

2016-2017

## Report to Board of Trustees and Administration

Audit Plan Code: 17-06

# COURSE NUMBER CODING AND REPORTING AUDIT

We found deficiencies in the  
design and operation of the  
internal controls for the  
District Course Catalog.



EL PASO  
INDEPENDENT  
SCHOOL DISTRICT  
*Internal Audit Department*



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## ABBREVIATIONS LIST

AAR	Academic Achievement Record
ARG	Administrators' Reference Guide
CAP	Corrective Action Plan
EPISD	El Paso Independent School District
GT	Gifted and Talented
IA	Internal Audit
ID	Identification
LEA	Local Education Agency
PEIMS	Public Education Information Management System
TEA	Texas Education Agency
TEAMS	Total Education Administrative Management Solution
TEC	Texas Education Code
TEDS	Texas Education Data Standards
TREX	Texas Records Exchange
TSDS	Texas Student Data System

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## Executive Summary

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We have completed the Course Number Coding and Reporting Audit for the 2016-2017 school year. The Executive Summary provides, on a summarized basis, the findings discussed throughout the body of the Internal Audit Report that follows. The Internal Audit Report includes background information and detailed findings, recommendations, and exhibits.

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### Summary of Findings

We identified errors in the data elements/codes and Academic Achievement Record (AAR) codes in the District Course Catalog. The data fields did not meet the requirements defined by the Texas Student Data System (TSDS) 2016-2017, Texas Education Data Standards (TEDS), and the Academic Achievement Record (AAR) special explanation codes defined in the Texas Education Agency's (TEA), "Minimum Standards for the Academic Achievement Record 2012." The errors were due to deficiencies in the design and operation of internal controls for maintaining the District's Course Catalog.

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### Management's Corrective Action Plan

A Corrective Action Plan (CAP) was provided outlining the activities to be implemented. The CAP appears to be sufficient to address the reportable conditions outlined in this report. The CAP addresses the deficiencies in the design and operation of internal controls and correcting the identified errors. Internal Audit will monitor the implementation of the CAP and schedule follow-up review(s) of evidence to ensure CAP activities have occurred.

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### Conclusion

We found deficiencies in the design and operation of the internal controls for the District Course Catalog which led to errors in the District's Course Catalog. The written procedures in the EPISD Administrators' Reference Guide for maintaining the District's Course Catalog were outdated, incomplete, and not effective in helping to identify and correct errors. Errors in the District's Course Catalog create a risk of reporting inaccurate data during PEIMS data submissions and incorrect student information on student transcripts.



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# Internal Audit Report

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## Background

The Course Number Coding and Reporting Audit was approved by the Board of Trustees as part of the 2016-2017 Internal Audit Plan.

The collection of Public Education Information Management System (PEIMS) data is required of all Local Education Agencies (LEAs) by Texas Education Code (TEC) 42.006. The Texas Education Data Standards (TEDS) provides instructions regarding the submission of PEIMS data from LEAs to the Texas Education Agency (TEA). The data collected is used to analyze Texas public education with data reports, evaluations, accountability ratings, funding calculations, and required state and federal reporting. The data collected through the PEIMS electronic collection method has a standard set of definitions, codes, formats, procedures, and dates for the collection of data published as the PEIMS Data Standards.

The Public Education Information Management System (PEIMS) includes data requested by TEA in five categories: education organization, finance, campus course section, staff, and student. This audit focused on the campus course section and related student data.

The District's Course Catalog is created using the mandatory TEA PEIMS Data Standards (PDS). In addition, TEA's "Minimum Standards for the Academic Achievement Record 2012" (AAR) is also referenced to comply with the requirements that denote special explanations which must be consistent with teacher records.

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## Objective and Scope

The objective of the audit was to provide reasonable assurance to the Board and administration regarding the effectiveness of the design and operation of the internal controls to ensure the District's Course Catalog meets state and District requirements. The scope of the audit was the District's 2016-2017 school year Course Catalog.

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## Acknowledgement

We would like to acknowledge and thank the Chief Innovation Officer, Executive Director, Innovation, Design, and Development, and Instructional Materials Coordinator for their cooperation and assistance during the audit.

