

DISTRICT OF COLUMBIA OFFICE OF THE INSPECTOR GENERAL

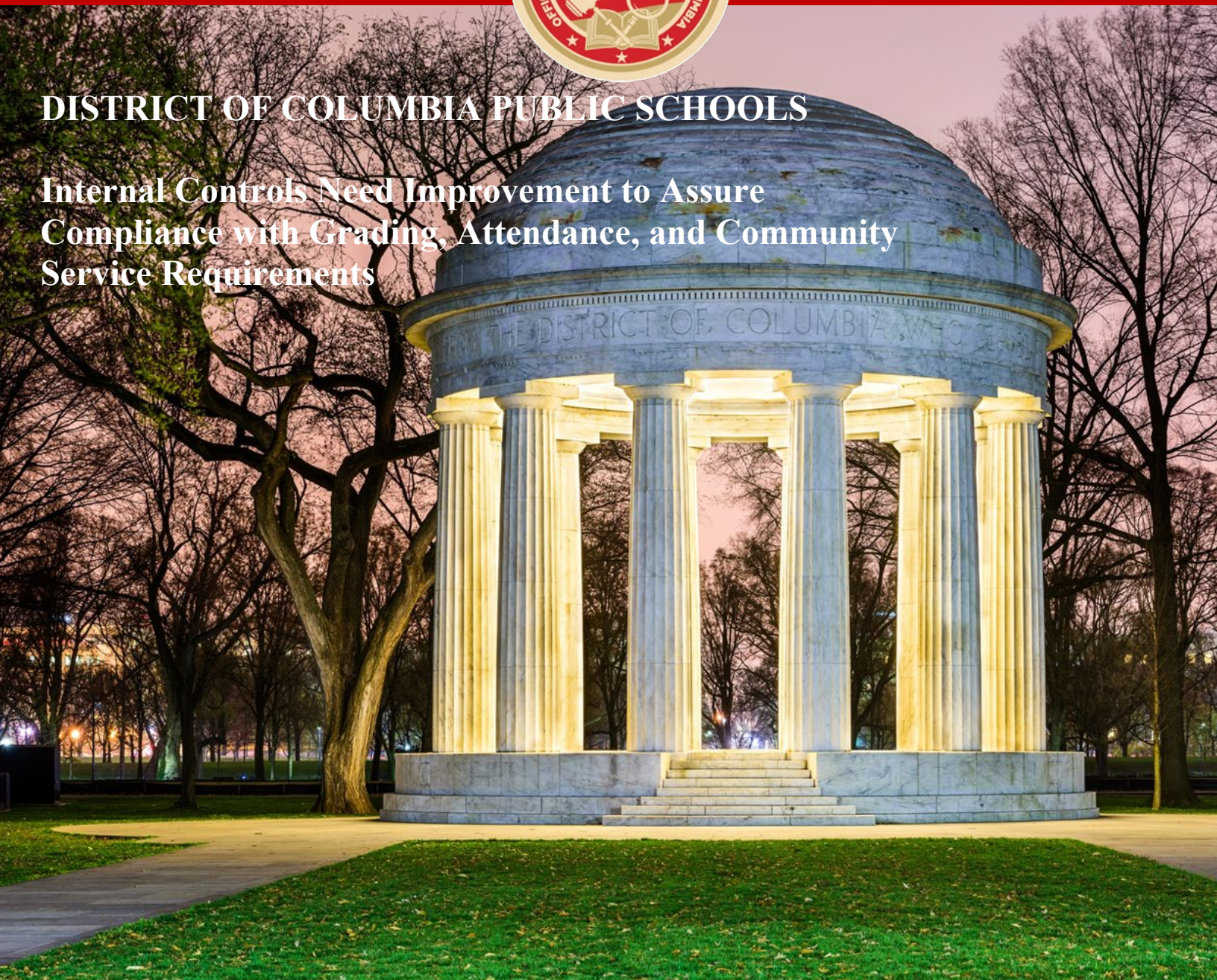
OIG Project No. 19-I-04GA

June 2019



DISTRICT OF COLUMBIA PUBLIC SCHOOLS

**Internal Controls Need Improvement to Assure
Compliance with Grading, Attendance, and Community
Service Requirements**



Guiding Principles

*Workforce Engagement * Stakeholders Engagement * Process-oriented * Innovation
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Our mission is to independently audit, inspect, and investigate matters pertaining to the District of Columbia government in order to:

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- inform stakeholders about issues relating to District programs and operations; and
- recommend and track the implementation of corrective actions.

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* Transparency * Empowerment * Courage * Passion
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Why the OIG Did This Audit

In January 2018, the Mayor of the District of Columbia requested the help of the Office of the Inspector General (OIG) in “identifying system weaknesses and proposing appropriate solutions” after news outlets reported that students from the Ballou Class of 2017 graduated after accruing high numbers of unexcused absences, in violation of the District’s graduation policy.

In response to the Mayor’s request and her concern for the impact of students graduating without meeting requirements in the District, the OIG initiated this evaluation to: (1) determine whether DCPS violated its graduation policy for the Ballou Class of 2017; and (2) assess the internal controls in place that should assure compliance with District policies related to graduation and attendance.

What the OIG Recommends

The OIG makes 25 recommendations to DCPS to strengthen controls surrounding grades, attendance, and community service requirements in DCPS schools, which will ultimately improve integrity in the District’s education system.

DISTRICT OF COLUMBIA PUBLIC SCHOOLS:

Internal Controls Need Improvement to Assure Compliance with Grading, Attendance, and Community Service Requirements

What the OIG Found

District of Columbia Public Schools’ (DCPS) purpose “is to ensure every DCPS school provides a world-class education that prepares ALL . . . students . . . for success in college, career, and life.” To ensure success in college, career, and life, a DCPS high school graduate must: (1) successfully complete at least 24 credits or Carnegie Units with a passing grade; and (2) complete 100 hours of community service. Importantly, to earn the minimum number of credits, students must meet attendance requirements to pass required courses.

DCPS measures its success largely upon the graduation rate of its students. DCPS’ narrow focus on increasing graduation rates led to Ballou administrators and teachers circumventing or ignoring regulations and policies to graduate students who would have otherwise been ineligible. We found that DCPS and Ballou Senior High School (Ballou) did not adequately enforce grading, attendance, and community service requirements for the Ballou Class of 2017. We also found that some issues identified at Ballou were systemic to DCPS following our examination of the ASPEN Student Information System (ASPEN SIS).

DCPS and Ballou showed a consistent pattern of policy violations to bolster its student graduation rates. More specifically, the OIG found that among the 178 graduating seniors: 96 passed at least 1 class with 30 or more unexcused absences during the school year; 87 could not have their community service hours verified; 52 were improperly enrolled in and/or utilized credit recovery courses; and 35 were not afforded school-based student support team (SBSST) interventions after accruing 5 or more unexcused absences.

Many teachers and school administrators interviewed for this report seemed unaware of the District of Columbia Municipal Regulations (DCMR) requirements for schools and school personnel. They reported that DCPS had not provided schools with training on the DCMR requirements and DCPS attendance, grading, and community service policies. Others who stated they knew the requirements but were focused on decreasing truancy and increasing graduation rates, elected to circumvent the requirements.

Because DCPS and Ballou failed to adhere to grading, attendance, and community service requirements, some Ballou Class of 2017 graduates may be left unprepared for success in college, career, and life. While this evaluation focused on the issues at Ballou High School, our findings would be instructive throughout DCPS.

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Office of the Inspector General

Inspector General



June 4, 2019

The Honorable Muriel Bowser
Mayor
District of Columbia
1350 Pennsylvania Avenue, N.W.
Mayor's Correspondence Unit, Suite 316
Washington, D.C. 20004

Dear Mayor Bowser:


Enclosed is our final evaluation report entitled *DCPS: Internal Controls Need Improvement to Assure Compliance with Grading, Attendance, and Community Service Requirements*, (OIG Project No. 19-I-04GA). We conducted this evaluation in accordance with *Council of the Inspectors General on Integrity and Efficiency Quality Standards for Inspection and Evaluation* and the Government Accountability Office (GAO) *Standards for Internal Control in the Federal Government*.

We initiated this project in response to your January 29, 2018, letter in which you requested the OIG's help in "identifying system weaknesses and proposing appropriate solutions" following the Office of the State Superintendent of Education's investigative work regarding the integrity of the Ballou High School Class of 2017 graduation rates. We provided the draft report to the Mayor on March 13, 2019, and received responses from the Mayor and the Chancellor, DCPS, on May 22, 2019.

Through the Mayor, DCPS concurred with all 25 recommendations. DCPS' actions taken and/or planned are responsive and meet the intent of the recommendations. Your response and DCPS' response are included in their entirety in Appendix C. We acknowledge and commend DCPS' work to improve its internal control environment to assure student grading, attendance, and community service compliance. We appreciate that DCPS began to address some of the findings immediately upon notification during the evaluation.

We also appreciate the cooperation and courtesies extended to our staff during this evaluation. If you have questions about this report, please contact me at (202) 727-2540.

Sincerely,


Daniel W. Lucas
Inspector General

DWL/mnw

Enclosure

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BACKGROUND

In 2007, then-Mayor Adrian Fenty assumed control of District of Columbia Public Schools (DCPS) because the local education agency (LEA) or school district was underperforming. The District of Columbia Public Education Reform Amendment Act of 2007 (PERAA)¹ officially established DCPS as a “separate cabinet-level agency, subordinate to the Mayor, within the executive branch of the District of Columbia government.”²

The idea of Mayoral control is codified in D.C. Code § 38-172(a), which gives the mayor “authority over all curricula, operations, budget, personnel, labor negotiations and collective bargaining agreements, facilities, and other education-related matters”

The D.C. Council established a Department of Education, which is subordinate to the Mayor and headed by a Deputy Mayor for Education. The Department of Education is “responsible for the planning, coordination, and supervision of all public education and education-related activities . . . from early childhood to post-secondary education level” for the LEAs in the city.³ A Chancellor, appointed by the Mayor, oversees DCPS and reports to the Deputy Mayor for Education.

Mayoral control also meant that the Board of Education no longer ran the school system but, among other duties, it exercises oversight of the Office of the State Superintendent of Education (OSSE).⁴ OSSE’s rulemaking authority set forth in D.C. Code § 38-2602(b)(7) permits OSSE to “[i]ssue rules to establish requirements to govern acceptable credit to be granted for studies completed at . . . public . . . schools”⁵ OSSE is the state education agency with oversight, regulatory, and grant-making authority over DCPS.⁶

The District of Columbia Public Schools

DCPS educates nearly 49,000 students and comprises 4,000 teachers, 109 principals, and a central office (DCPS Central) organized into 14 divisions.⁷ DCPS states that its purpose “is to ensure that every DCPS school provides a world-class education that prepares ALL . . . students . . . for success in college, career, and life.” Further, DCPS’ mission is to “[e]nsure that every school guarantees students reach their full potential through rigorous and joyful learning experiences provided in a nurturing environment.”⁸

¹ D.C. Law 17-9, effective June 12, 2007.

² D.C. Code § 38-171.

³ D.C. Code § 38-191(b)(2).

⁴ D.C. Code § 38-191(b).

⁵ In accordance with this authority, OSSE issued and published final rulemaking regarding graduation requirements in the D.C. Register effective April 8, 2016. These graduation requirements are in the District of Columbia Municipal Regulations at 5A DCMR Chapter 22, Section 2203.

⁶ OSSE’s responsibilities are codified at D.C. Code § 38-2602.

⁷ Information based on 2018 staffing, enrollment, and divisions.

⁸ DCPS website, <https://dcps.dc.gov/page/about-dcps> (last visited Feb. 22, 2019).

In 2012, DCPS released its 5-year strategic plan, *A Capital Commitment*, which “provides a roadmap for building DCPS into a high-quality, vibrant school district that earns the confidence of our community. The plan defines an overarching purpose as well as five goals that will guide DCPS’ work through 2017.”⁹

One goal is that at least 75 percent of entering 9th graders would graduate from high school in 4 years. When Ballou’s Senior Class of 2017 entered the 9th grade in 2013, DCPS had a graduation rate of 44.6 percent,¹⁰ according to an OSSE report of DCPS’s Adjusted Cohort Graduation Rates (ACGR) to the U.S. Department of Education. Based on DCPS’ graduation rate goal of 75 percent, DCPS expected Ballou to raise its graduation rate by 30 percent within 4 years.

