



College Readiness Program Audit

ASSURANCE • INSIGHT • OBJECTIVITY

Final Report

Audit Plan Code: 19-08

The district has a framework in place to support students in middle and high school with instruction in high school readiness, career, and the creation of a personal graduation plan; however, there are not sufficient written procedures to support the consistency, continuity of the process, and documentation requirements.



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Abbreviations

CCRP	College and Career Readiness Planner
CAP	Corrective Action Plan
CTE	Career and Technical Education
CUM	Student Cumulative Education Record
DLA	Distinguished Level of Achievement
EPISD	El Paso Independent School District
HB	House Bill
IA	Internal Audit
ICQ	Internal Control Questionnaire
IIA	Institute of Internal Auditors
PGP	Personal Graduation Plan
STEM	Science, Technology, Engineering and Math
TAC	Texas Administrative Code
TAP	Texas Achievement Plan
TEA	Texas Education Agency
TEAMS	Total Education Administration Management System (Prologic Technology Systems), school management system utilized by the District.
TEC	Texas Education Code
TSDE	Touch System Data Entry (EPISD CTE course)



Executive Summary

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We have completed the College Readiness Program Audit. The Board of Trustees approved the College Readiness Program Audit as part of the 2018-2019 El Paso Independent School District (EPISD) Internal Audit Plan.

The objective of the audit was to determine compliance with House Bills 5 and 18 Instruction in High School, College, and Career Preparation, Personal Graduation Plan (PGP), and related local requirements specific to the creation of a PGP and the selection of an endorsement(s). The scope of the audit included college and career preparation records and documentation for students enrolled during the 2018-2019 school year and graduates of the 2017-2018 school year.

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 and detailed findings, recommendations, observations, and exhibits.

Summary of Results

1. We found 20% (33 of 167) of students tested did not have their PGP/endorsement (or at least the signature page referred to by management as the endorsement) in the student's cumulative education record (CUM). Of the 134 students tested with a PGP/endorsement in their CUM, 5% (7 of 134) did not have a student and/or parent signature.
2. We identified 11% (17 of 150) of non-transfer students tested did not have a PGP/endorsement created before entering the ninth grade. We were unable to determine whether 19% (29 of 150) of non-transfer students tested had PGP/endorsement created before the ninth grade because no form was located in the CUM.
3. We identified 26% (six of 23) of the students tested who opted out of earning an endorsement did not have the TEA form "Foundation High School Program, Endorsement Opt-Out Agreement" in their CUM.
4. We identified 28% (seven of 25) of the students tested that changed their graduation plan did not have a "Foundation High School Program (HB 5) Change in Graduation Plan" form in their CUM. In addition, 32% (eight of 25) of the students that had the form in their CUM did not have the appropriate supporting documentation attached as required by the form.
5. Of the 33 counselors who responded to our survey, 33% (11) stated "It is not possible to meet with all students assigned to me in one year" when asked how many times they meet individually with students to counsel/prepare them for high school, college, and a career during a school year. The TEC 33.007 requires advising students and their parent(s) each year they are enrolled in high school. The TEC does not specify if advising should be on a one on one basis. Documents provided by District management also do not specify whether counselors should meet with students individually. If counselors do not meet with students individually, there is a risk counselors may not identify a student's individual PGP/endorsement needs.
6. Based on the responses to our counselor survey, it appears not all counselors are aware they have to request CCRP be locked, so students cannot make

edits to their PGP/endorsement. If the student's PGP/endorsement in CCRP is not locked, the student can edit the PGP/endorsement without their counselor's knowledge. This creates a risk the student(s) schedule may not be aligned with the changed PGP/endorsement and parent may not be provided written notice of the revised PGP/endorsement.

7. Of the 33 counselors who responded to our survey, 73% stated they do not obtain a parental/guardian signature each time a student changes their PGP/endorsement. There is a risk that confusion may lead to parent/employee complaints regarding the inconsistency in documenting parent notifications.

Management's Corrective Action Plan

District management and leadership submitted a Corrective Action Plan (CAP) outlining the activities to be implemented. All three (3) 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

The District has a framework in place that provides reasonable assurance of compliance with House Bills 5 and 18 Instruction in High School, College, and Career Preparation, Personal Graduation Plan specific to the creation of a PGP and the selection of an endorsement(s). However, we identified inconsistencies in (i) some of the processes followed by counselors and (ii) the supporting documentation maintained. It appears there are not sufficient written procedures to support consistency and continuity of the process and documentation requirements. District management should develop written procedures to define clear objectives, expectations, documentation requirements, and detailed written instructions to perform related tasks.