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## Methodology

To achieve our audit objectives, we:

1. Researched relevant state laws and regulations, Public Education Information Management System (PEIMS), Texas Education Data Standards (TEDS), Texas Education Agency (TEA) Minimum Standards for the Academic Achievement Record 2012 (AAR), Board policies, Total Education Administrative Management Solutions (TEAMS), EPISD Scheduling Guidelines, District Course Number-Structure, and the EPISD Administrators' Reference Guide (ARG).
2. Met with appropriate data owners to gain an understanding regarding department operations and discuss audit objective and areas scheduled to be audited.
3. Submitted Electronic Service Request to Technology Services to obtain the 2016-2017 District Course data file and performed analysis of 100% of the data in the District Course Data File/Catalog to identify anomalies based on Texas Education



Data Standards. The data elements/codes, when applicable, and AAR Codes with definitions that we tested are listed below:

- a. Texas Student Data System (TSDS), 2016-2017 Texas Education Data Standards (TEDS) in the following data elements:
  - 1) Service IDs (E0724) – Services supplied by staff. The values are listed in the C022 and include both courses and non-teaching responsibilities.
  - 2) Population served (E0747) – Identifies the student population for which a service has been designed or is intended. It does not necessarily identify the program eligibility of the students who receive the service.
  - 3) Instructional setting (E0713) – Indicates the setting used in providing instruction to students.
  - 4) Credit (E1112) – The value of credits or units of value awarded for the completion of a course.
  - 5) CTE indicator code (E0031) – Indicates whether the student is enrolled in a state approved career and technical education course as an elective, or as a participant in the district's career and technical coherent sequence of courses. When assigning the CTE indicator code, all Career and Technical Education courses are included, regardless of course funding weight.
  - 6) CTE contact hours – The average number of minutes per day students attend a course. (2016-2017 TEA Student Attendance Accounting Handbook)
  - 7) Dual credit (E1011) – Indicates whether the student was eligible to receive both high school and college credit for a college course.
  - 8) College hours (E1081) – Indicates the number of college hours a student earned for the completion of a dual credit course.
- b. AAR Codes – Special explanation codes are used to define the type of course for courses other than regular courses. Regular courses do not have an AAR Code. We tested the following ten AAR Codes:
  - 1) D – A college course for which the student earns dual credit
  - 2) G – A gifted/talented (G/T) course
  - 3) I – An International Baccalaureate (IB) course
  - 4) J – A high school course completed prior to grade nine
  - 5) K – A pre-International Baccalaureate (pre-IB) course
  - 6) L – A course taken for local credit only
  - 7) P – A College Board-approved Advanced Placement (AP) course
  - 8) Q – A pre/Advanced Placement (pre-AP) course
  - 9) V – A state approved course in which content as described by the Texas Essential Knowledge and Skills (TEKS) has been modified as a result of an Admission Review Dismissal (ARD) committee decision. (The “V” code may be recorded in the student’s permanent record but must not be printed on the AAR).
  - 10) X – An innovative course approved for state elective credit by the State Board of Education or the Commissioner of Education.
4. Validated TEAMS input application controls for the District Course Catalog for grade level associated with service ID (criteria provided by Texas Education Data Standards).
5. Determined whether the District Course Catalog could be modified at the campus level for example, master schedule, for random course samples of five elementary and middles schools and 15 high schools. The testing results validated that controls for the District Course Catalog, when used at the campus level, are adequate. This is because the access application controls are defined at the District level and



provide sufficient assurance that PEIMS data cannot be manipulated at the campus level.

## Inherent Limitations

Because of the inherent limitations in a system of internal controls, there is a risk that errors or irregularities occurred and were not detected. Thus, 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.

Also, projections of any evaluation of the effectiveness of the internal control to future periods are subject to the risk that procedures may become inadequate because of changes in conditions, or that the degree of compliance with the policies or procedures may deteriorate.

## Finding

### Finding (#01)

Condition

We identified errors in the data elements/codes and AAR codes in the District Course Catalog that did not meet the requirements defined by the Texas Student Data System (TSDS) 2016-2017 Texas Education Data Standards (TEDS) and the Academic Achievement Record (AAR) special explanation codes defined in the TEA, "Minimum Standards for the Academic Achievement Record 2012." Tables 1 through 3 provide a breakdown of the errors rates by elementary, middle, and high school. The District-wide error rates are listed below:

1. Thirty four (34) of 1,630 (2.1%) courses had an incorrect service identification number.
2. One hundred and eight-six (186) of 1,630 (11.4%) courses had an incorrect AAR code.
3. Fifty-eight (58) of 1,630 (3.6%) courses had an incorrect population served.
4. Seven (7) of 243 (2.9%) courses had an incorrect grade level (elementary only).
5. Nine (9) of 1,630 (0.6%) courses had an incorrect instructional setting.
6. Twenty-three (23) of 1,387 (1.7%) courses had an incorrect CTE indicator code and/or contact hours code (middle and high school).
7. Twenty (20) of 1,387 (1.4%) courses had an incorrect credit code (middle and high school).
8. Twenty-two (22) of 1,068 (2.1%) courses had an incorrect dual credit code and/or college hours code (high school only).

