

Report to Board of Trustees and Administration

2015-2016

ATTENDANCE AUDIT

We identified instances of missing/inadequate supporting documentation, inaccurate absence reason coding, occurrences of teachers not consistently taking attendance, and undocumented procedures.



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Abbreviations List

ADA	Average Daily Attendance
AR01	Executive Summary
AR02	Detailed Internal Audit Report
CAP	Corrective Action Plan
EPISD	El Paso Independent School District
FSP	Foundation School Program
FY	Fiscal Year
IA	Internal Audit
SAAH	Student Attendance Accounting Handbook
TAC	Texas Administrative Code
TEA	Texas Education Agency
TEAMS	Total Education Administrative Management Solution. A web-based software used by the District to manage data.
TEC	Texas Education Code

Executive Summary (AR01)

Background

The Attendance Audit was approved by the Board as part of the 2014-2015 and 2015-2016 Internal Audit Plan.

The correct absence coding, proper documentation, accurate maintenance of attendance records, and attendance data is crucial to ensure compliance with the Foundation School Program (FSP) funding during official attendance-taking time, compulsory attendance, and course credit (90% Rule). In addition, if students are not in class, they cannot receive the instruction necessary for academic success.

Objective(s) and Scope

The objective of the audit was to review attendance data and documentation to test for accuracy, evaluate adequacy of attendance records, and determine student absence reporting compliance, which impact:

- 1) Foundation School Program (FSP) funding TEC Chapter 42,
- 2) Compulsory School Attendance TEC 25.085, and
- 3) Minimum Attendance for Class Credit or Final Grade (90% Rule) TEC 25.092.

The scope of the audit included a sample of attendance data from the first semester of the 2014-2015 school year.

Limitations

When supporting documentation for the attendance entry was not located in the attendance file, some of the additional document testing could not be performed.

In accordance with the *Institute of Internal Auditors' Practice Advisory 2320-3: Audit Sampling*, "The internal auditor should validate the completeness of the population to ensure that the sample is selected from an appropriate data set." The objective of this audit did not include testing of Information Technology general controls over applications that produce the system-generated data/reports we used to select our sample selections.

Although we cannot for certain determine that the populations provided from TEAMS by Technology Services (TS) were 100% complete and accurate, our completeness and accuracy procedures, on a sample basis, gave us sufficient comfort to rely on this data for our testing purposes.

Summary of Findings

The District-wide findings of testing performed are listed below. The results of the testing for the 13 campuses and other outcomes are located in the detailed report (AR02).

1. The District did not count all absences to determine whether the student is in attendance 90% of the days the class is offered as required by the Texas Education Code. Note that this finding was previously reported and administration developed a CAP, that incorporated the recommendations in the section below. Furthermore, the District self-reported the finding to the Texas Education Agency (TEA).

2. We found 78 and 8 attendance entries (of 418 tested) resulted in inappropriate gain and loss of FSP funding, respectively.
3. We could not find documentation to support 23% (501 of 2,148) of the student attendance entries in TEAMS tested.
4. We found inadequate documentation to support 11% (175 of 1,647) of the student attendance entries in TEAMS tested.
5. We identified 300 instances where teachers were not taking attendance, not consistently taking attendance, and/or not taking attendance within the first 20 minutes of the class period, as stated by District requirements.
6. We identified 288 instances where an attendance clerk entered student attendance in TEAMS before the teacher had an opportunity to post attendance. The TEA's Student Attendance Accounting Handbook (SAAH) requires attendance be taken by the students' classroom teacher.
7. We found 14% (221 of 1,613) of the records tested had incorrect attendance codes. Attendance codes that generate FSP funding are not being used consistently by campuses as required by the TEA SAAH.
8. We found 146 instances of attendance entries made between 10 and 158 days after actual date of absence.
9. The District does not have written procedures for instances when the course period is changed that serves as the official attendance-taking time for FSP funding.

Summary of Recommendations

Internal Audit issued an interim attendance report regarding Finding 1 and recommended a corrective action plan (CAP) be developed to address the finding.

