



Internal Audit Department

Report to Board of Trustees and
Administration

2015-2016

STUDENT TRANSCRIPTS- GRADUATION REQUIREMENTS AUDIT

We found students that graduated in school year 2014-2015 who did not complete the graduation requirements for the high school program denoted on their transcript.



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ABBREVIATIONS LIST

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 AKA as Student Systems
TREX	Texas Records Exchange (Used to electronically exchange student records between Texas public school)
TS	Technology Services Department

Executive Summary (AR01)

Background

The Texas Administrative Code (TAC) provides graduation requirements for school districts. They are comprised of three high school programs and state assessment requirements for graduation. The graduation requirements vary based on the year the student entered the 9th grade (student cohort). Districts are given latitude to add additional requirements for graduation which are required to be in District policy.

According to 19 TAC Part II, Chapter 74, Subchapter F. Graduation Requirements, Beginning with School Year 2007-2008, Rule §74.61 (a), "Graduates of each high school are awarded the same type of diploma. The transcript or AAR rather than the diploma records individual accomplishments, achievements, and courses completed and displays appropriate graduation seals."

The Student Transcripts – Graduation Requirements audit was approved by the Board as part of the. 2015-2016 audit plan.

Objective and Scope

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.

Limitations

When supporting documentation for the transcript was not located in the student cumulative record folder (CUM) or files maintained by counselors, some of the additional testing could not be performed.

In accordance with the *Institute of Internal Auditors' Practice Advisory 2320-3: Audit Sampling*, "The internal auditor should validate the completeness of the population to ensure that the sample is selected from an appropriate data set." The objective of this audit did not include testing of Information Technology general controls over applications that produce the system-generated data/reports we used to select our sample selections.

Although we cannot for certain determine that the population from TEAMS reports were 100% complete and accurate, our completeness and accuracy procedures, on a sample basis, gave us sufficient comfort to rely on this data for our testing purposes.

Commendation

We would like to acknowledge and thank Manuel Castruita, Director of Guidance Services, and Cheryl Felder, Director of Student and Parent Services, for their assistance throughout the audit process and responsiveness to the audit report.

Summary of Findings

For the 2014-2015 graduates tested:

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.

Summary of Recommendations

1. Guidance Services should document a requirement for counselors to use District-wide standardized audit cards to evaluate if a student met graduation 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 and as deemed necessary.
2. 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 audit cards be filed in the student CUM to support the determination that the student met their declared graduation program for their cohort.
3. Written Distinguished Achievement High School Program (DAP) graduation 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 to ensure students meet graduation requirements and required measures.
4. Guidance Services should continue to 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.
5. 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. 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.

Summary of Observations and Recommendations

1. The District does not require all documentation supporting a student's declared graduation plan be kept in the CUM. We recommend all pertinent documentation supporting a student's academic performance denoted on the transcript/AAR be kept in the CUM.
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. We recommend the District develop a senior clearance process which includes using the senior clearance form to document that counselors have verified students' graduation requirements have been met based on the student's cohort, and declared graduation program.

Summary of Corrective Action Taken

A CAP was submitted by data process owners and administration outlining the activities to be implemented. The CAP appears to be sufficient to address the reportable conditions outlined in this report.

Conclusion

The state provides clear minimum graduation requirements and districts are given latitude to add additional requirements. We identified students that graduated in 2014-2015 school year that did not complete all the graduation requirements for the high school program indicated on their transcript. It is imperative District counselors, campus administrators, and central office administrators have a clear understanding of the requirements for all graduation programs and how the cohort plays a role in graduation program requirements. Students should be monitored at all phases of their education and the transcripts/AAR for all potential graduates should be carefully reviewed to ensure the correct students are graduating and are under the correct high school program.

Attached is the complete report, which includes more detailed findings, recommendations, and for those readers who would like further details.

Detailed Internal Audit Report (AR02)

Additional Background

According to 19 TAC Part II, Chapter 74, Subchapter F. Graduation Requirements, Beginning with School Year 2007-2008,

- Rule §74.61 states, “(a) Graduates of each high school are awarded the same type of diploma. The transcript or academic achievement record (AAR), rather than the diploma, records individual accomplishments, achievements, and courses completed and displays appropriate graduation seals.”
- Rule §74.61 also states, “(g)(2) testing requirements for graduation as specified in Chapter 101 of this title (relating to Assessment).”
- Defines three graduation programs each with specific credit and course graduation requirements;
 - Rule §74.62. Minimum High School Program (student must earn at least 22 credits),
 - Rule §74.63. Recommended High School Program (student must earn at least 26 credits), and
 - Rule §74.63. Distinguished Academic High School Program (DAP) (student must earn 26 credits and meet four of the advanced measures),