Another DCPS goal was to improve reading and math proficiency rates “by 40% points by 2016-2017” at the 40 Lowest Performing DCPS Schools, including Ballou. The so-called 40-40 schools “serve large populations of students who need extra support, including low-income students, English language learners, and students with special needs.”¹¹

Ballou Senior High School (Ballou) is located in Ward 8 and was founded in 1960. It offers traditional classes, advanced placement courses, technical classes, marching band, robotics team, and various athletic programs.

To manage student academics, DCPS employs the ASPEN Student Information System (ASPEN SIS). ASPEN SIS allows DCPS to “track[] and report[] ... student data, as well as supporting basic school operations, such as enrollment, scheduling, mark [grade] entry, behavior, and attendance.”¹²

DCPS Graduation Requirements & Ballou Reporting

The District of Columbia Municipal Regulations (DCMR) establishes graduation requirements for DCPS. Title 5A DCMR § 2203.3(f) requires a student to have: 24 Carnegie Units¹³ and 100 hours of volunteer community service to be eligible for graduation.

National Public Radio (NPR) reported on November 28, 2017, that students from Ballou’s Senior Class of 2017 graduated after accruing high numbers of unexcused absences, in violation of the District’s attendance policy. NPR also reported that teachers felt pressured to pass students who needed class credit to graduate. The allegations came after local news reports

⁹ DISTRICT OF COLUMBIA PUBLIC SCHOOLS, A CAPITAL COMMITMENT, <https://dcps.dc.gov/2017> (last visited Oct. 22, 2018).

¹⁰ According to *DC 2013 4-year & 2014 5-year Adjusted Cohort Graduation Rates*: https://osse.dc.gov/sites/default/files/dc/sites/osse/publication/attachments/GraduationbySchool_2013ACGR%20%282013%29.pdf (last visited 10/5/2018).

¹¹ <https://dcps.dc.gov/publication/40-lowest-performing-dcps-schools> (last visited 8/22/18).

¹² DISTRICT OF COLUMBIA PUBLIC SCHOOLS, NEGOTIATED CONTRACT FOR GOODS AND/OR SERVICES, CONTRACT NO. GAGA-2014-C-0052, Sec. B1.1 (Aug. 8, 2014).

¹³ Title 5A DCMR § 2299.1 defines a Carnegie unit as “120 hours of classroom instruction over the course of an academic year.”

lauded Ballou's Senior Class of 2017 for being the first in Ballou's history to have all graduating seniors accepted into college.¹⁴

Following the NPR report, the Mayor ordered OSSE to investigate the allegations as "the state education department and regulator." OSSE commissioned Alvarez & Marsal (A&M), whose investigation resulted in two reports that found "a culture of passing and graduating students," so a third of all graduates in the school system graduated due to policy violations. At Ballou, the percentage was nearly two-thirds of the Senior Class of 2017.

DCPS moved quickly to update its policies to address findings in the A&M report. The District of Columbia Council also held several hearings regarding these matters.

OIG's Independent Evaluation

To help the District in "identifying system weaknesses," in January 2018, the Mayor requested the OIG to conduct an independent evaluation. Our evaluation, guided by the *Council of the Inspectors General on Integrity and Efficiency Quality Standards for Inspection and Evaluation* (Blue Book) and the Government Accountability Office (GAO) *Standards for Internal Control in the Federal Government* (GAO-14-704G, the Green Book), sought to identify the root causes of the graduation issues.

The Green Book defines internal control as "a process used by management to help an entity achieve its objectives."¹⁵ Internal controls are the systems in place to reasonably assure the integrity of the process. Further, the Green Book explains that "[m]anagement is directly responsible for all activities of an entity, including the design, implementation, and operating effectiveness of an entity's internal control system."¹⁶ The internal control system is comprised of five components that "must be effectively designed, implemented, and operating together in an integrated manner, for an internal control system to be effective."¹⁷ The five components of internal control are:

- **Control Environment:** The foundation for an internal control system. It provides the discipline and structure to help an entity achieve its objectives.
- **Risk Assessment:** Assesses the risks facing the entity as it seeks to achieve its objectives. This assessment provides the basis for developing risk responses.
- **Control Activities:** The actions management establishes through policies and procedures to achieve objectives and respond to risks in the internal control system, which includes the entity's information system.

¹⁴ Q. McCray, *100% of Ballou High School's graduating senior class accepted into college*, ABC7, WJLA, June 16, 2017, <https://wjla.com/features/spotlight-on-education/100-percent-of-ballou-high-schools-graduating-senior-class-accepted-into-college> (last visited Mar. 8, 2019).

¹⁵ U.S. GOVERNMENT ACCOUNTABILITY OFFICE, STANDARDS FOR INTERNAL CONTROL IN THE FEDERAL GOVERNMENT, GAO-14-704G Title Page (Sept. 2014), <https://www.gao.gov/products/GAO-14-704G> (last visited Feb. 19, 2019).

¹⁶ *Id.* § OV2.14.

¹⁷ *Id.* § OV2.04.

- Information and Communication: The quality information management and personnel communicate and use to support the internal control system
- Monitoring: Activities management establishes and operates to assess the quality of performance over time and promptly resolve the findings of audits and other reviews.

Our evaluation of the graduation allegations at Ballou is well-suited for a discussion in a healthy internal control environment. Internal controls illustrate where weaknesses lie and provide opportunities to mitigate any challenges that undermine the successful implementation of an agency's objectives.

OBJECTIVES, SCOPE, AND METHODOLOGY

The objectives of this evaluation were to: (1) determine whether DCPS violated its graduation policy for the Ballou Class of 2017, specifically the regulations governing student attendance, grades, and community service; and (2) assess the internal controls in place that should provide reasonable assurance of compliance with District policies related to graduation and attendance.

The scope of this evaluation included those students who received diplomas as part of the Ballou Senior Class of 2017.¹⁸ The OIG identified 178 students who graduated from Ballou either in June or after the summer session.¹⁹ Of the 178 students, 160 graduated in June; 18 graduated after the summer session. Of the graduating students, four graduated in 3 years instead of the typical 4 years.

The OIG reviewed correspondence, DCPS policies, applicable regulations, and other criteria. The team analyzed data from ASPEN SIS, to include student gradebooks, transcripts, absence reports, and community service hours, as well as other data OSSE, DCPS, and Ballou provided. This information included electronic communications; student report cards; teacher and school leader IMPACT²⁰ evaluations with components of attendance and graduation as a measure of their performance; and forms documenting students' community service.

The team also interviewed 10 current or former DCPS Central employees or contractors and 13 current or former Ballou employees. Throughout this report, DCPS Central employees are referred to as "DCPS," current or former Ballou school leaders are referred to as "Ballou administrators," and current or former Ballou teachers are referred to as "Ballou teachers."

¹⁸ Students receiving certificates in lieu of diplomas do not officially graduate; therefore, the OIG excluded them from the scope.

¹⁹ Nine additional students were listed in ASPEN as "graduating from Ballou," but actually attended a non-public school and graduated from Ballou in name only. Students can attend private schools or other schools if their neighborhood school cannot meet their educational needs. The neighborhood school is the school of record because the taxpayer dollars flow to wherever the student attends.

²⁰ IMPACT is the DCPS system for assessing the performance of school-based staff, teachers, and school leaders.

FINDINGS

DCPS and Ballou neither followed nor enforced grading, attendance, and community service requirements for the Ballou Class of 2017. We found internal controls could improve at both DCPS and Ballou to assure integrity in the recording of graduation requirements.

DCPS uses ASPEN SIS to manage student academics. ASPEN SIS is customizable, but DCPS did not fully employ its capabilities in setting up internal controls to assure success in managing student performance and attendance. Sometimes, DCPS' configuration of ASPEN SIS made it difficult for teachers to track student attendance to monitor grading requirements. Ballou administrators and teachers were apparently unaware of the way ASPEN SIS functioned. Ballou administrators and teachers were also unaware of how to use "other marks and grading options"²¹ in lieu of issuing A-F grades to report student performance. Many available functions were not enabled within ASPEN SIS that would have allowed users to more effectively manage student performance and attendance.

The OIG's review of correspondence and ASPEN SIS data, as well as interviews with DCPS and Ballou administrators and teachers, identified students graduated without successful completion of either 24 Carnegie Units, attendance, or community service requirements.

Focus on Outputs versus Outcomes Led to a False Representation of Student Achievement

In 2012, DCPS' *A Capital Commitment* strategic plan identified five goals to "guide DCPS' work through 2017."²² Goal 3 of the plan called for an increase in the graduation rate so that "at least 75% of entering 9th graders will graduate from high school in four years."²³

At Ballou, DCPS and Ballou administrators and teachers were uninformed of, or disregarded:

- attendance policies and requirements;
- grading policies and requirements; and
- community service policies and requirements.

Failure to adhere to these policies and requirements ultimately portrayed false improvements in graduation rates.

Because of these violations, some students in the Ballou Class of 2017 graduated without fulfilling the established graduation requirements.

DCPS states that its purpose "is to ensure that every DCPS school provides a world-class education that prepares ALL . . . students . . . for success in college, career, and life."²⁴ By

²¹ DISTRICT OF COLUMBIA PUBLIC SCHOOLS, SECONDARY GRADING AND REPORTING POLICY, Table 1: Use of Non-Traditional Grades (SY 2015-2016).

²² D.C. PUBLIC SCHOOLS, A CAPITAL COMMITMENT, *supra* note 9.

²³ *Id.*

²⁴ *Id.*

failing to ensure that students met the requirements, DCPS and Ballou administrators could not be certain that graduating students were ready for success beyond high school.

A detailed discussion on the system weaknesses and policy violations discovered during this evaluation can be found in the following sections.

FINDING 1: DCPS AND BALLOU DID NOT FOLLOW OR ENFORCE ATTENDANCE REQUIREMENTS

DCPS and Ballou administrators and teachers did not enforce certain attendance policies required by the DCMR. Specifically, Ballou administrators and teachers: (1) did not initiate interventions to address students with 5 or more unexcused absences; (2) permitted students to pass a term with 10 or more unexcused absences; and (3) awarded credit for courses in which students accumulated 30 or more unexcused absences.

According to DCPS policies, teachers must use ASPEN SIS to record attendance in every class. They must mark each student missing as absent. Ballou teachers alleged that the ability to count student absences in ASPEN SIS is difficult. They stated that they had to count every absence by navigating to each student's profile to determine their overall attendance record. Teachers stated there was no other way to see if the student exceeded the limit of unexcused absences proscribed by the DCMR using ASPEN SIS. DCPS policies also lacked clear guidance on how students could use flexible school hours and failed to consider the attendance requirements based on the four different class schedules at Ballou.

Ballou Did Not Initiate Interventions to Address Absenteeism

Title 5A DCMR § 2103.2(c)(3) states that DCPS students with 5 or more unexcused absences in one marking period (or a similar time frame) will be referred to a school-based student support team (SBSST).

The SBSST coordinates services and initiatives related to academics, attendance, positive school culture, and health and wellness to ensure all students receive support and necessary intervention. SBSST teams may be comprised of guidance counselors, teachers, administrators, social workers, nurses, and other support staff. Although SBSST meetings serve as an early-warning system to identify struggling students and provide them with additional supports, we found no records in ASPEN SIS to indicate Ballou administrators and teachers initiated SBSST meetings for all students who accrued over 5 unexcused absences.

Ballou administrators stated they often lacked the required SBSST team members to conduct initial SBSST and follow-up meetings as required in 5A DCMR § 2103.4(b)-(c). Our review of ASPEN SIS indicated at least 35 of 178 students in the Ballou Class of 2017 with 5 or more unexcused absences received no SSBT intervention. Without these interventions, Ballou missed an important opportunity to help identify the causes for unexcused absences and intervene accordingly.

We recommend DCPS:

1. Develop a plan to identify and ensure all students who accumulate 5 or more unexcused absences receive interventions, as required by the DCMR and DCPS policies.

