



Houston Independent School District Internal Audit Report: On-Time Grad Academy

June 3, 2024



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TRANSMITTAL LETTER



June 3, 2024

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Pursuant to the approved internal audit plan for fiscal year ("FY") 2024 for Houston Independent School District ("HISD" or "District"), we hereby submit the internal audit report of the On-Time Grad Academy ("OTGA"). This internal audit report is focused on the accuracy and completeness of student credit earning records and the integrity of data entry, storage, and reporting processes related to the OTGA. The OTGA program has been terminated since the completion of our fieldwork, but the risks identified can be applied to similar programs or initiatives, as seen in management action plans. We have plans to present this report to the Audit Committee at the next meeting on July 30, 2024.

Our report is organized into the following sections:

Executive Summary	This provides a high-level overview and summary of the observations noted in our internal audit of the OTGA student credit earning process(es).
Background	This provides an overview of the function and relevant background information.
Objectives and Approach	The internal audit objectives are expanded upon in this section, as well as a review of the various phases of our approach.
Observations Matrix	This section includes a description of the observations noted during our internal audit and recommended actions, as well as management response, including responsible party, and estimated completion date.

We would like to thank the staff and all those involved in assisting our firm with this internal audit.

Respectfully Submitted,

RSM US LLP

Internal Audit



EXECUTIVE SUMMARY

Internal Audit: On-Time Grad Academy

Background

According to the On-Time Grad Academy's District website, the OTGA is "a non-traditional program that prepares every scholar for on time graduation by engaging them in an accelerated curriculum and personalized learning path to success."

Per the OTGA Program Information Guide, students eligible for program participation are those significantly behind in credits according to their original graduation cohort, are at risk of dropping out, and/or are experiencing personal issues that complicate attending traditional school. Accelerated learning at OTGA allows students to recover credits in a single cycle versus a full semester at a traditional high school, three times faster than the traditional learning schedule. Thus, OTGA administrators are tasked with effectively managing program recruitment, student scheduling, record keeping, grading, and compliance processes while maintaining adherence to the accelerating learning schedule.

OTGA is not a traditional school; students participate in the program while still enrolled and assigned to their "home" campus. Collaboration between OTGA administrators and home campus administrators is essential for effective student information management, student success facilitation, and compliance with the Texas Education Code ("TEC").

OTGA Students: 2022 – 2023 School Year

113 Cycle 1 OTGA Students

247 Cycle 2 OTGA Students

255 Cycle 3 OTGA Students

312 Cycle 4 OTGA Students

274 Cycle 5 OTGA Students

190 Cycle 6 OTGA Students

Note: There are 6 cycles in an academic year.

Internal Audit Objectives

The objective of this internal audit was to evaluate the design and control structure, including adherence to policies, procedures, and relevant laws and regulations, for the operating effectiveness of the OTGA's data quality management. To accomplish this objective, our procedures included:

- Conducted interviews and walkthroughs with key personnel from OTGA and the Program Compliance Department;
- For a sample of student schedules, assessed credits earned per cycle to determine reasonableness;
- Verified student credit accumulation records and the processing procedures within the student information system;
- Verified pre-requisite course and program eligibility criteria;
- Performed quality inspection of the data entry process and documented procedures for correcting erroneous entries;
- Verified the controls over the integrity of data storage and access;
- Assessed the reporting mechanisms for accuracy and timeliness in reflecting student progress and credit earning;
- Assessed the process in place for confirming compliance with educational standards and policies for accelerated credit-earning programs.

At the conclusion of this internal audit, we summarized our findings into this report. We have reviewed the results with the appropriate management personnel and have incorporated management responses into this report.

The OTGA program has been terminated since the completion of our fieldwork, but the risks identified can be applied to similar programs or initiatives, as seen in management action plans.



EXECUTIVE SUMMARY (CONTINUED)

Observation Summary (Continued)

Provided below are the observation risk rating definitions for the detailed observations.

Observation Risk Rating Definitions	
Rating	Definition
Low	Observation presents a low risk (i.e., impact on financial statements, internal control environment, or business operations) to the organization for the topic reviewed and/or is of low importance to business success/achievement of goals. Action should be taken within 12 months (if related to external financial reporting, must mitigate financial risk within two months unless otherwise agreed upon).
Moderate	Observation presents a moderate risk (i.e., impact on financial statements, internal control environment, or business operations) to the organization for the topic reviewed and/or is of moderate importance to business success/achievement of goals. Action should be taken within nine months (if related to external financial reporting, must mitigate financial risk within two months).
High	Observation presents a high risk (i.e., impact on financial statements, internal control environment, or business operations) to the organization for the topic reviewed and/or is of high importance to business success/achievement of goals. Action should be taken immediately, but in no case should implementation exceed six months (if related to external financial reporting, must mitigate financial risk within two months).



EXECUTIVE SUMMARY (CONTINUED)

Observation Summary (Continued)

Below is a summary of the observations identified during this internal audit. Detailed observations are included in the observation matrix section.

