

Student Discipline Audit

Audit Plan Code: 24.08.A



Assurance | Insight | Objectivity

Final Report
March 28, 2024

Actions taken by school administrators for the disciplinary removals in our sample were (i) in adherence to the Student Code of Conduct, Board Policy, and the Student and Parent Services Administrative Reference Guide and (ii) within two business days or sooner, depending on the severity of the violation.

However, we found (i) 31 disciplinary incidents with removal action codes that were not reported in the PEIMS 2022-2023 Summer Submission report, (ii) one disciplinary action that was not taken, and (iii) one disciplinary removal for which supporting documentation did not agree to the action taken record in Frontline.



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Abbreviations

ARG	Administrative Reference Guide
CAP	Corrective Action Plan
DAEP	Disciplinary Alternative Education Program
EPISD	El Paso Independent School District
Frontline	Enterprise Resource Planning Software System
IA	Internal Audit
ISS	In-School Suspension
JJAEP	Juvenile Justice Alternative Education Program
OSS	Out-of-School Suspension
PEIMS	Public Education Information Management System
SPS	Student and Parent Services
TEA	Texas Education Agency



Executive Summary

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We have completed the Audit of Student Discipline. The objectives of the audit were to determine if:

1. Actions taken by school administrators for student disciplinary incidents were in adherence to the Student Code of Conduct, Board Policy, and the Student and Parent Services Administrative Reference Guide for disciplinary removals.
2. District data for disciplinary removals reported in the Public Education Information Management System (PEIMS) 2023 summer submission was complete and accurate.

The scope of the audit was disciplinary incidents that resulted in students being removed from the classroom or school during the 2022-2023 school year.

The Internal Audit Report that follows includes detailed findings, recommendations, methodology, and background information.

We would like to acknowledge and thank the Student and Parent Services (SPS) Department and campus administration who participated in this audit for their time.

What We Found

Actions taken by school administrators for the disciplinary removals in our sample were (i) in adherence to the Student Code of Conduct, Board Policy, and the Student and Parent Services Administrative Reference Guide and (ii) within two (2) business days or sooner depending on the severity of the violation.

However, during the audit, we identified areas with deficiencies that warrant remedial action as follows:

1. Thirty-one (.5%) of 6,866 disciplinary incidents with removal action codes were not included in the PEIMS 2022-2023 Summer Submission report.
2. One (1) disciplinary action not taken.
3. For one (1) of 60 disciplinary removals sampled, the signed supporting documentation did not agree to the action taken record in Frontline.

In addition, we identified the following observation:

1. There were four (4) disciplinary incidents that were deleted for which the campuses could not determine if they had been or needed to be re-entered in Frontline.

What We Recommend

Internal Audit (IA) made nine (9) recommendations to address the findings and observation reported. Recommendations include for SPS to:

1. Provide a written explanation as to why the 44 disciplinary action records were not reported as part of the PEIMS 2022-2023 Summer Submission. Based on this explanation, determine if follow-up with TEA for the appropriate course of action is needed.

2. Develop and document procedures, to ensure:
 - a. A reconciliation process between the PEIMS PDM3-132-001 Student Disciplinary Action Roster report to the disciplinary incidents recorded in Frontline is in place.
 - b. A query is run to identify any deleted disciplinary incidents that occurred in the summer months.
 - c. A Variance Form is submitted by campuses for all deleted disciplinary incidents.
 - d. Defining who is responsible and accountable for verifying the accuracy of the deleted disciplinary incident data.
 - e. Campus administration contacts SPS for the appropriate course of action if a similar situation occurs (as stated in Finding 2).
3. Follow up with the campus that deleted disciplinary incident #15157 in June 2023 to determine if the disciplinary incident should be entered in Frontline and if disciplinary action should be implemented for the student.
4. Revisit the Variance Form to add language that addresses deleted disciplinary incidents.
5. Follow up with the campus to document the correct disciplinary action taken for disciplinary incident #8116.
6. Incorporate and emphasize, in the annual discipline training, when and how campuses should document changes to actions taken on the Discipline Incident Detail printout.