Ballou Permitted Students with 10 or More Unexcused Absences to Pass a Term

During School Year (SY) 2016-2017, 5E DCMR § 2103.8 stated: “D.C. Public School secondary students with ten (10) or more unexcused absences in any class during a single advisory [term] shall receive a grade of “FA” (failure due to absences) in that subject.”²⁵

Ballou teachers did not assign term grades of “FA” to students who accrued 10 unexcused absences. Some Ballou teachers and administrators stated they were unaware of the regulation – but others were aware and understood its implication, which was enforcement of the regulation would decrease the graduation rate. Administrators at other schools sought guidance from DCPS to ask whether they could deviate from the requirement. In one instance, a principal from another DCPS high school contacted DCPS regarding application of the “FA” policy due to concerns it “will lead to a much higher course failure rate.” In response, a high-ranking DCPS official responded that the “FA” policy was a DCMR regulation but there was “wiggle room” in how DCPS applied the “FA” policy.

Although ASPEN SIS can automatically record an “FA” once students reach 10 unexcused absences, DCPS did not enable this function to help enforce the regulation. In February 2017, a DCPS official emailed the ASPEN SIS team and specifically instructed them not to enable the “FA” during the SY 2016-2017 because:

[t]his is an extremely sensitive area since as a [D]istrict we are fighting to decrease truancy and increase graduation rate [sic]. I don’t foresee [sic] the Chief of Schools signing off on full implementation on the use of this grade although it exists [sic]. Again, on the school level, the question will be what’s in place to ensure the student succeeds.

As a result, 158 of 178 Ballou Class of 2017 graduates earned passing term grades after accruing at least 10 unexcused absences. Our analysis of ASPEN SIS showed that Ballou teachers did not assign an “FA” in 1,250 instances in which students had accrued 10 or more unexcused absences in a term. Passing term grades affect final course grades, and final course grades determine a student’s graduation eligibility.

In addition, several Ballou teachers stated they were not trained on the “FA” policy and others were told they did not have to apply it, even though the 5E DCMR § 2103.8 requirements regarding unexcused absences, prior to September 14, 2018, are included in the *DCPS Secondary School Grading and Reporting Policy*, and had been part of the DCMR since at least 2009.

²⁵ As of September 14, 2018, a student who accrues 10 or more unexcused absences will no longer receive a grade of FA; rather, 5B DCMR § 2103.4 states the student will receive a notice saying they are at risk of receiving a grade of FA.

We recommend DCPS:

2. Ensure teachers are aware of grading and attendance policies, as required by the DCMR.
3. Ensure school administrators enforce the proper recording of absences and are aware of its bearing on student grades, as required by the DCMR and DCPS policies.
4. Enable functions within ASPEN SIS to support student performance management.

Ballou Class of 2017 Students with more than 30 Unexcused Absences Were Allowed to Pass an Entire Course

Title 5E DCMR § 2103.10 states that DCPS secondary students who accumulate “thirty (30) or more unexcused absences in a course within a full school year shall receive a failing final grade in that course with a resulting loss of course credit.” Ballou administrators and teachers did not enforce the regulation and DCPS did not monitor Ballou’s compliance with the regulation. DCPS did not enable functions in ASPEN SIS that would have automatically assigned a grade of “FA” when 30 or more unexcused absences were accrued.

Although Ballou teachers were primarily responsible for assigning student grades and monitoring attendance, some stated they were unaware of the responsibility to fail students with more than 30 unexcused absences. Other Ballou teachers stated they had discretion in applying the rule. In both situations, teachers said they lacked formal training to ensure complete understanding and proper application.

DCPS and Ballou administrators also failed to meet their responsibilities to follow and enforce the regulations and policies. The *DCPS Graduate Verification Manual* requires DCPS to “verif[y] all graduates based on their transcript information in ASPEN”²⁶ to ensure that each student has met the minimum graduation requirements laid out in 5A DCMR § 2203.3, before being granted a diploma. School principals had to certify transcript accuracy for graduates specifically that “all courses and marks for each student who is graduating and receiving a diploma have been correctly entered into ASPEN...”²⁷

DCPS provided school administrators with monthly reports detailing both graduation rates and truancy rates at each school. A Ballou administrator stated that DCPS provided monthly reports, yet DCPS officials never questioned high graduation rates despite high truancy rates at the school. And the Ballou administrator was receiving positive accolades and feedback from DCPS simultaneously. As a result, the Ballou administrator felt they did not need to enforce the requirements.

When DCPS failed to provide training on and enforcement of the 30-day unexcused absence policy, DCPS sent a message that teachers did not have to follow the policy. By not ensuring compliance with the policy, teachers and administrators did not clarify it to students that attendance is a prerequisite for earning a grade and for graduating high school. As a result, 96 of

²⁶DISTRICT OF COLUMBIA PUBLIC SCHOOLS, GRADUATE VERIFICATION MANUAL, 4 (SY 2016-2017).

²⁷*Id.* at 37.

178 students in the Ballou Class of 2017 passed 244 classes in which they accrued over 30 unexcused absences. Eighty of the 96 students passed at least 1 required class needed to graduate despite accruing 30 or more unexcused absences.

We recommend DCPS and Ballou:

5. Provide training to school administrators and teachers to ensure the proper recording of absences and its bearing on student grades, under the DCMR and DCPS policies.
6. Enable ASPEN SIS functionalities to automate “FA” grade assignment following 30 unexcused absences in a class during a school year.
7. Develop an internal control in which DCPS principals periodically evaluate class attendance to ensure accurate data is available at the conclusion of the school year to determine graduation eligibility.

Ballou Misused Student Flexible School Hours

Ballou administrators granted flexible hours to students who were not eligible and in some cases had accrued 30 or more unexcused absences. D.C. Code § 38-202(c) states that flexible school hours are designed for students 17 years old or older who are regularly employed, but these flexible hours should not result in being excused from the entirety of regular attendance or interfere with the student’s timely graduation. Had Ballou adhered to the D.C. Code, several students would not have been granted flexible school hours.

Ballou administrators allowed 110 of 178 graduates to use flexible school hours to come to school late or leave school early. Of the 110 students, 65 had at least 30 unexcused absences in at least one class. With 30 or more unexcused absences, the students’ timely graduation was at risk because they were on a path toward course failure(s) and the loss of course credit due to the absences. Given the amount of unexcused absences students already accrued and the adverse impact the absences had on students’ ability to pass a course, Ballou administrators granting flexible school hours (authorizing students to spend even more time out of school) may not have been in the best interest of the student’s academic success.

Ballou administrators explained that they granted flexible school hours to students in part due to classroom capacity issues to include: the number of available teachers; the number of classes a teacher could teach per day; and limitations on the number of students in a single class. According to Ballou administrators, the Washington Teachers Union contract limited their ability to address these capacity issues as, per the contract, teachers were limited in the amount of classes they could teach during the school day. Additionally, Ballou administrators stated that they allowed flexible school hours in lieu of enrolling students in classes not required for graduation, as they worried the student may not pass the class, which would adversely affect the student’s academic standing.

By allowing flexible school hours without considering whether the student was on track to timely graduate, Ballou administrators may have missed an opportunity to intervene, provide additional support to the student, and ultimately get the student back on track to graduate on time. Further,

by permitting flexible school hours in lieu of classroom instruction, Ballou administrators missed an opportunity to seek additional assistance from DCPS in order to address capacity issues and ensure graduates met all requirements.

We recommend DCPS:

8. Develop and promulgate a policy, which identifies the appropriate use of flexible school hours for students, and ensures impacts to timely graduation, such as grading, attendance, and community service requirements, are considered.

DCPS Attendance Policies did not Consider Different Class Schedules

Title 5E DCMR § 2103.10, which was in effect during SY 2016-2017, stated that a DCPS secondary student accumulating thirty (30) or more unexcused absences in any class shall receive a failing grade in that course and lose course credit. However, when determining absences, some Ballou students could miss more instruction time than other students based on different class schedules available at Ballou. Using a 30-day measure as instead of an equivalent classroom instructional hour measurement, had a disproportionate effect on how many students failed courses at Ballou due to attendance.

In SY 2016-2017, four different types of class schedules were in effect at Ballou that met: (1) every day for 45 minutes during an entire school year; (2) every other day for 90 minutes, during an entire school year; (3) every day for 45 minutes during a semester; and (4) every other day for 90 minutes during a semester. Failure due to absences were calculated using the 30-day unexcused absence regulation, regardless of class schedule and corresponding amount of instruction time lost as a result of the absence. Table 1 shows the four class schedules and the corresponding percentage of instruction time that may be missed according to the 30-day unexcused absence regulation.

Table 1: Class Schedule Periodicity and Duration

Duration of Class	Class Schedule	Number of Days Per Class	Percentage of Instruction Time Missed Before Failing
Full-Year	Everyday	180	16.7%
	Every other day (Block)	90	33.33%
Semester	Everyday	90	33.33%
	Every other day (Block)	45	66.7%

Source: OIG Analysis.

Based on the 30-day absence measure, a student taking a class that meets every other day for a single semester (45 days of class), could be absent for 29 days (64.4%) of the classes' instructional hours, yet remain eligible to earn a passing grade. Comparatively, a student enrolled in a class that met every day for a full academic year could only miss 16.7% of class time.

We recommend DCPS:

9. Issue guidance that considers class schedule periodicity and duration and its impact on attendance requirements, in accordance with 5B DCMR § 2103.6.

DCPS did not Use ASPEN SIS to Assure the Integrity of its Attendance Monitoring Practices

DCPS did not use ASPEN SIS as a management tool to enforce attendance regulations.

According to the “negotiated contract for goods and services” DCPS signed in August 2014, ASPEN SIS was capable of “meeting internal needs for tracking and reporting of student data as well as supporting basic school operations such as enrollment, scheduling, mark [grade] entry, behavior, and attendance.”²⁸

Leveraging ASPEN SIS capability could help DCPS and Ballou administrators assure compliance with attendance regulations. For example, once a student reaches 10 or more unexcused absences in a term, ASPEN SIS can automatically enter an “FA” grade. However, DCPS did not enable this automation and teachers did not enter “FA” in ASPEN SIS.

ASPEN SIS has a function to automatically notify a teacher once a student reached 30 unexcused absences. DCPS did not enable this feature and teachers were unaware that a student should have received an “FA” for the entire course when 30 unexcused absences accrued.

DCPS also did not enable ASPEN SIS to provide an audit capability. Audit features are important to ensure integrity in the information within the system.

By enabling all available functions of the ASPEN SIS, DCPS could have used it as a true management information system, which would have reasonably assured compliance with applicable regulations, reduced administrative burden on employees, and helped to assure the integrity with information maintained in the system.

We recommend DCPS:

10. Enable ASPEN SIS functionalities to automate attendance notification and grade assignment in relation to unexcused absences, under applicable DCMR requirements.
11. Enable ASPEN SIS audit functionalities to track attendance when calculating grades.

²⁸ DISTRICT OF COLUMBIA PUBLIC SCHOOLS, NEGOTIATED CONTRACT FOR GOODS AND/OR SERVICES, *supra* note 12.

FINDING 2: DCPS AND BALLOU DID NOT FOLLOW OR ENFORCE GRADING REQUIREMENTS

DCPS and Ballou did not adhere to or ensure compliance with District grading policies. Prior to its repeal in September 2018, 5E DCMR § 2200.1 stated that the “marking or grading system of the DC Public Schools shall be designed to report fairly and accurately student progress and student achievement.” Title 5E DCMR § 2200.4 stated that “primary responsibility for evaluating the work of the student shall rest with the teacher.”²⁹

DCPS and Ballou administrators and teachers did not follow applicable guidance concerning the use of credit recovery, the proper use of grades other than A-F grades, use of make-up work, and the recording of assignment grades. Further, DCPS did not enable features in ASPEN SIS that would have served as internal controls to monitor student grading.

DCPS did not monitor the use of Evening Credit Recovery Program, nor did Ballou Comply with Program Policies

Credit recovery allows students who have not passed one or more classes to continue on a path toward graduation within 4 years. According to DCPS’ *Evening Credit Recovery (ECR) Operations Manual*, “Evening Credit Recovery exists to support student academic progress and to increase the Adjusted Cohort Graduation Rate, especially as we drive towards a 75% rate for the Class of 2017.”³⁰ The *ECR Manual* states that students enrolling in evening credit recovery classes must submit a Credit Recovery Student Application form. A counselor must then certify the following eligibility requirements on the application:

- the student has taken and failed the course;
- the course fulfills a graduation requirement; and
- the student is not currently taking the course during his/her daytime schedule.³¹

Additionally, the *ECR Manual* prohibits students seeking to graduate within 3 years from using ECR for original credit. The *ECR Manual* also states that DCPS’s Academic Planning and Support Team (APS) may approve requests for students to take one ECR course for original credit if the course fulfills a graduation requirement and the student will be potentially eligible to graduate by June or August of that year.³²

Ballou administrators and teachers violated policies governing the credit recovery program. Despite policy requirements, Ballou administrators did not require students to submit the ECR application form, which is an internal control to determine eligibility. According to interviews, Ballou administrators knew students were not eligible for ECR classes, but allowed students to participate in the credit recovery program to keep them on track to graduate. For example,

²⁹ We note that effective September 14, 2018, 5B DCMR § 2200 contains the provisions that were previously promulgated at 5E DCMR § 2200.