Summary of Observations	
Observations	Rating
<p>1. Manual OTGA Grading Process</p> <p>Condition: OTGA teachers and administrators currently utilize a manual, paper-based process to record and review student grades. Such processes reduce efficiencies and increase the risk of human error.</p> <p>Recommendation: Consider implementing an automated process for recording, reviewing, and approving student grades.</p>	High
<p>2. Supporting Documentation of OTGA Student Grades</p> <p>Condition: We identified 4 instances wherein student grades were not supported by underlying documentation, which would evidence the course taken, the pass/fail status, the final awarded grade, and the teacher’s approval of that grade.</p> <p>Recommendation: Reinforce expectations related to Student Performance Status Report (“SPSR”) report usage and document retention. All SPSR reports should be retained in a central location, and saved per District retention policies.</p>	High
<p>3. Review of OTGA Student Grade Documentation</p> <p>Condition: We identified 17 instances wherein teacher signatures, which would evidence approval of final awarded grades, was not present. We also identified a lack of documented review over the consolidated grading spreadsheet, which would evidence a secondary review occurred before transcripts were created.</p> <p>Recommendation: Reinforce expectations related to SPSR report usage, and clarify procedures in a written SOP.</p>	High
<p>4. Compliance with the Texas Education Code and OTGA Program Measurability</p> <p>Condition: Due to the decentralized nature of critical processes, access to data is limited, hindering compliance with the Texas Education Code and the ability to monitor and evaluate the effectiveness of the OTGA program.</p> <p>Recommendation: Consider utilizing PowerSchool functionality to generate reporting necessary for evaluation of TEC compliance and obtain data to measure OTGA program effectiveness internally. Further, we suggest the District create clear and quantifiable OTGA performance metrics and use the PowerSchools’ functionality to evaluate its capacity to achieve those metrics.</p>	High
<p>5. OTGA Data Governance</p> <p>Condition: We identified 13 edits made to student data after the Texas Education Agency’s submission deadline. Edits did not contain commentary explaining the need for the change, and the District does not have a formal data governance policy requiring such commentary.</p> <p>Recommendation: Develop and implement a data governance model to define data ownership and procedures related to data integrity.</p>	High



EXECUTIVE SUMMARY (CONTINUED)

Observation Summary (Continued)

Summary of Observations (Continued)	
Observations	Rating
<p>6. Availability of OTGA Student Documentation</p> <p>Condition: Based on testing of 25 sampled OTGA participants, 72 expected documents were not found in the student files. There are no written expectations related to OTGA student documentation.</p> <p>Recommendation: We recommend that OTGA define and enforce student documentation requirements as well as document retention expectations.</p>	<p>Moderate</p>
<p>7. Detective Controls and Rate of Credit Accrual</p> <p>Condition: We found instances where students exceeded the expected range of credits earned per semester and completed courses out of the anticipated order.</p> <p>Recommendation: Consider creating error reports to detect student schedules exceeding a pre-defined number of credits per cycle and semester. Once flagged, District staff should review the schedule to confirm that all scheduled courses are correct and adhere to the order of course completion.</p>	<p>Moderate</p>



BACKGROUND

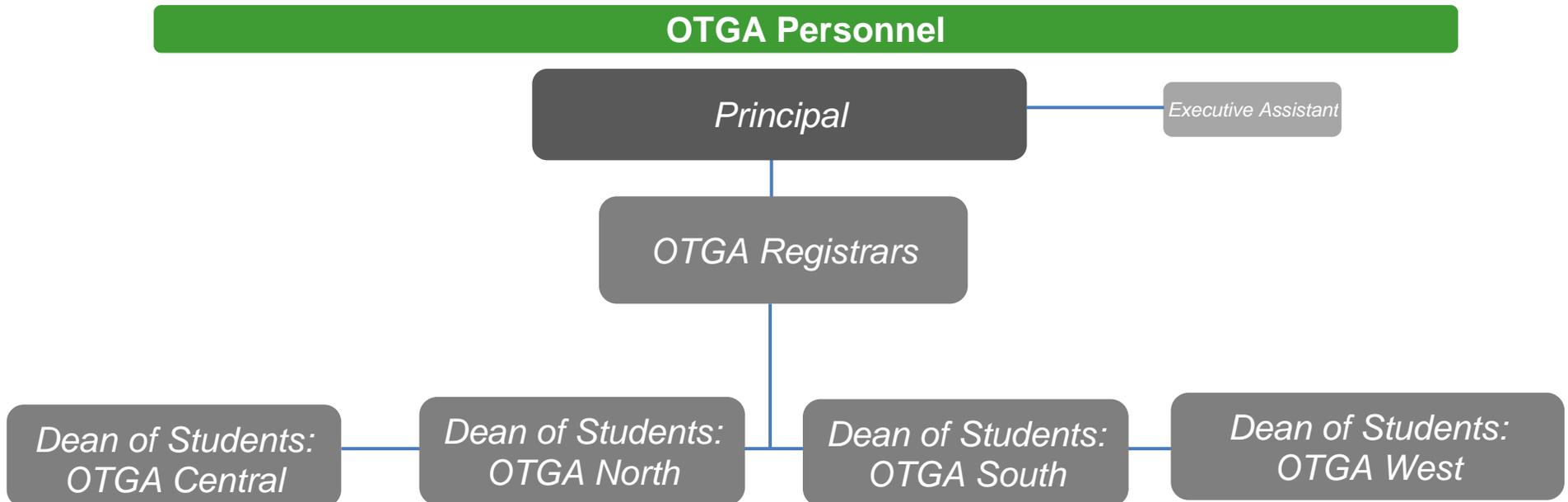
Overview

According to the OTGA's District website, the OTGA is "a non-traditional program that prepares every scholar for on-time graduation by engaging them in an accelerated curriculum and personalized learning path to success." OTGA outlines the following as key context for the program's offerings:

- Students can restore credits through various sessions such as 6-week cycles, night sessions, weekend sessions, holiday sessions, and summer school sessions.
- Students receive daily course preparation, earning credits alongside their cohort, improving campus graduation rates.
- Students can earn up to 3.5 credits per cycle and receive personalized learning plans.
- Students benefit from additional offerings, including college and career readiness programs, admission into the AVID (Advancement Via Individual Determination) program, opportunities for community involvement, and access to additional mental health support.

OTGA serves an average of 231 students per cycle, not including students who may enroll in sessions. Cycles represent a third of a traditional semester timeline, and sessions are courses completed on weekends and nights throughout the semester and academic breaks. The administrative team responsible for managing the OTGA application process, student scheduling, grading, reporting, and communication includes a registrar and several deans representing different geographical areas of the District. There are a total of 32 FTEs working within the OTGA program.*

Note: Since the completion of our fieldwork, the OTGA program has been terminated. The risks identified in this report can be applied to similar programs or initiatives, as seen in management action plans.



