

2016-2017

Report to Board of Trustees and Administration

Audit Plan Code:
16-08

TRANSFER CREDITS FOLLOW-UP AUDIT

Identified transcripts that
were incorrectly evaluated
and not processed in a
timely manner.



EL PASO
INDEPENDENT
SCHOOL DISTRICT
Internal Audit Department



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ABBREVIATIONS LIST

AAR	Academic Achievement Record
CAP	Corrective Action Plan
CCRP	College and Career Readiness Plan
CUM	Cumulative Record folder (student file)
EPISD	El Paso Independent School District
FY	Fiscal Year
IA	Internal Audit Department
PEIMS	Public Education Information Management System
TAT	Transcript Audit Tracking Form
TEA	Texas Education Agency
TEAMS	Total Education Administrative Management Solution AKA as Student Systems
TREX	Texas Records Exchange (Used to electronically exchange student records between Texas public school)
TS	Technology Services Department
USDE	United States Department of Education

Executive Summary

We have completed the Transfer Credits Follow Up Audit for the period of the 2014-2015 school year and fall semester of the 2015-2016 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.

Summary of Findings

1. Fifty-seven (57) of the 146 (39%) applicable students' transfer course credits were either given credits not earned or shorted credits earned.
2. Fifty-eight (58) of the 146 (40%) applicable students' transfer courses were incorrectly evaluated. This is when the student was not given the actual course earned.
3. Sixteen (16) of the 128 (13%) applicable students' transfer courses had the incorrect school year (when the student took the course).
4. Four (4) of the 168 (2%) applicable students' transfer supporting documentation was not located in the students' cumulative record folder (CUM) or counselor files. Of the 164 with documentation, 40 (24%) were considered to be inadequate (e.g. incomplete, not date/time stamped, and/or no evidence of follow-up).
5. Forty (40) of the 131 (31%) applicable students' transfer courses had course grades incorrectly evaluated.
6. We found 56 instances when applicable transfer students' documentation award of credit(s) took longer than 30 days. The Texas Education Agency requires evaluation and placement within 30 days. In addition, of the 146 applicable students 72 (49%) of the students' transfer documentation was not dated and therefore we could not gauge the time it took to evaluate their transcripts.
7. Of 92 applicable foreign transfer students, 56 (61%) were awarded the incorrect Spanish course. The majority of these students were from Mexico and were awarded "Spanish" instead of "Spanish for Spanish Speakers" (which has a separate state identification number). One student was not from Mexico and was incorrectly awarded "Spanish for Spanish Speakers" rather than "Spanish."

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. Internal Audit will monitor the implementation of the CAP and schedule follow-up review(s) of evidence to ensure CAP activities have occurred.

Conclusion

Internal Audit performed an audit in 2014 to determine if transcripts for Mexican transfer students were properly evaluated. In response, Guidance Services created a Corrective Action Plan that included assigning the responsibility to evaluate foreign transcripts to Guidance Services for all student transfers and developing/revising procedures and forms. It appears the 2014 Corrective Action Plan did not fully address the findings since this audit identified similar findings as the 2014 audit related to the incorrect evaluation of credits, courses, grades, year course taken, and timeliness in evaluating transfer



students' records for out of district, out of state, and foreign transfer students. One of the causes for the reoccurring findings is that not all campus counselors have a full understanding of how to evaluate foreign and/or outside of District transcripts, TREx, boletas-Mexican, and report cards since this responsibility was placed solely on the Guidance Services Department.

The CAP to address the current audit includes assigning the responsibility for evaluating transfer students' transcripts to the campus counselors under the oversight of the Guidance and Instruction Assistant Principal. This will ensure campuses take ownership of the evaluation process and Guidance Services will serve to provide training, support, monitoring, and auditing.



Internal Audit Report

Background

Texas law addresses requirements for students transferring to Texas schools. 19 TAC Chapter 74, Subchapter C. Other Provisions, 74.26 Award of Credit states, “1) Credit earned toward state graduation requirements by a student in an accredited school district shall be transferable and must be accepted by any other school district in the state. A district may not prohibit a new student from attending school pending receipt of transcripts or records from the school district the student previously attended. Credit earned in a local-credit course may be transferred only with the consent of the receiving school district. 2) A school district must ensure that the records or transcripts of an out-of-state transfer student (including foreign exchange students) or a transfer student from a Texas nonpublic school are evaluated and that the student is placed in appropriate classes promptly. The district may use a variety of methods to verify the content of courses for which a transfer has earned credit.”

In January 2014, the United States Department of Education (USDE) issued a program determination letter (PDL) in reference to students who transferred from Mexico schools to the El Paso Independent School District (EPISD). The USDE recommended a review be performed to determine if transfer credits for students who transferred from foreign countries have been evaluated and recognized to ensure placement in the correct grade level. In response, Internal Audit performed a Mexican Student Transcript Audit and issued the report in June 2014.

