



Dual Credit Audit

ASSURANCE • INSIGHT • OBJECTIVITY

Final Report

Audit Plan Code: 20-05

We determined that not all the dual credit courses in the EPCC Banner were transcribed to the EPISD student transcripts. Not all courses taken by students that were in the EPCC Banner were on the course crosswalk. This creates a risk that some courses may not be coded or transcribed correctly. Consequently, the dual credit data reported to the state through the PEIMS submission is incomplete and may be inaccurate.



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Abbreviations and Definitions

AAR	Academic Achievement Record
Banner	School management system utilized by the EPCC
CAP	Corrective Action Plan
CCRP	College and Career Readiness Planner
DC	Dual Credit
ECHS	Early College High School
EPCC	El Paso Community College
EPISD	El Paso Independent School District
FERPA	Family Educational Rights and Privacy Act
Frontline	School management system utilized by the District
GPA	Grape Point Average
IA	Internal Audit
IIA	Institute of Internal Auditors
MOU	Memorandum of Understanding
PEIMS	Public Education Information Management System
TAC	Texas Administrative Code
TEA	Texas Education Agency
TEC	Texas Education Code
THECB	Texas Higher Education Coordinating Board



Executive Summary

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We have completed the Dual Credit Program Audit. The Dual Credit Program Audit was approved by the Board of Trustees as part of the 2019-2020 Internal Audit Plan.

The objectives of the audit were to:

1. Determine the completeness and accuracy of the transcription of dual credit courses taken by currently enrolled students for school years 2016-2017, 2017-2018, and 2018-2019 at Transmountain Early College High School and Burges High School.
2. Determine the completeness and accuracy of Early College High School student and dual credit course completion data reported to the Texas Education Agency (TEA) for school years 2016-2019 for Transmountain Early College High School and Burges High School.
3. Identify if controls are in place to meet El Paso Community College timelines for adding or dropping dual credit courses for school years 2016-2019.

The Executive Summary provides, on a summarized basis, the findings discussed throughout the body of the detailed Internal Audit Report that follows. The Internal Audit Report includes background information, detailed findings, observations, recommendations, and corrective action activities.

Summary of Results

1. For the 60 students in our sample, 10% (50 of 484) of the dual credit courses taken that were in the El Paso Community College (EPCC) Banner data file were not transcribed to the EPISD student's Academic Achievement Record/transcript. Of those dual credit courses not transcribed 50% (25 of 50) were failing grades. Excluding courses from transcripts affect students' Grade Point Average (GPA) and ranking.
2. We identified 5% of the dual credit courses on the EPCC Banner data file did not match those on the crosswalk or were not on the crosswalk. There is a risk some of the courses were incorrectly transcribed. The crosswalk serves as a control to ensure courses are correctly transcribed by campus personnel. However, the design of this control is not effective as the crosswalk is incomplete.
3. The District's dual credit data for fiscal years 2017 through 2019 reported to the Texas Education Agency (TEA) through the Public Education Information Management System (PEIMS) submission was incomplete. Based on finding 2, there is also a risk some of the dual credit data reported through PEIMS may be inaccurate. Incomplete or inaccurate reporting of dual credit data may affect the District's accountability rating.
4. There is no process to ensure District campuses comply with EPCC's enrollment and withdraw deadlines, specifically the census date. The District incurs fees for not meeting EPCC enrollment and withdraw deadlines. The District paid the EPCC \$19,500.00 in Late Seat Enrollment fees for the Fall of 2018.

We also identified one observation as follows:

1. According to EPCC staff, the Dual Credit Program student data in their Banner System accessible to the District only contains data for students currently enrolled in the EPISD. This is due to a Family Educational Rights and Privacy Act (FERPA) limitation. The District does not have a process or written procedures for periodically archiving the complete data from the EPCC. As such, there is a risk if a dual credit course was not transcribed by District staff, it may not be detected if the student is no longer enrolled at EPISD.

Management's Corrective Action Plan

District management and leadership submitted a Corrective Action Plan (CAP) outlining 16 activities to be implemented. All five recommendations made by Internal Audit were incorporated into the CAP. The CAP appears to be sufficient to address the findings outlined in this report. Internal Audit will conduct follow-up reviews to validate CAP activities have been implemented.

