



Report to Board of Managers and
Administration

2014-2015

ALLEGATIONS OF FALSIFYING STUDENTS' TRANSCRIPT INFORMATION

Audit Report

Background

A student and his/her parents reported to Internal Audit an allegation that the class rankings of certain students at one of the District's high schools were affected by violations of federal law, state law, or local policy related to falsifying student transcripts. They specifically were concerned about the District awarding Advanced Placement credits for courses taken at La Paz Language Academy Inc. (La Paz). This project is authorized in the 2014-2015 Audit Plan under the category of "Other Potential Project Related Activities: Ethics and Compliance Hotline."

Scope and Objectives

The scope of the audit focused on the District awarded credits, grades, and bonus points pertaining to the allegation. The objectives of our audit were to determine (i) the validity of the allegation and (ii) whether controls need to be implemented or strengthened to reduce future vulnerability.

Methodology

To achieve our objectives we:

1. Reviewed District policies and procedures for calculating class ranking, calculating GPA, and the awarding of grade bonus points for Advanced Placement courses;
2. Reviewed student cumulative (CUMs) folders for proper documentation to support the credits, grades, and points;
3. Reviewed transcript audit logs to identify changes to credits/grades and relevant CUMs and other records to ensure proper documentation exists to support the changes;
4. Contacted The College Board and the Texas Education Agency's (TEA) Curriculum Division to determine whether there are federal or state requirements for accepting courses with the Advanced Placement designation from non-district entities; and
5. Conducted interviews with District central office and campus personnel.

Findings

Condition (#01)	<p>We found no inconsistencies with:</p> <ul style="list-style-type: none">• GPA levels and value points assigned to each possible course grade score in the TEAMS (system set-up); or• Courses and GPA value/points awarded based on type of course taken by each student. <p>This means GPA Levels set and value points set (in TEAMS) by the District for courses described as AP, IB, Pre-IB, Dual, Pre-AP, Advanced Academics Independent Studies, and regular courses were in accordance with Board Policy EIC (Local). Furthermore, we verified that students' grades awarded for each course were calculated into the correct grade points based on Board Policy EIC (Local).</p>
Condition (#02)	<p>We reviewed transcript audit logs to identify changes to credits/grades and searched documentation to support changes filed in the students' CUMs and AP test rosters. Based on our review, we found changes were:</p> <ul style="list-style-type: none">• Supported by documentation;• Consistent with Board Policy EIC (Local) Academic Achievement – Class Ranking section for Students Entering Grade 9 in 2012-13 School Year or Prior; and

	<ul style="list-style-type: none"> Consistent with other local policies and practices.
Condition (#03)	<p>Since school year 2009-2010, 31 students have received District credit for an AP Spanish 4 course taken at La Paz. All credits awarded for the course had the same GPA level of AP (which includes bonus points).</p> <p>La Paz's Spanish course did not receive the "AP" designation from The College Board until 2013-2014. According to staff at The College Board and TEA's Curriculum Division, it is a District's local decision to determine if they will grant or accept AP credit for a course that did not receive the AP designation from The College Board.</p> <p>Local policy does not address whether AP credit and points will be awarded for courses that did not receive the AP designation from The College Board. Therefore, according to District administration, their decision has been to "act in the best interest of the students" and consistently award AP credit and points for all AP Spanish 4 courses from La Paz.</p>
Recommendation	<p>The development and use of policies and procedures are an integral part of a successful quality system as it provides individuals with the information and guidance to perform a job properly. The District should consider updating policy to clarify the requirements for awarding the AP designation for courses taken outside the District. Some examples could include:</p> <ol style="list-style-type: none"> 1. The course should have an "AP" designation from The College Board, 2. The District may request the curriculum from the institution (in this case La Paz) to determine whether the course meets the curriculum requirements of The College Board or the TEKS. This determination should be documented. 3. Require students enrolled in the District to obtain prior approval before taking courses outside the District. District staff could determine approval based on 1 and 2 above. <p>The District should also consider whether to address issues in policy that may arise in the future for all courses taken or transferred from outside the District.</p>
Condition (#04)	We identified District courses that, based on their title and description, appear to have an incorrect state service identification (ID) number. Note that based on evidence provided, the needed corrections should not impact grades or bonus points awarded to by the District.
Recommendation	We recommend administration ensure that the needed corrections are made to address this finding.
Condition (#05)	We found an instance when AP bonus points were not awarded in a timely manner.
Recommendation	Campus administration should ensure all students receive all credits, grades, and bonus points in a timely manner.
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Observation	During our meeting with the student and parents who filed the complaint, Internal Audit observed that the parents and student had knowledge of other students' educational and personal information to include GPA, courses taken/dropped, and success/failure associated with those courses, and inside/outside classroom activities/incidents. The student and parents declined to reveal how they learned of

	<p>the other students' information.</p> <p>The Family Educational Rights and Privacy Act (FERPA) is designed to protect the privacy of students by limiting third party access to student education records. FERPA defines education records as records that are directly related to a student; are maintained, in whatever format or medium, by an educational institution and contain information that is personally identifiable to a student.</p>
Recommendation	<p>Maintaining confidentiality of student records is the responsibility of all District employees, including teachers, counselors, clerical staff, and administrators. As a general principle, student information should not be disclosed in oral, written, or electronic form to anyone except District staff who have a legitimate educational need to know the information in order to perform their functions.</p> <p>We recommend administration try to determine where this student and parents obtained the confidential information and address accordingly with the school's personnel. Furthermore, the data process owner(s) should ensure applicable campus personnel receive additional FERPA training in regards to the findings and observations within this report.</p>

Conclusion

We could not substantiate the allegations. However, we identified weaknesses in policy that may create a risk for inequitable awarding of credits and bonus points for courses taken at schools outside the District. As such, administration should consider reviewing and updating policy to reduce the risk for inequity and strengthen internal controls.