*The information in this section is unaudited.



BACKGROUND (CONTINUED)

OTGA Procedures Overview

OTGA defined the following processes within its Standard Operating Procedures document to fulfill its mission.

- **Recruitment:** The process involves OTGA deans collaborating with administrators throughout the District to identify students potentially eligible for program participation. OTGA registrars send District-wide email communications with referral period dates and deadlines, and orientation sessions are held to familiarize school staff members with the goals and procedures of the OTGA program.
- **Student Referral and Application:** OTGA currently utilizes an online SharePoint site to capture student applications. Students and their home campus administrators use the site to document their current academic status, request specific courses, and complete required documentation (see “Document Retention” below). After the referral deadline, OTGA administrators filter applications to prioritize over-age students (students older than their current grade level suggests) and current seniors. Any student rejections are based on the availability of courses and course capacity limits. Final decisions are communicated to the schools, and upon portal closure, OTGA personnel download the SharePoint files for accepted students to create rosters. These rosters are saved to the designated folder on the HISD OneDrive network. Each District campus receives an email detailing which students were accepted and what next steps are required before course commencement.
- **Schedule Creation:** OTGA registrars and deans create personalized course schedules for each accepted student. This process may involve creating “graduation checklists,” which map out the courses expected to be taken throughout the remainder of their high school career. As part of this process, transcripts from home campuses may be accessed and saved within the HISD OneDrive network. Once a proposed OTGA schedule has been created, OTGA administrators email details to the home campus for visibility. Changes, if requested, may be made before the student begins coursework.
- **Attendance Tracking:** Each day, students are required to report their attendance to their OTGA instructor. Attendance records are sent to home campuses, and any non-attending students are removed from the program by the third day of the cycle.
- **Grading:** OTGA instructors are responsible for signing and dating Excel spreadsheet gradebooks and inputting numeric grades into SPSR reports. OTGA administrators are tasked with consolidating program grades, performing accuracy reviews, and submitting comprehensive grade documentation to the District Student Information System team for transcript creation. Any errors discovered after transcripts have been created require a manual edit request for correction.
- **Document Retention:** OTGA administrators are responsible for printing, signing, and dating grade books, submitting documentation to the District Student Information System (“SIS”) team, generating student exit letters, documenting attendance in SharePoint, and reviewing each cycle’s applications.

Key Systems and Terms

- **SharePoint:** This is a system utilized by home campuses and students to submit program applications. Data submitted to the SharePoint site is used to prioritize at-risk students for program participation and begin the scheduling process.
- **PowerSchool:** This is a system utilized by HISD’s main campuses to track comprehensive student information (grades, student profiles, schedules, and attendance). Final student grades are uploaded into PowerSchool. OTGA does not use this system as it is not an approved secondary program system.
- **Cycle:** This refers to one six-week grading period. There are three cycles in one semester, and students are typically limited to earning 3.5 credits per cycle.
- **Session:** This refers to two- and four-day grading periods during which students can earn full course credit. If a student is tardy or absent, the student is unable to earn credit. Sessions can be held throughout the academic year, on weekends, and during the summer and winter breaks.



OBJECTIVES AND APPROACH

Objectives

The objective of this internal audit was to evaluate the design and control structure, including adherence to policies, procedures, and relevant laws and regulations for the operating effectiveness of the OTGA's data quality management. In-scope areas included the accuracy and completeness of student credit-earning records, the integrity of data entry, storage, and reporting processes, compliance with educational standards and policies for accelerated credit-earning programs, and the effectiveness of internal controls over the monitoring and reporting student progress. Additionally, where possible, the audit reviewed historical data to identify trends and anomalies in credit accumulation, provide recommendations to enhance data quality and establish procedures for ongoing evaluation and monitoring.

Approach

Our audit approach will consist of the three phases described below.

Understanding and Documentation of the Process

The first phase primarily involved inquiries to understand the critical personnel, risks, processes, and controls relevant to the above objective. The following procedures were conducted as part of this phase:

- Conducted interviews and walkthroughs with key personnel to obtain a detailed understanding of the District's operating policies and procedures and roles/responsibilities as they relate to the processes within our scope.
- Developed a work plan to evaluate the operating effectiveness of processes and controls based on the information obtained through our review, inquiry, and walkthrough procedures.

Evaluation of the Process and Controls Design and Testing of Operating Effectiveness

The purpose of this phase was to test compliance and internal controls. Our fieldwork testing utilized sampling and other auditing techniques to meet the abovementioned audit objectives. Samples included student records from the OTGA 2022 – 2023 program year. Procedures included the following:

- Evaluated the design and control structure, including adherence to policies and procedures.
- Reviewed documentation and records supporting student credit earning to assess their completeness and adequacy, including:
 - Assessment of scheduled credits per cycle to determine reasonableness;
 - Verification of student credit accumulation records and the processing within the student information system;
 - Verification of complete pre-requisite courses and program eligibility criteria;
 - Quality inspection of the data entry process and documented procedures for correcting erroneous entries;
 - Verification of the controls over the integrity of data storage and access; and
 - Assessment of the reporting mechanisms for accuracy and timeliness in reflecting student progress and credit earning.
- Assessed the process in place for validating compliance with educational standards and policies for accelerated credit-earning programs:
 - Review of program design and justification for accelerated credit earning.
 - Evaluation of the monitoring processes for student progress within the OTGA program.

Reporting

During this phase, we summarized the results of this internal audit and reviewed them with appropriate District and OTGA representatives.