Conclusion

We determined that not all the dual credit courses in the EPCC Banner taken by students were transcribed to the EPISD students' transcripts. Not all courses in the EPCC Banner were on the course crosswalk. This creates a risk that some courses may not be coded or transcribed correctly. Consequently, the dual credit data reported to the state through the PEIMS submission is incomplete and may be inaccurate. The cause appears to be the District does not have sufficient controls, in the form of written procedures and training, to ensure all EPCC dual credit courses are transcribed in a consistent, accurate, and timely manner.

In addition, there is not a process in place to ensure District campuses meet the EPCC census date to prevent unnecessary fees.



Internal Audit Report

ASSURANCE • INSIGHT • OBJECTIVITY

Background

School districts in Texas are required to implement programs in which students may earn college credit while in high school. Public institutions of higher education are required to assist school districts to meet this requirement. The requirements may be met by offering any combination of college courses for dual credit, articulated postsecondary courses, articulated postsecondary advanced technical courses, Advanced Placement courses, and/or International Baccalaureate courses. (Texas Education Code (TEC) 28.009)

Dual credit education is defined by Texas Higher Education Coordinating Board (THECB) as, "a process by which a high school student enrolls in a college course and receives simultaneous academic credit for the course from both the college and the high school." (Texas Administrative Code (TAC), Title 19, Part I, Subchapter D, Rule 4.83) Dual credit courses may be taught at the high school campus by an approved instructor or on the college campus. (TAC Title 19, Part 1, Subchapter D, Rule 4.84) An Early College High School (ECHS) offers students the opportunity to enroll in a combination of high school courses and college course. (TAC 102.1091(3))

According to TEC 28.009 (b-2)(2), "A Dual Credit Education Program agreement must, "(2) Establish, or provide a procedure for establishing, the course credits that may be earned under the agreement, including developing a course equivalency crosswalk or other method for equating high school courses with college courses and identifying the number of credits that may be earned for each course completed through the program." The EPISD and El Paso Community College (EPCC) are dual credit partners. There is a Memorandum of Understanding (MOUs) between the EPISD and EPCC for dual credit education programs/Early College High School at Transmountain Early College High School (TMECHS) and Burges/Early College High School (BECHS). Dual credit courses can also be taken by students at all EPISD high schools. The faculty must meet the same standards and approval procedures used by the college to select faculty responsible for teaching the same courses at the main campus of the college.

The TAC, Title 19, Part I, Chapter 4, Subchapter D, Rule 4.85, (h)) requires, "The transcription of credit for dual credit courses, high school as well as college credit should be transcribed immediately upon a student's completion of the performance required in the course."

The EPCC's utilizes Banner as a school management system. A student enrolled in an ECHS dual credit course at the EPCC is entered into the Banner. When a student completes a dual credit course at the EPCC, the students' course(s) and grade(s) are entered by the student's EPISD counselor into the District's College and Career Readiness Planner (CCRP) and the registrar enters into Frontline's transcript module. Dual credit courses grades taken at the high school campus are entered by the dual credit teacher into Frontline and the Banner System.

Objectives and Scope

The objectives and scope of the audit were to:

1. Determine the completeness and accuracy of the transcription of dual credit courses taken by currently enrolled students for school years 2016-2017,

2017-2018, and 2018-2019 at Transmountain Early College High School and Burges High School.

2. Determine the completeness and accuracy of Early College High School student and dual credit course completion data reported to the Texas Education Agency (TEA) for school years 2016-2017, 2017-2018, and 2018-2019 for Transmountain Early College High School and Burges High School.
3. Identify if controls are in place to meet El Paso Community College timelines for adding or dropping dual credit courses for school years 2016-2017, 2017-2018, and 2018-2019.

Methodology

To achieve our audit objectives, we:

- Researched relevant federal/state laws and regulations, Board policies, and departments manual/guidelines.
- Used pre-audit self-assessment and performed walkthroughs to obtain an understanding of the Dual Credit Program administrative functions, operations, processes, and controls in place.
- Performed a risk assessment based on our understanding of the Dual Credit Program processes and controls in place.
- Performed data analysis using the 2016-2017, 2017-2018, and 2018-2019 enrollment demographic data, from Frontline, to identify students enrolled in dual credit courses.
- Performed data analysis on El Paso Community College Banner System data of students enrolled in dual credit courses, provided by Curriculum and Instruction Department.
- Determined the amount the District paid to the El Paso Community College in fees due to not meeting deadlines for enrolling and withdrawing in courses.
- Sent questionnaires to counselors at Burges High School and Transmountain Early College High School regarding dual credit education program to identify written procedures.