³⁰ DISTRICT OF COLUMBIA PUBLIC SCHOOLS, EVENING CREDIT RECOVERY PROGRAM OPERATIONS MANUAL 2 (SY 2016-2017).

³¹ *Id.* at 4.

³² *Id.*

instead of waiting for students to fail all the terms in a course, Ballou administrators and teachers allowed students who had received two failing term grades in a course to enroll simultaneously in credit recovery classes while completing the remaining terms of the daytime course.³³

Ballou administrators used ECR classes to enable students who were failing daytime classes to earn credit needed to graduate, which violated the *ECR Manual* policies. Approximately 30 percent of the Ballou Class of 2017 enrolled in ECR was in violation of the policy. Ballou permitted:

- 15 students to enroll in ECR courses while they were simultaneously taking the same original credit courses during the day;
- 52 students to enroll in ECR courses for original course credit, without prior approval from the DCPS APS team;
- 9 of the 52 students to use over 1 ECR course for original credit; and
- 3 of 4 students who graduated in 3 years to substitute ECR courses for regular daytime courses.

DCPS did not detect Ballou's improper use of the credit recovery program because it did not effectively monitor the program. The DCPS official tasked with oversight for the credit recovery program claimed to have conducted site visits to examine Ballou's credit recovery program and offered to provide the OIG with audit checklists used during site visits and logs documenting the results. However, the official never produced the documentation for review. Ballou administrators stated that DCPS never conducted site visits to examine its ECR program.

We recommend DCPS:

12. Develop internal controls to ensure schools are in compliance with all provisions of the *ECR Manual*.
13. Provide training to school administrators and teachers to ensure appropriate use of the ECR program.

Ballou Misused “Other Marks and Grading Options”

Ballou administrators and teachers incorrectly used “other marks and grading options,” such as “Late” (L), “Incomplete” (I), and “Medical” (M), for situations that did not comply with DCPS policy. The *DCPS Secondary Grading and Reporting Policy* outline the appropriate use of “other marks and grading options.”³⁴ See Table 2, page 14.

³³ Final grades are calculated using a percentage of term grades, midterm grades, and final exam grades.

³⁴ DISTRICT OF COLUMBIA PUBLIC SCHOOLS, SECONDARY GRADING AND REPORTING POLICY, *supra* note 21, at 27.

Table 2: Other Marks and Grading Options Criteria

Mark	Intended Use
L (Late Entry)	Applied for transfer students who enter mid-term (usually within 2-4 weeks of the end of the term); if possible, grades from a previous course/school should be combined with term marks earned in the receiving school.
I (Incomplete)	Indicates a missing project or assignment that will impact the grade—should be converted into F after 10 school days from the end of the reporting period if the missing work is not completed.
M (Medical)	Applied for a student on medical leave as verified by a doctor’s note or hospital stay—should only be used for courses that HHIP ³⁵ cannot service or for students not involved in the program.

Source: DCPS Secondary Grading and Reporting Policy.

Some Ballou teachers misused “other marks and grading options.” Other Ballou teachers stated they were unaware of when these grades could be assigned because they were not trained on this policy or the criteria associated with assigning each grade.³⁶ Ballou teachers could not articulate the rules related to “other marks and grading options.”

The OIG’s review of Ballou Class of 2017 transcripts found instances of incorrectly using these alternative marks. For example, teachers incorrectly used an “L” as a substitute for grades “A” though “F” when students entered a course during a later term as opposed to entering a course mid-term grade. For example, if a student entered within a week of the end of term 2, a teacher entered an “L” for both terms 1 and 2; however, an “L” should have only appeared in term 2. And interviewees frequently stated that “M” stood for “missing” rather than “medical,” and assigned an “M” when a student was frequently absent. An “M” grade was considered a “null grade” and would not have been calculated in the student’s final course grade.

The OIG identified the following examples of Ballou administrators and teachers improperly assigning “other marks and grading options” to students in the Class of 2017:

- A student received an “L” in the same course during more than one term;
- A student received an “A-F” grade for term 1 but an “L” for term 2 in the same course, which indicated the student was not enrolled in term 1;
- A student received an “L” despite entering the class approximately 2 weeks after the term began, but should have received an “A-F” grade for the term; and
- A student received an “I” that should have been converted to an “F” after 10 days if the student failed to complete their missing work. The “I” remained on their report card for months and was eventually converted to a “C,” but the policy stated the grade should have resulted in an “F.”

³⁵ HHIP DCPS’ Home and Hospital Instruction Program, which, according to DCPS’ website: “provides instruction and support to students who have had their educational programs interrupted because of a physical disability and/or health impairment resulting in confinement to home and/or hospital for three weeks or more.” <https://dcps.dc.gov/service/home-and-hospital-instruction> (last visited Aug. 20, 2018).

³⁶ In general, teachers and school administrators were often unaware of DCMR requirements related to schools or that regulations must be followed. They reported that DCPS had not provided schools with training related to the DCMR.

Improper use of “other marks and grading options” misrepresents student academic performance. If a teacher awarded an “L” rather than an “A-F” grade the student earned, the student’s final grade would not reflect the student’s actual academic performance. DCPS could have leveraged ASPEN SIS capabilities to ensure proper use of “other marks and grading options.”

We recommend DCPS:

14. Provide school administrators and teachers with training on appropriately using “other marks and grading options,” as defined in the *DCPS Secondary Grading and Reporting Policy*.
15. Develop internal controls to assure school compliance with the use of “other marks and grading options,” as defined in the *DCPS Secondary Grading and Reporting Policy*.
16. Enable ASPEN SIS functions for using “other marks and grading options,” as defined in the *DCPS Secondary Grading and Reporting Policy*.

Ballou Teachers Provided Makeup Work and Allowed Retesting Until Students Obtained a Passing Grade

Ballou teachers provided makeup assignments to be completed after an unexcused absence and after students failed to complete original assignments. Ballou teachers also reported that they allowed students with unexcused absences to make up homework and tests. The *DCPS Secondary School Grading and Reporting Policy* states, makeup work is only to be provided to students with excused absences. Additionally, the policy requires that “[e]ach teacher shall specify a reasonable period of time for completion of make-up work, which shall be no less than one full calendar day for each day missed.”³⁷

During interviews, Ballou teachers stated they felt school administrators required them to provide make-up work in an effort to boost student achievement. They also stated that students came to them at the direction of Ballou administrators, to obtain make-up work, regardless of how many unexcused absences students had incurred or how much work students missed. Ballou teachers also admitted that they allowed students to make up tests and final exams beyond the limits prescribed by DCPS policy, until the student earned a passing grade. Ballou administrators created the “Turn-Back Tuesday” program as an additional effort to allow students to make up missed work. Teachers stated that Ballou administrators mandated “Turn-Back Tuesday” to provide make-up work to students who missed assignments from previous weeks, irrespective of students’ eligibility to receive make-up work.

By providing make-up work in a manner inconsistent with DCPS policies and permitting retesting until the student obtained a passing grade, Ballou administrators and teachers misrepresented student academic performance, and placed additional burdens on school resources, which may neither have been planned nor allocated.

³⁷ DISTRICT OF COLUMBIA PUBLIC SCHOOLS, SECONDARY GRADING AND REPORTING POLICY, *supra* note 21, at 24.

We recommend DCPS:

17. Provide school administrators and teachers with training on appropriately using make-up work, under the *DCPS Secondary School Grading and Reporting Policy*.
18. Ensure school administrators and teachers know the appropriate use of retesting.

Ballou Assigned Term Grades Despite no Evidence of Graded Assignments

Ballou teachers and administrators assigned term grades in ASPEN SIS without evidence that assignments were completed or graded. And substitute teachers did not have access to ASPEN SIS and could not enter grades or assignments. Given this limitation, Ballou did not have a policy in place to address who would enter student assignments and grades into ASPEN SIS on behalf of the substitute teacher. In instances where a Ballou teacher departed mid-term and a substitute teacher was in place, Ballou administrators assigned term grades to students in classes despite a lack of evidence that assignments were completed and recorded in ASPEN SIS.

Prior to its repeal in September 2018, 5E DCMR § 2200.1 stated that “[t]he marking or grading system of the D.C. Public Schools shall be designed to report fairly and accurately student progress and student achievement.”³⁸ The *DCPS Secondary School Grading and Reporting Policy* states, “[a]ll teachers will be expected to use an online gradebook for the purpose of maintaining student grades.”³⁹

Our review of records identified a concerned parent contacted a Ballou administrator when their child received a “C” grade, which was lower than their previous term grade. The Ballou administrator explained there were no graded assignments in ASPEN SIS to “support a grade above a ‘C’.” The OIG reviewed ASPEN SIS, and found no assignments were listed. We found 166 of the 178 graduates received one or more term grades in classes where they lacked graded assignments in ASPEN SIS to justify the term grade.

By providing term grades without evidence of graded assignments in ASPEN SIS, Ballou administrators and teachers likely misrepresented student academic performance.

We recommend DCPS:

19. Develop internal controls to ensure all assignments and grades are maintained in ASPEN SIS.

³⁸ Effective September 14, 2018, 5B DCMR § 2200.1 contains this provision that was previously promulgated at 5E DCMR § 2200.1.

³⁹ DISTRICT OF COLUMBIA PUBLIC SCHOOLS, SECONDARY GRADING AND REPORTING POLICY, *supra* note 21, at 9.

DCPS did not use ASPEN SIS to Assure the Integrity of its Grading Practices

DCPS did not enable features in ASPEN SIS as a management tool to enforce grading regulations. According to the “negotiated contract for goods and services” DCPS signed in August 2014, ASPEN SIS was capable of “meeting internal needs for tracking and reporting of student data as well as supporting basic school operations such as enrollment, scheduling, mark [grade] entry, behavior, and attendance.”⁴⁰

Title 5E DCMR § 2200.4 states the “primary responsibility for evaluating the work of the student shall rest with the teacher.”⁴¹ To automate the evaluation and tracking of students’ work, the *DCPS Secondary School Grading and Reporting Policy* states “[a]ll teachers will be expected to use an online gradebook for the purpose of maintaining student grades.”⁴²

Although teachers were responsible for evaluating students’ work, DCPS did not enable ASPEN SIS functionalities to: (1) ensure the appropriate use of “other marks and grading options;” (2) reconcile unexcused absences with the eligibility for make-up work; or (3) restrict entry of term grades without evidence of graded assignments.

DCPS also did not enable ASPEN SIS functionalities to maintain audit logs of grade overrides and did not notify teachers of changes to student grades. Under the *DCPS GPA Mapping Policy*, a teacher can override the term grade automatically calculated by ASPEN and assign the student a different grade before the grade posts in ASPEN SIS as “they see fit.”⁴³ The policy states that a record of these overrides shall be maintained.

We found term grades in ASPEN SIS that did not correspond with grades on transcripts. Additionally, we found no records to justify grade overrides. According to the ASPEN SIS team, DCPS did not enable the audit feature to manage and monitor grade overrides.

DCPS missed an opportunity to enhance internal controls to maintain integrity within the grading system. By enabling all ASPEN SIS functions, DCPS could have automated numerous compliance requirements outlined in DCPS policies, reduced administrative and teacher burden, and reasonably assured the integrity of information maintained in the system.

We recommend DCPS:

20. Enable ASPEN SIS features that support the compliance of grading requirements, in accordance with the DCMR and DCPS policies.

⁴⁰ DISTRICT OF COLUMBIA PUBLIC SCHOOLS, NEGOTIATED CONTRACT FOR GOODS AND/OR SERVICES, CONTRACT No. GAGA-2014-C-0052, *supra* note 12.

⁴¹ As previously noted, effective September 14, 2018, DCMR 5B § 2200.4 contains this provision that was previously promulgated at DCMR 5E § 2200.4.