OBSERVATIONS MATRIX

Observation	1. Manual OTGA Grading Process
<p style="text-align: center;">High</p>	<p>While traditional school campuses utilize the District’s Student Information System (“SIS”), PowerSchool, to record student grades throughout the cycle (including interim exam grades and final grades), OTGA teachers track student grades manually through locally saved Excel spreadsheets. Teachers record only the final grade on hard copies of Student Performance Status Reports (“SPSRs”) at the end of each cycle or session. Teachers must record the student’s name, ID number, home campus, cycle/session number, course name, final grade, and pass/fail status. Once complete, teachers sign the SPSR form to document their final review and approval of the grade given.</p> <p>At the end of each cycle or session, OTGA teachers send the completed SPSR report to the OTGA Registrar. The Registrar is tasked with manually entering each student’s grade into a consolidated grading spreadsheet, which the District SIS team utilizes to create student transcripts. For Cycle 1 of the 2023 school year alone, 630+ student grades (and corresponding student ID numbers, campus information, etc.) were manually typed into the consolidated listing.</p> <p>By utilizing the aforementioned manual process to record, approve, and submit student grades, OTGA workflows lose efficiencies, and educational data is susceptible to increased risk of error.</p>
<p>Recommendation</p>	<p>The following is recommended:</p> <p>Consider implementing an automated process for recording, reviewing, and approving OTGA grades. At a minimum, the following functionalities should be considered:</p> <ul style="list-style-type: none"> • The ability for OTGA instructors to utilize secure login credentials to record student grades throughout the cycle/session instead of using local Excel spreadsheets and paper SPSR reports, which record only the student’s final grade; • The ability for OTGA registrars and deans to review student grades, thereby eliminating the need to consolidate grades into an Excel spreadsheet for processing manually; and • The ability for home campuses to review the courses enrolled through OTGA, and their students’ progress reports throughout the cycle/session, thereby increasing transparency related to credit-earning. <p>The District should consider whether granting PowerSchool access to OTGA administrators is a practicable solution to meet the above objectives.</p>



OBSERVATIONS MATRIX (CONTINUED)

Observation	1. Manual OTGA Grading Process (Continued)
<p>Management Action Plan</p>	<p>Response: Implement as proposed. Any students participating in credit recovery through offerings within the Apex Learning Management System (Apex LMS) must do so via scheduling at the home campus. The home campus will schedule the student in the appropriate local course numbers that facilitate the enrollment integration between Apex LMS and HISD Connect through a scheduled “99” period expression. District central office support for the Apex LMS system will ensure OTGA or other program staff receive access to participating student enrollments for administration and gradebook entries. Students enrolled in accelerated direct instruction with a teacher must have a teacher assigned as the Teacher of Record to maintain an electronic gradebook that can be archived based on approved records management processes.</p> <p>Note: Advanced Virtual Academy (AVA) opened in August 2009 on the campus of Scarborough HS. AVA was established to offer a flexible alternative to traditional high school education through online courses. AVA was its own school with a TEA campus ID number. In May 2017, AVA changed its name to Momentum Academy, maintaining its own school with a campus ID number. In May 2018, Momentum Academy closed as a school and began the On Time Grad Program. As a program, the school no longer had its own campus number. Moving from a campus to a program created some of the issues listed as risks in the OTG audit because students were connected to their home/zoned campuses rather than the OTG teachers and program. These issues and concerns were known, and various technical remedies were explored to try and resolve the concerns outlined in the audit. As of July 2024, OTG program ceased to exist because of budgetary constraints.</p> <p>Responsible Party: AAC Compliance Director, IT SIS Director, CCMR Credit Recovery Coordinator, CCMR Counseling Director.</p> <ul style="list-style-type: none"> • AAC monitors for compliance and provides support where necessary. This will be outlined in School Guidelines. • IT will have to develop a solution to allow appropriate teacher access to create links between teachers’ gradebooks and the Credit Recovery platform (e.g., APEX LMS). • CCMR Credit recovery supports APEX credit recovery and the linkage with Period 99 and the APEX platform. • CCMR Counseling supports counselors with the correct student scheduling processes, including credit recovery scheduling. <p>Estimated Completion Date: September 2024 for AAC, CCMR Credit Recovery and CCMR Counseling. IT Processes might take longer (estimated December 2024).</p>



OBSERVATIONS MATRIX (CONTINUED)

Observation	2. Supporting Documentation of OTGA Student Grades
<p style="text-align: center;">High</p>	<p>As described in Observation 1, the current process for recording, reviewing, and approving student grades is manual in nature, and relies on paper documentation (SPSR reports) to be passed from the various OTGA teachers to the OTGA Registrar. The SPSR reports serve as the foundation of transcribed OTGA grades, as they evidence the pass/fail status, and the final grade earned, and the teacher's attestation and approval of that grade.</p> <p>As part of our procedures, we noted that for 4 of the 25 sampled students, or 16%, SPSR reports could not be located.</p> <p>Without properly documenting and retaining evidence of final grades, the reliability of student academic data is impacted, impairing the District's decision-making and oversight ability. Should disputes or additional inquiries arise related to grades earned, supporting documentation may not be available.</p>
<p>Recommendation</p>	<p>The following is recommended:</p> <ul style="list-style-type: none"> • OTGA should consider reinforcing expectations related to SPSR report usage (including document retention). All SPSR reports should be retained in a central location, and saved per District retention policies. • If an automated process is implemented (see Observation 1), confirm that historical grade data is saved within the system and made available for audit purposes.
<p>Management Action Plan</p>	<p>Response: Implement as Proposed. Establish guidelines for gradebook maintenance with any accelerated credit/credit recovery program. Students enrolled in APEX LMS must have the APEX LMS documentation confirming final grade printed out and maintained in accordance with HISD records management guidelines. Students who earn credit in accelerated direct instruction settings must have an electronic grade book. In both instances, the grade book's summative semester grades should be reflected on the students' report card grades and their final credit/grade entries onto the students' AARs/transcripts.</p> <p>Responsible Party: AAC Compliance Director and CCMR Credit Recovery Coordinator. AAC drives the required documentation as outlined in School Guidelines. CCMR Credit Recovery will use the guidance to develop the required documentation needed for any APEX Credit Recovery course.</p> <p>Estimated Completion Date: September 2024</p>



