



Attendance Audit of Elementary Schools

ASSURANCE • INSIGHT • OBJECTIVITY

Audit Plan Code: 18-16

We identified instances of non-compliance with state and local attendance requirements regarding teachers taking attendance properly and clerks maintaining documentation to support the electronic attendance coding, exposing the District to the risk of a loss of state funding.



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Abbreviations

Attd.	Attendance
Acct.	Accounting
ADA	Average Daily Attendance
APM	Attendance Procedures Manual
BOY	Beginning of the year
CAP	Corrective Action Plan
EPISD	El Paso Independent School District
E.S.	Elementary School
FSP	Foundations School Program
IA	Internal Audit
IIA	Institute of Internal Auditors
NA	Not Applicable
PEIMS	Public Education Information Management System
PK	Prekindergarten
SAAH	Student Attendance Accounting Handbook
SPS	Student and Parent Services
SOP	Standard Operating Procedures
TAC	Texas Administrative Code
TEA	Texas Education Agency
TEAMS	Texas Education Administrative Management Solutions (Student Systems)
TEC	Texas Education Code
TSDS	Texas Student Data System (TSDS)



Executive Summary

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We have completed our audit of elementary schools' student attendance for the period of August 22, 2016 through December 23, 2016. The objective of the audit was to provide reasonable assurance to the Board and administration regarding the adequacy and effectiveness of the design and operation of the internal controls related to elementary student attendance data and records.

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

Summary of Results

The primary purpose for the Texas Education Agency's (TEA) collection of student attendance data is to ensure that Foundation School Program (FSP) funds can be allocated to Texas's public schools. All public schools in Texas must maintain records to reflect the average daily attendance (ADA) for the allocation of these and other funds by the TEA.

The following findings expose the District to the risk of the loss of FSP funds due to non-compliance with regulations in the:

- i. Texas Education Agency's *Student Attendance Accounting Handbook* (TEA's SAAH), and/or
 - ii. District's *Attendance Procedures Manual* (APM). The District's attendance manual, maintained by the Student and Parent Services Department (SPS), is a requirement in TEA's SAAH.
1. We found 79% (21,528 of 27,369) of elementary school students' absences were not recorded by teachers during the District's official accounting snapshot time for attendance. According to Board Policy FEB (Local): *Attendance Accounting* and the District's APM (p. 9), attendance for elementary schools **shall be recorded at 10:00 a.m. for morning prekindergarten (PK) through fifth grade and 12:30 p.m. for afternoon PK.**
 2. We found six (6) of nine (9) campus' staff reported homeroom teacher(s) took attendance instead of the Physical Education (P.E.) teachers the students were assigned to during the attendance accounting snapshot time. The District's APM (p.11) states, **"The elementary teacher who has the student at 10:00 a.m. must take the attendance each day of instruction."**

We found an additional example when the teacher of record may not be taking attendance. Eight percent (8%) (345 of 4,380) of attendance entries ("Take Attendance") appeared to be entered by the PEIMS/Attendance clerk prior to the teacher and prior to the official attendance snapshot time, using information received through their campus Tardy Log, Absence Call Log/call from parents, or Sign-in/out Logs. (*Fieldtrip attendance entries were excluded.*)

3. We found 33% (101 of 310) students' absence codes were either:
 - 1) Not supported by documentation or 2) Documentation was misfiled. According to the TEA's SAAH (p.23), "...If attendance is undocumented at the days of attendance level, any special program attendance based on those days of attendance also will be considered undocumented."

4. We found 14% (43 of 309) absence codes for students were updated more than 10 school days after the PEIMS/Attendance clerk received additional absence documents such as doctor/parent notes. According to the District's APM (p. 5), "*...All posting must occur after the teacher takes attendance and **within ten days of receiving the absence documentation.***"

We could not determine whether an additional 20% (63 of 309) of the absence codes were timely updated, as the documents **were not date stamped as required**. Student and Parent Services uses the date stamp as an audit tool to monitor compliance with the 10-day deadline.

