



Corrective Action Plan Follow-up Review: Student Transcripts – Graduation Requirements

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Audit Plan Code: 18-24

A Corrective Action Plan with 10 activities was implemented by management and administration to address the two findings, two observations, and eight recommendations in the original audit report. As such, this report represents the close-out of this Corrective Action Plan.



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Abbreviations

AAR	Academic Achievement Record
CAP	Corrective Action Plan
CUM	Cumulative Record folder (student file)
DAP	Distinguished Achievement Program
EPISD	El Paso Independent School District
FY	Fiscal Year
IA	Internal Audit Department
PEIMS	Public Education Information Management System
TEA	Texas Education Agency
TEAMS	Total Education Administrative Management Solution
TREX	Texas Records Exchange (Used to electronically exchange student records between Texas public schools)
TS	Technology Services Department



Follow-up Review

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Background

As part of the reporting and audit process, the Institute of Internal Auditors' (IIA) International Standards for the Professional Practice of Internal Auditing, Performance Standard 2500 - Monitoring Progress, require we "...establish and maintain a system to monitor the disposition of results communicated to management." We comply with this standard through our Corrective Action Plan (CAP) follow-up review process.

Internal Audit performed the Student Transcripts-Graduation Requirements Audit as part of the 2015-2016 Internal Audit Plan. The objective of the audit was to provide reasonable assurance to the Board and administration regarding the adequacy of internal controls to ensure graduating students are meeting requirements defined by state and local graduation requirements. The scope of the audit was 2014-2015 school year student graduates. See **Exhibit A** for Summary of Original Audit Findings.

The original audit report included two (2) findings, two (2) observations, and eight (8) recommendations. District management and administration agreed with our recommendations and developed a CAP with 10 activities.

Objective and Scope

The objective and scope of this follow-up review was limited to determining whether management and administration implemented the 10 CAP activities or took other actions to address the two (2) findings, (2) observations, and eight (8) recommendations in the original audit report.

Methodology

To achieve our follow-up review objective, we:

- Held meetings with persons responsible for carrying out the CAP activities.
- Reviewed supporting documentation maintained by management as evidence of completion of the CAP activities provided to Internal Audit.

Inherent Limitations

This was a limited scope follow-up review covering only the actions taken by administration to address the original audit findings, observations, and recommendations stated in the Objective and Scope section of this report. No representations of assurance are made to other areas or periods not covered by this follow-up review.

Summary of Results

Our follow-up review found 10 CAP activities were implemented by management and administration to address the two (2) findings, (2) observations, and eight (8) recommendations of the original audit report. As such, this report represents the close-out of this Corrective Action Plan.

Original Recommendations

The original recommendations are outlined in this section.

1

Original Recommendation: Guidance Services should document a requirement for counselors to use District-wide standardized audit cards to evaluate if a student met credit requirements. The Area Superintendents should notify principals of their responsibility to ensure compliance with this requirement. The audit card should match the student's graduation program, which may vary by cohort (year a student enters 9th grade). The audit card should be updated as credit requirements change.

2

Original Recommendation: Audit cards prepared by counselors for potential graduates should be carefully reviewed and signed by both the counselor and Assistant Principal HS Guidance and Instruction. We recommend filing audit cards in the student CUM to support the determination that the student met the graduation program for their cohort. Currently, the audit cards are kept in the counselor's files.

3

Original Recommendation: Guidance Services should provide training to counselors and campus administrators to ensure they have a clear understanding of (i) the graduation requirements for all high school programs and (ii) their responsibilities for monitoring for said requirements. Staff should have clearly identified roles and responsibilities to ensure students complete and graduate under their declared graduation plan according to their cohort.

4

Original Recommendation: Written DAP guidelines and roles and responsibilities for data owners should be developed to ensure consistency and prevent inequities. Said guidelines should be revisited on an annual basis. All DAP information should be readily available to all stakeholders, most importantly students and parents.

5

Original Recommendation: The Academics and School Leadership team should determine the District administrator(s) assigned to ensure state and local graduation requirements are updated in the District Policy, guidelines, forms/templates, and create a plan for disseminating any revisions and/or updates to stakeholders.

6

Original Recommendation: Findings from this audit report should be presented to the Superintendent's Leadership Team so they can determine the process/plan for notifying students who did not meet graduation requirements and determine whether the District needs to notify the Texas Education Agency.

