

Student Engagement and Support Audit

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Date: October 18, 2023

To: Board of Trustees
Stephanie S. Elizalde, Ed.D., Superintendent

From: Robert Rubel, MBA, CPA, CIA, CISA
Chief Internal Audit Officer

Subject: Student Engagement and Support Audit

Executive Summary

The Dallas Independent School District (District) Office of Internal Audit (OIA) has completed the Student Engagement and Support Audit.

The audit focused on the District's internal controls over the student discipline process designed to provide leadership, support, and resources to promote an orderly, safe, and conducive learning environment on District campuses.

The audit included reviews of student disciplinary referrals and actions created within the Student Positive Behavioral System (SPBS); school campus visits and interviews to determine whether they are managed timely and appropriately; and if there is ongoing monitoring and communication of results to stakeholders, executive leadership, and campus administration.

Overall, the Office of Student Engagement and Support (SEAS) has implemented applicable controls within the SPBS system to support the student disciplinary process in managing risks. Additionally, SEAS personnel are providing assistance to school administration and coaching to campus Reset Center staff to better manage student disciplinary referrals and restorative monitoring.

Opportunities for improvement were identified in the following areas:

1. The process for identifying and tracking at-risk students should be standardized.
2. Student Engagement and Support should develop guidelines for how supplemental student discipline referral documentation is to be maintained.

Implementation of the recommendations in this report would assist SEAS and the district in strengthening the district-wide administration over the student engagement and support process.

Background

SEAS assists all District campuses in having an orderly, safe, and conducive learning environment by providing leadership, support, and resources, including offering guidance to campuses in preventing and addressing discipline matters. Student discipline matters are handled by SEAS to ensure consistency with overarching federal and state statutes, Texas Education Agency regulations (TEA), and local board policies in student discipline and restoration.

When a student commits a disciplinary infraction, a referral is submitted to the campus behavior coordinator (CBC) to document the offense and determine what intervention is needed. The District offers student behavior interventions including verbal correction, school counseling, assignment to the campus Reset Center, Disciplinary Alternative Education Program (DAEP), and the Juvenile Justice Alternative Education Program (JJAEP). District Student Code of Conduct (SCOC) categorizes infractions into four category levels:

- Level I – Violations of classroom rules: Offenses that occur in the classroom and can be corrected by the teacher or administrator.
- Level II – Reset Center and/or optional removal to DAEP: Offenses that seriously disrupt the educational process in the school, classroom, on school property, and/or at a school-related activity occurring on or off school property.
- Level III – Mandatory placement in DAEP: Criminal offenses as defined in Level III. All offenses listed in Level III are according to Texas Education Code (TEC), Chapter 37.006
- Level IV – Expulsion: Offenses that include those which a student may be expelled under state law TEC, Chapter 37.007.

The District eliminated discretionary out-of-school and in-school suspensions in fiscal year (FY) 2021-2022 while continuing to emphasize positive student support. In August 2021, District leadership introduced the Reset Centers with dedicated coordinator staffing and working space at 52 secondary campuses. This initiative received federal grant funding administered through the TEA Elementary and Secondary School Emergency Relief (ESSER) fund. The District created and filled 11 student engagement coordinator (SEC) positions on eight campuses reporting to four SEAS managers to provide the SECs with coaching, training, and continuous monitoring.

Teachers serve as the first line of defense in addressing non-criminal student disciplinary infractions occurring in the classroom. School resource officers (SRO) provide support to classroom teachers, if necessary, for these non-criminal student disciplinary infractions. In addition, the SROs monitor access and egress points throughout the school, are present in the halls during class breaks, and monitor the school grounds. Hall monitors are responsible for monitoring activity in the hallways including bathrooms and common areas. Teachers and administrative staff are responsible for behavioral concerns in classrooms, hallways, and common areas throughout the school. Dallas ISD Police Department officers address criminal violations on the campus.

Campus Reset Center coordinators have a responsibility to provide short-term educational and behavioral management services for students removed from the regular classroom setting for a SCOC referral through restorative practices and social emotional learning (SEL). Student assistance includes self-awareness, self-management, healthy relationship skills, and problem solving. The goal is to provide students with positive intervention and support to process and reset behavior while staying engaged in their schoolwork. Reset Centers are not designed to accommodate Levels III and IV offenses. Students are subject to DAEP or JJAEP if the offense

is considered to be high level and may be placed in the Reset Center until the intake date is available at the alternative school.

Disciplinary referrals and caseloads are entered and managed in SPBS, an Oracle-based application developed in-house and implemented in FY 2021-2022. This system records student disciplinary data such as offenses and dates, actions, monitoring referrals for discipline compliance, and completion. Also, specific behavioral data reports may be downloaded or viewed for campus improvement.