A Corrective Action Plan was developed by administration to address the Internal Audit findings in the June 2014 audit report, which included developing and revising procedures, timeliness for evaluating and transcribing student credits, awarding credits correctly, and documentation. The Corrective Action Plan also included assigning the responsibility to evaluate transcripts to Guidance Services for all foreign student transfers.

The Transfer Credits Follow-up Audit was approved by the Board of Trustees as part of the 2015-2016 and 2016-2017 Internal Audit Plans.

Objective and Scope

The objective of the audit was to provide reasonable assurance regarding the adequacy of internal controls that ensure transfer students' earned credits, grades, courses, and year course taken are accurately awarded and recorded on the student transcript. This audit is intended to (i) follow up on findings identified in the 2014 audit performed by Internal Audit and (ii) test a sample of all transfer students' credit and course evaluations; not only students from foreign countries.

The scope of the audit was transfer students enrolled during the 2014-2015 school year and fall semester of the 2015-2016 school year.

Acknowledgement

We would like to acknowledge and thank Director of Guidance Services Manuel Castruita, Director of Student & Parent Services, and Lead Counselor Norma Venegas for their cooperation and assistance during the audit.



Methodology

To achieve our audit objectives, we:

1. Reviewed relevant requirements in the Texas Education Code (TEC), District policies, Texas Education Agency (TEA) minimum Standards for the Academic Achievement Record (AAR), documentation, guidelines, and procedures provided by Guidance Services.
2. Selected a sample of 181 AAR/CUMs from six middle and 14 high schools for students who transferred to the District during the 2014-2015 school year and fall semester of the 2015-2016. Depending on documentation found, not all of the 181 AAR/CUMs were applicable for all testing areas.
3. We tested student CUMs to determine whether transfer credits were accurately and timely recorded to the student's transcript.
4. If the supporting documentation was not in the CUM it was denoted as an error as transfer documentation is required to be filed in CUM. We also requested counselors' files and observed some of the documentation is kept in the counselors' files and not in the CUM. When documentation was located in the counselor's files we removed the error.

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.

Findings (01 to 07)

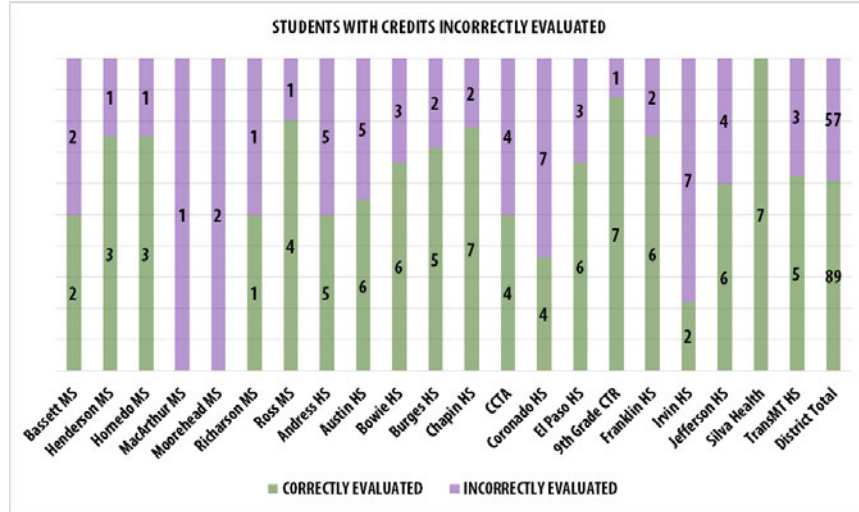
Findings #1 through #6 listed below have the same causes, effects, and management's action plan which are outlined under Finding #6. Criteria for all findings are outlined in Exhibit 1.

Finding (#01)

Condition	Fifty-seven (57) of the 146 (39%) applicable students' transfer <u>course credits</u> were incorrectly evaluated. The students were either given credits not earned or shorted credits earned. See Chart 1 for results by campus.
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Chart 1