Management's Response

Management and leadership agreed with the audit findings. District management and leadership submitted a Corrective Action Plan (CAP) outlining 15 activities to be implemented. All 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.



Audit Report

ASSURANCE • INSIGHT • OBJECTIVITY

Objective and Scope

The objective(s) of the audit were to determine if:

1. Actions taken by school administrators for student disciplinary incidents were in adherence to the Student Code of Conduct, Board Policy, and the Student and Parent Services Administrative Reference Guide for disciplinary removals.
2. District data for disciplinary removals reported in the PEIMS 2023 summer submission was completed and accurate.

The scope of the audit was discipline incidents that resulted in students being removed from the classroom or school during the 2022-2023 school year.

Results and Recommendations and Management's Response

Actions taken by school administrators for the disciplinary removals in our sample were found to be:

1. In adherence to the Student Code of Conduct, Board Policy, and the Student and Parent Services Administrative Reference Guide and
2. Within two (2) business days or sooner depending on the severity of the violation.

However, we identified areas with deficiencies that warrant remedial actions as follows:

1. One (1) finding related to disciplinary incidents with removal action codes that were not included in the PEIMS 2022-2023 Summer Submission report.
2. One (1) finding related to disciplinary action not taken towards a student.
3. One (1) finding related to the signed supporting documentation that did not agree to the action taken record in Frontline.

In addition, we identified the following observation:

1. There were four (4) disciplinary incidents that were deleted for which the campuses could not determine if they had been re-entered in Frontline.

We would like to acknowledge and thank the SPS Department and campus administration who participated in this audit for their time.

Finding 1

Thirty-one (.5%) of 6,866 disciplinary incidents with removal action codes were not included in the PEIMS 2022-2023 Summer Submission report

All disciplinary records that were submitted to the Texas Education Agency (TEA) through the PEIMS PDM3-132-001 Student Disciplinary Action Roster report were compared to all records for disciplinary removals recorded in Frontline. A variance of 31 disciplinary incidents was noted. The 31 disciplinary incidents were composed of 44 disciplinary action taken records. See Table 1 below.

Table 1: Variances of Disciplinary Actions Taken for Removals

Disciplinary Action Taken Description	Disciplinary Action Taken Record Count
ISS-In School Suspension	11
On-Campus Disciplinary Alternative Education Program (DAEP)	10
Cont Prior Yr Plcmnt/DAEP	5
OSS-Out of School Suspension	5
Off-Campus DAEP	4
Partial Day ISS	4
Cont Dist DAEP Plcmnt Oth Camp	2
Expulsion to Juvenile Justice Alternative Education Program (JJAEP)	2
Partial Day OSS	1

Total Count: 44

It appears that SPS staff did not properly reconcile the PEIMS PDM3-132-001 Student Disciplinary Action Roster report to the disciplinary incidents recorded in Frontline prior to the PEIMS Summer Submission. If a proper reconciliation had been performed, the variances may have been identified and corrected.

The 44 records were emailed to SPS for their review and response as to the cause of why the records were not included in the PEIMS Summer Submission. Currently, SPS is conducting a review to identify why the 31 disciplinary incidents were not included in the PEIMS 2022-2023 Summer Submission report and will provide an explanation as CAP Activity 1, due April 5, 2024.

Not reporting all disciplinary removal actions may result in an incomplete and inaccurate PEIMS submission. In addition, this can lead to serious consequences under the Texas Education Code (TEC). Under TEC 37.008(m-1), failure to report all disciplinary removal actions as required by state and federal law may result in a review by the commissioner of education and notice to the local school board of any problems noted in the district's data, or a violation of a law or other rule. This provision can apply to missing or inaccurate information/data.

Recommendations and Management's Response

The SPS Department should:

- 1.1 Research and provide a written explanation as to why the 44 disciplinary action records were not included in the PEIMS 2022-2023 Summer Submission.