⁴² DISTRICT OF COLUMBIA PUBLIC SCHOOLS, SECONDARY GRADING AND REPORTING POLICY, *supra* note 39.

⁴³ Dr. Jane Spence, Grade Calculation Feedback Meeting PowerPoint Presentation 18 (Aug. 1, 2016). (A grade is not posted, and captured on the student’s official transcript, until the teacher clicks the “post” button in ASPEN SIS.)

FINDING 3: DCPS AND BALLOU DID NOT FOLLOW OR ENFORCE COMMUNITY SERVICE REQUIREMENTS

DCPS and Ballou administrators did not enforce the 100-hour community service requirement, as required by the DCMR and DCPS policies. The community service requirement seeks to “equip students with the necessary skills and abilities for career and educational advancement as well as motivate students to take an active role as leaders in their communities.”⁴⁴

Ballou did not maintain required documentation to verify that all graduates had completed their community service requirement. Further, Ballou administrators accepted student community service conducted at ineligible entities and for ineligible activities. DCPS missed an opportunity to leverage ASPEN SIS features to improve oversight and integrity of its students’ community service requirements.

Ballou could not Provide Documentation to Validate Community Service Hours

DCPS student community service activities were documented on the DCPS Community Service Project and Hours Form. The forms recorded:

- student information;
- student signature agreement that hours were performed at a 501(c)(3) non-profit organization⁴⁵ or a federal, state, or local government agency;
- organization information, to include: name, address, supervisor name, telephone, Tax ID (EIN Number), and email;
- a brief description of the activity performed, to include date(s) performed, time in, time out, and the total of hours; and
- the name, title, and signature of the organization’s supervisor certifying that the community service hours were completed “according to the requirements for DCPS Community Service Hours.

The SY 2016-2017 *DCPS Graduate Verification Manual* states:

[a]ll students seeking a high school diploma must complete a minimum of 100 community service hours while attending high school. All community service hours must be completed through a 501(c)(3) non-profit organization or a federal, state or local government agency. Hours must be completed under the supervision

⁴⁴ DISTRICT OF COLUMBIA PUBLIC SCHOOLS, STUDENT GUIDE TO COMMUNITY SERVICE.

⁴⁵ Per 26 USC § 501(c)(3) a 501(c)(3) organization is defined as: “**Corporations**, and any community chest, fund, or foundation, organized and operated exclusively for religious, charitable, scientific, testing for public safety, literary, or **educational purposes**, or to foster national or international amateur sports competition (but only if no part of its activities involve the provision of athletic facilities or equipment), or for the prevention of cruelty to children or animals, no part of the net earnings of which insures to the benefit of any private shareholder or individual, no substantial part of the activities of which is carrying on propaganda, or otherwise attempting, to influence legislation (except as otherwise provided in subsection (h)), and which does not participate in, or intervene in (including the publishing or distributing of statements), any political campaign on behalf of (or in opposition to) any candidate for public office.”

of an adult at the agency, group, or organization and must be strictly on a volunteer basis. All hours must be documented, signed off by the site supervisor, recorded in ASPEN, and kept in the student's cumulative folder.⁴⁶

Once completed and submitted to the school, these forms should be maintained in students' cumulative folders. Certain information from the form should also be entered into ASPEN SIS.

In total, Ballou administrators provided 827 community service forms for review. The OIG's review found many of these forms to be incomplete. For example, forms lacked dates of service, organizations' EINs, and names of students performing the service. We also observed that some forms contained mathematical errors, which granted students more hours of service than were actually performed.

The OIG was unable to validate whether 87 of the 178 graduates had completed the required 100 hours of community service because documentation in the students' cumulative folders was either missing or incomplete. Of those 87 graduates, we verified 60 had fewer than 100 community service hours by summing the number of hours, per student, based on the records Ballou administrators provided. Ballou administrators could not produce any community service forms for the remaining 27 graduates.

The OIG also reviewed community service information entered into ASPEN SIS and found instances where Ballou administrators had not entered a description of the community service activities performed by the student as well as the name of the organization/government agency where the service had been performed. The data in ASPEN SIS indicated all graduates met the 100 hours of community service required to graduate.

According to the Ballou office responsible for reviewing student community service forms, their staff members would review the forms and determine whether to accept or deny the community service. The office stated if any forms raised "red flags,"⁴⁷ they would deny the hours they felt were not in accordance with community service requirements. Once accepted, the administrator initialed the form, and then entered the information into ASPEN SIS. The OIG could not find any DCPS-issued guidance that captured this verification process the Ballou administrator described.

The DCPS Graduation Verification Form requires principals to certify and maintain documentation that students have completed 100 hours of community service. Specifically, DCPS principals were required to certify the following statement:

Each student who is graduating and receiving a diploma has completed the legally required 100 hours of community service. Documentation demonstrating this requirement has been met is available at the school, and hours were entered into ASPEN [SIS].

⁴⁶ DISTRICT OF COLUMBIA PUBLIC SCHOOLS, GRADUATE VERIFICATION MANUAL, *supra* note 26, at 16.

⁴⁷ The school official referenced as examples of "red flags" white-out used on certain parts of the forms or activities that appeared to be part of students' paid employment.

Each student's cumulative record contains documentation he/she has completed at least the 100 required hours of community service.

Despite incomplete community service records maintained in students' cumulative folders, Ballou provided DCPS with the graduation verification form containing the principal's signature certifying that all 178 students had met the 100-hour requirement and that the school had documentation of these hours. Ultimately, DCPS and Ballou administrators certified 87 of the 178 students as eligible for graduation, despite the lack of evidence to validate community service completion.

Graduating without performing the required community service hours means students do not achieve the intended purpose for community service, which the DCPS Student Guide to Community Service describes as to provide students with skills and abilities for the next phase of life and to motivate students to become leaders within their communities.⁴⁸

We recommend DCPS:

21. Develop internal controls to ensure documentation is maintained to demonstrate students' successful completion of community service graduation requirements in accordance with the DCMR and DCPS policies.

Ballou Students Earned Community Service Hours at Ineligible Entities, for Ineligible Activities

Ballou administrators accepted community service hours conducted at ineligible organizations/agencies and for ineligible activities. Those ineligible organizations/agencies included a for-profit daycare center and a catering business. Ineligible activities included attending school field trips and donating items.

The *DCPS Graduate Verification Manual: Community Service Hours* section states that community service hours must be earned through service to organizations classified as 501(c)(3) organizations or to a federal, state, or local government agency, and that the service must be done voluntarily. The *DCPS Student Guide to Community Service* deemed activities such as babysitting, receiving tutoring, and donating goods and services ineligible community service activities.

Ballou administrators stated they used their own judgement to determine whether organizations were a 501(c)(3) organization or a federal, state or local government agency; and whether students performed qualified or non-qualified activities as defined by the *DCPS Student Guide to Community Service*. The OIG found instances where Ballou administrators accepted community service hours from students for non-qualifying community service activities, to include donating canned goods and working at a for-profit daycare facility.

⁴⁸ DISTRICT OF COLUMBIA PUBLIC SCHOOLS, *supra* note 44, at 2.

DCPS and Ballou administrators did not verify students' community service hours in ASPEN SIS with the records maintained in the students' cumulative file. During the graduation verification process, DCPS reviewed the total number of community service hours recorded in ASPEN SIS to determine whether that number was at least 100, but stated during interviews they did not look at the supporting community service forms maintained in the students' cumulative folder.

Without effective internal controls to ensure DCPS and Ballou administrators were verifying the accuracy of information contained within ASPEN SIS, some ineligible students were allowed to graduate. Although the OIG's review focused on Ballou, our research shows that DCPS failed to provide oversight regarding community service hours across the entire DCPS system.

We recommend DCPS:

22. Develop internal controls to ensure the community service requirements comply with the DCMR and DCPS policies.

DCPS did not use ASPEN SIS to Assure the Integrity of its Community Service Practices

ASPEN SIS can capture all elements of the student's community service; however, DCPS did not enable this function.

After students submit their community service form(s) to the responsible school administrator, the administrator manually enters data from the form into ASPEN SIS. The OIG team found instances in which some community service fields in ASPEN SIS were left blank.

Requiring all fields from the hardcopy forms to be copied into ASPEN SIS would have ensured that hardcopy forms were complete and could be cross-checked by Ballou administrators. If enabled, ASPEN SIS can record all community service data and calculate the total number of hours completed for each student.

Failure to require school administrators to enter data from all fields on the hardcopy community service form into ASPEN SIS prevented DCPS from obtaining information that would help verify the eligibility of graduates' community service hour submissions. Without making entry of each field mandatory, community service data entered into ASPEN SIS was more susceptible to error. Without requiring that all community service fields be completed in ASPEN SIS, DCPS reduced the effectiveness of its graduation verification process. It is worth noting that DCPS did not use ASPEN SIS to verify that organizations/agencies met the eligibility criteria for community service requirements. The lack of organizational eligibility verification increased the risk of DCPS graduating students who failed to meet the community service requirement and were therefore ineligible to graduate.

We recommend DCPS:

23. Enable ASPEN SIS functions to record all student community service data.

FINDING 4: DCPS DID NOT MAINTAIN ADEQUATE USER CONTROLS TO PREVENT CORRUPTION OF STUDENT RECORDS

DCPS did not limit the number of employees who had access rights to ASPEN SIS, lacked control over teacher and administrator overrides and grade changes, and did not provide training to those with access.

The GAO *Green Book* states that management designs the appropriate control activities for the entity's internal control system.⁴⁹ Further, the *Green Book* states that, "management divides or segregates key duties and responsibilities among different people to reduce the risk of error, misuse, or fraud. This includes separating the responsibilities for authorizing transactions, processing and recording them, reviewing the transactions, and handling any related assets so that no one individual controls all key aspects of a transaction or event."⁵⁰

In addition to controls identified in the GAO *Green Book*, the District of Columbia's Office of the Chief Technology (OCTO) advises that each District agency must:

implement security access control measures to ensure appropriate access for all DC workforce members based upon each workforce members' job requirements; and must establish procedures that document, review, and modify a user's right of access to assigned equipment, transactions, programs, networks, data, work areas, or processes⁵¹

ASPEN SIS allows for customized "roles" that limit teachers' and administrators' rights, depending on their responsibilities. According to the ASPEN SIS team, DCPS principals should have only assigned two employees to each administrative role within ASPEN SIS – one primary user and one to cover that role when the primary user is absent.

DCPS had no policy that established roles and access rights for individuals required to use ASPEN SIS. A principal would assign users "roles" and then request that the ASPEN SIS team assign staff members those roles. We found instances where Ballou administrators and teachers had more access rights than needed. An ASPEN SIS team member stated that enhanced access was restricted to only a few individuals, but they have seen instances where up to eight individuals at a single school have been granted enhanced access. The OIG's review of ASPEN SIS audit data found that certain Ballou administrators changed student marks after the student's teacher posted the grade.

The ASPEN SIS team provided the OIG with a list of Ballou ASPEN SIS users. The OIG's review of the list found that 7 staff members had the "grade manager" role, 5 staff members occupied the "attendance manager" role, and 10 staff members occupied the "principal" role.

⁴⁹ U.S. GOVERNMENT ACCOUNTABILITY OFFICE, *supra* note 15, § 10.03.

⁵⁰ *Id.* at 47.

⁵¹ DISTRICT OF COLUMBIA OFFICE OF THE CHIEF TECHNOLOGY OFFICER, ACCESS CONTROL POLICY, OCTO-1014.0 § 4 (Sept. 2011), https://octo.dc.gov/sites/default/files/dc/sites/octo/publication/attachments/OCTO_Access_Control_Policy.pdf (last visited March 7, 2019).

And it is worth noting that employees who left Ballou, or who no longer occupied that role, never had their access privileges removed. There was no process in place to address updating roles when administrators or teachers moved to new jobs or schools. As a result, some roles were not as restricted as they should have been.

According to training logs, none of the Ballou administrators and teachers occupying these ASPEN SIS specific roles received the appropriate training for their specific roles. Providing untrained employees administrative rights in ASPEN SIS increases the risk that users can accidentally or deliberately alter grades and attendance history or incorrectly input data. Further, granting multiple administrators and teachers enhanced user rights in ASPEN SIS increased the risk that student grade and attendance data could be manipulated, undermining the integrity of the system. The absence of an audit function further undermines the program risk.