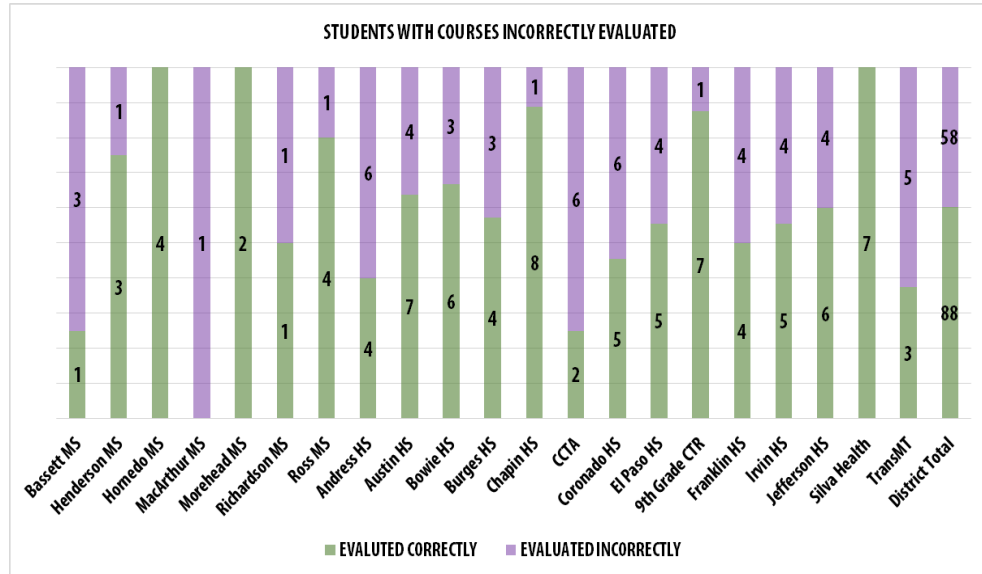


Finding (#02)

Condition

Fifty-eight (58) of the 146 (40%) applicable students' transfer courses were incorrectly evaluated. This is when the student was not given the actual course earned. For example, documentation shows "Spanish for Spanish Speakers" and credit is given for "Spanish" during the evaluation of courses. See Chart 2 for results by campus.

Chart 2

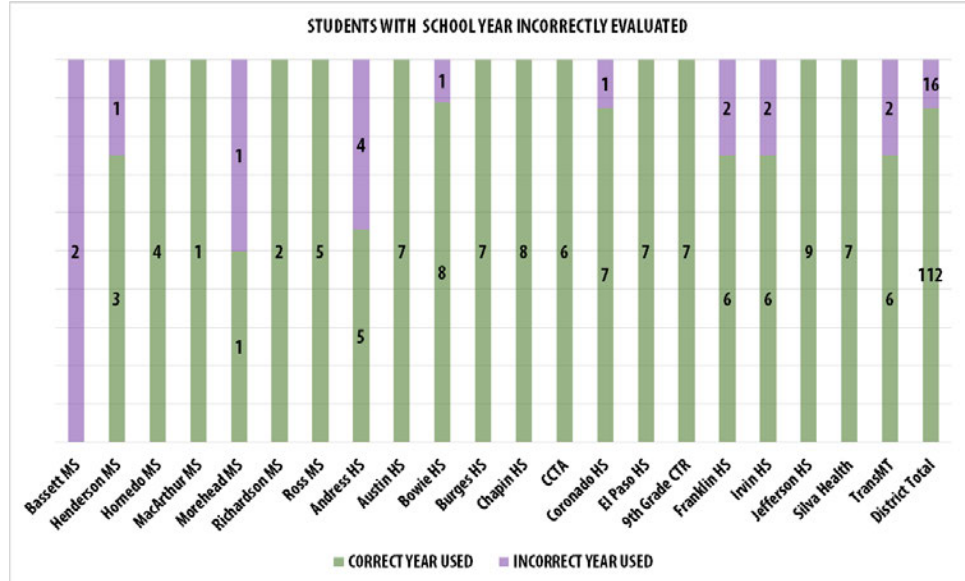


Finding (#03)

Condition

Sixteen (16) of the 128 (13%) applicable students had the school year the course was actually taken incorrectly evaluated. See Chart 3 for results by campus.