Limitations

The EPCC staff stated the Dual Credit Program student data from Banner System provided to the District only contains data for students currently enrolled in the EPISD. This is due to the requirements under Family Educational Rights and Privacy Act (FERPA). Therefore, testing was only performed for currently enrolled students.

Because of the inherent limitations in a system of internal controls and limitation stated above, 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 the federal, state, local policies, and guidelines.

Acknowledgement

We would like to acknowledge and thank staff at the El Paso Community College, Transmountain Early College High School, Burges High School, Curriculum and Instruction, Secondary Schools Division, Guidance and Counseling, and Analytics, Strategy/Assessment and PEIMS for their cooperation and assistance during the audit.

Results

We determined that not all the dual credit courses taken by students and in the EPCC Banner were transcribed to the EPISD students' transcripts. Not all courses in the EPCC Banner were on the course crosswalk. This creates a risk that some courses may not be coded or transcribed correctly. Consequently, the dual credit data reported to the state through the PEIMS submission is incomplete and may be inaccurate. The cause appears to be the District does not have sufficient controls, in the form of written procedures and training, to ensure all EPCC dual credit courses are transcribed in a consistent and accurate manner.

In addition, there is no process in place to ensure we meet the EPCC census date to prevent unnecessary fees.

Finding 1

For the 60 students in our sample, 10% (50 of 484) of the dual credit courses taken by students and in the EPCC Banner data file were not transcribed to EPISD students' Academic Achievement Record (AAR)/student transcript. Of those dual credit courses not transcribed 50% (25 of 50) were failing grades. "The Academic Achievement Record (AAR) is an official and permanent record of a student's academic performance during high school...." (19 TAC 74.14)

Excluding courses from students' transcripts has the following effects:

- 1.1 Inaccurate student Grade Point Average (GPA), which can impact students' college acceptance,
- 1.2 Inaccurate Student Ranking, which can impact student's ranking at graduation and college acceptance,
- 1.3 Impact on the District's Accountability Ratings (refer to Finding 3 regarding PEIMS reporting),
- 1.4 Noncompliance with TEC 25.001(h), which requires "Data entered on the AAR must accurately reflect the student's actual course completion and performance and must reflect teachers' records and the student's IEP, when applicable. All completed high school courses, regardless of the amount of credit earned, must be entered on the AAR. Entries on this official record of actual courses taken, grades earned, credit awarded, and codes denoting special explanations must be consistent with teachers' records...Failure to maintain the AAR accurately or any attempt to alter the document with intent to use it for fraudulent purposes is a misdemeanor."

It appears the causes of incomplete transcribing are due to:

- There is confusion among campus and District staff regarding transcribing of dual credit courses taken at EPCC to students' transcripts. Specifically, which dual credit courses should be transcribed and the equitable high school course.

- The District does not have sufficient controls, in the form of written procedures and training, to ensure all EPCC dual credit courses are transcribed in a consistent and accurate manner.

Finding 2

We identified 5% (25 of 484) of the dual credit courses that were on the EPCC Banner file did not match those on the crosswalk or were not on the crosswalk. There is a risk some of the courses were incorrectly transcribed.

In two (2) instances the substituted dual credit course resulted in a duplicate course on the transcript. The TEA's 2018-2019 Student Attendance Accounting Handbook, Nontraditional Programs page 233 states, "Students may not earn high school credit for a course for which they have already earned credit. It is the responsibility of the high school to ensure that courses offered for dual credit allow for mastery of the TEKS for the appropriate high school course. While dual credit for local credit courses is allowed in accordance with Texas Higher Education Coordinating Board (THECB) requirements, the most beneficial dual credit opportunities will allow student to earn state credits toward high school graduation."

The dual credit courses transcribed that either did not match or were not on the crosswalk are listed below in Table 1:

Table 1

Number of Dual Credit Courses Identified	Dual Credit Course Taken
1	"Cr m na Inve"
2	"Intro to Ph osophy"
2	"Human Sexua ty"
2	"Intro to Comp Graph cs"
3	"Computer I ustrat on"
5	"Dance Apprec at on"
10	"Gen B o Sc 1"

A crosswalk, included in the MOU between EPISD and EPCC, defines the EPISD high school course description and number for the college courses offered by EPCC. The crosswalk serves as a control to ensure courses are correctly transcribed by campus personnel. However, the design of this control is not effective as the crosswalk is incomplete.