5. We found 51% (145 of 282) Daily Attendance Files (not student or absence code specific) had at least one error. Errors involved finding misfiled documents such as doctors'/parents' notes, missing daily attendance reports and student sign-in/out sheets. The missing and misfiled documents typically contain information supporting attendance. The TEA's SAAH (p. 23) states, "*If attendance is undocumented at the days of attendance level, any special program attendance based on those days of attendance also will be considered undocumented.*"

Management's Corrective Action Plan

District management and leadership submitted a Corrective Action Plan (CAP) outlining the activities to be implemented. Eight (8) of eight (8) recommendations suggested by Internal Audit, and the sub-recommendations contained therein, were incorporated into the CAP. The CAP appears to be sufficient to address the findings outlined in this report. Internal Audit will conduct follow-up reviews to validate CAP activities have been implemented.

Conclusion

We found the design of the internal controls for student attendance records should be sufficient to ensure compliance with state requirements. However, we are unable to provide reasonable assurance to the Board and administration regarding the adequacy and effectiveness of the operation of the internal controls at elementary schools (E.S.). We identified instances of non-compliance with state and local attendance requirements that expose the District to a loss of funds.

Active oversight and monitoring at the District and campus level needs to occur to ensure:

- 1) Teachers take attendance **at** the official attendance accounting snapshot time,
- 2) PEIMS/Attendance clerks maintain documentation in the (correct) Daily Attendance File to support an absence code entered/updated in TEAMS, and
- 3) PEIMS/Attendance clerks confirm Daily Attendance Files have the required attendance reports, student sign-in sheets, and that all notes, corrections, and signatures/dates on attendance documents are in ink as required by the state.
- 4) We also recommend central office School Leadership administration discuss implementing similar internal controls District-wide, although the scope of this audit was limited to elementary schools, as middle and high schools may be experiencing similar non-compliance issues.

We recognize central office School Leadership administrators are not responsible for the day-to-day operations of schools and rely on principals for this purpose. However, because the tone at the top can have a trickle-down effect on principals and other employees of the District, School Leadership administrators should emphasize the importance of meeting state and District requirements through both its words and actions. As such, central office School Leadership administrators should assist, reinforce, and support SPS' efforts regarding adherence to both the state's *Student Attendance Accounting Handbook* (SAAH) and the District's local attendance procedures outlined in the *Attendance Procedures Manual* (APM).



Internal Audit Report

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Background

The Board of Trustees approved the attendance audit of selected elementary schools as part of the 2017-2018 Internal Audit Plan. The District reports attendance to the Texas Education Agency (TEA) through the Texas Student Data System, Public Education Information Management System (TSDA PEIMS).

The TEA's Student Attendance Accounting Handbook (SAAH) states, *"The primary purpose for the TEA's collection of student attendance data is to ensure that Foundation School Program (FSP) funds can be allocated to Texas's public schools. All public schools in Texas must maintain records to reflect the average daily attendance (ADA) for the allocation of these and other funds by the TEA."* (TEA's SAAH 1.1 Student Attendance and FSP Funding p.18 and Texas Administrative Code (TAC) §129.21(a))

For our District to claim a student for funding purposes, and receive the maximum amount of funding for all its students:

- (i) *"The District must have **complete** documentation that proves the eligibility of the student for the FSP **and must first be on file.**"*
- (ii) *"**District and campus personnel** must be aware of their individual responsibilities **and work together** to assemble required documentation as early as possible: administrators, special program staffs, teachers, and attendance personnel."* (TEA's SAAH Overview, 1.1 Student Attendance and FSP Funding)

Elementary school (E.S.) PEIMS/Attendance clerks have three critical job roles essential to the District's TSDA PEIMS data reporting and subsequent District funding: a) attendance clerk, b) PEIMS clerk, and c) registrar.

PEIMS data is used throughout state Accountability systems to monitor and evaluate districts. **All data must be accurate** as many financial, accountability, and other decisions are made based on data reported to the state. It should be noted middle and high schools have separate personnel for each elementary PEIMS/Attendance clerk job role listed above.

Objective and Scope

The objective of the audit was to provide reasonable assurance to the Board and administration regarding the adequacy and effectiveness of the design and operation of the internal controls related to student attendance records at elementary schools. The audit scope included student attendance records for the period of August 22, 2016, through December 23, 2016 (fall 2016).

Methodology

To achieve our audit objectives, we:

- Researched relevant attendance federal/state laws and regulations, Board policies, and department manuals procedures and processes as applicable to fall 2016 attendance processes and procedures.
- Used pre-audit self-assessment and internal control questionnaires, and performed walkthroughs with the process-data owner to obtain an understanding of the attendance administrative functions, operations, processes, and controls in place.