We recommend DCPS:

24. Develop a policy that implements internal controls related to requesting, establishing, issuing, suspending, modifying, and closing ASPEN SIS user accounts and privileges.
25. Ensure school administrators and teachers receive ASPEN SIS training prior to receiving access to the systems.

CONCLUSION

The OIG undertook this examination in response to a Mayoral request to obtain information regarding the root causes of the underlying issues surrounding Ballou Senior High School's graduating class of 2017. The request followed negative news reports alleging Ballou Senior High School graduated many students who did not meet minimum graduation requirements. Our examination sought to determine the circumstances that allowed this outcome to occur, and to determine whether there were deficiencies in the school's internal controls.

In addition to attendance requirements, DCPS requires all students to obtain 24 credits (Carnegie Units) and complete 100 hours of community service to be eligible for graduation. Our examination confirmed that a significant portion of the Ballou Class of 2017 class was not eligible to graduate on time due to the accumulation of excessive, unexcused absences, improper grading, and/or improper awarding of community service hours.

We found that DCPS and Ballou administrators placed greater value on graduation rates than on meeting the minimum graduation requirements outlined in the DCMR and DCPS policies. Exacerbating the issue was a lack of internal controls, which might have helped minimize or even eliminate the conditions we discovered during this evaluation.

Despite DCMR and DCPS provisions that outlined graduation requirements, DCPS and Ballou administrators misused or abused grading and attendance systems to present students as eligible for graduation when they were not. These misuses and abuses, either done in the purported interest of the student or done to maintain an illusion of school and employee success is not consistent with DCPS' goal of preparing students for success in college, career, and life.

Our analysis and conclusions make no judgements regarding the necessity for tailored programs and interventions in response to student academic needs. Our analysis and conclusions focused on the behaviors and actions of DCPS and Ballou Senior High School employees and the requirements placed on them by District of Columbia laws, rules and regulations. Where the District and DCPS determine the need for additional programs and policies to support student academic success, those programs and policies should be codified so their application can be appropriately administered and monitored. Obtaining success within a school system in an urban environment is a complex undertaking. However, the system cannot be effective, no matter how well designed, if student performance is not accurately measured and reported.

EXECUTIVE RESPONSE AND OFFICE OF THE INSPECTOR GENERAL COMMENTS

We provided the draft report to the Mayor on March 13, 2019, and received responses from the Mayor and the Chancellor, DCPS, on May 22, 2019. We acknowledge and commend DCPS' work to improve its internal control environment to assure student grading, attendance, and community service compliance. We appreciate that DCPS began to address some of the findings immediately upon notification during the evaluation.

DCPS concurred with all 25 recommendations. DCPS' actions taken and/or planned are responsive and meet the intent of the recommendations. The OIG may elect to follow up on these recommendations in future engagements in order to determine whether corrective actions remediated the conditions identified in this report. The Executive and DCPS responses are included in their entirety in Appendix C.

APPENDIX A. ACRONYMS AND ABBREVIATIONS

ASPEN SIS	ASPEN Student Information System
DCMR	D.C. Municipal Regulations
DCPS	D.C. Public Schools
ECR	Evening Credit Recovery
EIN	Employee Identification Number
GAO	U.S. Government Accountability Office
PERRA	Public Education Reform Amendment Act of 2007
OCTO	Office of the Chief Technology Officer
OSSE	Office of the State Superintendent for Education
SBSST	School-Based Student Support Team
SY	School Year

APPENDIX B. SUMMARY OF RECOMMENDATIONS

1. Develop a plan to identify and ensure all students who accumulate 5 or more unexcused absences receive interventions, as required by the DCMR and DCPS policies.
2. Ensure teachers are aware of grading and attendance policies, as required by the DCMR.
3. Ensure school administrators enforce the proper recording of absences and are aware of its bearing on student grades, as required by the DCMR and DCPS policies.
4. Enable functions within ASPEN SIS to support student performance management.
5. Provide training to school administrators and teachers to ensure the proper recording of absences and its bearing on student grades, in accordance with the DCMR and DCPS policies.
6. Enable ASPEN SIS functionalities to automate “FA” grade assignment following 30 unexcused absences in a class during a school year.
7. Develop an internal control in which DCPS principals periodically evaluate class attendance to ensure accurate data is available at the conclusion of the school year to determine graduation eligibility.
8. Develop and promulgate a policy, which identifies the appropriate use of flexible school hours for students, and ensures impacts to timely graduation, such as grading, attendance, and community service requirements, are considered.
9. Issue guidance that considers class schedule periodicity and duration and its impact on attendance requirements, in accordance with 5B DCMR § 2103.6.
10. Enable ASPEN SIS functionalities to automate attendance notification and grade assignment in relation to unexcused absences, in accordance with applicable DCMR requirements.
11. Enable ASPEN SIS audit functionalities to track attendance when calculating grades.
12. Develop internal controls to ensure schools are in compliance with all provisions of the *ECR Manual*.
13. Provide training to school administrators and teachers to ensure appropriate use of the ECR program.
14. Provide school administrators and teachers with training on the appropriate use of “other marks and grading options,” as defined in the *DCPS Secondary Grading and Reporting Policy*.

APPENDIX B. SUMMARY OF RECOMMENDATIONS

15. Develop internal controls to assure school compliance with the use of “other marks and grading options,” as defined in the *DCPS Secondary Grading and Reporting Policy*.
16. Enable ASPEN SIS functions for the use of “other marks and grading options,” as defined in the *DCPS Secondary Grading and Reporting Policy*.
17. Provide school administrators and teachers with training on the appropriate use of make-up work, in accordance with the *DCPS Secondary School Grading and Reporting Policy*.
18. Ensure school administrators and teachers are aware of the appropriate use of retesting.
19. Develop internal controls to ensure all assignments and grades are maintained in the ASPEN SIS.
20. Enable ASPEN SIS features that support the compliance of grading requirements, in accordance with the DCMR and DCPS policies.
21. Develop internal controls to ensure documentation is maintained to demonstrate students’ successful completion of community service graduation requirements in accordance with the DCMR and DCPS policies.
22. Develop internal controls to ensure the community service requirements comply with the DCMR and DCPS policies.
23. Enable ASPEN SIS functions to record all student community service data.
24. Develop a policy that implements internal controls related to requesting, establishing, issuing, suspending, modifying, and closing ASPEN SIS user accounts and privileges.
25. Ensure school administrators and teachers receive ASPEN SIS training prior to receiving access to the systems.

APPENDIX C. THE EXECUTIVE'S RESPONSE TO THE DRAFT REPORT



MURIEL BOWSER
MAYOR

May 22, 2019

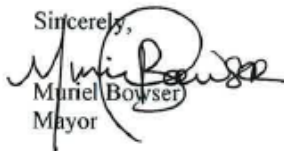
Inspector General Daniel Lucas
717 14th Street, N.W.
Washington, DC 20005

Dear Inspector General Lucas:

The attached comprehensive memo from Chancellor Lewis Ferebee responds to your draft report entitled *District of Columbia Public Schools: Internal Controls Need Improvement to Assure Compliance with Grading, Attendance, and Community Service Requirements*.

I appreciate your thorough follow up on my request that you examine system weaknesses and propose solutions following OSSE's investigative work regarding Ballou High School Class of 2017 graduation rates.

As you will see from the Chancellor's memorandum, DCPS is on the right path towards fixing the issues identified and preventing similar problems in the future. If you require any follow up to the responses contained herein, please feel free to contact Chancellor Ferebee directly and his office can direct you to the appropriate programmatic lead.

Sincerely,

Muriel Bowser
Mayor

Attachment: Memo from Chancellor Ferebee

Cc: Chancellor Lewis Ferebee
Deputy Mayor Paul Kihn

APPENDIX C. THE EXECUTIVE'S RESPONSE TO THE DRAFT REPORT

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Executive Office of Mayor Muriel Bowser



MEMORANDUM

TO: Mayor Muriel Bowser
FROM: Chancellor Lewis Ferebee, DCPS
DATE: May 21, 2019
SUBJECT: Response to OIG Draft Report No. 19-I-04GA

The District of Columbia Public Schools (DCPS) has had an opportunity to review the Office of Inspector General's draft report entitled *DCPS: Internal Controls Need Improvement to Assure Compliance with Grading, Attendance, and Community Service Requirements*, dated March 12, 2019 (OIG Draft Report No. 19-I-04GA). DCPS appreciates the opportunity to review the draft report and to respond to its recommendations. With the Inspector General, DCPS is very concerned that we establish, publicize, train our personnel on, and enforce systems so that school personnel, in their zeal to help all our students graduate, do not ignore and do not circumvent established policies, such as those relating to attendance.

In summary, DCPS concurs with each of the 25 recommendations contained in the draft report and, in nearly all instances, has already taken steps to implement the recommendations over the course of the last year, based on recommendations from studies you previously commissioned. We have listed the specific recommendations included in the draft report and with our responses below.

Recommendation 1:

Develop a plan to identify and ensure all students who accumulate 5 or more unexcused absences receive interventions, as required by the DCMR and DCPS policies.

Response:

Agree. DCPS recognizes the fundamental importance of attendance to academic success and the importance of targeted interventions once it is apparent a student is struggling with unexcused absences. Such interventions are coordinated through the school's Student Support Team (SST).¹ At the beginning of school year 18-19, all DCPS attendance counselors and at least one attendance point of contact from each school were invited to participate in an attendance policy training session. This was followed up by quarterly sessions.

¹ The SST performs the same functions as the school-based student support team (SBSST) mentioned in the report.



APPENDIX C. THE EXECUTIVE'S RESPONSE TO THE DRAFT REPORT

In addition, the DCPS Attendance Team in central office works closely with school leaders and staff to ensure compliance with attendance protocols by identifying additional DCPS resources and engaging attendance intervention partners, such as Access Youth. Access Youth supports Ballou HS with attendance intervention work, including SSTs. To increase access to more reliable and updated attendance information, DCPS moved from a weekly to daily notification to attendance staff and SST leads. These daily notifications inform attendance staff and SST leads which students require an SST. SST compliance is closely monitored by the DCPS Attendance Team, principals and instructional superintendents using the Continuous Improvement Framework, which was implemented during school year 18-19.

DCPS established the Continuous Improvement Framework to provide clear guidance and expectations regarding attendance compliance, including student referrals to SSTs. This includes flagging instances when SST and other attendance compliance obligations assumed by the attendance points of contact, SST leads and principals are off-track. In addition, the DCPS Attendance Team has conducted quality reviews of the SST plans and used the results to inform additional guidance and additional professional development opportunities for school-based staff members.

In order to further improve compliance, such required trainings will be provided annually as part of school opening and at quarterly professional development sessions.

Recommendation 2:

Ensure teachers are aware of grading and attendance policies, as required by the DCMR.

Response:

Agree. Training and awareness of grading and attendance policies are critical to ensuring compliance with those policies. At the beginning of school year 18-19, all DCPS secondary schools were required to participate in operational policy training sessions that were facilitated through both direct engagements at high school sites and webinars. During these training sessions, school leaders and staff were presented with information directly pertaining to grading and attendance policies and had to demonstrate proficiency on a post-test to receive credit for the training. The documents that were cited in these forums include a School Opening Training PowerPoint, the Pre-K to Graduation Policies, Implementation Protocols, and the Post-Test. All documents are referenced in Appendix A and are accessible to DCPS staff on the website or through internal platforms. This level of training and education will be maintained by DCPS as an ongoing practice and required annually as part of the school opening process. DCPS will continue to refine its protocols for informing all relevant stakeholders of modifications and updates to grading and attendance policies as necessary.

Recommendation 3:

Ensure school administrators enforce the proper recording of absences and are aware of its bearing on student grades, as required by the DCMR and DCPS policies.

Response:

Agree. School officials have been provided with the appropriate policy and regulation citations that define the impact of students' absences on their grades. During school year 18-19, attendance entry continues to be closely monitored by the attendance team, principals and instructional superintendents. Principals are flagged when entry drops below acceptable levels and teachers are contacted when they fail to post attendance. Over the past two years, attendance entry has significantly improved. Additionally, Principals have been provided with resources through Aspen, the District's

APPENDIX C. THE EXECUTIVE'S RESPONSE TO THE DRAFT REPORT

student information system, to support the monitoring and management of appropriate attendance and grade recording. Two of the resources that Principals have been provided are as follows:

1. **Principals Attendance Report** - This report is available to school leaders to identify the number of course absences individual students have accrued in scheduled courses.
2. **Unexcused Course Absence Report** - This report is available to school users to identify the number of unexcused course absences individual students have accrued. Users can set specific unexcused absence counts based on 10, 15, 25, and 31 attendance triggers determined for unexcused course absence warnings.