7

Original Recommendation: We recommend all pertinent documentation supporting a student's academic performance denoted on the transcript/AAR be kept in the CUM. This includes evidence the four additional DAP measures were met, any assessment test scores, and the final audit card that demonstrates how a student met the required academic requirements for graduation.

8

Original Recommendation: The District should develop a written senior clearance process and form which can be used to document that students' credits and academic achievements, based on the student's cohort and declared plan have been verified by the counselor.

Status of CAP Activities

The CAP activities, person(s) responsible, and their status are outlined in this section.

1

“School Leadership and Academics will update state and local graduation requirements in the District Policy, guidelines, forms/templates and create a plan for disseminating any revisions and/or updates to stakeholders.”

Persons Responsible: Chief School Officer and Executive Director of Academics

Status: Implemented

2

“Revise Standardized Hand Audit Cards, DAP Form, Secondary Student Course Audit Protocol and High School Counselor EOY Clearance Checklist and create a standardized Senior Clearance Card.”

Persons Responsible: Director of Guidance, Counseling, and College Readiness Services

Status: Implemented

3

“Provide training to all Guidance and Instruction Assistant Principals on the: Revised Audit Cards, Senior Clearance Card, Secondary Student Course Protocol, DAP Form, and High School Counselor EOY Clearance Checklist.”

Persons Responsible: Director of Guidance, Counseling, and College Readiness Services and Lead Counselor

Status: Implemented

4

“Provide training to all high school counselors on the: Min-Rec-DAP Graduation and HB 5 Graduation requirements; Revised Audit Cards, Senior Clearance Card, Secondary Student Course Protocol, DAP Form, and High School Counselor EOY Clearance Checklist”

Persons Responsible: Director of Guidance, Counseling, and College Readiness Services and Lead Counselor

Status: Implemented

5

“Communicate to all high school principals the required implementation of: Revised Audit Cards, Senior Clearance Card, Secondary Student Course Protocol, DAP Form, and High School Counselor EOY Clearance Checklist in writing through Principals' Landing Page and Principals' Grade Level meetings.”

Persons Responsible: School Area Superintendents; Chief School Officer; and Director, Guidance, Counseling, and College Readiness Services

Status: Implemented

6

“Conduct a self-audit every nine weeks of 10% of counselor records to ensure that the updated Audit Cards are being implemented and reviewed by high school counselors for accuracy. Documentation of self-audit should be submitted to the Area Superintendents.”

Persons Responsible: Director of Guidance, Counseling, and College Readiness Services; Lead Counselor; and respective Guidance and Instruction Assistant Principals

Status: Implemented

7

“Conduct a self-audit of 100% of early completers and 100% 2017 Spring Graduates to ensure that the updated Senior Clearance Card is being implemented and reviewed by high school counselors for accuracy. Documentation of self-audit should be submitted to the Area Superintendents.”

Persons Responsible: Director of Guidance, Counseling, and College Readiness Services; Lead Counselor; and respective Guidance and Instruction Assistant Principals

Status: Implemented

8

“Conduct a self-audit by end of counselors' days on duty to ensure that the updated High School Counselor EOY Clearance Checklist was implemented and reviewed by high school counselors for accuracy. Documentation of self-audit should be submitted to the Area Superintendents.”

Persons Responsible: Director of Guidance, Counseling, and College Readiness Services; Lead Counselor; and respective Guidance and Instruction Assistant Principals

Status: Implemented

9

“Update the AAR/Cum Checklist to include the Final Senior Audit Card, DAP Form, and Senior Clearance Card”

Persons Responsible: Director Student and Parent Services

Status: Implemented

10

“Findings from this audit report will be presented to the Superintendent's Leadership Team with (1) recommendations on the process/plan for notifying students who did not meet graduation requirements and (ii) to discuss and determine whether the District needs to notify the Texas Education Agency.”

Persons Responsible: Chief School Officer; Director of Guidance, Counseling, and College Readiness Services; and Director of Student and Parent Services

Status: Implemented

Exhibit A – Summary of Original Audit Findings

Finding	Summary Finding
1	Two of 158 (1%) students did not complete the end of course (1 student) or state/District credit requirements needed to graduate (1 student).
2	Ten of the 158 (6%) students graduated under the incorrect high school program.
Observation 1	The District does not require all documentation supporting a student's declared graduation plan to be kept in the cumulative record folder (CUM).
Observation 2	The District has a senior clearance form that is used to verify credits and academic achievements necessary to clear the graduation program, but it is not used consistently by campus staff.



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