Chart 3

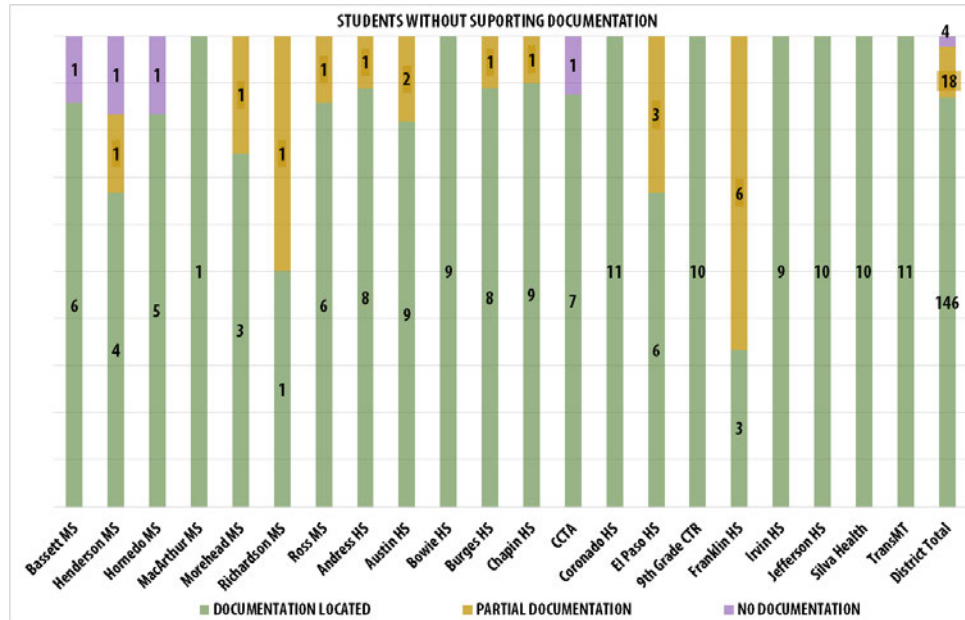


Finding (#04)

Condition

Four (4) of 168 (2%) applicable students' supporting documentation for transfer credits was not located in CUM or counselor files. See Chart 4 for results by campus.

Chart 4



Of the 164 with documentation, 40 (24%), which are not represented on Chart 4 above, were considered to be inadequate (e.g. incomplete, not date/time stamped, and/or no evidence of follow-up).

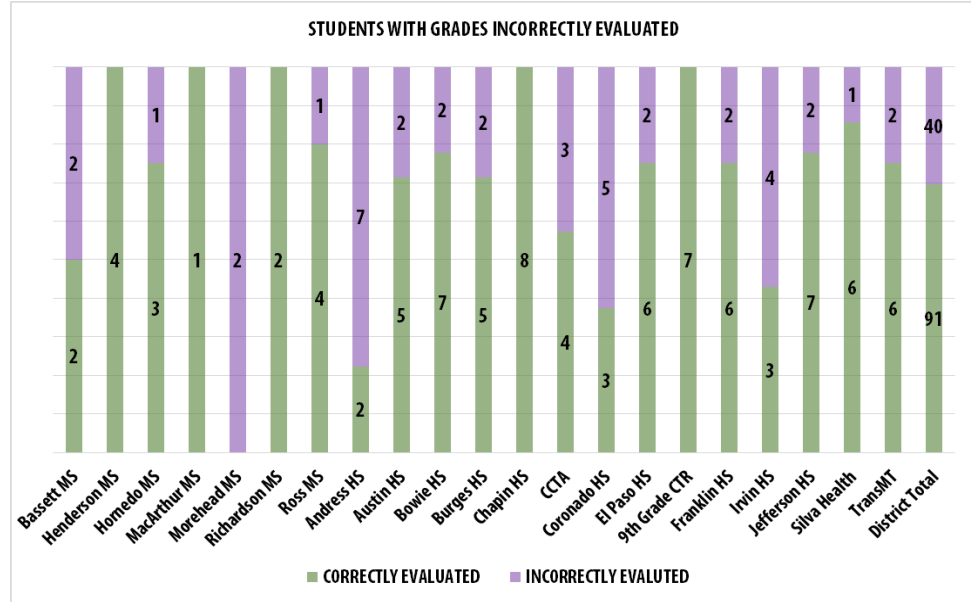
Finding (#05)

Condition

Forty (40) of the 131 (31%) applicable students' transfer course(s) had course grades incorrectly evaluated. See Chart 5 for results by campus.



Chart 5



Causes

- District policy and procedures do not address the 2011-2012 and 2012-2013 school years' grade conversion scale.
- The grade conversion scale in District policy for students entering 9th grade in the 2013-2014 school year has a range in the conversion scale, which does not specify which numerical grade corresponds to the letter grade.
- Counselors may have used the incorrect grade conversion scale when evaluating transferring course grades because policy was not clear.
- Errors in transcribing students' transfer credit grades could also contribute to a portion of the error rate.

Effect

Awarding transfer students incorrect grades during evaluation of their records impacts the student's GPA and results in noncompliance with state law.

Recommendations

The District should evaluate District Policy EIC (Local) Academic Achievement, and make appropriate revisions/corrections as needed. It is imperative that course grade scales, letter grade conversions, corresponding school years are clearly defined and accurate.

Finding (#06)

Condition

We found instances of noncompliance with the Commissioner of Education's letter dated March 5, 2014 which states that transcripts should be evaluated within 30 days of enrollment. Table 1 shows the range of calendar days to enter credits/courses for those we tested.

District Policy Admissions, Transfer Credits FD (Local) and Guidance Services procedures are not in alignment with the 30-day requirement because the document states "promptly," not 30 days.

Of 146 applicable students tested, we found:

- Eighteen students (18) were evaluated and entered into TEAMS within 30 days,



- Fifty-six (56) instances when transfer students' documentation award of credit(s) took longer than 30 days to enter into TEAMS. The Texas Education Agency requires evaluation within 30 days,
- Seventy-two (72) or 49% of the students' transfer documentation was not dated and therefore we could not gauge the time it took to evaluate their transcripts.