Student demographic, attendance, and academic performance information is processed in the PowerSchool system. Student intervention plans and progress are recorded and managed through the Multi-Tiered Systems of Support (MTSS) module within PowerSchool. The MTSS framework consists of a) Universal Screening used to identify students who may experience lower than expected academic outcome; b) Root Cause Analysis that identifies underlying factors or causes of an adverse event; and c) MTSS Interventions made available online to assist campuses with creating intervention plans for students to address areas of concerns for academic, language, and engagement. The MTSS department is responsible for managing the MTSS module.

The Student Disciplinary System (SDS) is used to process allegations of student bullying and initiate investigations. Unsubstantiated reports are closed out in SDS. Substantiated cases are entered in SPBS by school administrators to document the applicable intervention and formal reporting.

SEAS leadership reported districtwide student discipline referral reduction of 23 percent from fall 2021 to fall 2022. Additionally, the number of students referred to Reset Centers more than once decreased by 32 percent in the same timeframe.

Scope

The audit focused on activity from FY 2022-2023.

Objective

The objective of the audit was to review and assess the effectiveness of the SEAS programs, including their role in identifying at-risk students, and determination, implementation, and documentation of intervention plans for multilevel offenses in MTSS.

Methodology

OIA reviewed processes, controls, and supporting documents related to SEAS programs. Auditors interviewed key personnel, conducted walkthroughs, and performed the following:

1. At-risk student identification - To determine if there are effective processes in place to assist campus personnel and other departmental stakeholders in identifying and managing students that are potentially at-risk for disciplinary issues, auditors selected a sample of ten campuses with higher-tiered offenses and high recidivism rates and performed walkthroughs to assess the following:
 - The process/criteria used by campus administration to identify at-risk students
 - Processes conducted by school administration once an at-risk student is identified

- Processes for monitoring identified at-risk students
- The intervention or restorative processes in place (student counseling, parents contact, resources provided, etc.)

See Recommendation 1 in this report.

2. Intervention plans - To determine if intervention and support is provided to students that are identified as at-risk for disciplinary issues, from the campuses selected in step one above, auditors selected a sample of student records with higher-tiered offenses and high recidivism rates and performed the following:

- Verified the SEAS staff and campus staff have documented applicable intervention plans that consider the following:
 - Positive behavior (fewer number of referrals or same offense referrals)
 - Interaction with other students and teachers
 - Class attendance
 - Academic performance
- Verified the plans are properly monitored and progress is documented.

See Recommendation 2 in this report.

3. Consistency of disciplinary actions - To determine if disciplinary actions assigned for offenses are reasonably consistent, auditors obtained and analyzed the complete current year population of student discipline data showing number of students per offense type and the associated actions taken.

No observations were noted; however, results were communicated to management for review.

4. Close-out of disciplinary referrals - To determine whether disciplinary referrals are closed out timely in SPBS, auditors obtained the current year SPBS Referral Report to verify referrals were closed out within a reasonable time frame.

No observations were noted; however, results were communicated to management for review.

Primary criteria used for this audit were:

- 1) Dallas ISD 2022-2023 Student Code of Conduct
- 2) Dallas ISD Reset Center Playbook FY 2022-2023
- 3) The Committee of Sponsoring Organizations of the Treadway Commission (COSO) Internal Control – Integrated Framework, May 2013
- 4) Dallas ISD Student Engagement Coordinators (SECs) Playbook

Audit Observations and Recommendations

Observation 1 – The process for identifying and tracking at-risk students should be standardized.

Condition

Auditors visited selected secondary campuses and noted they each had developed their own processes for tracking students with an elevated risk of committing disciplinary offenses. These processes seemed to be adequate in documenting students; however, the processes varied across campuses and were not consistently documented.

Auditors selected the campuses to be visited by obtaining a SPBS Referral Report as of March 23, 2023. Referrals that were categorized as Level II through IV with Reset Center and DAEP actions were counted and represented as a percentage of the total referrals for each campus. Additionally, Reset Center and DAEP recidivism for these referrals were counted and represented as a percentage of the total recidivism for each campus. These campuses were then sorted in descending order based on total referrals, and all campuses with under 150 total referrals for the data period were removed. Finally, auditors selected ten campuses based on the following criteria:

- Referral percentage
- Recidivism percentage
- At least one campus was selected from each trustee district

While SEAS has developed the “Student Engagement Coordinator’s Playbook” for the eight secondary campuses with assigned student engagement coordinators and the “22-23 Reset Center Playbook” for the 52 campuses with a Reset Center coordinator, procedures to assist in the identification and tracking of at-risk students have not been developed for the remaining campuses without these resources. The two documents mentioned above contain information that could be useful in identifying and tracking at-risk students throughout all campuses districtwide.