**Table 1: Testing Results for Elementary Schools**

Testing Results	Service ID	AAR Code	Population Served	Grade Level	Instructional Setting
CORRECT	227	226	240	236	239
INCORRECT	16	17	3	7	4
ERROR RATE	6.6%	7.0%	1.2%	2.9%	1.6%





**Table 2: Testing Results for Middle Schools**

Testing Results	Service ID	AAR Code	Population Served	Instructional Setting	CTE (Indicator Code/CTE Contact Hours)	Credit
CORRECT	306	296	277	316	304	310
INCORRECT	13	23	42	3	15	9
ERROR RATE	4.1%	7.2%	13.2%	0.9%	4.7%	2.8%

**Table 3: Testing Results for High Schools**

Testing Results	Service ID	AAR Code	Population Served	Instructional Setting	CTE (Indicator Code/CTE Contact Hours)	Credit	Dual Credit/ College Hours
CORRECT	1063	922	1055	1066	1060	1057	1046
INCORRECT	5	146	13	2	8	11	22
ERROR RATE	0.5%	13.7%	1.2%	0.2%	0.7%	1.0%	2.1%

**Risks**

There is a risk inaccurate course codes in TEAMS may result in:

- Reporting inaccurate data during PEIMS data submissions,
- Inaccurate student transcripts,
- Contact hours at high schools for CTE courses may be under or over reported, and
- Student could be enrolled in incorrect courses due to inaccurate service IDs and/or grade level.

**Cause**

The course code errors were due to deficiencies in the (1) design and (2) operation of internal controls for maintaining the District's Course Catalog as follows:

1. Current procedures in the EPISD Administrators' Reference Guide for maintaining the District's Course Catalog are outdated and were not effective in helping identify and correct errors.
2. The AAR code error was high due to miscoding, by a previous data owner, of Gifted and Talented (GT) courses that were not specifically created for GT students. The current data owner became aware of this issue and stated they were in the process of correcting the codes for these courses in the District's Course Catalog.

**Criteria**

See Exhibit A

**Recommendations**

We recommend:

1. Address the deficiencies in the design of internal controls by updating the ARG procedures for the management of the District's Course Catalog. At a minimum, the procedures should include:
  - a. Roles and responsibilities be assigned to staff (by position) for maintaining, updating, and verifying the accuracy of the District's Course Catalog,
  - b. Flow charts and/or decision trees to illustrate the process of adding, updating, and verifying accuracy of the District's Course Catalog,



	<p>c. Standardized forms used to document requests to add, delete, and change courses should include the required approval signatures and dates,</p> <p>d. The monitoring activities that will be used to help prevent, identify, and correct course code errors.</p> <p>2. Stakeholders should be notified of revised written procedures, their location, and the contact information for the staff responsible for the District's Course Catalog.</p> <p>3. Address the deficiencies in the operation of internal controls by providing training to the data-process owners who have a role in maintaining the District Course Catalog.</p> <p>4. Errors identified as part of this audit should be corrected to ensure they meet the TEDS, TREx, and the AAR special explanation codes defined in the TEA, "Minimum Standards for the Academic Achievement Record 2012." Corrections made should be documented to record why, when, and by whom for historical records.</p>
Management's Action Plan	<p><u>Activity #01:</u> "Update the Administrators reference guide with new procedures to the District Course File/Catalog and post on District website."</p> <p><u>Person(s) Responsible:</u> Coordinator of Instructional Materials; Executive Director of Innovation, Design, and Development</p> <p><u>Implementation Date:</u> 4/20/2018</p> <p><u>Activity #02:</u> "Develop Roles and responsibility (by position) for maintaining, updating, and verifying the accuracy of the District Course File/Catalog."</p> <p><u>Person(s) Responsible:</u> Coordinator of Instructional Materials; Executive Director of Innovation, Design, and Development</p> <p><u>Implementation Date:</u> 10/3/2017</p> <p><u>Activity #03:</u> "Develop flow charts to illustrate the process of adding, updating, and verifying accuracy of the District Course File/Catalog."</p> <p><u>Person(s) Responsible:</u> Coordinator of Instructional Materials; Executive Director of Innovation, Design, and Development</p> <p><u>Implementation Date:</u> 10/3/2017</p> <p><u>Activity #04:</u> "Develop standardized forms used to document request to add, delete and change courses in the District Course File/Catalog."</p> <p><u>Person(s) Responsible:</u> Coordinator of Instructional Materials; Executive Director of Innovation, Design, and Development</p> <p><u>Implementation Date:</u> 9/18/2017</p>





Activity #05: “Develop procedures that will be used to document historical data, to name courses with state name, prevent, identify and correct course errors in the District Course File/Catalog.”