- Performed a risk assessment based on our understanding of the attendance process, elementary school procedures, and the controls in place for fall 2016.
- Obtained from Technology Services, audit logs of TEAMS - Student Systems attendance entries for 12 E.S. campuses for the scope of the audit.
- Analyzed the audit logs and selected a representative sample based on our sampling procedures for each of the tests performed.
- We tested a sample of 310 absence/tardy codes assigned to students, which represented 282 Daily Attendance Files tested for supporting documentation.

We performed two different tests on the Daily Attendance Files:

- Absence Code specific tests related to the specific supporting documentation for 310 absence codes assigned to students.
- Other documents required in each Daily Attendance File (282) by TEA and/or local criteria, such as two different daily attendance reports and student sign-in/out sheets.
- In addition, we tested that all documents found in the file, actually belonged in that day's file (not misfiled), and
- All document/report updates, notes, signatures/dates were in ink as required by TEA's SAAH (p.53).
- We also reviewed 100% of the 12 E.S. campus' TEAMS attendance audit logs to determine:
 - The actual time teachers took attendance,
 - Entries made by PEIMS/Attendance clerks prior to the teacher taking attendance, and
 - The number of days between initial attendance code entries and PEIMS/Attendance clerks' updates/deletes.

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.

Results

We identified instances of non-compliance with state and local attendance requirements for fall of 2016, as noted within each finding below. This could result in a loss of average daily attendance (ADA) and the Foundations School Program (FSP) funding for the District.

Finding 1

We found E.S. teachers did not record 78.66% (21,528 of 27,369) of students' absences during the District's official attendance snapshot time. We used a six-minute allowance to allow time for the teacher to roll call students and perform attendance data entry: 9:59 -10:05 a.m. for morning prekindergarten (PK) through fifth grade, and 12:29 -12:35 p.m. for afternoon PK.

The TEA's SAAH section 3.6 (p. 52) requires a District to determine attendance for all grades, "...by the absences recorded at the **one particular point** in time the campus has chosen for roll to be taken (a snapshot, for example, 9:45 a.m.) during the **second** or **fifth** instructional hour of the day or its equivalent."

According to Board Policy FEB (Local): *Attendance Accounting* and the District's Attendance Procedures Manual (APM, p. 9), attendance for elementary schools **shall be recorded at 10:00 a.m. for morning PK through fifth grade and 12:30 p.m. for afternoon PK**. However, the District allows teachers TEAMS access to posting attendance throughout the school day and before and after official school hours.

- 1.1 We found E.S. teachers recorded 76.98% (21,069) of students' absences during the school day, but either **before** 9:59 a.m. or **after** 10:05 a.m.; and for afternoon PK, **before** 12:29 p.m. or **after** 12:35 p.m.
- 1.2 We also found E.S. teachers recorded 2.13% (459) of absences either **before** the official school start time or **after** school officially ended.

It appears there is a lack of oversight and/or monitoring of what time teachers actually take attendance by campus and District administration. This may be due in part to insufficient tools or reports to monitor the actual time teachers take attendance.

The lack of training should also be regarded as a possible cause, as we found only 34 principals and eight (8) assistant principals District-wide (elementary and secondary campuses) took the (mandatory) online attendance training provided by Student and Parent Services (SPS) at the beginning of the 2016-2017 school year. If administrators do not know the attendance "rules", then they will not be able to effectively follow, enforce, or monitor them.

Finding 2

- 2.1 We found six (6) of nine (9) campus' staff reported homeroom teacher(s) took attendance instead of the Physical Education (P.E.) teachers the students were assigned to during the official attendance accounting snapshot time. This fails to conform with local attendance regulations. The District's APM section *General Information for Teachers* (p.11) states, **"The elementary teacher who has the student at 10:00 a.m. must take the attendance each day of instruction."** There is a risk TEA could disallow the attendance, as the teacher who had the student at 10:00 a.m. did not take the attendance as required by state and local regulations, which could result in a loss of attendance funds for the District.
- 2.2 We found an additional example when the teacher of record may not be taking attendance. Eight percent (8%) (345 of 4,380) of attendance entries ("Take Attendance") appeared to be entered by the PEIMS/Attendance clerk prior to the teacher and prior to the official attendance snapshot time, using information received through their campus Tardy Log, Absence Call Log/call from parents, or Sign-in/out Logs. *(Fieldtrip attendance entries were excluded.)*

Finding 3

We found 33% (101 of 310) students' absence codes were either: 1) not supported by documentation or 2) documentation was misfiled.