We recommend Leadership Team Member(s), data-process owner(s), and campus administrators create action plan(s) to address the following:

1. Ensure compliance with state and local requirements regarding use of appropriate absence reason codes, documentation standards for student absence reason codes, and internal controls to mitigate inappropriate gain or loss of FSP funding due to non-compliance.
2. Ensure teachers are taking attendance consistently and in accordance with District guidelines and require administrators to address repeated non-compliance.
3. Ensure attendance clerks do not take attendance before the teacher and require administrators to address repeated non-compliance.
4. Ensure employees receive the appropriate training prior to granting access to enter/make changes in the student attendance modules in TEAMS.
5. Evaluate if policies and/or procedures are needed for changes to student attendance records after a significant period of time.
6. Create written procedures for instances when the course period that will serve as the official attendance-time for FSP funding is changed.
7. The data-process owner should collaborate with TS to determine if any instances occurred where TEAMS flags were not changed when the official attendance-taking time course

period was changed. If any issues are identified, Student and Parent Services should inform the appropriate District personnel to determine how to address.

8. Require campuses to use a date/time stamp machine to stamp all attendance related documentation when it is received.

Furthermore, we recommend the data-process owner and Area Superintendents collaborate with District legal counsel to request clarification on the requirements for absence codes; for example, codes the District is using requiring the student make up homework for FSP funding. The District should implement *TEA SAAH Section 3.6.3 Requirements for a Student to Be Considered Present for FSP (Funding) Purposes* correctly.

Corrective Action Plan

A CAP was submitted outlining the activities to be implemented. The CAP appears to be sufficient to address the reportable conditions outlined in this report. Furthermore, the District self-reported Finding 1 to the TEA.

Conclusion

We identified instances of non-compliance with state and District student attendance requirements, occurrences of teachers not consistently taking attendance, inaccurate absence coding, missing/inadequate documentation, and undocumented procedures.

The District receives Foundation School Program funding based on student average daily attendance. The state uses the official attendance-taking time as a component to determine funding the District receives; however, student attendance for all course periods in a student's schedule are important as the state has compliance requirements for compulsory attendance and course credit. Therefore, it is crucial the District ensure compliance with all student attendance recording requirements.

Attached is the complete report, which includes more detailed information on methodology, findings, and recommendations for those readers who would like further details.

Detailed Internal Audit Report (AR02)

Methodology

To achieve our audit objectives we:

1. Identified student attendance requirements in state law, TEA Student Attendance Accounting Handbook (SAAH), District policies, and District Attendance Procedures Manual.
2. We contacted TEA to verify compliance requirements regarding official attendance-taking time and student attendance codes.
3. We selected attendance data/records for 505 students from 13 high school campuses, which included 2,370 TEAMS student attendance entries and performed the following tests:
 - a. Is there supporting documentation for the absence code?
 - b. Is the supporting documentation adequate?
 - c. Does the attendance code entry affect funding positively or negatively?
 - d. Is the correct absence code used?
 - e. Did the teacher fail to take attendance?
 - f. Did the attendance clerk enter the attendance before the teacher had an opportunity to enter the attendance?

Findings (01 to 09)

Finding (#01)

Condition	The District did not count all absences to determine whether the student is in attendance 90% of the days the class is offered. Some attendance absence codes, including those for "school activities," "in-school" (but not in class), and "religious note" were not counted as absences to determine whether a student attended the required percentage of days as required by the Texas Education Code.
Criteria	<ol style="list-style-type: none">1. The Texas Education Code 25.092 states that, "...a student may not be given credit or a final grade for a class unless the student is in attendance for at least 90% of the days the class is offered."2. According to a Texas Attorney General's opinion (Opinion No. JC-0398) from 2001, "...a student, in order to receive credit under section 25.092, is required actually to attend class for the requisite period regardless of whether his absences are excused or unexcused."3. Internal Audit contacted the Curriculum Division at the Texas Education Agency (TEA) to seek clarification on which absences count towards the 90% rule. The response from TEA was as follows: "Excused and unexcused absences apply to attendance for funding purposes, not to the award of credit. A student may not be given credit for a class unless the student is in attendance for at least 90 percent of the days the class is offered...Excused absences count toward the 90 percent rule."
Cause	It appears the cause was due to lack of understanding that the TEC 25.092 requires that all of a student's absences be counted when determining Course Credit.
Recommendation	Internal Audit issued an interim attendance report dated May 7, 2015 regarding this finding and recommended a corrective action plan (CAP) be developed to include the following:

	<ul style="list-style-type: none"> • Corrections to the attendance absence codes, • Updates to the appropriate District procedures/instructions, • Training/support on the proposed changes for principals, attendance clerks, and other appropriate staff, and • The District self-report to the Texas Education Agency (TEA).
Corrective Action Taken	Administration developed a CAP that incorporated the recommendations above. Furthermore, the District self-reported the finding to the TEA.

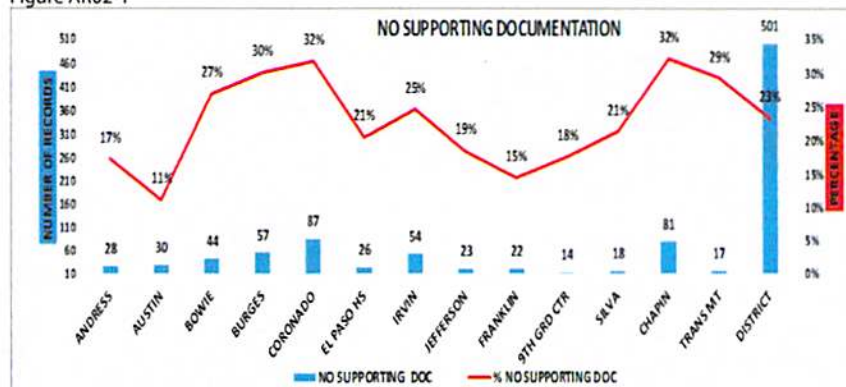
Finding (#02)

Condition	There were 78 and 8 attendance entries, of the 418 entries made during the official attendance-taking time and testing, that resulted in inappropriate gain and loss of FSP funding, respectively. This was due to the lack of or inadequate documentation and/or inaccurate attendance codes entered in TEAMS.
Criteria	<ol style="list-style-type: none"> 1. TEA SAAH Section 2 Audit Requirements, "...Attendance will be considered undocumented if documentation of the attendance is either missing or is so inadequate that a reasonable person could not conclude from the documentation that the attendance it is intended to support actually occurred...(19 Texas Administrative Code (TAC) 129.21(d)." 2. TEA SAAH Section 3.6.3 Requirements for a Student to Be Considered Present for FSP (Funding) Purposes, "...The district must keep documentation related to the absence on file for audit purposes. Your school district should establish a local policy what constitutes acceptable documentation for each of the listed absences." 3. EPISD Attendance Procedures Manual, Required Documents for the Attendance Audit File, and Additional Documentation Requirements for Attendance.
Recommendation	We recommend the District ensure compliance with state and local requirements regarding documentation to support student attendance records in TEAMS. The attendance clerks and all campus staff should be proficient in the documentation requirements, the importance of appropriate documentation, and that verbal and inadequate documentation is unacceptable.

Finding (#03)

Condition	We could not find documentation to support 23% (501 of 2,148) of student attendance entries in TEAMS tested. Figure AR02-1 shows the campus outcomes for the applicable samples tested:
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Figure AR02-1