Internal Audit Report

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Background

In 2013, The Texas Legislature passed Texas House Bill (HB) 5. It established the Foundation High School Graduation Program with five (5) endorsements and a Distinguished Level of Achievement (DLA) to replace the previous Recommended, Minimum, and Distinguished High School Graduation Programs. The goal was to promote high school, college, and career preparation/readiness. The graduation requirements started in the 2014-2015 freshman class. In 2015, HB 18 was passed to support HB 5 and increase advising to students in middle and high school.

House Bill 18 is outlined in the Texas Education Code (TEC) 28.016 Instruction in High School, College, and Career Preparation. This HB requires districts provide instruction to students in seventh and eighth grade to prepare them for high school, college, and career. The instruction must cover the following five (5) topics:

- 1) The creation of a high school personal graduation plan (PGP). At the El Paso Independent School District (EPISD), a school counselor or administrator is required to review the student's PGP options, with each student before entering grade nine together with that student's parent or guardian. Before the conclusion of the school year, the student and the student's parent or guardian must confirm and sign a PGP for the student. A student may amend their PGP after the initial confirmation of the plan; however, the school shall send written notice to the student's parents regarding the change. (TEC 28.0212 Junior High or Middle School Personal Graduation Plan and TEC 28.02121 High School Personal Graduation Plan) The student's PGP is created in EPISD's College and Career Readiness Planner (CCRP), a district-developed application.

According to District management, a Foundation High School Program Change in Graduation Plan" (HB 5) form must be completed when a student changes their graduation plan. Management stated that the HB 5 form must filed in the student's cumulative education record (CUM)

- 2) There are five endorsement areas students can choose from. Students can earn one or more endorsements by completing the curriculum requirements for the endorsement. Students may change endorsement(s) at any time. A student is allowed to graduate under the foundation high school program without earning an endorsement if, after the student's sophomore year:
 - a. a school counselor advises the student and the student's parent (or person standing in parental relation to the student) on the specific benefits of graduating from high school with one or more endorsements; and
 - b. the student's parent (or person standing in parental relation) files with a school counselor written permission, on the TEA form, "Foundation High School Program, Endorsement Opt-Out Agreement" adopted by the agency. (TEC 28.025 High School Diploma and Certificate; Academic Achievement Record)
- 3) The benefits of the Distinguished Level of Achievement (DLA). The DLA will:
 - a. allow a student to compete for Top 10% automatic admissions eligibility at any Texas public university,
 - b. position a student for a TEXAS Grant (if financially qualified) to help pay for university tuition, and

- c. Ensure a student is a competitive applicant for selective college and universities.
- 4) College readiness standards which can be defined as the level of preparation necessary for students to enroll and succeed, without remediation, in entry-level general education course for credit in that same content area for a baccalaureate degree or associate degree program.
- 5) Potential career choices and the education requirements to enter those careers.

Per TEC 28.016 the required instruction can be embedded in an existing Career and Technical Education (CTE), course designated as appropriate for this purpose, or be delivered in a new elective course. According to management, the District incorporates the required instruction into the elective course Touch System Data Entry (TSDE), which eighth-grade students are required to take. Students create their initial PGP, select endorsement(s) and enter into CCRP. The endorsements must be approved by parent or guardian, student, and counselor and placed in the student's CUM.

According to TEC 33.007 Counseling Regarding Postsecondary Education, "(a) Each school counselor at an elementary, middle, or junior high school...shall advise students and their parents or guardians regarding the importance of postsecondary education, coursework designed to prepare students for postsecondary education, and financial aid availability and requirements.

(b) During the first school year, a student is enrolled in a high school...and again during each year of a student's enrollment in high school or at the high school level, a school counselor shall provide information about postsecondary education to the student and the student's parent or guardian."

Objective and Scope

The objective of the audit was to determine compliance with House Bills 5 and 18 Instruction in High School, College, and Career Preparation, Personal Graduation Plan, and related local requirements specific to the creation of a PGP and the selection of an endorsement(s). The scope of the audit included college and career preparation records and documentation for students enrolled during the 2018-2019 school year and graduates of the 2017-2018 school year.