Management and Leadership Response: Concurred with the recommendation and incorporated into the CAP as activity one (1). In addition, management added CAP activities two (2) and three (3), which read:

- a. "Update the ARG to include information on verifying the student's attendance during the accounting period before processing a referral in the student system.
- b. "Review the Discipline Maintenance codes to ensure that all discipline actions are submitted prior to submission; have a second verifier to ensure compliance."

Person(s) Responsible: Executive Director of Administrative Services and Assistant Superintendent of Student Services

Implementation Date: April 5, 2024; May 1, 2024; and August 31, 2024

- 1.2 Based on the explanation for the 44 variances, determine if follow-up with TEA for the appropriate course of action is needed.

Management and Leadership Response: Concurred with recommendation and incorporated into the CAP as activity four (4).

Person(s) Responsible: Executive Director of Administrative Services and Assistant Superintendent of Student Services

Implementation Date: May 31, 2024

- 1.3 Develop and document procedures that outline the reconciliation process between the PEIMS PDM3-132-001 Student Disciplinary Action Roster report to the disciplinary incidents recorded in Frontline. Procedures should include:

- a. Guidelines for documenting any justified variances including clearly stating the reasons for the variances and ensuring documentation is maintained as part of the records.
- b. Identification of who will be responsible and involved in the reconciliation process.

Management and Leadership Response: Concurred with recommendation and incorporated into the CAP as activity five (5).

Person(s) Responsible: Executive Director of Administrative Services and Assistant Directors of SPS

Implementation Date: August 31, 2024

Finding 2

Disciplinary action was not taken towards a student

Disciplinary action was not taken towards a student who was caught with a THC vape and paraphernalia during the summer of 2023. Based on the Chart for Determining Mandatory and Discretionary DAEP Placement and Expulsion, the recommended action for this incident at the time of occurrence was mandatory expulsion with a due process hearing, which was not properly followed.

The school's Assistant Principal entered and subsequently deleted disciplinary incident #15157 in Frontline. According to the Assistant Principal, the disciplinary incident was deleted because "s/he was notified by SPS that summer violations must be recorded on paper referral forms." A paper copy for disciplinary incident #15157 was filled out. However, the incident was not re-entered in Frontline in

the fall of school year 2023-2024, and the copy of the paper referral was not sent to SPS.

At the beginning of the 2023-2024 school year, the student withdrew from the campus where the disciplinary incident occurred and enrolled at another EPISD campus for one week before returning to the original campus. No disciplinary action was taken by either campus.

- Since the disciplinary incident was recorded on a paper referral, and not in Frontline, the campus where s/he enrolled for a week would not have known of the offense, since there was no record of it in Frontline.
- In addition, a new principal started on the first day of the 2023-2024 school year, at the campus where the offense occurred. According to the principal "s/he did not know anything about the summer incident being deleted and not entered in Frontline."
- Also, SPS did not identify incident #15157 because they do not run a query for deleted disciplinary incidents that occur during the summer months. Therefore, the incident was not identified in their six-weeks audit, and the campus was not asked to complete and submit a Variance Form.

Per SPS Summer School Discipline Procedures (summer training), disciplinary incidents that occur during the summer months cannot be entered in Frontline since the Discipline module does not support scheduled enrolled students. If disciplinary incidents occur during the summer months, campuses are instructed to fill out paper referrals and forward original copies to SPS by Monday of the following week. Per the Executive Director of Administrative Services, if the disciplinary incident results in the action of DAEP or JJAEP, campuses are instructed to enter the disciplinary incident in Frontline once school starts in the fall if the student returns to EPISD.

Failure to enter disciplinary incidents in Frontline, as per policy, may lead to inequitable disciplinary treatments for students and incomplete disciplinary data in the PEIMS Summer Submission to TEA. Under TEC 37.008(m-1), failure to report all disciplinary removal actions as required by state and federal law may result in a review by the commissioner of education and notice to the local school board of any problems noted in the district's data, or a violation of a law or other rule. This provision can apply to missing or inaccurate information/data.

See below for additional information obtained for this disciplinary incident.