According to the TEA's SAAH section 2.1, *General Audit Requirements* (p.23), *"Attendance will be considered undocumented if documentation of the attendance either is missing or is so inadequate that a reasonable person could not conclude from the documentation that the attendance it is intended to support actually occurred. If attendance is undocumented at the days of attendance level, any special program attendance based on those days of attendance also will be considered undocumented."*

Leading causes for this finding include:

- a. In seventeen (17) instances, the District approved correction forms were not found/used when a student's absence code was corrected or deleted.
- b. The Absence Call Logs, Tardy Logs, and Sign-in/out Sheets often had no "Reason" documented under that column or only contained an absence or tardy code. If left blank by office staff, the clerk, or the parent(s), you would expect the code to default to unexcused. **However, we found absences and tardies "excused" without a surmisable "Reason".**
- c. It appears the PEIMS/Attendance clerks are determining the absence reason **and** code rather than the sheets/logs' "Reason" determining the absence code and whether excused or not. This could lead to misuse such as excusing absences/tardies for friends and/or family members' students, and not excusing absences/tardies for others.

PEIMS/Attendance clerks are responsible for attendance data-entry and should not be making absence code determinations without clearly written directions, including excused or unexcused absences/tardies. **Unexcused absences affect compulsory attendance.** According to Board Policy FEA (Legal): *Compulsory Attendance*, "Students in violation of the compulsory attendance law shall be reported to the District truancy and prevention officer, who shall institute court action as provided by law."

- PEIMS/Attendance clerks stated sometimes the parents met with or called the principal, and they (clerks) were asked verbally to change the absence/tardy to excused by the principal. As such, written documentation did not exist.
- When queried if a written list or guidance was provided to the PEIMS/Attendance clerk by the principal or another campus administrator, delineating when to excuse/unexcuse an absence or tardy, the short answer was no. Most explained they use the EPISD Attendance Absence Coding chart; however, the coding chart **does not include** concrete examples of acceptable or unacceptable reasons for excused/unexcused absences or tardies.
- According to TEA's SAAH, section 3.6.4, *Excused Absences for Compulsory Attendance Purposes* (59), "A teacher, principal, or superintendent of the school in which a student is enrolled may excuse the temporary absence of the student for any reason acceptable to the teacher, principal, or superintendent. However, the student will not be counted as present for FSP (funding) purposes for the day(s) of the absence unless the absence is for one of the reasons specified in 3.6.3 Requirements for a Student to be Considered Present for FSP (Funding) Purposes."
- d. In addition, it appears only Student and Parent Services (SPS) is reviewing the electronic attendance data or Daily Attendance Files throughout the year, and SPS does so on a limited basis, due to a lack of personnel to be able to review 94 campus' attendance data/files.

Finding 4

We found PEIMS/Attendance clerks updated 14% (43 of 309) of student absence codes more than 10 days after receiving absence documents or information from a parent or teacher. According to the District's APM *Daily Attendance Procedures* (p. 5), "Posting corrections and absence in the student system, **All posting must occur after the teacher takes attendance and within ten days of receiving the absence documentation.**"

The District has 20 days to make attendance documents available to the TEA in the event of an audit. If changes to the attendance records are not performed in a timely manner or documented sufficiently, **"Incomplete or inaccurate data will result in attendance not being allowed."** This could result in a loss of attendance funds for the District. (TEA's SAAH section 2: *Audit Requirements* and section 2.1 *General Audit Requirements* p.23)

We could not determine whether an additional 20% (63 of 309) of absence codes were updated on a timely basis, since the documents supporting the absence codes were not **date stamped** as required. Student and Parent Service's uses the date stamp as an audit tool for compliance monitoring of the 10-day deadline. The date stamp requirement **is** included in the District's APM, **"Please Note: All attendance documentation received must be date stamped."** (APM, *Daily Attendance Procedures*, p. 5 and 6).

Finding 5

We reviewed all other documents within each Daily Attendance File audited and found 51% (144 of 282) of Daily Attendance Files reviewed had at least one error.

The TEA's SAAH and District's APM requires the Daily Attendance File to have specific documents in the file; e.g., two daily attendance reports and student sign-in/out sheets. We also checked to determine if all documents were in the correct file (not misfiled), and checked that all attendance documentation, corrections, notes, signatures/dates were in ink as required by TEA's SAAH 3.6.1 (p.52).