Table 1

RANGE OF DAYS TAKEN TO INPUT TRANSFER RECORDS							
0-30 Days	31-41 Days	41-50 Days	51-75 Days	76-125 Days	126-150 Days	151- 220 Days	TOTAL
18	7	10	12	13	5	9	74

Causes
(Findings 01 - 06)

The procedures created by Guidance Services are not always being adhered to by counselors, registrars, and/or Guidance Services' staff resulting in errors in the award of credits, courses, year course taken, documentation, grades, and students' transcripts not being evaluated promptly (within 30 days as required). Procedural steps that are not being performed by or consistently performed include:

- Of the applicable 87 foreign students tested, 46 (53%) students did not have the "Campus Request for Transcript Review by Guidance Services" form in the CUM as required. In addition, the "District Office Use Only" portion of the form was not filled out by Guidance Services. This area has important information for tracking the form and transcript, using dates, recipients, and monitoring timelines.
- "International Student Transcript Checklist" form was not regularly used by the counselor and not always located in the CUM and/or filled out completely. It was sometimes located in the counselor's files. This form is not required in Guidance Services' procedures; however, the form has excellent information and steps for counselors to use as a monitoring tool to track the process of evaluating students' credits, courses, and placement.
- Date/time stamping of documentation –
 - Not all students' records (transcripts, TREx, boletas-Mexican report cards, and report cards) are consistently date/time stamped by campus staff receiving the documentation.
 - Guidance Services is not consistently date/time stamping course credit evaluations to show when they completed the evaluation.
 - Campuses are not consistently date/time stamping the course credit evaluations when received from Guidance Services.
- Documentation in CUM:
 - Students' records (transcripts, TREx, boletas-Mexican report cards, and report cards) are not consistently in the CUM or only partial documentation is located in CUM.
 - The transcript evaluation prepared by Guidance Services for foreign students were not always in the CUMS. Of the applicable 94 foreign students tested, 46 (49%) students did not have the Guidance Services' evaluation template in the CUM as required.
 - Evidence of requests for students' records (transcripts, TREx, boletas-Mexican report cards, and report cards) and follow up notation is not consistently located in the CUM.



	<ul style="list-style-type: none"> Transcript Audit Tracking Form (TAT) – It appears registrars are trying to comply with the data entry of student information and dates into the TAT, but based on queries to some registrars, they enter information after the fact. In addition, some registrars stated they do not receive requests for reports or inquiries from campus administration regarding status of transcript evaluation. The TAT is not being used as a tool for tracking student transcripts by the majority of the registrars queried. The only exception was El Paso High School which, according to the registrar, requires each staff member in the process to enter their piece into the TAT. The registrar stated the principal does perform some monitoring and follow up.
Effects Findings 01 - 06	<ul style="list-style-type: none"> Forms - When forms are not used or are used incorrectly there is an increased risk of error. Date/time stamping of documentation – If all documentation received and prepared when evaluating transfer students is not date/time stamped, timeliness cannot be monitored. This creates a risk of transfer students' records (transcripts, TREx, boletas-Mexican report cards, and report cards) not being evaluated and/or students not being placed within the required 30 days. Documentation in CUM – If all documentation received and prepared when evaluating a transfer student is not filed in the student CUM, there may be no support for the transcript evaluation, student placement, and that it was performed in a timely manner. Transcript Audit Tracking Form (TAT) – When the TAT is not utilized as a tool, to track evaluation and placement of transfer students, the procedures are not being adhered to and there is a risk of not meeting the 30 day requirement. Students may be registered and take courses they have already earned credit for resulting in taking duplicate courses. Students may receive credit for courses they have not completed. Inaccurate grades and courses impact student grade point average (GPA).
Recommendations	<ul style="list-style-type: none"> We recommend Guidance Services re-evaluate the current procedures for students transferring to EPISD. Guidance Services should consider training all campus counselors on evaluating all student transcripts, including those for foreign students, and requiring the campus counselors to take ownership of the process by making them responsible for evaluating all transcripts. We recommend the Assistant Principal for Guidance and Instruction have oversight of the process at the campus. <p>Guidance Services should create an action plan to revise the process for students transferring to EPISD and any changes to the process should include transition facilitation to ensure campus counselors are thoroughly trained, supported, and acquire proficiency for evaluating all transcripts, including foreign transcripts.</p> <ul style="list-style-type: none"> Revising this process would eliminate the current procedure of waiting for Guidance Services to evaluate the students' records (transcripts, TREx, boletas-Mexican report cards, and report cards). This will help minimize redundancy with paperwork and evaluation. This process would be more