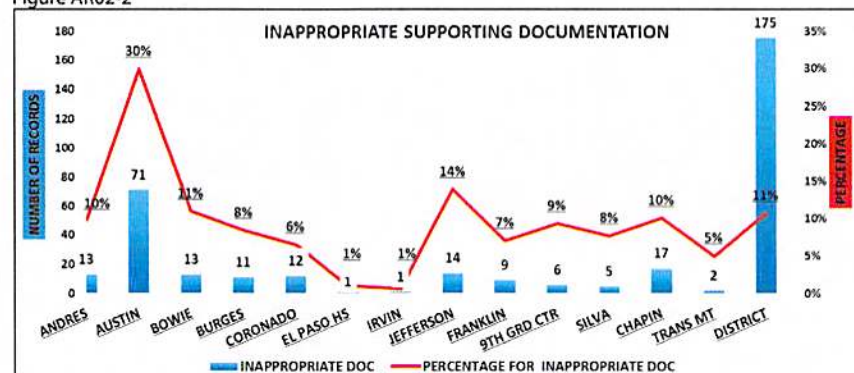
Criteria	<ol style="list-style-type: none"> 1. TEA SAAH Section 2 Audit Requirements, "...Attendance will be considered undocumented if documentation of the attendance is either missing or is so inadequate that a reasonable person could not conclude from the documentation that the attendance it is intended to support actually occurred.(19 Texas Administrative Code (TAC) 129.21(d)." 2. TEA SAAH 3.6.3 Section Requirements for a Student to Be Considered Present for FSP (Funding) Purposes"...The district must keep documentation related to the absence on file for audit purposes." 3. EPISD Attendance Procedures Manual, Required Documents for the Attendance Audit File and Additional Documentation Requirements for Attendance.
Recommendation	We recommend access (in TEAMS) should be granted only after an employee has attended training. Also see recommendations for Finding #02.

Finding (#04)

Condition

We found inadequate documentation to support 11% (175 of 1,647) of the student attendance entries in TEAMS tested. Inadequate documentation included missing sign-in/out sheets, students not signing in or out, no title to identify the purpose, no dates or time-frames, and no signatures by teachers. In addition, incorrect documentation was used for absence codes. Figure AR02-2 below shows the campus outcomes for the samples tested:

Figure AR02-2



Criteria	<ol style="list-style-type: none"> 1. TEA SAAH Section 2 Audit Requirements, "...Attendance will be considered undocumented if documentation of the attendance is either missing or is so inadequate that a reasonable person could not conclude from the documentation that the attendance it is intended to support actually occurred (19 Texas Administrative Code (TAC) 129.21(d)." 2. TEA SAAH Section 3.6.3 Requirements for a Student to Be Considered Present for FSP (Funding) Purposes, "...The district must keep documentation related to the absence on file for audit purposes...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.). 3. TEA SAAH Section 2.3.5 Additional Required Documentation- #8 "Documentation supporting the claim that a student was attending a board-approved activity,
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	<p><i>accompanied by a professional staff member or adjunct staff member of the district, signed by the staff member who supervised the student.</i></p> <p>4. TEA SAAH Section 1.2 Taking and Recording Student Attendance, <i>“...District personnel must create the original documentation of attendance at the time of attendance. Original documentation must not be created after the fact. Original Documentation that is not created at the time of attendance will not be accepted by agency auditors.”</i></p> <p>5. EPISD Attendance Procedures Manual, Required Documents for the Attendance Audit File, and Additional Documentation Requirements for Attendance.</p>																														
Recommendation	<p>We recommend the District should consider that each campus use a date and time stamp machine and all attendance documentation be date and time stamped when received. Also see recommendations for Finding #02.</p>																														
Finding (#05)																															
Condition	<p>We identified 300 instances (of the records tested) where teachers were not taking attendance, not consistently taking attendance, and/or not taking attendance within the first 20 minutes of the class period, as required by the District. Since the TEAMS attendance module is set to positive attendance, the students are counted present if the teacher does not post attendance. Figure AR02-3 shows the campus outcomes:</p> <p>Figure AR02-3</p> <table border="1"> <caption>Figure AR02-3: TEACHER DID NOT TAKE ATTENDANCE</caption> <thead> <tr> <th>Campus</th> <th>Number of Records</th> </tr> </thead> <tbody> <tr><td>ANDRES</td><td>10</td></tr> <tr><td>AUSTIN</td><td>25</td></tr> <tr><td>BOWIE</td><td>33</td></tr> <tr><td>BURGESS</td><td>53</td></tr> <tr><td>CORONADO</td><td>54</td></tr> <tr><td>EL PASO HS</td><td>12</td></tr> <tr><td>IRVIN</td><td>37</td></tr> <tr><td>JEFFERSON</td><td>18</td></tr> <tr><td>FRANKLIN</td><td>13</td></tr> <tr><td>9TH GRO CTR</td><td>7</td></tr> <tr><td>SILVA</td><td>8</td></tr> <tr><td>CHAPIN</td><td>29</td></tr> <tr><td>TRANS MT</td><td>1</td></tr> <tr><td>TOTAL</td><td>300</td></tr> </tbody> </table>	Campus	Number of Records	ANDRES	10	AUSTIN	25	BOWIE	33	BURGESS	53	CORONADO	54	EL PASO HS	12	IRVIN	37	JEFFERSON	18	FRANKLIN	13	9TH GRO CTR	7	SILVA	8	CHAPIN	29	TRANS MT	1	TOTAL	300
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Criteria	<p>1. TEA SAAH Section 3.6 General Attendance Taking Rules, <i>“Students who are on campus and in their classrooms at the time attendance is taken must have their official attendance conducted and completed by the classroom teacher...”</i></p> <p>2. EPISD Attendance Procedures Manual, General Attendance Procedures <i>“...High school campuses shall take attendance within the first twenty minutes of a class period each day.”</i></p>																														
Recommendation	<p>The District administration should ensure:</p> <p>1. Teachers follow the EPISD Attendance Procedures Manual, General Attendance Procedures <i>“...High school campuses shall take attendance within the first twenty minutes of a class period each day.”</i></p> <p>2. Attendance clerks follow the attendance procedures in the District’s Attendance Procedures Manual, Daily Attendance Procedures, <i>“Generate the attendance not</i></p>																														