Note: When students from the same campus shared the same absence date, they also shared the same Daily Attendance File. As such, the file was counted only once for the general documentation audit tests, so errors were not counted twice for the same file.

Details for the above finding are as follows:

- 5.1 We found 14% (40 of 282) of absence documents were **not** in the correct daily attendance file (misfiled Dr.'s notes, parent letters, tardy and absence call logs, and sign-in/out sheets as well as substitute attendance rosters).

Misfiled absence documentation could cause the District to lose attendance funding as it may result in incorrect absence coding and/or supporting documentation to be missing from the correct Daily Attendance File.

- 5.2 We found 23% (66 of 282) of Daily Attendance Files did not have the report **"Attendance Not Taken"** (run daily) as required in the District's APM. This report list the teachers who have **not** taken attendance for the day. The campus uses the report to identify teachers out of compliance with taking attendance daily as required by the state. **Without the daily report, it would be unknown to the clerk and principal if all teachers took attendance on the days the reports were not run.**

- 5.3 We found 21% (58 of 282) Daily Attendance Files did not have the required "Daily Attendance" summary report (run the next school day) as required by TEA's SAAH and the District's APM. The requirement is in the section outlining the documents the District must provide in the event of an audit (within 20 working days). (Section 2: *Audit Requirements*; Subsection 2.3.5 *Additional Required Documentation* p.31 and APM, *Daily Attendance Procedures*, p.5).

The report serves as back up and **supporting documentation** for changes made to the electronic attendance data entered in TEAMS by District/campus staff. The Daily Attendance File must contain the documentation related to

the attendance changes made in TEAMS and noted on the Daily Attendance report. The District risks losing ADA/FSP funds if the reports and file documentation do not match the attendance data in TEAMS or if the reports are missing.

- 5.4 We found 18% (52 of 282) of Daily Attendance Files did not have daily student sign-in/out sheet(s) as required. The sign-in/out sheets serve as documentation for tardies (excused/unexcused) and "initial" absence codes. Students may earn ADA when tardy if they were present during the attendance accounting time/period (3T/4T), or if they left the premises after the attendance accounting period/time (6T/7T).

The sign-in/out sheets also serve as evidence for the MD absence code (documented medical appointment – temporarily absent), to document the student began or ended the day on campus before or after a medical appointment, which allows a student to earn ADA regardless if they were present during the attendance accounting period.

- 5.5 We found 17 % (49 of 282) of attendance documentation updates, notes, or signatures were not in ink as required by TEA's SAAH section 3.6.1 (p. 52) which states, "***District staff members must always use ink to make manual entries or corrections in the attendance records, on daily absence slips, on 6-week absence reports, and on daily summary sheets. Staff members must never record manual entries in pencil....***"

- On the substitute teachers' "Class Roster for Absent Teachers" (ATT400), pencil was used to take attendance, write attendance notes, and to sign/date the roster. Besides documenting absences, this roster is also used to **support the present attendance of students** when there is a substitute, which in turn generates ADA for the District. Tardies/partial day absences are also sometimes notated on the substitute rosters, which may allow a student to earn ADA, as it serves as back-up documentation when other documentation does not exist.
- The District's APM affirms the substitute must use ink stating, "*The substitute must indicate if the student is absent, sign and date the class roster. If attendance is electronically taken, the teacher absence worksheet must be signed and left with the attendance clerk. **Pencil may not be used under any circumstances.***" (General Attendance Procedures, p.9)
- We also found campus staff used pencil on student sign-in/out sheets, tardy logs/slips, nurses/teachers' slips/passes (e.g., student sent home at 10:30 a.m.), miscellaneous absence notes, attendance correction forms, and changes to the attendance summary reports. These documents are all used as support for a student's absence reason and subsequent attendance coding in TEAMS.

Recommendations and Management Response

We made eight (8) recommendations, with several sub-recommendations, to the School Leadership Elementary Division and Student and Parent Services Department regarding the District's attendance processes and procedures. Administration agreed to implement our recommendations.