- On January 26, 2024, campus administration consulted with the Executive Director of Administrative Services regarding disciplinary incident #15157. The campus was asked to submit a corrective action plan to prevent future occurrences. Internal Audit requested a copy of the corrective action plan from the campus Principal; however, it has not been provided.
- Internal Audit spoke to TEA on February 12, 2024, regarding disciplinary incident #15157. TEA explained that at this point (eight months after the incident occurred) it is the District's decision whether to enter the disciplinary incident in Frontline or not.
- Had this disciplinary incident been entered in Frontline as required, it would be included in the 2023-2024 PEIMS Summer Submission for student disciplinary actions to TEA.

Recommendations and Management's Response

The SPS Department should:

- 2.1 Follow up with the campus that deleted disciplinary incident #15157 in June 2023 to determine if the disciplinary incident should be entered in Frontline and if disciplinary action should be implemented for the student.

Management and Leadership Response: Concurred with recommendation and incorporated into the CAP as activities six (6) through nine (9), which read:

- a. "SPS shall notify the campus that the referral #15157 shall not be entered based upon the length of time in which the incident occurred."
- b. "SPS will ensure the campus completes a corrective action plan for referral #15157 and submits to SPS for approval."
- c. "Provide additional discipline update to the administrator who entered incident # 15157. The update will include summer school procedures."
- d. "SPS shall request participation in summer school training in regards to discipline. The request shall be made to the Director Literacy and the Chief Academic Officer."

Person(s) Responsible: Executive Director of Administrative Services and Assistant Directors of SPS

Implementation Date: April 12, 2024, and May 31, 2024

- 2.2 Develop and document procedures to ensure:

- A query is run to identify any deleted disciplinary incidents that occurred in the summer months.
- A Variance Form is submitted by campuses for all deleted disciplinary incidents.
- Defining who is responsible and accountable for verifying the accuracy of the deleted disciplinary incident data.

Management and Leadership Response: Concurred with recommendation and incorporated into the CAP as activities 10 and 11, which read:

- a. "Add an additional query timeline at the end of summer school and develop procedures to include the completion of a variance form when referrals are deleted during the summer."
- b. "SPS will develop procedures which requires SPS to contact the principal and assistant principal at the of summer if a variance form has not been submitted pertaining to a deleted referral."

Person(s) Responsible: Executive Director of Administrative Services and Assistant Directors of SPS.

Implementation Date: August 30, 2024

2.3 Revisit the Variance Form to add language that addresses deleted discipline incidents to include:

- The reason for the deletion,
- If the deleted disciplinary incident was replaced in Frontline, and
- Identification of the replacement disciplinary incident number.

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

Person(s) Responsible: Executive Director of Administrative Services and Assistant Directors of SPS.

Implementation Date: August 30, 2024

Finding 3

For one (1) of 60 disciplinary removals sampled, the signed supporting documentation did not agree to the action taken record in Frontline

Once a disciplinary incident is entered in Frontline, campuses print a copy of the Discipline Incident Detail to be signed by student, parent and administration. For disciplinary incident (#8116), campus ID #001, the printed and signed copy of the Discipline Incident Detail, reflected an action taken of two (2) days of In-School-Suspension (ISS) with two (2) actual days served. However, the record in Frontline shows the student served a partial day of ISS instead of the two (2) days of ISS originally assigned.

Per campus administration, subsequent changes were made to the actions taken for the disciplinary incident in Frontline after the Discipline Incident Detail had been printed. However, campus administration did not go back and update the Discipline Incident Detail printout. In addition, SPS did not identify the discrepancy during the 4th six-weeks audit performed on March 7, 2023.

The Discipline Incident Detail printout from Frontline serves as both the supporting documentation for the actions taken in response to the disciplinary incident and a record containing the signatures of the campus administrator, student, and parent. Discrepancies between the printout and the Frontline record may create uncertainty about the accuracy of the documented actions taken in response to the disciplinary incident, prompting questions about which record (either the printout or Frontline) reflects the correct information.