Methodology

To achieve our audit objectives, we:

1. Researched relevant federal/state laws and regulations, Board policies, and departments' manual/guidelines.
2. Used pre-audit self-assessment, internal control questionnaires, interviews (in person and via telephone), and performed walkthroughs to obtain an understanding of the relevant District procedures, administrative functions, operations, processes, and internal controls in place.
3. Performed a risk assessment based on our understanding of the District's processes and internal controls in place.

4. Performed data analysis using the TEAMS 2018-2019 enrollment/demographics to identify 168 students for sample testing based on our sampling procedures.
5. Reviewed students' CUM folders and College and Career Readiness Planner (CCRP) and tested the following:
 - a. Evidence of a personal graduation plan/endorsement letter with signatures of a parent, a counselor, and the student.
 - b. Evidence of distinguished level of achievement
 - c. Evidence that students took the course Touch System Data Entry course (TSDE).
 - d. Determine if counselors meet with individual students to counsel them in high school, college, and career readiness. In addition, determine if the counseling sessions are documented in CCRP.
6. Created and sent a survey to 93 counselors from the high schools in our sample and feeder middle schools to gather information about the post-secondary education advising and District processes/procedures. Reviewed the response from the 33 counselors who responded to the survey.

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. 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 want to acknowledge and thank Guidance and Counseling, CTE, campus principals, and respective staff for their cooperation and assistance during the audit.

Results

The District has a framework in place to support students in middle and high school with instruction in high school readiness, career, and the creation of a personal graduation plan. However, there are not sufficient written procedures to support consistency and continuity of the process and documentation requirements.

Finding 1

We found 20% (33 of 167) of students tested did not have their PGP/endorsement (or at least the signature page referred to by management as the endorsement) in their cumulative education record (CUM). Of the 134 students with a PGP/endorsement in their CUM, 5% (7 of 134) did not have a student and/or parent signature.

The TEC 28.02121 requires the original PGP/endorsement be signed by the student and student's parent/guardian. According to management, the signed PGP/endorsement is filed in the student's cumulative education record (CUM). However, the requirement the PGP/endorsement be signed and filed in the CUM is not outlined in District procedures to support consistency and continuity of the process and documentation requirements.

Finding 2

We identified 11% (17 of 150) of non-transfer students tested did not have a PGP/endorsement created before entering the ninth grade. All 17 of these students subsequently created a PGP/endorsement in a future grade level, as shown in the table below:

Grade Level	Total
9	15
10	1
12	1

We were unable to determine whether 19% (29 of 150) of non-transfer students tested had a PGP/endorsement created before ninth grade because no form was located in the CUM.

District management stated, that prior to 9th grade all students are enrolled in Touch System Data Entry (TSDE), create a Personal Graduation Plan (PGP), and select endorsement(s) in CCRP. The district has a framework in place to provide students in middle school with instruction in high school readiness, career, and the creation of a personal graduation plan. However, there are not sufficient written procedures to support the consistency of the process and documentation requirements.

Finding 3

We identified 26% (six of 23) of the students tested who opted out of earning an endorsement did not have the TEA form “Foundation High School Program, Endorsement Opt-Out Agreement” in their CUM. We were able to confirm the students that opted out of earning an endorsement were in 11th or 12th grade.

After their sophomore year, a student may choose to graduate under the foundation high school program without earning an endorsement. However, a parent must file with a school counselor written permission on the TEA form, “Foundation High School Program, Endorsement Opt-Out Agreement.” District management stated the aforementioned form is filed in the student’s CUM. However, the requirement the form be filed in the CUM is not outlined in the District’s written procedures to support consistency of the process and documentation requirements.

Finding 4

We identified 28% (seven of 25) of the students tested that changed their graduation plan did not have a “Foundation High School Program (HB 5) Change in Graduation Plan” form in their CUM. In addition, 32% (eight of 25) of the students that had the form in their CUM did not have the appropriate documentation (current grades, copy of audit card, Foundation HS Program Opt-Out Agreement, current attendance, EOC scores, current transcript) attached as required by the form.

According to management, students may change their graduation plan. The District has a framework in place for students in EPISD to begin with the District’s default graduation plan, which includes the DLA and an endorsement. District management stated that a “Foundation High School Program (HB 5) Change in Graduation Plan” form must be completed and filed in the student’s CUM when a student changes their graduation plan. This indicates the student will not pursue the District’s default graduation plan and pursue another graduation plan endorsed by HB 5. If a student amends their graduation plan, the District must send written notice to the parent regarding the change (TEC 28.02121).