Person(s) Responsible: Coordinator of Instructional Materials; Executive Director of Innovation, Design, and Development

Implementation Date: 10/16/2017

Activity #06: “Notify stakeholders of revised written procedures, their location, and contact information for the Data Owner of the courses.”

Person(s) Responsible: Coordinator of Instructional Materials; Executive Director of Innovation, Design, and Development

Implementation Date: 4/20/2018

Activity #07: “Train all Data Owners (example Academic Facilitator for English) on the process of creating a course and verifying the accuracy of the district courses they own.”

Person(s) Responsible: Coordinator of Instructional Materials; Executive Director of Innovation, Design, and Development

Implementation Date: 10/30/2017

Activity #08: “Use standardized forms (course request, course change and course delete) and eSR request with data owners to correct errors in the 2018 District Course File/Catalog that were identified as errors in the 2017 District Course File/Catalog that have not already been corrected prior to the delivery of the audit.”

Person(s) Responsible: Coordinator of Instructional Materials; Executive Director of Innovation, Design, and Development

Implementation Date: 12/15/2017

Activity #09: “Audit and correct errors in the 2018 District Course File/Catalog with data owners using standardized forms.”

Person(s) Responsible: Coordinator of Instructional Materials; Executive Director of Innovation, Design, and Development

Implementation Date: 12/15/2017

Activity #10: “Work with Data Owners to code all course titles which will identify state course name at beginning of name.”

Person(s) Responsible: Coordinator of Instructional Materials; Executive Director of Innovation, Design, and Development

Implementation Date: 1/16/2018



	<p><u>Activity #11:</u> “Audit and correct course changes from the 2017-2018 TEDS change log for 2018 District Course File with data owners using standardized forms.”</p> <p><u>Person(s) Responsible:</u> Coordinator of Instructional Materials; Executive Director of Innovation, Design, and Development</p> <p><u>Implementation Date:</u> 12/15/2017</p> <p><u>Activity #12:</u> “Review all course usage, and if the course has not been used within 2 years, work with data owner (academic facilitator) to determine if course is still viable.”</p> <p><u>Person(s) Responsible:</u> Coordinator of Instructional Materials; Executive Director of Innovation, Design, and Development</p> <p><u>Implementation Date:</u> 3/23/2018</p>
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## Exhibit A: Criteria

No	Criteria Source	Criteria Details
1	Texas Student Data System (TSDS) 2016-2017 Texas Education Data Standards (TEDS)	The collection of Public Education Information Management System (PEIMS) is required of all Local Education Agencies (LEAs) by TEC 42.006. The Texas Education Data Standards (TEDS) provides instructions regarding the submission of PEIMS data from LEAs to the Texas Education Agency. The Texas data collected is used for required state and federal reporting.
2	Texas Education Code 42.006, Public Education Information Management System (PEIMS)	<p>(a) Each school district shall participate in the Public Education Information Management System (PEIMS) and shall provide through that system information required for the administration of this chapter and of other appropriate provisions of this code.</p> <p>(a-1) The commissioner by rule shall require each school district and open-enrollment charter school to report through the Public Education Information Management System information regarding the number of students enrolled in the district or school who are identified as having dyslexia. The agency shall maintain the information provided in accordance with this subsection.</p> <p>(b) Each school district shall use a uniform accounting system adopted by the commissioner for the data required to be reported for the Public Education Information Management System.</p> <p>(c) Annually, the commissioner shall review the Public Education Information Management System and shall repeal or amend rules that require school districts to provide information through the Public Education Information Management System that is not necessary. In reviewing and revising the Public Education Information Management System, the commissioner shall develop rules to ensure that the system:</p> <p>(1) provides useful, accurate, and timely information on student demographics and academic performance, personnel, and school district finances;</p> <p>(2) contains only the data necessary for the legislature and the agency to perform their legally authorized functions in overseeing the public education system; and</p> <p>(3) does not contain any information related to instructional methods, except as provided by Section 29.066 or required by federal law.</p> <p>(d) The commissioner's rules must ensure that the Public Education Information Management System links student performance data to other related information for purposes of efficient and effective allocation of scarce school resources, to the extent practicable using existing agency resources and appropriations.</p>
3	Texas Education Agency Student Attendance Accounting Handbook, 5.5 CTE (Contact-Hour Codes)	"...Each CTE course must be reviewed separately to determine the average minutes per day students attend that course. Three contact hours is the maximum your district may claim for a single course...."
4	PEIMS - Overview <a href="http://tea.texas.gov/index4.aspx?id=3541">http://tea.texas.gov/index4.aspx?id=3541</a>	<p>The Public Education Information Management System (PEIMS) encompasses all data requested and received by TEA about public education, including student demographic and academic performance, personnel, financial, and organizational information.</p> <p>The data collected through the PEIMS electronic collection method has:</p> <ul style="list-style-type: none"> <li>• A standard set of definitions, codes, formats, procedures, and dates for the collection of data published as the PEIMS Data Standards;</li> </ul>