Per the SPS ARG if any corrections are necessary, [to the discipline referral] the correction must be made on the original referral and a revised copy provided to the student and parents.

Recommendations and Management's Response

The SPS Department should:

3.1 Follow up with the campus to document the correct disciplinary action taken for disciplinary incident #8116.

Management and Leadership Response: Concurred with recommendation and incorporated into the CAP as activity 13.

Person(s) Responsible: Executive Director of Administrative Services and Assistant Directors of SPS

Implementation Date: May 31, 2024

3.2 Incorporate and emphasize, in the annual discipline training, when and how campuses should document changes to actions taken on the Discipline Incident Detail printout.

Management and Leadership Response: Concurred with recommendation and incorporated into the CAP as activities 14 and 15, which read:

- a. "Develop a mandatory half-day discipline session for all administrators prior to the beginning of the school year and thereafter for new employees. Each session would include guidance on how to correct discipline data."
- b. "Add diagrams/screen shots to the ARG on how to correct discipline referrals."

Person(s) Responsible: Executive Director of Administrative Services and Assistant Superintendent of Student Services

Implementation Date: August 30, 2024, and August 31, 2024

Observation and Recommendations

While conducting this Audit, we made an observation that does not violate local, state, or federal guidelines and, as such, was not included as a finding in the Audit Report. However, we felt the observation was worthy of informing you as the data owner/expert to determine how it should be addressed.

Observation 1

There were four (4) disciplinary incidents that were deleted for which the campuses could not determine if they had been or needed to be re-entered in Frontline. See Table 2.

- For deleted disciplinary incidents #1, 2 and 3, Variance Forms were submitted by the campus and the incidents were identified during the respective six-weeks audit performed by SPS. However, neither the campus nor SPS could determine if the incidents were re-entered in Frontline. Per campus administration, "the interim assistant principal deleted the referrals due to her lack of training on coding referrals which were made in error."
- Deleted disciplinary incident #4 occurred during summer school (June 2023) and was for a student who was found in the restroom with a group of other students with tobacco products in their possession. Campus administration stated that because the student was not enrolled in summer school, he/she was asked to leave and not come back. The campus provided a copy of a paper referral that was filled out during the summer; however, they were not sure that the paper copy provided was related to disciplinary incident #4. This disciplinary incident was not re-entered in Frontline. In addition, SPS was not aware of this disciplinary incident.

Table 2: Deleted Disciplinary Incidents

No.	Disciplinary Incident No.	Campus ID #	Incident Date	Was deleted incident re-entered in Frontline?
1	12206	167	4/21/23	Unknown
2	14811	167	5/25/23	Unknown
3	14812	167	5/25/23	Unknown
4	15159	003	6/22/23	No

Failure to enter disciplinary incidents in Frontline, as per policy, may lead to inequitable disciplinary treatments for students and incomplete disciplinary data in the PEIMS Summer Submission to TEA.

Recommendation and Management Response

The SPS Department should:

- 1.1 Implement the recommendations for Finding #2 to address deleted discipline incidents.

Management and Leadership Response: Concurred with recommendation and incorporated into the CAP as activities six (6) through 12. For further details please see the recommendations and CAP activities in Finding #2.