	<p>streamlined, which can lead to fewer data entry errors, and a more efficient timely process.</p> <ul style="list-style-type: none"> • Campus counselors should become proficient in using the crosswalk for students from Mexico. Guidance Services should serve to provide support, monitor, and audit the campus counselors. • Student and Parent Services should review the Transcript Tracking Form (TAT) to determine if is useful and necessary to track the evaluation of transcript evaluations of transfer students. If the TAT continues to be a part of the procedures for evaluating student transfers, Guidance Services should create procedures and provide training to appropriate campus staff. • Guidance Services should conduct regular monitoring and audits to ensure compliance and provide guidance as needed. • Data owner(s) should develop an action plan for addressing and correcting the findings from this audit report and present to leadership for buy in.
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Finding (#07)

Condition	Of 92 applicable foreign transfer students, 56 (61%) were awarded the incorrect Spanish course. The majority of these students were from Mexico and were awarded "Spanish" instead of "Spanish for Spanish Speakers" (which has a separate state identification number). One student was not from Mexico and was incorrectly awarded "Spanish for Spanish Speakers" rather than "Spanish."
Cause	The template used by Guidance Services to record the credit analysis has the wrong Spanish District course number (ID).
Effect	There is a risk students may be placed in duplicate courses.
Recommendation	Guidance Services should review and revise the template used to evaluate transcripts to ensure service identification number, course numbers, and courses coincide to ensure courses are awarded correctly.

Corrective Action Plan

A Corrective Action Plan (CAP) was provided by administration outlining activities to be implemented to address the audit report findings. The activities, person(s) responsible, and projected implementation dates are outlined below.

Activity (#03)	"Student and Parent Services and Counseling, Advising, and College Readiness will review and provide a course grade scale and grade conversion guiding document."
Person(s) Responsible	Cheryll Felder, Director, Student Parent Services, Manuel Castruita, Director, Counseling, Advising, and College Readiness
Implementation Date	October 31, 2016



Activity (#04)

	"Student and Parent Services and Counseling, Advising, and College Readiness will review and update transcript checklist and other template resources, e.g. Mexican Crosswalk, and make the appropriate revisions/corrections, as needed."
Person(s) Responsible	Manuel Castruita, Director, Counseling, Advising, and College Readiness
Implementation Date	July 30, 2017

Activity (#05)	"Counseling, Advising, and College Readiness will recommend to Area Superintendents of the need for secondary school counseling departments and registrars to allow for scheduled time to complete administrative paperwork, e.g. audits."
Person(s) Responsible	Manuel Castruita, Director, Counseling, Advising, and College Readiness
Implementation Date	November 30, 2016

Activity (#06)	"Counseling, Advising, and College Readiness will recommend to Area Superintendents of the need to review the scope of work and duties assigned to secondary (middle and high) counselors in light of administrative tasks and counseling duties."
Person(s) Responsible	Manuel Castruita, Director, Counseling, Advising, and College Readiness
Implementation Date	November 30, 2016

Activity (#07)	"Counseling, Advising, and College Readiness will recommend to Area Superintendents of the need to review the salary scales for high school counselors to be commensurate with their duties and/or to consider proposing a stipend to high school counselors."
Person(s) Responsible	Manuel Castruita, Director, Counseling, Advising, and College Readiness
Implementation Date	November 30, 2016

Activity (#08)	"Counseling, Advising, and College Readiness will recommend creation of a "Transcript Clerk" position to each campus based on enrollment to assist with processing of transcripts, etc. and work alongside campus counseling departments."
Person(s) Responsible	Manuel Castruita, Director, Counseling, Advising, and College Readiness
Implementation Date	January 9, 2017



Activity (#09)	"Counseling, Advising, and College Readiness will provide individual campuses with roster of records denoted in audit and request corrections, re-assessment of said records by January 9, 2017, and will provide technical support as needed."
Person(s) Responsible	Manuel Castruita, Director, Counseling, Advising, and College Readiness High School Campus Guidance and Instruction Assistant Principals
Implementation Date	January 9, 2017

Activity (#10)	"Counseling, Advising, and College Readiness will establish a committee to assist in developing a transition plan to return the transcript audits back to the campus so campus counselors evaluate and take ownership of the process under the supervision of the campus Guidance and Instruction Assistant Principal."
Person(s) Responsible	Manuel Castruita, Director, Counseling, Advising, and College Readiness
Implementation Date	November 30, 2016

Activity (#11)	"Counseling, Advising, and College Readiness will implement the transition plan to include training for secondary campus counselors, as developed and recommended by the transcript committee, to return the transcript audits back to the campus so campus counselors evaluate and take ownership of the process under the supervision of the campus Guidance and Instruction Assistant Principal."
Person(s) Responsible	Manuel Castruita, Director, Counseling, Advising, and College Readiness
Implementation Date	February 28, 2017