Recommendation 4:

Enable functions within ASPEN SIS to support student performance management.

Response:

Agree. The regulation in effect during school year 2017-2018 (5-E DCMR § 2103) indicated that students should receive a grade reduction at 5 unexcused absences per term, a term failure at 10 unexcused absences in a term and a course failure at 30 unexcused absences in the course. DCPS automated a procedure in Aspen to automate these triggers accordingly.

In June 2018, DCPS enacted emergency and proposed rulemaking to change the secondary grading and reporting regulation (5-B DCMR § 2103). The new regulation went into effect for school year 18-19 with the following changes: Students no longer receive a grade reduction at 5 absences; students no longer receive a term failure at 10 absences; students receive a course failure at 31 absences (instead of 30). The course failure at 31 absences is automated in Aspen for school year 18-19.

Recommendation 5:

Provide training to school administrators and teachers to ensure the proper recording of absences and its bearing on student grades, in accordance with the DCMR and DCPS policies.

Response:

Agree. The steps taken to address Recommendation 2 also apply to this recommendation. At the beginning of school year 18-19, all secondary schools were required to participate in operational policy training sessions that were facilitated through both direct engagements at high school sites and webinars. During these training sessions, school leaders and staff were presented with information directly pertaining to grading and attendance policies and had to demonstrate proficiency on a post-test to receive credit for the training. The documents that were cited in these forums include a School Opening Training PowerPoint, the Pre-K to Graduation Policies, Implementation Protocols, and the Post-Test. All policy documents are referenced in Appendix A and are accessible to DCPS staff on the website or through internal platforms. This level of training and education will be maintained by DCPS as an on-going practice and required annually as part of the school opening process. DCPS will continue to refine its protocols for informing all relevant stakeholders of modifications and updates to grading and attendance policies as necessary.

Recommendation 6:

Enable ASPEN SIS functionalities to automate "FA" [Failure due to Absences] grade assignment following 30 unexcused absences in a class during a school year.

APPENDIX C. THE EXECUTIVE'S RESPONSE TO THE DRAFT REPORT

Response:

Agree. The steps taken to address Recommendation 4 also apply to this recommendation. DCPS implemented a procedure in Aspen SIS to automate student course failures for accruing 30 or more unexcused absences in a course. In addition, in 2018, DCPS revised the procedure to automate student course failures for accruing 31 or more unexcused course absences, instead of 30 or more unexcused course absences, in alignment with code and regulation.

Recommendation 7:

Develop an internal control in which DCPS principals periodically evaluate class attendance to ensure accurate data is available at the conclusion of the school year to determine graduation eligibility.

Response:

Agree. Over the past year, DCPS has worked to strengthen its systems for collecting attendance data and has made key improvements to Aspen SIS, such as clarifying attendance reporting codes, creating the capacity to upload attendance-related documentation, and locking attendance data on a monthly basis.

Additionally, DCPS has instituted the Continuous Improvement Framework for Graduation Monitoring, which is an internal data monitoring platform and accountability tool that cites specific policy variances and prescriptions for resolution that have been defined by the District as vital to graduation integrity. The Graduation Monitoring report is updated nightly to provide real-time student data applicable to specific graduation data indicators. High School Principals receive a comprehensive summary report of graduation data on a monthly basis; two of the criteria included in the Principal's monthly report that are relevant to the impact of attendance and grading on graduation eligibility are as follows:

1. Original Credit Course with 31+ absences – This indicator is a report of students that have accrued 31 or more unexcused absences in original credit courses that they are currently scheduled in.
2. Original Credit Course with 31+ absences, not recorded as FA – This indicator is a report of the students that have accrued 31 or more unexcused absences in original credit courses, but Aspen did not automate and assign a final grade of F that is reported on the student's transcript record.

Recommendation 8:

Develop and promulgate a policy, which identifies the appropriate use of flexible school hours for students, and ensures impacts to timely graduation, such as grading, attendance, and community service requirements, are considered.

Response:

Agree. The current scheduling guidance provides instruction to schools regarding the use of an authorized off-campus code (a standardized scheduling code utilized to provide flexible student schedules) for students based on the following criteria:

1. A student has been scheduled in all required courses which promote matriculation towards an on-time graduation in a manner that will not impede/delay a student's academic progression, as required by the student's designated program of study.

APPENDIX C. THE EXECUTIVE’S RESPONSE TO THE DRAFT REPORT

2. A student’s request for a flexible schedule is authorized through the school; the student has an Authorized Off Campus application completed and the Authorized Off Campus/Internship course codes must be reflected on their schedules.

Additionally, there are three circumstances in which a student is eligible for an authorized off campus clearance: an approved internship opportunity, enrollment in an off-campus dual enrollment program, and evidence of employment.

DCPS recognizes the need to develop specific policy guidance that defines the District’s expectations pertaining to flexible school hours for students and will do so in advance of school year 19-20.

Recommendation 9:

Issue guidance that considers class schedule periodicity and duration and its impact on attendance requirements, in accordance with 5B DCMR § 2103.6.

Response:

Agree. DCPS has implemented scheduling guidance that prescribes a set instructional day schedule for secondary schools (referenced in Appendix A). Specifically, high schools are required to operate on an Alternating A-B day schedule with four instructional blocks that must be a minimum of 82 minutes in duration. This prescribed schedule design safeguards the seat hour requirement for awarding Carnegie Units to DCPS courses. DCPS specialized high schools and comprehensive schools that require a modified version of the prescribed schedule due to programmatic needs must submit a request for authorization to their Instructional Superintendent who will vet the proposed schedule design to ensure compliance with attendance and credit awarding regulations.

Recommendation 10:

Enable ASPEN SIS functionalities to automate attendance notification and grade assignment in relation to unexcused absences, in accordance with applicable DCMR requirements.

Response:

Agree. As discussed above in the response to Recommendation 4, DCPS implemented a procedure in Aspen SIS to automate student course failures for accruing 31 or more unexcused absences in a course. In addition, beginning in February 2018, as a part of Strategic Initiative 3.3, “Develop and Implement a Strategy to Increase Attendance,” the Blackboard Parent Notification system was programmed to send timely communications regarding attendance and course failure to students and families. To reach our target audience, we used several different modes of communication (text, email, and Aspen letters). Also, in May 2019, the truancy and attendance notifications were combined into a single universal letter (Note: exceptions include notification letters for 7, 20, 31 and 38 unexcused absences, which are still standalone letters). Currently, these communications are being sent via Aspen in a written format and via Blackboard via email format.

Recommendation 11:

Enable ASPEN SIS audit functionalities to track attendance when calculating grades.

Response:

Agree. DCPS enabled the attendance and grading audit functionality in 2018. In fact, DCPS used this auditing functionality to provide information to the OIG in January 2018.

APPENDIX C. THE EXECUTIVE’S RESPONSE TO THE DRAFT REPORT

Recommendation 12:

Develop internal controls to ensure schools are in compliance with all provisions of the ECR Manual.

Response:

Agree. During the second semester of school year 2017-2018, DCPS trained all stakeholders on the guidance set forth in the ECR manual and conducted data reviews to ensure that students were not enrolled in credit recovery improperly (e.g. without having failed the original course) and were not receiving credit after accruing more than four unexcused absences from the credit recovery course. DCPS created a graduation monitoring report to flag any instances of variation from the written manual and worked with schools to address them.

Concurrently, students, families, and staff expressed concerns that the credit recovery guidance in the ECR Manual was unclear and that the structure of the courses made it difficult for students to succeed (such as rigid attendance policies and time-bound courses). We also discovered that many of our credit recovery course offerings did not meet DCPS’ standards for rigor and were not setting our students up for success in high school and beyond. As a result of DCPS’ review of the ECR Manual and this feedback, DCPS decided to pause the credit recovery program during the fall of 2018 so it could gather additional stakeholder feedback and write a redesigned credit recovery policy. The redesigned credit recovery policy (included in appendix A) was released on 11/5/18, and the ECR manual became obsolete.

The use of credit recovery is now monitored through the Continuous Improvement Framework by flagging the following indicators:

1. Credit recovery course completed/in progress without previous failure; and
2. Credit recovery course scheduled concurrently with original course.

This monitoring is reviewed weekly by central office and school-based staff. If a school displays these policy variances, central office staffers work with the school to resolve the issue in real time.

Recommendation 13:

Provide training to school administrators and teachers to ensure appropriate use of the ECR program.

Response:

Agree. Once the redesigned credit recovery policy was finalized, DCPS focused on training administrators and staff on all elements of the policy and how to effectively implement it. In November 2018, all credit recovery teachers were trained on the policy and programming, and were provided access to resource materials in Canvas (the redesigned policy, frequently asked questions, credit recovery course guides and PowerPoint presentations from all credit recovery meetings). All resource materials are referenced in Appendix A. In addition, credit recovery coordinators participate in monthly meetings to review expectations and ensure policies are being implemented with fidelity.

Recommendation 14:

Provide school administrators and teachers with training on the appropriate use of “other marks and grading options,” as defined in the *DCPS Secondary Grading and Reporting Policy*.

APPENDIX C. THE EXECUTIVE’S RESPONSE TO THE DRAFT REPORT

Response:

Agree. This recommendation highlights the need for DCPS to update the DCPS Secondary Grading and Reporting policy with greater detail and explicit protocols for using “other marks and grading options.” The guidance in the current policy is general and does not adequately provide implementation criteria for the use of other marks. DCPS will update the current Secondary Grading and Reporting Policy to address these concerns and ensure consistent and equitable grading/reporting practices across secondary schools; an updated version of the grading and reporting policy will be available prior to the beginning of school year 2019-2020.

Recommendation 15:

Develop internal controls to assure school compliance with the use of “other marks and grading options,” as defined in the DCPS Secondary Grading and Reporting Policy.

Response:

Agree. An internal control has been built into the Aspen SIS logic to ensure final course marks align with the use of “other marks” as articulated in 5-B DCMR § 2200.7. The system logic for the computation of final marks when “other marks” are entered is as follows:

1. Other Mark L (late) - If a student receives a mark of L for any given term and the mark of L is not reassigned with a valid course mark associated with the respective course, then the mark of L will convert to a mark of AUD at the end of the scheduled course. AUD is a final mark, thus a mark of AUD for any scheduled term results in a final course mark of AUD. A mark of L does not have an associated GPA value. This procedure applies to all courses.
2. Other Mark I (incomplete) – If a student receives a mark of I for any given term and the mark of I is not reassigned with a valid course mark associated with the respective course, then the mark of I will convert to a mark of F at the end of the scheduled course. The grade calculation in Aspen will compute all term marks in accordance to the final grade calculation procedures and assign a final course grade. A mark of I does not have an associated GPA value. This procedure applies to all courses.
3. Other Mark AUD (audit) - The mark AUD is a final mark, thus a mark of AUD for any scheduled term results in a final course mark of AUD. A mark of AUD does not have an associated GPA value.
4. Other Mark M (medical) - If a student receives a mark of M for any given term and the mark of M is not reassigned with a valid course mark associated with the respective course, then the mark of M will remain assigned at the end of the scheduled course. M is a final mark, thus a mark of M for any scheduled term results in a final course mark of M. A mark of M does not have an associated GPA value. This procedure applies to all courses.

Recommendation 16:

Enable ASPEN SIS functions for the use of “other marks and grading options,” as defined in the DCPS Secondary Grading and Reporting Policy.