1

- 1.1 Partner with Student and Parent Services (SPS) and record a message to include in the annual attendance training for both principals and campus staff.
 - 1.1.1 Remind principals and school staff how it is extremely important attendance is taken as accurately as possible. **Failure to take attendance correctly may cause the District to lose critical ADA/FSP funding.**
 - 1.1.2 Emphasize to principals, that as the campus administrator, the principal is accountable for the work their campus personnel perform, particularly attendance data entry submitted through TEA's TSDS PEIMS. However, it should also be emphasized attendance documentation maintained in each Daily Attendance File is just as important, as it **supports** the attendance data entry submitted through TEA's TSDS PEIMS, and is what will be requested by TEA if there is an audit.
 - 1.1.3 Remind principals and school staff the procedures outlined in the District's APM are a **requirement** by TEA and outlined in detail within the Student Attendance Accounting Handbook, and as such, **attendance procedures in the District's manual are not suggestions, must be adhered to, and not changed at the campus level for convenience or any other individual campus purpose.**
- 1.2 Proper attendance reporting is part of campus and classroom management, and going forward, **the School Leadership administration** should consider including campus attendance management in a principal's annual evaluation (teachers not taking attendance during the official attendance snapshot time, PEIMS/Attendance clerk's missing Daily Attendance Files, missing or inadequate attendance documentation, miscoding students' absences, and missing attendance reports, etc.).
- 1.3 Ensure principals are held accountable for **non-compliance** with the annual online attendance training (which is already mandatory), by including attendance at mandatory trainings (online or in person) as part of the principal's annual evaluation.
- 1.4 Work with the SPS director to ensure the required attendance training for principals is included in the APM manual as well as the accountability component for **non-compliance**, and add that attendance/non-attendance at mandatory trainings will be part of the principal's annual evaluation.
- 1.5 Develop a system to ensure principals comply with the requirement to provide campus and District attendance procedures training to their campus staff as outlined in the District's APM, *"Each campus must conduct staff development on campus and District (attendance) procedures on a yearly basis."* (General Information for Teachers, p 11)
- 1.6 Ensure principals emphasize to campus staff the TEA requirement of taking attendance **at the official attendance accounting snapshot time**, including discussing possible consequences for teachers, the campus, and the District. This includes P.E. teacher(s), for whom the Homeroom teacher is entering attendance after dropping off the students, and to PEIMS/Attendance clerks who enter attendance before the teacher when they receive information from parents prior to the official attendance snapshot time.
- 1.7 Work with Human Resources to ensure **elementary** substitute teachers are trained/informed attendance is only to be taken at the official attendance snapshot time, 10:00 a.m. for PK through fifth grade, and at 12:30 p.m. for afternoon PK classes.
- 1.8 Work with the SPS director to determine if a "note" can be added to the E.S. "Class Roster for Absent Teachers" (ATT400) in TEAMS, which states/explains the time(s) for the official attendance snapshot time. If a note can be added, it should include the requirement the substitute teacher **must use ink** when taking attendance, writing notes on the class roster, and when signing their signature and date.

Management and Leadership Response: Management agrees with the recommendations and incorporated into the CAP as Activities 2, 3, 4, 8, 9, 10, 16, 17, 20, and 21. Management added CAP Activity 18 to develop a report for principals to use to forward any non-compliance issues with attendance taking by teachers to their Assistant Superintendent.

Person(s) Responsible: Asst. Supt. E.S. Division; Director, Student and Parent Services

Activities' Due Dates: 08/30/2018 (1.1); 6/30/2019 (1.2 - 1.3); 8/30/18 - 10/31/2018 (1.4 – 1.8)

2

Consider requesting the time elementary school (ES) teachers are allowed electronic access to take attendance be locked down in TEAMS. Attendance reporting should not occur when students are not in the presence of the teacher, especially after school hours when the teacher is at home.

Management and Leadership Response: Management agrees with our recommendation and incorporated into the CAP as Activity 1.

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

Activity Due Date: 07/30/2018

3

Currently, SPS conducts random campus audits of attendance records each six-weeks. A summary of findings memo is sent to principals for campuses found deficient and the assistant superintendent overseeing the principal is copied in. **As such**, we recommend the **assistant superintendent** should take the memo into consideration during the principal's annual evaluations, as ensuring proper attendance procedures are followed by teachers and PEIMS/Attendance clerks, is part of a principal's campus management duties.

Management and Leadership Response: Management agrees with our recommendation and incorporated into the CAP as Activity 23.