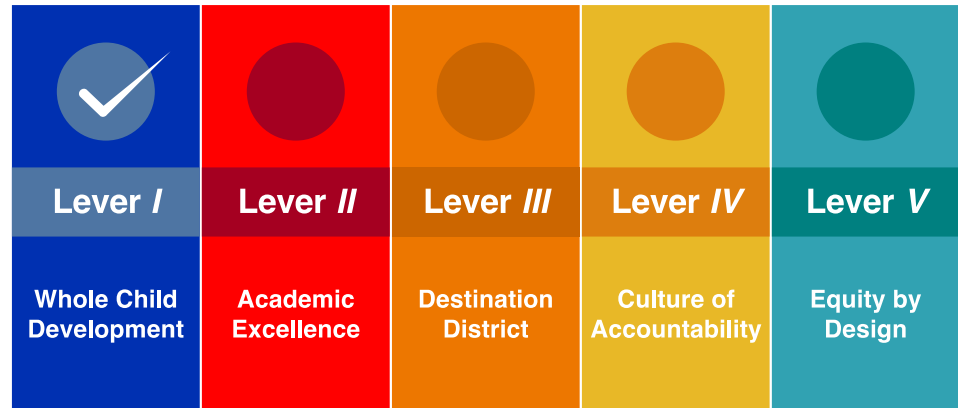


Appendix A: Background and Methodology

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Background

The Student Discipline Audit was approved by the Board of Trustees as part of the 2023-2024 Internal Audit Plan. The audit supports Lever I of the District's Strategic Blueprint which states, "Implementing meaningful, engaging practices that develops students' ability to manage and own their own behavior."



The Student Discipline Audit provides an independent and objective risk-based assessment of whether District disciplinary removals were addressed in accordance with local policy/procedures and reported accurately to the state. The specific audit objectives are included in the [Objective and Scope](#) section of this report.

According to Texas Education Agency's (TEA) website for Student Discipline, "Texas public schools are required to develop and enforce various student discipline policies that follow the Texas Education Code and federal law. These policies include a student code of conduct outlining disciplinary actions taken based on student behavior." Disciplinary actions that result in the removal of a student from any part of their regular academic program are reported to TEA during the PEIMS Summer Submission. These removals fall under one of these categories:

- ISS,
- OSS,
- Expulsion,
- JJAEP, or
- DAEP assignments.

For the school year 2022-2023 there were a total of 15,008 unique disciplinary incidents IDs recorded in Frontline. Of those, a total of 6,866 (46%) unique disciplinary incidents IDs (composed of 10,545 records) resulted in the removal of students from any part of their regular academic program. Please see Figures 1-3 with a summary of the data for disciplinary removals for the school year 2023-2024.

Figure 1 – Provides a summary of disciplinary incidents that led to a removal by School Type.

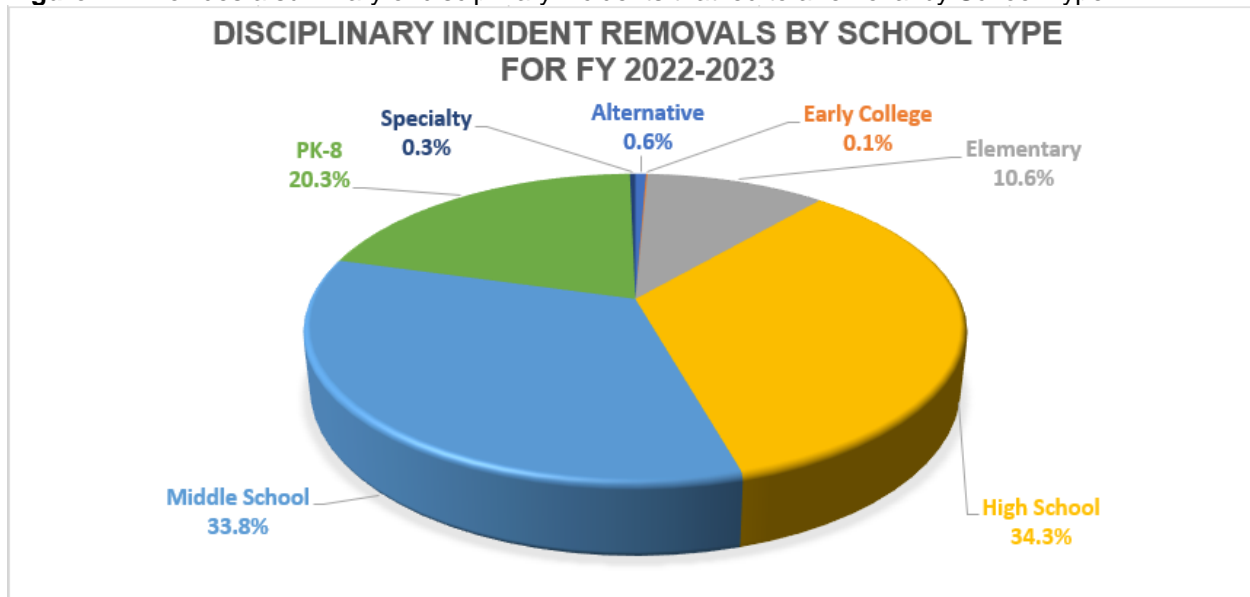


Figure 2 - Provides the top ten disciplinary offenses district-wide, with counts of records that led to a student's removal from their regular academic program.