Although the District has a framework, we found there are not sufficient written procedures to support the consistency and continuity of the process and documentation requirements.

Finding 5

Of the 33 counselors who responded to our survey 33% (11) stated, “It is not possible to meet with all students assigned to me in one year” when asked how many times they meet individually with students to counsel/prepare them for high school, college, and a career during a school year. The TEC 33.007 requires advising to students and their parent(s) each year they are enrolled in high school. The TEC does not specify if advising should be on a one on one basis. Documents provided by District management also do not specify whether counselors should meet with students individually. If counselors do not meet with students on a one on one basis, there is a risk counselors may not identify a student’s individual PGP/endorsement needs.

In addition, for the other 67% of counselors who indicated they do meet individually with students, we did not see that each student in our sample had counselor notes in CCRP recording individual counseling sessions with students regarding their PGP/endorsement. We did observe the notes in CCRP by counselors were mass notes referencing meetings with a group of students. Management provided a copy of a counselor training PowerPoint on how to enter counselor sessions in CCRP. However, the presentation did not cover expectations for documenting individual counseling sessions with students to discuss their PGP/endorsement in CCRP.

Finding 6

Based on the responses to our counselors’ survey, it appears not all counselors are aware they have to request CCRP be locked to prevent students from making edits to their PGP/endorsement. Responses to the survey were that 58% of counselors thought that students could not change their endorsement in CCRP without the counselor’s knowledge, and 42% responded that students could not make changes.

If the student’s PGP/endorsement in CCRP is not locked, the student can edit the PGP/endorsement without their counselor’s knowledge. This creates a risk the student(s) schedule may not be aligned with the changed PGP/endorsement, and parents may not be provided written notice of the revised PGP/endorsement. We did not find instructions for locking of PGP/endorsement in CCRP by counselors outlined in a written procedure.

Finding 7

Of the 33 counselors who responded to our survey, 73% stated they do not obtain a parental/guardian signature each time a student changes their endorsement. Counselor comments for not obtaining signatures included; making notifications on the telephone, signatures not needed because most students do not change endorsements, students do not bring signed paperwork back, and it is not necessary for adult students. There is a risk that confusion may lead to parent/employee complaints regarding the inconsistency in documenting parent notifications. We did not find instructions for parental/guardian signature requirements when a student changes their endorsement outlined in a written procedure to ensure consistency in documentation requirements.

Recommendations and Management Response

A Corrective Action Plan (CAP) outlining the activities to be implemented and signed by District management, and leadership was submitted to Internal Audit. All three (3) recommendations made by Internal Audit were incorporated into the CAP. The CAP appears to be sufficient to address the findings outlined in this report.

1

We recommend Counseling and Advising and CTE, develop written procedures for instruction in High School, College, and Career Preparation. The procedures should be used for training and distributed to stakeholders. The procedures should be maintained and updated as needed by the appropriate data owner(s). The written procedures should define documentation requirements for the following:

1. PGP/Endorsement Documentation,
2. Appropriate signatures,
3. Foundation High School Program, Endorsement Opt-Out Agreement,
4. Foundation High School Program (HB 5) Change in Graduation Plan, and the required documentation, and
5. Quantity and quality of counseling sessions with students regarding High School, College and Career, including documentation requirements.

The written procedures at a minimum should include the following:

- a. Identify who is responsible, accountable, consulted, and/or informed,
- b. Clear objective(s), requirements, and detailed instructions on how to perform the task,
- c. Clearly define when the task needs to take place,
- d. Define references to relevant forms, documents, and reference material,
- e. May include graphic diagrams or process flow charts if needed, and define records retention and document update requirements.

Management and Leadership Response: Agreed with our recommendation and incorporated into the CAP as activities one (1), two (2), three (3), four (4), five (5), eight (8), nine (9), and ten (10) as follows:

Activity 1: “Revise flowchart with outlined steps for the requirement of the Endorsement Letter on the electronic platform to be: a) signed initial PGP/endorsement letter at the end of 8th Grade; b) signed endorsement letter each time there is a CHANGE in Endorsement; c) and signed endorsements letters to filed in the CUM Folder.”

Person(s) Responsible: Director Counseling and Advising; School Leadership Facilitators; High School Guidance and Instruction Assistant Principals; Executive Director – Student and Parent Services

Implementation Date: June 1, 2020

Activity 2: “Revise Performance Acknowledgement Form to include outlined steps for documentation in the CUM.”