No	Criteria Source	Criteria Details
4	PEIMS – Overview (continued) <a href="http://tea.texas.gov/index4.aspx?id=3541">http://tea.texas.gov/index4.aspx?id=3541</a>	<ul style="list-style-type: none"> <li>• Standard edit procedures;</li> <li>• An established database design;</li> <li>• A production system to format and load data into the TEA enterprise database; and</li> <li>• Written documentation describing the numeric and alphanumeric values stored in the database published as the Data Documentation.</li> </ul> <p>For the PEIMS electronic collection, school districts submit their data via standardized computer files, as defined by the PEIMS Data Standards....Currently, the major categories of data collected are:</p> <ul style="list-style-type: none"> <li>• organizational,</li> <li>• budget,</li> <li>• actual financial,</li> <li>• staff,</li> <li>• student demographic,</li> <li>• program participation,</li> <li>• school leaver,</li> <li>• student attendance,</li> <li>• course completion, and</li> <li>• discipline.</li> </ul> <p>TEA manages other collections for evaluation, monitoring, funding, or auditing. Many are automated, electronic collections.</p> <p>In compliance with the Texas Education Code, PEIMS contains only the data necessary for the legislature and TEA to perform their legally authorized functions in overseeing public education.</p>
5	Texas Education Agency, Minimum Standards for the Academic Achievement Record 2012, 1.16b Special Explanation Codes	TEA authorizes the use of the “A” code for courses included in an articulated agreement and is required. The use of the “D” code for dual credit courses is required. The use of all other codes is optional. Districts may use additional codes locally.
6	EPISD Administrators’ Reference Guide, Curriculum & Instruction, Course Development	<p>The process and time lines for new course proposals, a course not offered in EPISD but an approved course through TEA or a proposed local course, is outlined below to facilitate assessment of materials, textbooks, teacher certification requirements, additional staff, and other possible costs to the District of the proposed curriculum addition. After preparing the course proposal, the person(s) submitting the request is to present details and answer questions posed by the appropriate department head and assistant superintendent for C &amp; I. Once approved by the appropriate department head and assistant superintendent for C &amp; I, he/she sends the request to the chief school leadership and administration. The chief reviews the request and approves or denies the request in collaboration with the assistant superintendent for C &amp; I. If approved, he/she sends the appropriate paperwork to TIS for input into TEAMS. TIS will inform the chief once the course request has been inputted into TEAMS.</p> <p>A new course that is approved for one school may not be approved for all schools in the District.</p> <p>All campuses must follow the time line outlined below.</p>



No	Criteria Source	Criteria Details
6	EPISD Administrators' Reference Guide, Curriculum & Instruction, Course Development (continued)	<p>Time Lines</p> <p>New Courses Offered-Fall Semester</p> <p>This time line is to assure approval by March 1 for courses to be offered in August of the next school year.</p> <p>November - New course proposals submitted to assistant superintendent for C &amp; I</p> <p>November/December - Chief School Leadership and Administration reviews proposals</p> <p>New course proposals presented to Superintendent's Leadership Team for information</p> <p>January - New course proposals presented to DEIC for information</p> <p>Course Development Form</p> <p>Contact the Curriculum and Instruction Department to obtain a Course Development Form and a description of the protocol for creating, deleting, or modifying courses.</p>
7	Texas Records Exchange (TREx)	A web-based software application designed for the exchange of electronic student records as mandated by the 79 <sup>th</sup> Legislature, 3 <sup>rd</sup> Called Session, 2006 (House Bill 1).