preferably in writing. Run again at the end of the day. If this occurs on a frequent basis, notify your campus administrator in writing."

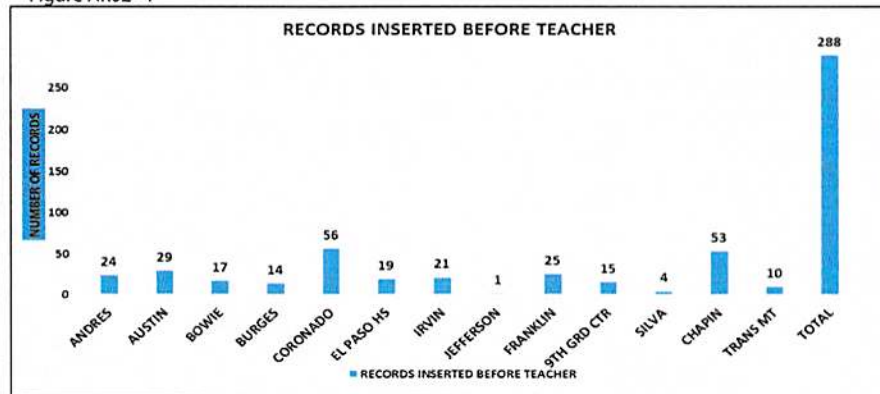
3. We recommend the District consider consequences for teachers not entering daily attendance in TEAMS for each period at the appropriate time.

Finding (#06)

Condition

We identified 288 instances (of the records tested) where an attendance clerk entered student attendance in TEAMS before the teacher had an opportunity to post attendance. The TEA's Student Attendance Accounting Handbook (SAAH) requires attendance be taken by the students' classroom teacher. Generally, the teacher should post (insert) attendance into TEAMS and the clerk should update, as needed, based on appropriate documentation. If any attendance entry is made before the teacher, TEAMS does not allow the teacher to insert attendance. Figure AR02-4 below shows the campus outcomes:

Figure AR02- 4



Criteria

1. TEA SAAH Section 3.6 General Attendance - Taking Rules, "Students who are on campus and in their classrooms at the time attendance is taken must have their official attendance conducted and completed by the classroom teacher...."
2. EPISD Attendance Procedures Manual, General Attendance Procedures, "...High school campuses shall take attendance within the first twenty minutes of a class period each day."