OBSERVATIONS MATRIX (CONTINUED)

Observation	3. Review of OTGA Student Grades Grade Documentation
<p style="text-align: center; background-color: red; color: white; padding: 5px;">High</p>	<p>As described in Observations 1 and 2, the current process for recording, reviewing, and approving student grades is manual, and relies on paper documentation (SPSR reports) to be signed and passed from the various OTGA teachers to the OTGA Registrar. After the Registrar has reviewed the signed SPSR reports and manually entered each student's grade into a consolidated grading sheet, the OTGA Registrar compares the completed spreadsheet to the original SPSR report to confirm that data was transcribed correctly. To evidence the completion of this review, the OTGA Registrar initials each SPSR report. After this has been completed, the consolidated spreadsheet is submitted to the District SIS team for transcript creation.</p> <p>As part of our procedures, we selected a sample of 25 SPSR reports, but only 21 were provided, as stated in Observation 2. The following issues were identified within the SPSR reports obtained:</p> <ul style="list-style-type: none"> • 17 of 21 sampled SPSR reports, or 80%, were missing at least one teacher signature, which would evidence the instructor's review and approval of final grades. • All 25 sampled students were missing the Registrar's signature on at least one SPSR report, which would evidence a reconciliation between the SPSR report and the consolidated grading spreadsheet occurred. Through discussion with management, we noted this process may have changed throughout the 2022 – 2023 school year; however, detailed standard operating procedures describing a revised process, and documentation evidencing a review occurred, do not exist. <p>How student grades are reviewed and approved plays a critical role in the completeness and accuracy of academic student data. Teacher signatures provide evidence that the final grade has been verified from an educator's perspective, while the Registrar's signature provides evidence that human error was not detected in the transcribing process. Without both components, the reliability of student academic data is impacted, impairing the District's decision-making and oversight ability.</p>
<p>Recommendation</p>	<p>The following is recommended:</p> <ul style="list-style-type: none"> • OTGA should consider reinforcing expectations related to SPSR report usage (including teacher verification, approval, and review procedures). • OTGA should clarify expectations and develop written procedures related to the reconciliation of SPSR reports and consolidated grading spreadsheets. This review assists in mitigating the risk of human error, and documentation that the review has been performed should be retained. • If an automated process is implemented (see Observation 1), confirm that historical grade data and the related approvals are saved within the system and made available for audit purposes.
<p>Management Action Plan</p>	<p>Response: Implement as Proposed. All grades earned in a credit recovery program or an accelerated credit program must maintain the same grade documentation standards as other courses and schools.</p> <p>Responsible Party: AAC Compliance Director and CCMR Credit Recovery Coordinator. AAC drives all grade reporting responsibilities and requirements as outlined in School Guidelines. CCMR Credit Recovery will use the guidance to develop the required documentation needed for any APEX LMS Credit Recovery course.</p> <p>Estimated Completion Date: January 2025 (to ensure Semester 1 2024 grades are saved appropriately).</p>



OBSERVATIONS MATRIX (CONTINUED)

Observation	4. Compliance with the Texas Education Code and OTGA Program Measurability
<p style="text-align: center;">High</p>	<p>Texas Education Code Chapter 29 mandates that school districts and open-enrollment charter schools annually publish a report on their websites detailing measurable outcomes for each dropout recovery education program. Required data points include the percentage of students who transfer to a traditional program, complete the program, earn dual credits, and obtain a credential of value.</p> <p>During our audit, it was observed that HISD does not currently post the required reports on its website. Further investigation revealed that the District lacks the capability to generate the necessary data. Although OTGA administrators can list students who have applied to the program via reporting from an online SharePoint site, they cannot produce comprehensive reports detailing active or previous enrollments, course participation, assigned teachers, students' home campuses, or credentials earned.</p> <p>The root cause of this issue is the manual and decentralized processes related to scheduling and grading, which are conducted outside the District's Student Information System ("SIS") and often rely on paper documentation. This approach limits data availability and integration, hindering compliance with the Texas Education Code and the ability to monitor and evaluate the effectiveness of the OTGA program.</p> <p>The lack of a centralized data repository integrated with District databases may compromise HISD's ability to adhere to statutory requirements and leverage critical performance metrics. This limitation poses risks to program oversight, decision-making, and overall educational effectiveness, potentially impacting student outcomes and the District's reputation.</p>
<p>Recommendation</p>	<p>The following is recommended:</p> <ul style="list-style-type: none"> • We understand that OTGA administrators were granted access to PowerSchools' scheduling functionality at the beginning of the 2023/2024 school year; we recommend utilizing and expanding that functionality to generate listings of actively enrolled students and their credits earned. Such reports can be used to comply with the aforementioned Texas Education Code and increase transparency. • We suggest the District create clear and quantifiable OTGA performance metrics and use the PowerSchools' functionality to evaluate its capacity to achieve those metrics.
<p>Management Action Plan</p>	<p>Response: Implement as Proposed for future accelerated learning programs. All grades earned in a credit recovery program or accelerated credit programs must maintain the same grade documentation standards as other courses and schools. Please note that this will not apply to OTGA as the program will not exist after July 1, 2024.</p> <p>Responsible Party: AAC Compliance Director and IT SIS Director. IT grants SIS Access and will have to develop a way for accelerated learning professionals to obtain access to the appropriate students. AAC would help establish performance metrics with the appropriate stakeholders for any new credit recovery/accelerated learning programs.</p> <p>Estimated Completion Date: January 2025</p>