Finding 3

The District's dual credit data for fiscal years 2017 through 2019 reported to the Texas Education Agency (TEA) through the Public Education Information Management System (PEIMS) submission was incomplete. Based on Finding 2, there is also a risk some of the dual credit data reported through PEIMS may be inaccurate.

The dual credit data from the EPCC Banner System and the Frontline data were compared to the PEIMS data reported to the TEA. We found:

- 3.1 A total of 117 courses were not reported for the years 2017 through 2019.
- 3.2 We found 80% (94 of 117) of the dual credit courses not reported were taken by students in the summer.

The cause of the incomplete and potentially inaccurate reporting can be tied to the Findings 1 and 2. Another cause may be untimely transcription.

According to TEA, "...PEIMS encompasses all data requested and received by TEA about public education, including student demographic and academic performance...Data collected through PEIMS is used by several TEA programs to create reports, including the following...Accountability System." As such, incomplete or inaccurate reporting of dual credit data may affect the District's accountability rating.

In addition, the District did not comply with the reporting requirements of Texas Administrative Code 102.1091(f)(3) which states, "Each school district shall annually report to the agency: (1) the number of district students, including career and technical students, who have participated in the program and earned college credit; and (2) the cumulative number of courses in which participating district students have enrolled and college credit hours the students have earned."

Finding 4

There is no process to ensure District campuses comply with EPCC's enrollment and withdraw deadlines, specifically the census date. The District incurs fees for not meeting EPCC enrollment and withdraw deadlines.

The District paid the EPCC \$19,500.00 in Late Seat Enrollment fees for the Fall of 2018. The Dual Credit Partnership Agreement between El Paso Independent School District and El Paso Community College District, Funding 11c states, "...A fee of \$150 will be assessed for each student enrolled after the College's Census Date when it is determined that the student or school was responsible for not meeting the deadline." The EPCC also assesses a fee for withdrawing from dual credit courses after EPCC census date.

Late Seat Enrollment Fees Fall 2018

Campus	Late Seat Enrollment Fees
Burges Early College High School	\$ 4,500
Burges High School	\$ 7,350
Coronado	\$ 6,450
El Paso High School	\$ 750
Irvine High School	\$ 450
Total	\$ 19,500

Observation 1

According to EPCC staff, the Dual Credit Program student data in their Banner System accessible to the District only contains data for students currently enrolled in the EPISD. This is due to Family Educational Rights and Privacy Act (FERPA) 20 U.S. C. 1232g; 34 CFR Part 99 limitations. The District does not have a process or written procedures for periodically archiving the complete data from the EPCC. As such, there is a risk if a dual credit course was not transcribed by District staff, it may not have been detected if the student is no longer enrolled at EPISD.

Recommendations

A Corrective Action Plan (CAP) outlining 16 activities to be implemented and signed by District management, and leadership was submitted to Internal Audit. All

five recommendations made by Internal Audit were incorporated into the CAP. The CAP appears to be sufficient to address the findings outlined in this report.

We recommend Academics and School Leadership staff develop controls in the form of written procedures and training for the District's Dual Credit Education Program. The procedures should be (1) reviewed on a regular basis and updated as needed; (2) used for training purposes, and (3) distributed to stakeholders.

The written procedures should, at a minimum, define the following:

- 1.1 Expectations for transcribing dual credit courses taken outside of EPISD,
- 1.2 Process for transcribing dual credit courses to a student's AAR/transcript,
- 1.3 Process for maintaining a complete and accurate dual credit course crosswalk, and
- 1.4 Expectations for meeting EPCC census date deadline to avoid unnecessary fees.

The written procedures should also include the following:

- a. Identify the individuals (by position) responsible for maintaining, updating, and distributing the procedure,
- b. Identify who is responsible, accountable, consulted, and/or informed,
- c. Clear objective(s), requirements, and detailed instruction on how to perform the tasks,
- d. Clearly define when the tasks needs to take place,
- e. Define references to relevant forms, documents, and reference material, and
- f. Define records retention and document update requirements.

Management and Leadership Response: Agreed with our recommendation and incorporated into the CAP as activities one, two, three, five, six, seven, and eight.

Activity 1: "Procedures for transcribing dual credit courses taken outside of EPISD."

Person(s) Responsible: Lead Counselor, Counseling and Advising - Responsible; Director, Counseling and Advising - Accountable; Executive Director, Student and Parent Services - Consulted; Executive Director, Curriculum and Instruction - Informed; College Readiness Facilitator, Curriculum and Instruction - Informed; Chief Academic Officer - Informed; Associate Superintendent, Academics and School Leadership - Informed; Facilitator, Secondary Schools Division - Informed; and Executive Director, 21st Century Learning and Well-Being - Informed

Implementation Date: June 30, 2020

Activity 2: "Process for transcribing dual credit courses to a student's AAR/transcript."