Cause

This may be due to attendance clerks attempting to stay ahead of their workload.

Recommendation

We recommend the District ensure attendance clerks and any campus staff inserting and/or updating attendance receive training and understand the possible consequences of inappropriate gain or loss of FSP funding to the District.

Finding (#07)

Condition

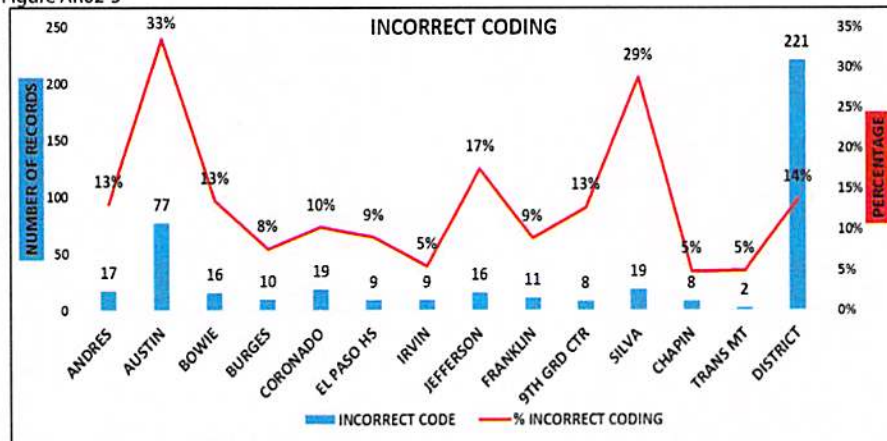
We found that 14% (221 of 1,613) of the records tested had incorrect attendance codes. It appears attendance codes that generate FSP funding are not being used consistently by campuses as required by the TEA SAAH. Consequently, this may result in the loss or gain of FSP funding. Figure AR02-5 shows the campus outcomes for samples tested.

In addition, to use the FSP funding absence code for visits to institutions of higher education, TEA SAAH requires the District (1) adopt a policy for visiting institutions of higher education, and (2) a procedure for verifying students' visits to institutions of

higher education. District policy Attendance, FEB LEGAL addresses visits to institutions of higher education, but the District **does not** have a written procedure for verifying the visits, which results in non-compliance.

1. There are separate and distinct requirements for the use of certain codes for FSP funding and compulsory attendance.
2. The TEA SAAH states for FSP funding purposes, a student must be in attendance at the official attendance-taking time; however, the TEA SAAH lists exceptions based on specific criteria. For example, holy days, court appearances, and visiting institutions of higher education, and several others.
 - a. The District has defined two absence codes for each of the aforementioned absence reasons: one that generates FSP funding and the other that does not. Documentation is required to support the absence code used for FSP funding.
 - b. The TEA SAAH (TEC, 25.087(d)) states the aforementioned codes do not require a student to make up homework to received FSP funding, **but does** require the student make up homework for the absence to be counted as a day of compulsory attendance.
3. We observed the following for student absences due to visiting an institution of higher education and court appearances:
 - a. We found instances where the FSP funding code was not used, but there was supporting documentation.
 - b. We observed inconsistencies on the use of the FSP funding code when a student did not make up homework; resulting in the District not receiving FSP funds.
 - c. We observed student absences to meet with parole officers that were coded with the FSP funding code; however, the TEA SAAH states the FSP funding absence code for court is only to be used for instances when the student has been summoned or subpoenaed to appear in court.