OBSERVATIONS MATRIX (CONTINUED)

Observation	5. OTGA Data Governance
<p style="text-align: center;">High</p>	<p>As mentioned in Observations 1, 2, and 3, various OTGA-related processes occur outside of the District Student Information System (SIS), and data inputs may be retained at both the OTGA and home campus locations. However, for student grades and data to be converted into final transcripts, data must eventually be transcribed and recorded within the central SIS, PowerSchool. At the end of each cycle, OTGA student grades are sent to the District’s SIS team to be translated into transcripts within PowerSchool. District-wide data must be submitted to the State at the end of each year before the Texas Education Agency’s submission deadline.</p> <p>During our review of 7 subsampled OTGA students, the following issues were identified:</p> <ul style="list-style-type: none"> • Texas State Reporting requires Districts to document the teacher of record for all face-to-face instructor-led courses. All 7 subsamples contained courses coded as “face-to-face,” but the system did not include a teacher ID reference. When a teacher ID reference is not provided, the system prompts users to give an explanation code to justify the omission; however, none of our subsamples had an explanation code selected. • 1 of the 7 subsamples contained an edit to add a credit (thereby changing the grade point average), but no justification was provided as to why the addition was warranted. • Each of the above edits was made after the TEA submission deadline of August 17, 2023. The editor made no comments to explain the need for the edit or how it may have impacted the state-reported data. • Through discussion with the District’s Data Science and Compliance team, we noted that a data governance policy or standard operating procedure for editing substantive grade changes does not exist. While the integrity of stored grade records is the responsibility of District registrars, procedures defining data editing review and approval processes, requirements for documenting edit justifications, or communicating changes that may impact state reporting do not exist. <p>Without requiring all fields to be completed at the time of data creation and without documenting when and why a change to data must be made, the audit trail and the integrity of student grade information is compromised.</p>
<p>Recommendation</p>	<p>The following is recommended:</p> <ul style="list-style-type: none"> • Create a data governance model, including formalized standard operating procedures and responsibility assignments related to student grade data. • For any fields related to a Texas State Reporting requirement, consider implementing a stop-gate control, preventing data submission until all required fields are complete. • For any edits made, including those made after the TEA submission deadline, consider preventing changes from being saved until a review comment is provided to explain the edit. A secondary user should review all edits made that may impact student grades.



OBSERVATIONS MATRIX (CONTINUED)

Observation	5. OTGA Data Governance (Continued)
Management Action Plan	<p>Response: Implement as Proposed. AAC's guidance on the on a data governance model will be clearly defined and will outline specific steps required of all programs to maintain grade data and credit accrual data.</p> <p>Responsible Party: AAC Compliance Director, IT Postsecondary Credit Recovery Coordinator. AAC would establish the data governance requirements for all campuses and grade reporting in School Guidelines. CCMR Credit Recovery will implement the data governance plan with schools utilizing APEX LMS. IT must establish a report in SIS that assists with the audits required to see if missing information is not coded appropriately in the SIS.</p> <p>Estimated Completion Date: Guideline established by September 2024. IT report created by May 2025</p>



OBSERVATIONS MATRIX (CONTINUED)

Observation	6. Availability of OTGA Student Documentation
<p>Moderate</p>	<p>Before students are admitted into the OTGA program, they must first apply through an online SharePoint site, obtain parental approval, and obtain a referral from a District administrator. As part of the OTGA application, students and their home campus administrator select individual course(s) that the student may take to re-align with their graduation timeline. The student's academic standing is corroborated by reviewing their current, point-in-time transcript. Once a student is accepted into the program, OTGA registrars and deans prepare customized checklists detailing which courses are to be taken and when. These documents, including the parental consent form, referral form, transcript, and graduation checklist, are retained in the student's file.</p> <p>During our review, the following issues were identified:</p> <ul style="list-style-type: none"> • 17 of the 25 sampled student files did not contain a Parental Authorization Form. This form documents guardian consent to allow their children to participate in the OTGA program, agree to attendance requirements, and agree that transportation will not be provided. • 24 of the 25 sampled student files did not contain a Student Referral Form. A district administrator typically creates this document and provides a formal recommendation for a student to be considered for OTGA eligibility based on their current credit earning trajectory and their graduation cohort. • 11 of the 25 sampled student files did not contain a transcript generated at the time of program referral. The point-in-time transcript is utilized to review the student's current academic progress and determine how many credit(s) are needed to graduate with their cohort. • 20 of the 25 sampled student files did not contain a "Graduation Requirements" checklist. Deans and registrars typically complete this form and map the student's progress toward required coursework and graduation prerequisites. <p>Through discussion with Management, we noted that there are no formal expectations related to the completeness of student files; documentation may vary depending on the student and the circumstances in which they are enrolled in the OTGA program. We also noted that files may have been retained by deans and home campus administrators who no longer work within the District, and thus, documentation is now inaccessible.</p> <p>Without defined expectations as to what constitutes a "complete" student record and without consistent document retention practices, audit trails related to student OTGA eligibility and admission, parent authorization, course scheduling, and credit earning may be incomplete.</p>
<p>Recommendation</p>	<p>The following is recommended:</p> <ul style="list-style-type: none"> • Define expectations related to student documentation. While courses and schedules may vary depending on the student, program referral forms, authorization forms, and graduation requirement checklists should be created for all program participants. To assist in developing standardized, complete student forms, OTGA may consider creating student file checklists to confirm that all required forms and documentation are present. The checklist may include the OTGA application, transcripts, and attendance records. • Define expectations related to document retention, including the location of student files. The District should consider housing student documentation in a central location so that home campuses and OTGA administrators can contribute to and view it in real-time, as needed.