In addition, 19 TAC, Chapter 101, Subchapter CC, Rule §101.3022, Assessment Requirements for Graduation states,

- “(a) Beginning with students first enrolled in grade 9 in the 2011-2012 school year a student must meet satisfactory performance on each end of course (EOC) assessment listed in the Texas Education Code (TEC) 39.032...in order to be eligible to receive a Texas diploma.”
- “(e) Effective beginning with the 2014-2015 school year, a student who has taken, but failed to achieve the EOC assessment graduation requirements for no more than two courses may receive a Texas high school diploma if the student has qualified to graduate by means of an Individual Graduation Committee (IGC) under TEC, §28.0258.”
- “(f)(1) A student receiving special education services is not subject to the requirements in the TEC, §28.0258...a student’s admission, review, and dismissal (ARD) committee determines whether a student is required to achieve satisfactory performance on an EOC assessment to graduate.”

Methodology

To achieve our audit objectives, we:

1. Identified graduation requirements in state law, Texas Administrative Code (TAC), District policies, Texas Education Agency (TEA) minimum Standards for the Academic Achievement Record (AAR), and documentation provided by Guidance Services.
2. Selected a non-statistical sample of 2014-2015 Graduates (*158 students*) from 13 high school and District-wide campuses.
3. We reviewed documentation in the students’ AAR/CUMs to determine the following:
 - a. Was the graduation program completed to include:
 - i. Were End of Course (EOC) exams passed?
 - ii. Were course credit requirements met? (Determine if the student meet credit requirements for graduation plan denoted on the transcript)

- iii. Were DAP requirements (if applicable) met?
- b. Did the AAR denote an accurate graduation program?
4. When supporting documentation was not found in the CUM, we asked campuses to provide the counselors' files.

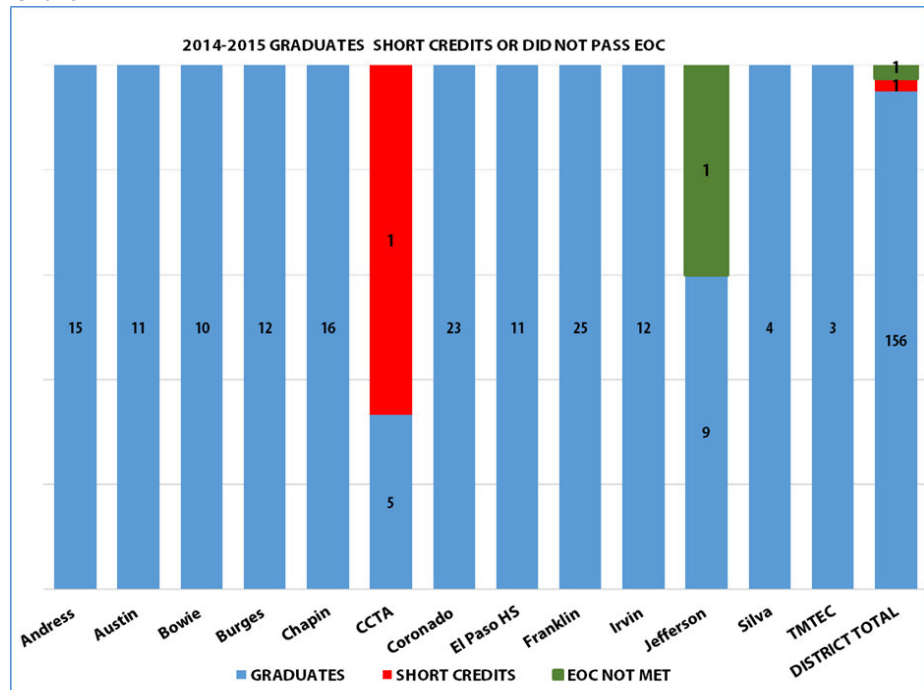
Findings

Conditions

For the 2014-2015 graduates in our sample:

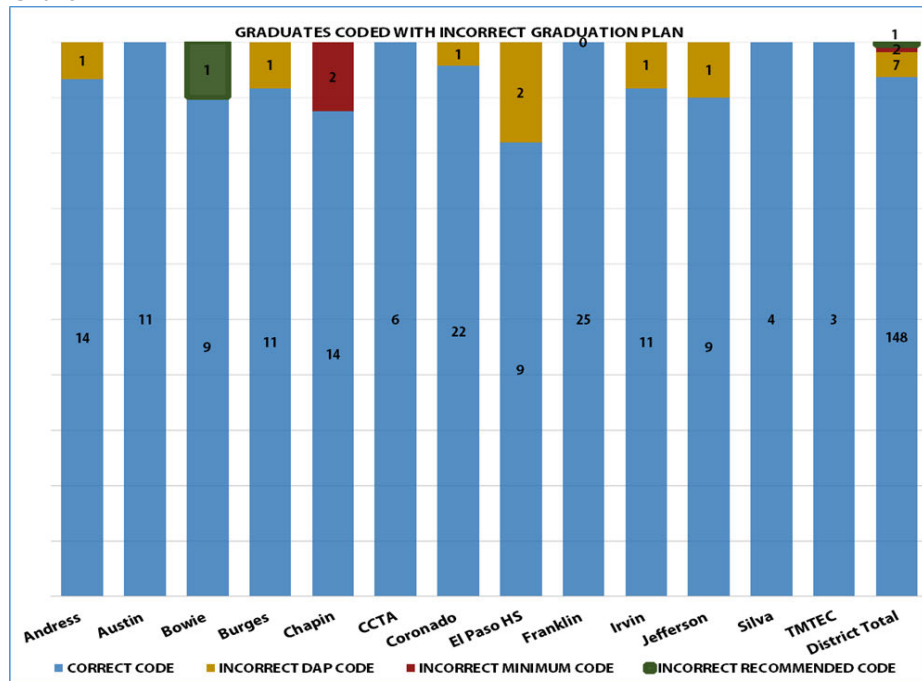
1. Two of 158 (1%) students did not complete the requirements to graduate. Chart 1 below shows the results by individual campus.
 - a. One student did not meet the end of course requirements.
 - b. One student did not have the required state/District credits needed to graduate.

Chart 1



2. Ten of the 158 (6%) students graduated under the incorrect high school program. Chart 2 below shows the results by individual campus.
 - a. Seven students graduated under the DAP (per the AAR), however, since they did not complete the required four DAP measures, they should have graduated under the Recommended High School Program.
 - b. One student, who took a modified (SPED) course, graduated under the Recommended High School Program, but should have graduated under the Minimum High School Program.
 - c. Two students graduated under the Minimum High School Program, but could have graduated under the Recommended High School Program.

Chart 2



Criteria	<ul style="list-style-type: none"> • 19 TAC Part II, Chapter 74, Subchapter F. Graduation Requirements, Beginning with School Year 2007-2008 (see additional background section for information) • 19 TAC, Part II, Chapter 101, Subchapter CC, Rule §101.3022, Assessment Requirements for Graduation (see additional background section for information)
Cause	<ul style="list-style-type: none"> • Not all counselors are adhering to graduation program requirements. • Written guidelines, policies, and procedures for the DAP requirements were outdated or obsolete. There were District bulletins that are no longer used and the criteria was based on outdated guidelines. The inadequacy of written guidelines may result in variances/inequity when evaluating DAP candidates and inaccurate coding of DAP graduates that did not meet DAP requirements. • Board Policy EIF (Local) does not have additional graduation requirements than those of the state for students who entered the 9th grade in the school years 2011-2012 through 2013-2014. However, a District practice and graduation plan template for Guidance Services used by counselors requires one additional technology application credit.
Effect and Risks	Student graduation data is used for state accountability and graduation reports and may impact the District's state and federal accountability and Performance-Based Monitoring (PBM) ratings.
Recommendations	1. 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,

	<p>which may vary by cohort (year a student enters 9th grade). The audit card should be updated as credit requirements change.</p> <ol style="list-style-type: none"> 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. 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. 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. 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. 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.
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Observations

While conducting this audit, some observations were made that do not violate state or federal guidelines, and as such, were not included in the findings of the report. However, we felt the items noted or observed were worthy of informing you as the data owner/expert, in order for you to make the determination as to whether they should be addressed.

Observation (#01)

	<p>The District does not require all documentation supporting a student's declared graduation program be kept in the CUM. Not included is documentation to support the four additional DAP measures, assessment test scores (for example, International Baccalaureate, and College Board Advanced Placement), the final manual audit card that demonstrates a student met the academic requirements for graduation, and any other academic achievement completed that qualifies as a DAP measure by the student during their academic career. Furthermore, some of this documentation is kept in counselor files, however there is a risk the documentation is not following the student when they transfer to other campuses.</p>
Criteria	<p>According to the Texas Education Agency, Minimum Standards for the Academic Achievement Record 2012, "The Academic Achievement Record (AAR) is an official and permanent record of a student's academic performance during high school and, in some</p>

	cases, of high school courses completed prior to high school (19 TAC 74.14). Entries on this official record of actual courses taken, grades earned, credit awarded, and codes denoting special explanations must be consistent with teachers' records and the student's Individualized Education Program (IEP), when applicable. Entries may not be altered or removed except to correct errors. Error corrections must be fully explained in the student's permanent record. An AAR must be maintained for each student enrolled in a high school."
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.

Observation (#02)

	The District has a senior clearance form that can be used to verify credits and academic achievements necessary to clear the graduation plan, but it is not used consistently by campus staff.
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.