Person(s) Responsible: College Readiness Facilitator and Executive Director of Curriculum & Instruction

Implementation Date: June 1, 2020

Activity 3: “CTE will develop step by step procedural guidelines for the creation of a personal graduation plan and endorsement selection in the Touch Systems Data Entry (TSDE) Course.”

Person(s) Responsible: Director CTE; CTE Facilitator; and Executive Director Curriculum & Instruction

Implementation Date: June 1, 2020

Activity 4: “Revise the Change in Graduation Plan Form to include: a) Counselor Assurance that TEA mandated form “Foundation High School Program, Endorsement Opt-Out Agreement” has been provided to Parent; b) appropriate documentation required is attached and c) signed documentation is filed in CUM.”

Person(s) Responsible: Director Counseling and Advising; Executive Director of Student and Parent Services; School Leadership Facilitator; and High School Guidance and Instruction Assistant Principals

Implementation Date: June 1, 2020

Activity 5: “Revise written CCRP procedures for entering counseling notes: Mass and/or Individual.”

Person(s) Responsible: Director Counseling and Advising; School Leadership Facilitators; High School Guidance and Instruction Assistant Principals; and Lead Counselors

Implementation Date: June 1, 2020

Activity 8: “Revise the Middle and High School Student Course Audit Protocol Form and Campus Counseling Program Objectives (CCPO) to reflect: a) review of Endorsements in 8th, 9th and 11th grade and b) CCRP procedures for entering counseling notes: Mass and/or Individual for CCMR a minimum of twice a year: Fall and Spring.”

Person(s) Responsible: Director Counseling and Advising; School Leadership Facilitators; High School Guidance and Instruction Assistant Principals; and Lead Counselors

Implementation Date: June 1, 2020

Activity 9: “Develop a Written Request to lock CCRP, so students cannot make edits to their PGP/endorsement to be approved by campus administration after registration is complete.”

Person(s) Responsible: Director Counseling and Advising; School Leadership Facilitators; High School Guidance and Instruction Assistant Principals; and Lead Counselors

Implementation Date: June 1, 2020

Activity 10: “Revise Counselor Job Descriptions to include requirements for coding CCRP entries and CA Director evaluation component.”

Person(s) Responsible: Director Counseling and Advising; Lead Counselors; and Campus Administrator

Implementation Date: June 1, 2020

2

We recommend management conduct an evaluation to determine if counselors are provided sufficient time to meet and counsel individual students yearly regarding High School, College, and Career Preparation as required by TEC 33.007.

Management and Leadership Response: Agreed with our recommendation and incorporated into the CAP as activities six (6), seven (7), and ten (10).

Activity 6: “Upon approval by Analytics, Strategy, Assessment, and PEIMS (ASAP), Campus Counselors and campus administrators will participate in External Focus Groups and/or Research studies to determine level of implementation of HB 5 and perceptions of counselor roles in schools as determined by researchers...The objectives of the study are as follows:

1. Gain an understanding of Title I principals' perceptions, attitudes, and understanding of the school counseling profession.
2. Increase understanding of how school counselors are utilized in Title 1 schools and how those decisions are made.
3. Gain an understanding of the school counselor roles that principals' value. Note: Research findings will be shared with counselors and campus/District administration.”

Person(s) Responsible: Director Counseling and Advising; Lead Counselors; and Analytics, Strategy, Assessment and PEIMS (ASAP) Department

Implementation Date: June 1, 2020.

Activity 7: “Campus School Counselors will participate in two Counseling and Advising Student Service Surveys based on the American School Counselor Association standards; the two surveys will take place in Fall 2019 and Spring 2020. Surveys will focus on counselors time/effort on addressing student needs as noted in the ASCA National Model Components: Guidance, Responsive, Individual, System Supports.”

Person(s) Responsible: Director Counseling and Advising; School Leadership Facilitators; High School Guidance and Instruction Assistant Principals; and Lead Counselors

Implementation Date: June 1, 2020

Refer recommendation one (1) for details on CAP activity ten (10).

3

Guidance and Advising should ensure that written procedures and training include the documentation in CCRP of individual counseling sessions with students regarding post-secondary and career readiness. This should include documenting all counseling sessions and/or changes to a student's PGP/endorsement, which include change of endorsement.

Management and Leadership Response: Agreed with our recommendation and incorporated into the CAP as activities one (1), two (2), four (4), five (5), eight (8), nine (9) and ten (10) as outlined under recommendation one (1).



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