Activity (#12)	"Guidance and Counseling and the campus Guidance and Instruction Assistant Principal will conduct an audit each semester of 3% (will increase to 5% if error rate is in excess of 20%) of counselor records to ensure that the updated Audit Cards and transcripts are being implemented and reviewed by high school counselors for accuracy. Documentation of self-audit should be submitted to the Area Superintendents."
Person(s) Responsible	Manuel Castruita, Director, Counseling, Advising, and College Readiness
Implementation Date	May 31, 2017

Activity (#13)	"Counseling, Advising, and College Readiness will recommend to Area Superintendents and Executive Directors in Academics Division that beginning in 2017-18 all high school courses offered for high school credit at the middle school level will use the same District ID as the high school course so as to allow for easier monitoring and review of Transcripts and CCRP." (sic)
Person(s) Responsible	Executive Directors: Language and Learning, Core Content and Academics, College and Career Readiness and Innovation



	Directors: Connecting Languages, Core Content and Academics, Director Career & Technical Education, Fine Arts, Health-Wellness-PE, Coordinator Academic Comp/Speech/Journalism, Coordinator Instructional Materials
Implementation Date	May 31, 2017

Activity (#14)	“Connecting Languages will review and update annually the transcript audit crosswalk and make the appropriate revisions/corrections, as needed.”
Person(s) Responsible	Mariana Balsiger, Director, Connecting Languages Manuel Castruita, Director, Counseling, Advising, and College Readiness
Implementation Date	May 31, 2017

Activity (#15)	“Connecting Languages will review the transcript audit crosswalk and make the appropriate revisions/corrections regarding English Language Arts Credits.”
Person(s) Responsible	Mariana Balsiger, Director, Connecting Languages
Implementation Date	May 31, 2017

Activity (#16)	“Core Content and Academic Programs will review and update annually the transcript audit crosswalk and make the appropriate revisions/corrections, as needed. “
Person(s) Responsible	Troy Byrne, Interim Executive Director, Core Content and Academic Programs Ron Winkelman, Coordinator Instructional Materials, Academics Manuel Castruita, Director, Counseling, Advising, and College Readiness
Implementation Date	May 31, 2017

Activity (#17)	“Core Content and Academic Programs will review and update annually the Course Catalog and make the appropriate revisions/corrections, as needed.”
Person(s) Responsible	Troy Byrne, Interim Executive Director, Core Content and Academic Programs Ron Winkelman, Coordinator Instructional Materials, Academics
Implementation Date	May 31, 2017

Activity (#18)	“Student and Parent Services will schedule a staff development session to review transcript procedures and required forms, e.g. TAT with high school and middle school registrars.”
Person(s) Responsible	Cheryll Felder, Director, Student Parent Services, Director,
Implementation Date	November 30, 2016



Exhibit A: Criteria

Criteria No	Criteria Source	Criteria Details
1	19 TAC Chapter 74, Subchapter C. Other Provisions, 74.26 Award of Credit	<p>19 TAC Chapter 74, Subchapter C. Other Provisions, 74.26 Award of Credit states,</p> <p>(a) The award of credit for a course by a school district affirms that a student has satisfactorily met all state and local requirements. Any course for which credit is awarded must be provided according to this subsection</p> <p>(1) Credit earned toward state graduation requirements by a student in an accredited school district shall be transferable and must be accepted by any other school district in the state. A district may not prohibit a new student from attending school pending receipt of transcripts or records from the school district the student previously attended. Credit earned in a local-credit course may be transferred only with the consent of the receiving school district.</p> <p>(2) A school district must ensure that the records or transcripts of an out-of-state transfer student (including foreign exchange students) or a transfer student from a Texas nonpublic school are evaluated and that the student is placed in appropriate classes promptly. The district may use a variety of methods to verify the content of courses for which a transfer has earned credit.</p> <p>(b) Districts may offer courses designated for Grades 9-12 (refer to 74.11 of this title) in earlier grade levels. A course must be considered completed and credit must be awarded if the student has demonstrated achievement by meeting the standard requirements of the course, including demonstrated proficiency in the subject matter, regardless of the time the student has received instruction in the course or the grade level at which proficiency was attained. The academic achievement record (transcript) shall reflect that students have satisfactorily completed courses at earlier grade levels than Grades 9-12 and have been awarded state graduation credits.</p> <p>Students from non-public, out-of-state, or out-of-country schools may have transcripts that record letter grades or that indicate awarded credit for courses with grades lower than the Texas passing standard of 70 (TAC §74.26(c)). These transcripts may also indicate awarded credit for courses that do not exactly correlate with a Texas course title. The receiving school district must evaluate the transcript to determine the appropriate recording of the students' grades and award credits in accordance with the standard used in the receiving Texas district or charter school (TAC §74.26(a)(2)). Districts must determine the proper placement of and award of credit to these students based on the required evaluation of the students' records. The district may use a variety of methods to verify the content of courses for which a transfer student has earned credit."</p> <p>The commissioner of education shall develop and distribute to each school district and institution of higher education the state guidelines for a common academic achievement record and coding system for courses and instructions for recording information on the academic achievement record. Each school district must use the coding system provided by the commissioner.</p>
2	Board Policy EI (Legal) Academic Achievement	<ul style="list-style-type: none"> • Award of Credit -The award of credit for a course affirms that a student has satisfactorily met state and local requirements. 19 TAC 74.26(a) • Graduation Requirements • Academic Achievement Record • Distinguished Level of Achievement Education Code 28.025(e-1); 19 TAC 74.5(f)–(h), .11(b)