Figure AR02-5



Criteria

TEA SAAH Section 3.6.3 Requirements for a Student to Be Considered Present for FSP funding Purposes...***"Your school district must allow a student whose absence is excused for any of the previously listed reasons (with the exception of the first five***

reasons, for which this paragraph does not apply) a reasonable amount of time to make up school work missed on these days. If the student satisfactorily completes the school work, the day of absence is counted as a day of compulsory attendance; is in his or her junior or senior year of high school and misses school for the purpose of visiting an institution of higher education accredited by a generally recognized accrediting organization to determine the student's interest in attending the institution. Your district 1) must not excuse for this purpose more than 2 days during a student's junior year and 2 days during a student's senior year and 2) must adopt a) a policy stating when an absence will be excused for this purpose and b) a procedure for verifying students' visits to institutions of higher education; Absences to meet with probation officers and other absences related to court-ordered activities outside the courtroom do not qualify as required court appearances."

Cause It appears the cause is due to lack of understanding of TEA SAAH Section 3.6.3 in regards to making up homework/and or requirements substantiating; for example, college visits, court, and other absences listed in the aforementioned section.

Recommendation

1. We recommend the data-process owner and Area Superintendents collaborate with District legal counsel and request in writing clarification on the requirements on absence codes, for example codes that the District is requiring the student make up homework for FSP funding. The District should implement ***TEA SAAH Section 3.6.3 Requirements for a Student to Be Considered Present for FSP (Funding) Purposes*** correctly.
2. We recommend the data-process owner(s) provide comprehensive training and accurate information to ensure attendance clerks and campus staff entering attendance in TEAMS use appropriate absence code with appropriate supporting documentation.

Finding (#08)

Condition

We found 146 instances of attendance entries made between 10 and 158 days after the actual date of absence. There is a risk of inappropriate student attendance records when there are large gaps of time when updating entries. Table AR02-6 below shows District-wide the number of students with entries made nine days after an absence. Entries made within one to nine days after an absence were considered reasonable and are not included.

Table AR02-6

NUMBER OF STUDENTS WITH ENTRIES MADE NINE DAYS AFTER DATE OF ABSENCE							
TIME FRAME	10 to 25	26 - 40	41 - 54	56 - 80	82 - 96	102 - 158	TOTAL
INSTANCES	44	46	20	18	9	9	146

Criteria TEA SAAH Section 1.2 – Taking and Recording Student Attendance, “...***District personnel must create the original documentation of attendance at the time of attendance. Original documentation must not be created after the fact. Original Documentation that is not created at the time of attendance will not be accepted by agency auditors.***”

Recommendation We recommend the District evaluate if procedures are needed to ensure adequate internal controls are in place to mitigate inappropriate changes to attendance records after a significant amount of time from the absence.

Finding (#09)

Condition

The District does not have written procedures or a documented process to follow when

campuses change the course period that serves as the official attendance-taking time of 10:00 AM. The TEAMS attendance module's setting is positive attendance, which means if a teacher does not take attendance a student is counted present. There is a risk the system will record all students present for second period or fifth period (depending on the campus bell schedule) in instances where a campus may rearrange the course schedule due to finals to start the school day at third/sixth period.

- | | |
|----------------|---|
| Criteria | <ol style="list-style-type: none"> 1. TAC 129.21(h) Student Attendance, <i>"Attendance for all grades must be determined by the absences recorded in the second or fifth instructional hour of the day, unless the local school board adopts a district policy, or delegates to the superintendent the authority to establish procedures, for recording absences in an alternative hour...."</i> 2. TEA SAAH Section 3.6.2 Time of Day for Attendance Taking, <i>"Each campus must determine attendance for all grades by the absences recorded at the one particular point in time the campus has chosen for roll to be taken...during the second or fifth instruction hour of the day or its equivalent. The selected time may vary from campus to campus within your district. However, once a time has been selected, a campus must not change it during the school year...."</i> |
| Recommendation | <ol style="list-style-type: none"> 1. We recommend the District create written procedures for changing the course period that will occur during the official attendance-taking time for FSP funding. The procedures should include roles and responsibilities, timelines to include lead time notification required from campuses, forms, approval process, and training. 2. We recommend the District collaborate with TS to determine if any instances occurred where TEAMS flags were not changed when the course period during the official attendance-taking time was changed. If any issues are identified, Student and Parent Services should inform the appropriate District personnel and request written direction from TEA on how to address. |