Person(s) Responsible: Lead Counselor, Counseling and Advising - Responsible; Director, Counseling and Advising - Accountable; Executive Director, Student and Parent Services - Consulted; Executive Director, Curriculum and Instruction - Informed; College Readiness Facilitator, Curriculum and Instruction - Informed; Chief Academic Officer - Informed; Associate Superintendent, Academics and School Leadership - Informed; Facilitator, Secondary Schools Division - Informed; and Executive Director, 21st Century Learning and Well-Being - Informed

Implementation Date: June 30, 2020

Activity 3: "Process for maintaining a complete and accurate dual credit course crosswalk."

Person(s) Responsible: College Readiness Facilitator, Curriculum and Instruction - Responsible; Executive Director, Curriculum and Instruction - Accountable; Director, Counseling and Advising - Informed; Lead Counselor, Counseling and Advising - Informed; Chief Academic Officer - Informed; Associate Superintendent, Academics and School Leadership - Informed; Facilitator, Secondary Schools Division - Informed; and Executive Director, 21st Century Learning and Well-Being - Informed

Implementation Date: June 30, 2020

Activity 5: “Expectations for meeting EPCC census date deadline to avoid unnecessary fees.”

Person(s) Responsible: College Readiness Facilitator, Curriculum and Instruction - Responsible; Executive Director, Curriculum and Instruction - Accountable; Director, Counseling and Advising - Informed; Lead Counselor, Counseling and Advising - Informed; Chief Academic Officer - Informed; Associate Superintendent, Academics and School Leadership – Informed; Facilitator, Secondary Schools Division – Informed; and Executive Director, 21st Century Learning and Well-Being - Informed

Implementation Date: June 30, 2020

Activity 6: “Train counselors on written procedures.”

Person(s) Responsible: Lead Counselor, Counseling and Advising – Responsible and Director, Counseling and Advising – Accountable

Implementation Date: August 31, 2020

Activity 7: “Train registrars on written procedures.”

Person(s) Responsible: Executive Director, Student and Parent Services - Responsible and Accountable

Implementation Date: August 31, 2020

Activity 8: “Train Principals and G&I Asst. Principals on written procedures.”

Person(s) Responsible: College Readiness Facilitator, Curriculum and Instruction – Responsible and Executive Director, Curriculum and Instruction - Accountable

Implementation Date: August 31, 2020

2

We recommend Academics and School Leadership staff review and revise the current dual credit course crosswalk to comply with TEC 28.009, which states, “The crosswalk should establish, or provide a procedure for establishing, the course credits that may be earned under the agreement, including by developing a course equivalency crosswalk or other method for equating high school courses with college courses and identifying the number of credits that may be earned for each course completed through the program.” Training should be provided to the stakeholders on using the crosswalk to transcribe dual credit courses correctly.

Management and Leadership Response: Agreed with our recommendation and incorporated into the CAP as activities 10 and 11. In addition, management also added activities four and nine.

Activity 10: “Review and revise the current dual credit course crosswalk(s) to comply with TEC 28.009.”

Person(s) Responsible: College Readiness Facilitator, Curriculum and Instruction - Responsible; Executive Director, Curriculum and Instruction - Accountable; Executive Director Secondary Schools and College Readiness - Consulted; and Director, Career and Technical Education - Consulted

Implementation Date: June 30, 2020

Activity 11: “Training should be provided to the stakeholders on using the crosswalk to transcribe dual credit courses correctly.”

Person(s) Responsible: College Readiness Facilitator, Curriculum and Instruction – Responsible and Executive Director, Curriculum and Instruction - Accountable

Implementation Date: August 31, 2020

Activity 4: “For 50 dual credit courses that were not transcribed, identify appropriate course number based on new procedures and crosswalks, pull all students who took and completed those courses, change the transcript to reflect new course number and grade earned.”

Person(s) Responsible: Lead Counselor, Counseling and Advising – Responsible and Director, Counseling and Advising – Accountable

Implementation Date: September 30, 2020

Activity 9: “Review the 25 dual credit courses and determine if they were accurately transcribed to students' AAR/transcript.”