Criteria No	Criteria Source	Criteria Details
3	Board Policy EIC (Local) Academic Achievement, Class Ranking	<ul style="list-style-type: none"> • Letter grade conversion • Transfer students categories and grade weight system
4	Board Policy FD (Local) Admissions, Transfer Credits	Before granting credit, the District shall validate by testing or other evidence, that any course taken by a student at a non-accredited public, private, or parochial school meets State Board requirements. "
5	Board Policy FL (Local) Student Records	<ul style="list-style-type: none"> • Comprehensive System - The Superintendent shall develop and maintain a comprehensive system of student records and reports dealing with all facets of the school program operation and shall ensure through reasonable procedures that records are accessed by authorized persons only, as allowed by this policy. These data and records shall be stored in a safe and secure manner and shall be conveniently retrievable for use by authorized school officials. • A cumulative record shall be maintained for each student from entrance into District schools until withdrawal or graduation from the District. This record shall move with the student from school to school and be maintained at the school where currently enrolled until graduation or withdrawal.
6	Board Policy FDA (Legal) Admissions, Interdistrict Transfers	<ul style="list-style-type: none"> • Credits and Records - Credits earned in local credit courses may be transferred at the enrolling district's discretion. Transfer students shall not be prohibited from attending school pending receipt of transcripts or academic records from the district the student previously attended. 19 TAC 74.26(a)(1) • <i>Nonpublic Schools</i> - Records and transcripts of students from Texas nonpublic schools or from out of state or out of the country (including foreign exchange students) shall be evaluated, and students shall be placed promptly in appropriate classes. The District may use a wide variety of methods to verify the content of courses for which a transfer student has earned credit. 19 TAC 74.26(a)(2)
7	Administrator's Reference Guide, Guidance and Counseling	Guidelines for Awarding Credit from International Schools, Evaluating Student Transcripts
8	2015-16 Counselor Resources – GCS/ International Transcripts 2013-14 (District web page, Guidance Services)	Guidelines for Awarding Credit from International Schools, Evaluating Student Transcripts
9	Administrator's Reference Guide, Curriculum & Instruction	Guidelines for Awarding Credit from International Schools, Evaluating Student Transcripts, High School Credit for AP Foreign Language Test Scores
10	Administrator's Reference Guide, Secondary Division, Transfer Credit	Guidelines for Awarding Credit from International Schools, Evaluating Student Transcripts



Criteria No	Criteria Source	Criteria Details
11	TEC Chapter 7, 7.010	All requested Academic Achievement Records (AAR) must be transferred to other Texas public school districts and charters and institutions of higher education through the TREx system.
12	Texas Education Agency (TEA), Minimum Standards for the Academic Achievement Records 2012	<p>Section 1.15 Record of Courses and Credits Earned states, "This is the official record of a student's high school achievement regarding courses completed, grades earned, and credits awarded. The AAR must be consistent with teachers' records and the student's IEP. All courses completed in grades 9-12 and before grade nine for high school credit must be recorded on the AAR (TAC §74.26(b)).</p> <p>Students from non-public, out-of-state, or out-of-country schools may have transcripts that record letter grades or that indicate awarded credit for courses with grades lower than the Texas passing standard of 70 (TAC §74.26(c)). These transcripts may also indicate awarded credit for courses that do not exactly correlate with a Texas course title. The receiving school district must evaluate the transcript to determine the appropriate recording of the students' grades and award credits in accordance with the standard used in the receiving Texas district or charter school (TAC §74.26(a)(2)). Districts must determine the proper placement of and award of credit to these students based on the required evaluation of the students' records. The district may use a variety of methods to verify the content of courses for which a transfer student has earned credit."</p>
13	Texas Education Agency (TEA) Requirements for Awarding Credit and Appropriate Grade Placement, letter from Michael Williams, Commissioner of Education, March 5, 2014	Letter from Michael Williams, Commissioner of Education, addresses the requirement of evaluation and placing transfers students within 30 days.