OBSERVATIONS MATRIX (CONTINUED)

Observation	6. Availability of OTGA Student Documentation (Continued)
Management Action Plan	<p>Response: Implement as Proposed. All grades earned in a credit recovery program, or an accelerated program must maintain the same grade documentation standards as other courses and schools.</p> <p>Responsible Party: AAC Compliance Director, CCMR Credit Recovery Coordinator, and CCMR Counseling Director. Compliance regarding student documentation and retention is completed by AAC and outlines in School Guidelines. CCMR Counseling, in conjunction with AAC's Federal State and Compliance, would establish the graduation checklists used by counselors and registrars to support graduation and credit planning. CCMR Credit Recovery will utilize this documentation plan with campuses utilizing the APEX LMS system.</p> <p>Estimated Completion Date: January 2025</p>



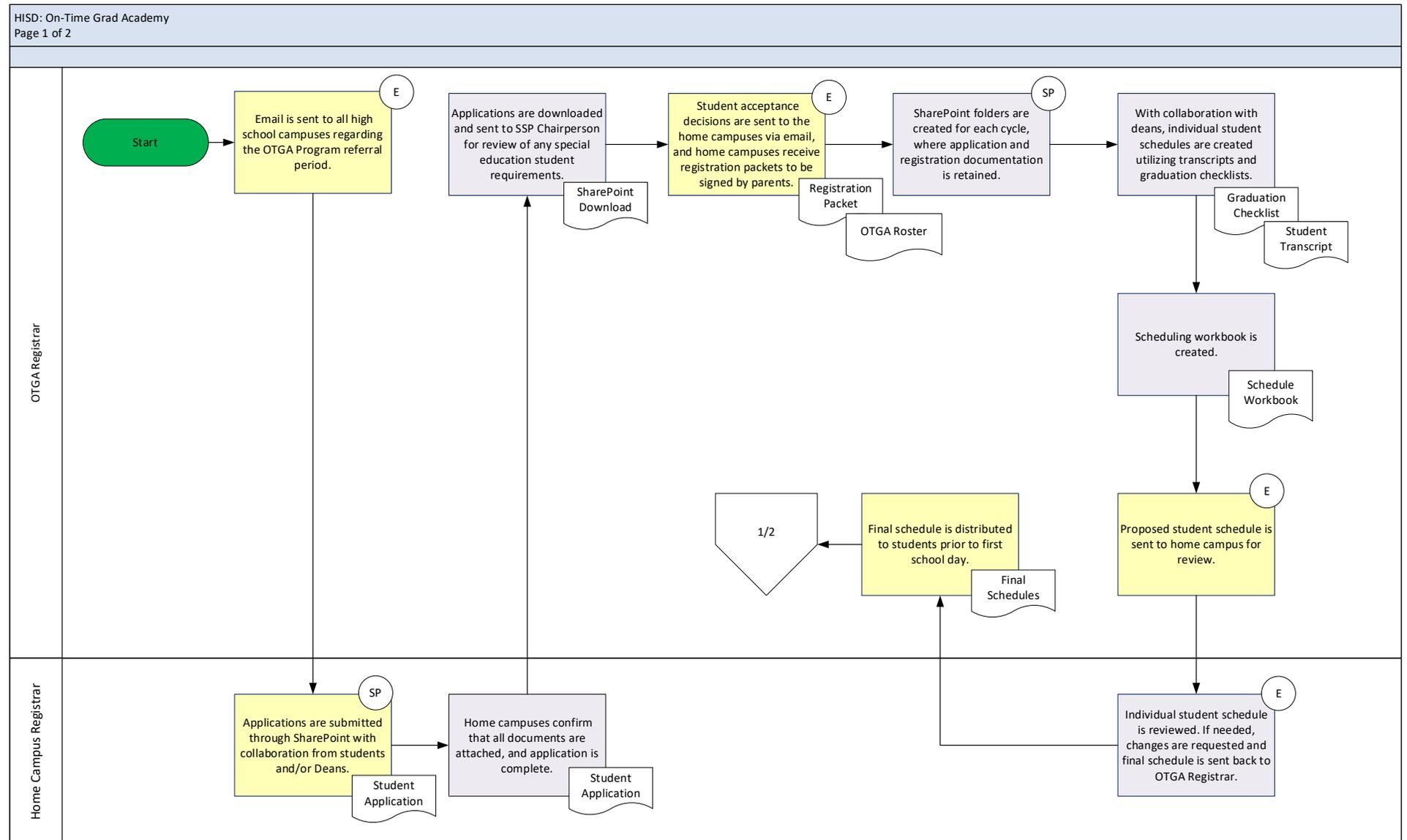
OBSERVATIONS MATRIX (CONTINUED)