Person(s) Responsible: Assistant Superintendent, Elementary Division

Activity Due Date: 06/30/2019

4

4.1 The **assistant superintendent(s), working with the SPS director**, should direct principals to review the PEIMS/Attendance clerk's work on a regular basis (to be defined monthly/quarterly), specifically the Daily Attendance Files. Allow the principal to designate an administrator designee.

4.1.1 A form/check-list should be created for use by principals with a signature/date area for the principal or designee and PEIMS/Attendance clerk to sign/date. The form/check-list should include date of Daily Attendance File selected, name/IDs of student(s) selected (using the Daily Attendance summary report in file), absence code, description of documentation supporting the absence code, and questions such as, "Does the attendance documentation support the absence code?" "If no, describe why." "Are the required daily reports in the file?" "Were errors corrected (date/by whom)?"

4.1.2 A separate campus audit notebook should be maintained and the original signed/dated audit form/check-list filed/stored in said notebook. In addition, the audit checklist should be used as part of the PEIMS/Attendance clerk's annual evaluation by the principal, and for monitoring, accountability, and audit purposes.

4.2 The **assistant superintendent(s)** or their designee(s) should consider performing random campus Daily Attendance File checks to ensure the principal or principal designee are

performing the Daily Attendance File reviews. The information gathered from the reviews should be used during the principal's annual evaluation(s), and for monitoring and accountability purposes.

Management and Leadership Response: Management agrees with our recommendation and incorporated into the CAP as Activities 05, 11, 12, and 22. Management added CAP Activity 23 to create a memo of findings based on their reviews to be used during a principal's evaluation.

Person(s) Responsible: Asst. Supt. E.S. Division and Director, Student and Parent Services

Activities' Due Dates: 08/30/2018 – 10/31/2018 and 6/30/2019

5

PEIMS/Attendance clerks are responsible for attendance data-entry and should not make absence code determinations without clearly written directions, in particular excusing or not excusing absences/tardies. **Principals** should be directed to provide a list to their PEIMS/Attendance clerk at the beginning of each school year, with **clear criteria** for an absence/tardy to be considered excused or unexcused. This list must be signed/dated by the principal with the original placed in the yearly attendance audit file/binder for accountability, monitoring, and audit purposes.

Management and Leadership Response: Management agrees with our recommendations and incorporated into the CAP as Activities 7 and 19.

Person(s) Responsible: Asst. Supt. E.S. Division and Director, Student and Parent Services

Activity Due Date: 08/30/2018 and 09/30/2018

6

When students do not formally withdraw and enroll elsewhere (creating absences that need to be deleted), we recommend **SPS** direct PEIMS/Attendance clerks to place a copy of the email from the SPS director, authorizing the PEIMS/Attendance clerk to delete the absences (related to the withdrawal), and place in each day's Daily Attendance File affected. This will ensure documentation exist for the deletion, for monitoring, accountability, and auditing purposes.

Management and Leadership Response: Management agrees with our recommendations and incorporated into the CAP as Activities 6 and 7.

Person(s) Responsible: Asst. Supt. E.S. Division and Director, Student and Parent Services

Activity Due Date: 08/30/2018

7

The **SPS director** should include in the District's APM the Military Block Leave Request forms and Parent Request forms, are to copied and placed in all subsequently affected Daily Attendance Files, with a note written on top stating the original approved signed/dated form is in (date of file) Daily Attendance File. This will ensure documentation exist for each absence day for monitoring, accountability, and audit purposes.

Management and Leadership Response: Response: Management agrees with our recommendations and incorporated into the CAP as Activities 7 and 13.

Person(s) Responsible: Asst. Supt. E.S. Division and Director, Student and Parent Services

Activity Due Date: 08/30/2018

8

The **SPS director** should include in the District's APM that the District's official correction form must also be used by the principal and the PEIMS/Attendance clerk for changes to attendance data already entered in TEAMS, such as:

- 8.1 Request by the principal to change an unexcused absence/tardy to excused after call/meeting with a parent, and
- 8.2 Corrections the PEIMS/Attendance clerk makes to his/her own data entry errors, especially when an absence is deleted, changed to present, or changed to any code earning ADA/FSP.

Management and Leadership Response: Response: Management agrees with our recommendations and incorporated into the CAP as Activities 7, 14, and 15.

Person(s) Responsible: Asst. Supt. E.S. Division and Director, Student and Parent Services

Activities' Due Dates: 8/30/2018 - 10/31/2018



EL PASO INDEPENDENT SCHOOL DISTRICT

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