Person(s) Responsible: Lead Counselor, Counseling and Advising – Responsible; Director, Counseling and Advising – Accountable; and Executive Director, Student and Parent Services - Informed

Implementation Date: September 30, 2020

3

We recommend District management consider revising the District's course catalog to include unique course code numbers for dual credit courses taken at EPCC with the required PEIMS course codes. Currently, the campus registrar manually enters the PEIMS dual credit course codes: college hours, dual credit indicator, and noncampus based instruction code. Manual entries increase risk of error.

Creating unique course numbers will differentiate dual credit courses taken at EPCC and could help decrease the errors from manual entries.

Management and Leadership Response: Agreed with our recommendation and incorporated into the CAP as activity 12.

Activity 12: “Revise the District's course catalog to include unique course code numbers for dual credit courses taken at EPCC with the required PEIMS course codes.”

Person(s) Responsible: Instructional Materials Coordinator, Secondary Schools Division - Responsible; Associate Superintendent, Academics and School Leadership - Accountable; Executive Director, Curriculum and Instruction - Consulted; College Readiness Facilitator, Curriculum and Instruction - Consulted; and PEIMS Manager - Informed

Implementation Date: June 30, 2020

4

We recommend Academics and School Leadership staff work with Analytics, Strategy, Assessment & PEIMS Department staff to develop internal controls to provide reasonable

assurance the PEIMS dual credit course and student data being submitted to TEA is complete and accurate. Internal controls should include the following:

- 4.1 Written procedures that include roles and responsibilities by position/department, related to ensuring the completeness and accuracy of dual credit data reported through PEIMS.
- 4.2 Analytical reviews to search for anomalies and assess the reasonableness of dual credit record counts District-wide and by campus.
- 4.3 Developing discrepancy reports to help the data owner and campus administration validate the completeness and accuracy of the dual credit course and student data.

In addition, the District should determine why the majority of courses not reported to the state were dual credit courses taken in the summer and address said cause.

Management and Leadership Response: Agreed with our recommendation and incorporated into the CAP as activities 13, 14 and 15.

Activity 13: “Build tools that reflect accurate reporting of dual credit in PEIMS.”

Person(s) Responsible: Executive Director, Strategy, Accountability & Assessment - Responsible; Executive Director, Curriculum and Instruction - Consulted; College Readiness Facilitator, Curriculum and Instruction - Consulted; Instructional Materials Coordinator, Secondary Schools Division - Consulted; Director, Counseling and Advising - Informed; Lead Counselor, Counseling and Advising - Informed; Facilitator, Secondary Schools Division - Informed; Executive Director, 21st Century Learning and Well-Being - Informed; Chief Academic Officer - Informed; and Associate Superintendent, Academics and School Leadership - Informed

Implementation Date: June 30, 2020

Activity 14: “Develop a timeline for reviewing anomalies and assessing the reasonableness of dual credit record counts District-wide and by campus each semester.”

Person(s) Responsible: College Readiness Facilitator, Curriculum and Instruction - Responsible; Executive Director, Curriculum and Instruction - Accountable; and Facilitator, Secondary Schools Division - Informed; and Associate Superintendent, Academics and School Leadership - Informed

Implementation Date: June 30, 2020

Activity 15: “Determine why the majority of courses not reported to the state were dual credit courses taken in the summer to include cause.”

Person(s) Responsible: College Readiness Facilitator, Curriculum and Instruction - Responsible; Executive Director, Curriculum and Instruction - Accountable; Director, Counseling and Advising - Informed; Lead Counselor, Counseling and Advising - Informed; Chief Academic Officer - Informed; and Associate Superintendent, Academics and School Leadership - Informed; Facilitator, Secondary Schools Division - Informed; and Executive Director, 21st Century Learning and Well-Being - Informed

Implementation Date: June 30, 2020

5

The Academics and School Leadership staff should develop a process and written procedures to ensure course and grade data posted in the EPCC Banner System is archived in a timely manner. If the District waits to review data, there is a risk the data will not include students who

are no longer enrolled in the District. The written procedures should include records retention requirements for said data.

Management and Leadership Response: Agreed with our recommendation and incorporated into the CAP as activity 16.

Activity 16: “Develop a process and written procedures to ensure course and grade data posted in the EPCC Banner System is archived in a timely manner.”

Person(s) Responsible: College Readiness Facilitator, Curriculum and Instruction - Responsible; Executive Director, Strategy, Accountability & Assessment - Accountable; Director, Counseling and Advising - Informed; and Lead Counselor, Counseling and Advising - Informed

Implementation Date: June 30, 2020



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