Observation	7. Detective Controls and Rate of Credit Accrual
<p>Moderate</p>	<p>While there is no State-level limitation related to the volume of credits that can be earned in a given semester, OTGA imposed a credit accrual limitation of 3.5 credits per cycle (or 10.5 credits per semester). This maximum credit-earning pace was established to prevent students from earning credit faster than administrators could process. In addition to the specifications related to the pace of credit-earning, the OTGA Standard Operating Procedure also defines the order in which courses should be taken: “<i>Students must take math courses in the following sequence: Algebra 1, Geometry, MMA or Algebra 2, and then Pre-Calculus...</i>”</p> <p>During our review, the following issues were identified:</p> <ul style="list-style-type: none"> • 13 of the 25 sampled students, or 52%, accrued credits faster than the anticipated rate of 3.5 credits per cycle, or 10.5 credits per semester (samples ranged from 11 credits to 21 credits earned per semester). While credit may have been earned through various other avenues currently available to students¹, there is currently no detective control in place to identify and investigate instances of credit being earned at unusually rapid rates. • 2 of the 13 students who accrued credits faster than the anticipated rate completed coursework out of the expected order. Credit earning that falls outside the pre-defined order may indicate scheduling and credit-earning process errors. <p>Without controls in place to detect anomalies in course scheduling and credit earning, potential errors in the manual scheduling and credit reviewing process may go undetected.</p>
<p>Recommendation</p>	<p>The following is recommended:</p> <p>Consider creating error reports that would flag student schedules exceeding a pre-defined number of credits per cycle and semester. Once flagged, District staff may review the schedule to confirm that all scheduled courses are correct and adhere to the order of course completion. While the District may not limit the rate at which credits are completed, implementing a detective control to identify potential irregularities and errors in student schedules will increase the accuracy and integrity of the scheduling and credit-earning process.</p>
<p>Management Action Plan</p>	<p>Response: Implement as Proposed. A determination of the number of allowable earned credits per semester must be established. Once established, AAC and IT can work to create a report in the HISD SIS to flag students who exceed the number of credits earned in a semester.</p> <p>Responsible Party: AAC Compliance Director, IT SIS Director, CCMR Counseling Director. AAC and Counseling will determine a reasonable number of credits that students should be able to accrue in a semester and the process to override the credit limit with appropriate documentation. Using the established credit limit criteria, IT will have to develop a report that flags students who earn more than a set number of credits in a semester. This report will be utilized by campus registrars and counselors to audit students’ AARs/Transcripts for errors.</p> <p>Estimated Completion Date: Criteria Discussion December 2024. Creation of an SIS report on Credits – June 2025.</p>

¹ Per the Program Compliance Department, there are approximately nine (9) methods in which students may earn credit outside of the regular coursework at the home campus, and outside of the OTGA program. They include credit by exam (through University of Texas or Texas Tech programs), completion of a dual language immersion program, summer school courses offered at the home campus, Texas Virtual School Network’s distance learning courses, foreign, out-of-state, or private secondary school, credit via Board Waiver, the HISD REAL program, the Texas College Bridge program, and the Graduation Lab initiative.

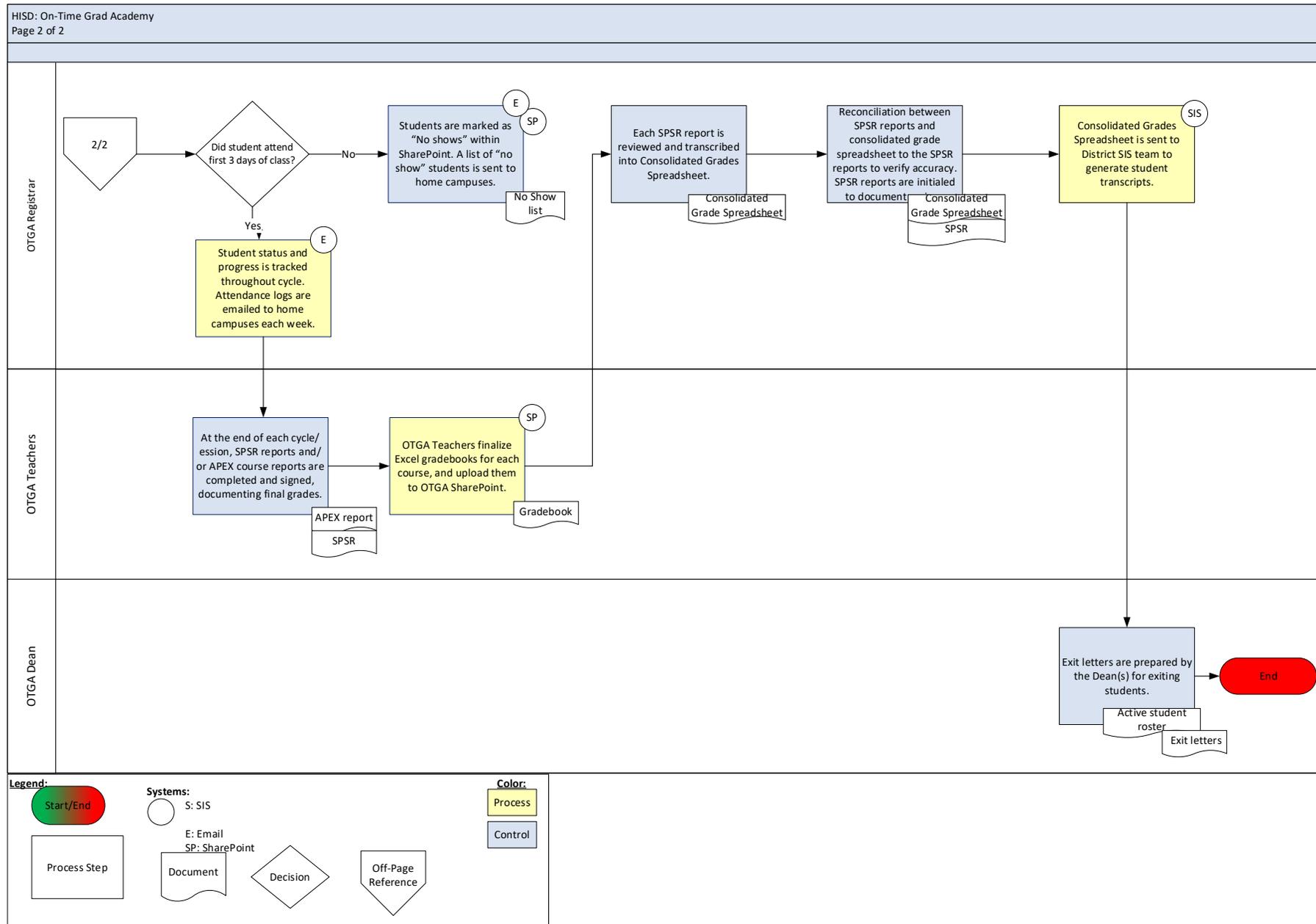


APPENDIX: PROCESS MAPS





APPENDIX: PROCESS MAPS (CONTINUED)





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