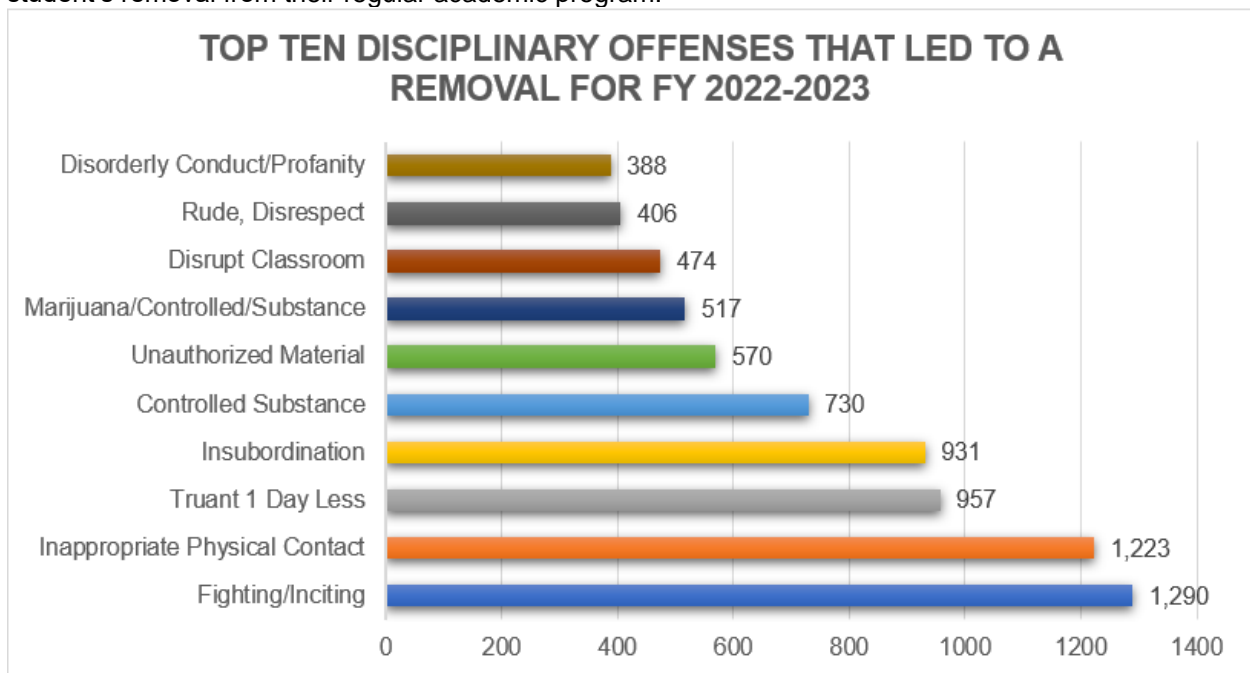
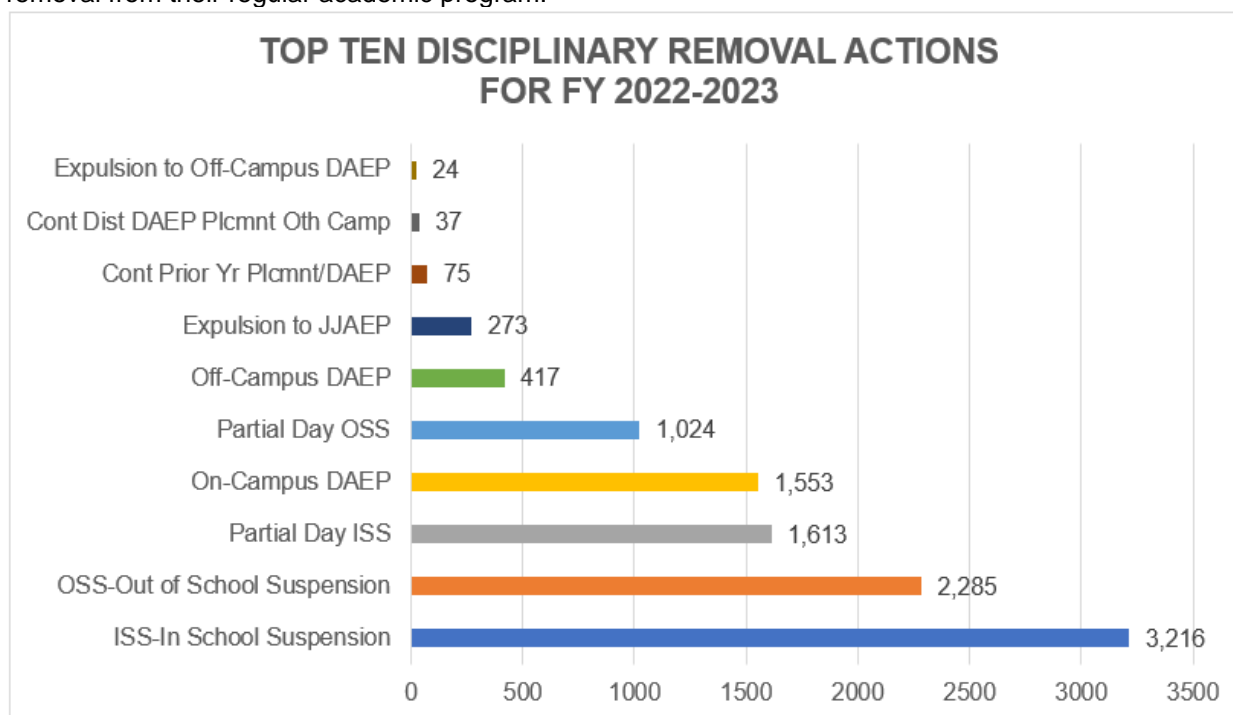