Response:

Agree. The steps taken to address Recommendation 15 also apply to this recommendation. An internal control has been built into the Aspen SIS logic to ensure final course marks align with the use of “other marks” as articulated in 5-B DCMR § 2200.7. The system logic for the computation of final marks when “other marks” are entered is as follows:

APPENDIX C. THE EXECUTIVE'S RESPONSE TO THE DRAFT REPORT

1. Other Mark L (late) - If a student receives a mark of L for any given term and the mark of L is not reassigned with a valid course mark associated with the respective course, then the mark of L will convert to a mark of AUD at the end of the scheduled course. AUD is a final mark, thus a mark of AUD for any scheduled term results in a final course mark of AUD. A mark of L does not have an associated GPA value. This procedure applies to all courses.
2. Other Mark I (incomplete) – If a student receives a mark of I for any given term and the mark of I is not reassigned with a valid course mark associated with the respective course, then the mark of I will convert to a mark of F at the end of the scheduled course. The grade calculation in Aspen will compute all term marks in accordance to the final grade calculation procedures and assign a final course grade. A mark of I does not have an associated GPA value. This procedure applies to all courses.
3. Other Mark AUD (audit) - The mark AUD is a final mark, thus a mark of AUD for any scheduled term results in a final course mark of AUD. A mark of AUD does not have an associated GPA value.
4. Other Mark M (medical) - If a student receives a mark of M for any given term and the mark of M is not reassigned with a valid course mark associated with the respective course, then the mark of M will remain assigned at the end of the scheduled course. M is a final mark, thus a mark of M for any scheduled term results in a final course mark of M. A mark of M does not have an associated GPA value. This procedure applies to all courses.

Recommendation 17:

Provide school administrators and teachers with training on the appropriate use of make-up work, in accordance with the DCPS Secondary School Grading and Reporting Policy.

Response:

Agree. The DCPS Secondary Grading and Reporting Policy provides guidance on supporting students with absences in making-up course assignments. However, to ensure equity in expected practices across schools, DCPS recognizes the need to provide additional guidance and protocols for school administrators and teachers regarding make-up work. Additional guidance and protocols, along with associated training, will be provided prior to the start of school year 19-20.

Recommendation 18:

Ensure school administrators and teachers are aware of the appropriate use of retesting.

Response:

Agree. In the cluster meetings with school leaders this year, the instructional superintendents addressed recommended revision practices to use with assessments so that students may learn from them and deepen their understanding of the performance standards (referenced in Appendix A). Although school leaders regularly monitor gradebooks, DCPS recognizes that this issue requires additional work and plans to continue training school-based administrators and teachers on the appropriate use of retesting in school year 19-20.

Recommendation 19:

Develop internal controls to ensure all assignments and grades are maintained in the ASPEN SIS.

APPENDIX C. THE EXECUTIVE’S RESPONSE TO THE DRAFT REPORT

Response:

Agree. DCPS acknowledges the need to develop internal controls to ensure that teachers are reporting assignments and grades in accordance with the DCPS Secondary Grading and Reporting Policy. It is articulated in the policy that Aspen is the SIS for DCPS. However, the consistent use of this platform must be maintained and monitored across all schools. By January 2020, DCPS will incorporate a monitoring category for the Continuous Improvement Framework–Graduation Monitoring Report. In order to efficiently review teacher gradebooks and support school leaders in monitoring grading compliance standards, DCPS will establish system logic that generates the appropriate monitoring data for gradebook entries and systematically reports this information to school leaders and other relevant stakeholders.

Recommendation 20:

Enable ASPEN SIS features that support the compliance of grading requirements, in accordance with the DCMR and DCPS policies.

Response:

During school year 2018-2019, DCPS updated the Aspen SIS to apply the appropriate grading calculations to final course marks when marks “L”, “I”, “M”, and/or “AUD” are reported in accordance with DCMR grading and reporting regulations. The logic that established this grading protocol is defined in response #16.

However, DCPS acknowledges the need to improve ASPEN SIS functionalities to prevent grade policy violations that are facilitated by teachers or other school users. In response to this need, DCPS will modify Aspen system logic to restrict the posting of an end of term grade in the absence of grades for assignments/assessments posted in the Aspen grade book. Additionally, DCPS will develop system logic that enables school and district users to monitor changes to grades during and after academic terms. Grade change entries in teacher grade books and student transcripts will be monitored by school administrators and central office personnel. The reporting of the type and frequency of monitored grade change entries will be available through DCPS reports in Aspen SIS and/or Certify data management. This system improvement will be effective at the beginning of school year 2019-2020.

Recommendation 21:

Develop internal controls to ensure documentation is maintained to demonstrate students’ successful completion of community service graduation requirements in accordance with the DCMR and DCPS policies.

Response:

DCPS currently requires that all documentation of community service is verified by the school counselor and maintained at the school level. DCPS acknowledges that this is an area of needed improvement. DCPS will move to a system implementation that requires schools to upload student community service forms into the Aspen SIS so that a permanent file for all high school students is stored and reviewable. The process that will be implemented during school year 2019-2020 is as follows:

1. Students will submit community service activity hours that are authorized by a community service site supervisor documented on a DCPS community service form or on official letterhead from the organization sponsoring/facilitating the community service activity.

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2. School counselors and community service coordinators will be responsible for receiving and verifying student community service activity hours documentation.
3. School counselors and coordinators will be required to verify that the community service site is a non-profit organization or a governmental agency (per DCPS policy), the activity that is described that the student engaged in meets the criteria for community service, and the number of hours documented for the service activity are accurate.
4. School counselors and coordinators will be required to enter community service submissions into Aspen SIS within 5 school days of receiving documentation from students. Upon receipt of community service forms, school counselors and coordinators are required to document on the form the date of submission. Community service activity information and hours must be entered in Aspen SIS as a record of a student's fulfillment of the 100 community service hours graduation requirement.
5. School counselors and coordinators must enter community service information exactly as documented by the submission from community service site supervisors. In Aspen SIS the following data entry fields will be required on the community service hours submission page: Name of Organization, Name of Site Supervisor, Organization's EIN, Start Date of Community Service Activity, End Date of Community Service Activity, Description of Community Service Activity, and Total Number of Community Service Hours Earned by Student.
6. The Aspen SIS will not permit a final submission of community service hours without an attachment/upload of the community service form or an acknowledgement and description of the community service activity on an organization's official letterhead.
7. A central office quarterly review of community service activities/hours will be facilitated to ensure compliance and integrity in practice in accordance with the DCPS community service policy.

Recommendation 22:

Develop internal controls to ensure the community service requirements comply with the DCMR and DCPS policies.

Response:

Agree. There is currently a central office staff member assigned to monitor the entry of community service hours in Aspen to ensure students are tracking towards fulfilling the graduation requirement. However, this is an area of needed development for DCPS. To ensure that community service requirements are in compliance with District regulations and policies, DCPS will review the graduation verification process and include protocols for substantiating community service hours documented for individual students through a system of quarterly reviews of community service documentation and the monitoring of required data entry fields in Aspen SIS to ensure accurate and reliable entry of community service activities. An updated version of the community service protocol is expected to be completed prior to the beginning of school year 2019-2020.

Recommendation 23:

Enable ASPEN SIS functions to record all student community service data.

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Response:

Agree. Currently, Aspen SIS functions allow system users with associated roles to enter service hours data for individual students as a record of community service activity. The community service data entry screen has entry boxes to capture the following information:

1. Contact Name – required
2. Organization EIN (recently added) – required
3. Start Date – required
4. End Date – optional
5. Total Service Hours – required
6. Description – optional

DCPS recognizes that this format requires modification. DCPS will review the functionality of the current format and implement system improvements to ensure the reporting of community service information is accurate and reliable prior to the beginning of school year 2019-2020.

Recommendation 24:

Develop a policy that implements internal controls related to requesting, establishing, issuing, suspending, modifying, and closing ASPEN SIS user accounts and privileges.

Response:

Agree. DCPS acknowledges the need to develop additional internal controls for ASPEN SIS user accounts and privileges. DCPS will take the following steps by September 30, 2019:

1. Audit all existing user roles in Aspen.
2. Review permissions assigned to each role and develop guidelines for appropriate permissions for each role.
3. Require schools to assign users to each role designation before the start of the school year.
4. Remove non-designated users from roles.

DCPS will also maintain a master list of Aspen users and refresh Aspen roles at least annually and as changes are requested throughout the year.

Recommendation 25:

Ensure school administrators and teachers receive ASPEN SIS training prior to receiving access to the systems.

Response:

Agree. All Aspen users receive fundamentals training prior to receiving access to Aspen. In addition, DCPS offers a suite of trainings throughout the year in-person and virtually based on the user’s role. DCPS acknowledges the need for additional, refresher trainings for teachers and administrators. DCPS will review the final roles developed in response to Recommendation 24 and consider what additional trainings are needed prior to September 30, 2019 and on an ongoing basis.

Conclusion:

The foregoing demonstrates that under your leadership DCPS took a hard look in the mirror when the problems at Ballou came to light. We have engaged in a top to bottom review of our policies, training, and practices regarding graduation requirements, attendance, the recording of excused and unexcused

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absences, legitimate reasons for being off campus, systems for making up credits, and our community service requirements. We have invested in technology to facilitate accurate record keeping, and we endeavor to train our teachers and administrators – throughout the system and not just at Ballou – in our policies and practices. We are all committed to helping our students gain the skills they need for college and career. Graduation is a key indicator for our students' future success, and graduation rates are helpful in assessing how well each school is serving its students. But we recognize that graduation cannot be achieved through short-cuts. We very much appreciate the thoughtful report from the Inspector General, and as we refine, recalibrate, assess, and enforce our systems, we will look to its guidance in the months and years to come.

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Appendix A

The below resources are referenced in each response as indicated.

Recommendations 2 and 5:

- School Opening Training PowerPoint: [School- based policy training August 2018.pptx](#)
- Pre-K to Graduation Policies (attendance, grading, promotion, credit recovery, graduation): <http://bit.ly/2MHYvH6>
- Policy Implementation Protocols: <http://bit.ly/implementationguidance>
- Policy Training Post-Test: https://drive.google.com/file/d/1SQPtVlpyjbBvji3LL_utW9rFExBSsd_D/view?usp=sharing

Recommendation 9:

- Use of Authorized Off-Campus Scheduling Code
- https://dck12-my.sharepoint.com/:b:/g/personal/conchita_hudson-hall_k12_dc_gov/EQuD1fiheM1EpYUGPH3ubw4BxJ3VxIRK2pBvdEpujkd-Mg?e=pmDxZd

Recommendation 12:

- Credit Recovery Policy: https://dcps.dc.gov/sites/default/files/dc/sites/dcps/page_content/attachments/Credit%20Recovery%20Policy_DCPS_%20Final%2011-2.pdf

Recommendation 13:

- Credit recovery FAQ: [Credit Recovery Frequently Asked Questions.docx](#)
- Credit Recovery Overview: https://dcps.dc.gov/sites/default/files/dc/sites/dcps/page_content/attachments/Credit%20Recovery%20Overview%20FINAL%20%281%29.pdf
- Credit recovery training deck: [Credit Recovery Teacher PD Term 2 11.5 \(1\).pptx](#)
- Credit recovery course guides:
 - English 1 Course Guide: [English I Credit Recovery \(3\).docx](#)
 - English 2 Course Guide: [English II Credit Recovery \(1\).docx](#)
 - English 3 Course Guide: [English III Credit Recovery \(1\).docx](#)
 - English 4 Course Guide: [English IV Credit Recovery \(1\).docx](#)
 - Algebra 1: [Algebra 1 Credit Recovery \(1\).docx](#)
 - Geometry: [Geometry Credit Recovery \(1\).docx](#)
 - Algebra 2: [Algebra 2 Credit Recovery \(2\).docx](#)
 - World History 1: [SS Credit Recovery 9th \(1\).docx](#)
 - World History 2: [SS Credit Recovery 10th \(1\).docx](#)
 - US History: [SS Credit Recovery 11th \(1\).docx](#)
 - DC History: [SS Credit Recovery 12th DC.docx](#)
 - US Government: [SS Credit Recovery 12th USG \(1\).docx](#)
 - Chemistry: [Chemistry+Credit+Recovery+Course+Outline \(3\).docx](#)
 - Biology: [Biology Credit Recovery Course Outline.docx](#)
 - Physics: [Physics+Credit+Recovery+Course+Outline \(final\).docx](#)
 - Earth Science: [Earth Science Credit Recovery Course Outline.docx](#)

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Recommendation 18:

- Defining revision guidance: [https://dck12-my.sharepoint.com/:w/g/personal/sarah_navarro_k12_dc_gov/EU3p1AhbpfINlkQyugxyO80BoBfj4PW9gEKdh3XqTU5BNg?rtime=DHd 3OLa1kg](https://dck12-my.sharepoint.com/:w/g/personal/sarah_navarro_k12_dc_gov/EU3p1AhbpfINlkQyugxyO80BoBfj4PW9gEKdh3XqTU5BNg?rtime=DHd%20La1kg)