Figure 3 – Provides the top ten disciplinary actions district-wide, with counts of records, for students' removal from their regular academic program.



Methodology

To achieve our audit objective(s), we:

1. Researched relevant federal/state laws and regulations, Board policies, and the department manual/guidelines.
2. Used internal control questionnaires and interviewed key personnel to obtain an understanding of the student disciplinary process.
3. Performed a risk assessment based on our understanding of the student discipline process and controls in place.
4. Obtained discipline referral data for the school year 2022-2023 and analyzed it by various fields.
5. Selected a sample of 60 disciplinary incidents to verify if:
 - The disciplinary action taken by campuses was in adherence to the Student Code of Conduct, Board Policy, and the SPS ARG.
 - Disciplinary incidents were acted on within two (2) business days or sooner, depending on the severity of the violation.
6. Compared the 2022-2023 PEIMS PDM3-132-001 Student Disciplinary Action Roster to the disciplinary removals recorded in Frontline for school year 2022-2023 to verify if the Summer Submission was complete and accurate.
7. Selected a sample of 10 of the 51 deleted disciplinary incidents that led to a disciplinary removal to verify if the deletion was justified.

8. Selected a sample of 15 disciplinary incidents for which the action taken was changed from a disciplinary removal to a non-removal action and verified the appropriateness of the action taken.
9. Inquired about the review process to verify the accuracy of the data that was submitted for the PEIMS 2023 summer submission.
10. Reviewed the discipline set up tables in Frontline to determine if the tables include all the action taken codes that need to be reported to TEA during the PEIMS summer submission per the TSDS Web-Enabled Data Standards.

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.



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Internal Audit

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