Additionally, while at these selected campuses, auditors interviewed campus administrators and student disciplinary personnel to determine what additional personnel are utilized to prevent at-risk student disciplinary incidents. Auditors noted in conversations with campus administrators that student fighting and non-felony drug use through vaping are among the biggest concerns. Campus administrators stated they use all available resources to prevent student disciplinary violations from occurring, including SROs, hall monitors, teachers, and office staff. All campuses visited for testing indicated that campus staff must be visible, vigilant, and vocal in their duties to monitor and prevent student disciplinary actions.

Cause

The complexity of the student disciplinary process requirements and the wide age range of students impacted has made the development of standardized processes and procedures difficult.

Effect

Not effectively identifying and tracking at-risk students could result in a poor learning environment for other students. Additionally, increased frequency of at-risk student disciplinary incidents could negatively impact the District’s image of a safe learning environment for its students and could result in an increase in teacher turnover.

Recommendation 1

SEAS management should work with campus administrators, Reset Center coordinators, and other departments involved in the student disciplinary process to develop standardized processes for identifying and tracking at-risk students at all campuses. Potential process standardization opportunities may include, but not be limited to:

- Regular tracking of student attendance and academic progress
- Utilization of certain behavioral interventions such as daily check-ins, motivation, re-

- direction, and de-escalation
- Parent engagement
- Reviewing incoming students for past behavior issues/concerns
- Weekly meetings of campus administrators to discuss students who could be identified as at-risk and potential intervention options

Criteria

COSO Internal Control – Integrated Framework, May 2013, Principle 12 – Deploys through Policies and Procedures

The organization deploys control activities through policies that establish what is expected and procedures that put the policies into action:

- Management establishes control activities that are built into business processes and employees' day to day activities through policies establishing what is expected and relevant procedures specifying actions
- Management periodically reviews control activities to determine their continued relevance, and refreshes them when necessary

COSO Internal Control – Integrated Framework, May 2013, Principle 14 – Communicates Internally

The organization internally communicates information, including objectives and responsibilities for internal control, necessary to support the functioning of internal control:

- A process is in place to communicate required information to enable all personnel to understand and carry out their internal control responsibilities
- Communication exists between management and the board of trustees so that both have information needed to fulfill their roles with respect to the entity's objectives

Risk Level for Observation 1: Medium¹

Observation 2 – Student Engagement and Support should develop guidelines for how supplemental student discipline referral documentation is to be maintained.

Condition

During school campus visits, auditors noted each campus had a unique method for documenting and retaining supplemental student disciplinary referral documentation. In one instance, documentation that should typically be kept within SPBS (such as Reset Center activity logs) was being retained in paper files either by the Reset Center coordinator or the CBC instead.

During discussions with SEAS, auditors were made aware of the multiple disparate systems used by school campuses, SEAS, and other departments to process and house certain documentation related to student disciplinary referrals. These systems include SPBS, SDS, MTSS, and PowerSchool.

¹ See Attachment 1 for Definition of Risk Level.

Cause

There is no specific written guidance or dedicated staff training that provides District campuses with direction as to how certain supplemental information/documentation pertinent to student discipline referrals should be maintained.

Additionally, multiple disparate systems are currently being utilized due to documentation and functionality limitations within the various systems.

Effect

The absence of a standardized process for recording and retaining pertinent supplemental student disciplinary referral documentation could result in missing documentation and/or record retention violations.

Additionally, utilization of multiple disparate systems to record, track, and monitor student disciplinary referrals could potentially result in data validity concerns and increase the time and effort needed to validate and transfer data between systems.

Recommendation 2

SEAS management and campus leadership should work with Information Technology and other system owners to develop a process to streamline the student discipline referral reporting and documentation process where viable. This could include:

- Development of guidelines for recording and retaining pertinent student disciplinary referral documentation.
- Providing focused training to Reset Center coordinators and other responsible campus members regarding effective use of systems to improve documentation retention and processing consistency.
- Exploring further process automation and system upgrades, where feasible, to allow for additional needed documentation, functionality, and to help reduce the number of systems needed to properly report, document, and track student disciplinary referrals.

Criteria

COSO Internal Control – Integrated Framework, May 2013, Principle 12 – Deploys through Policies and Procedures

The organization deploys control activities through policies that establish what is expected and procedures that put the policies into action:

- Management establishes control activities that are built into business processes and employees' day to day activities through policies establishing what is expected and relevant procedures specifying actions
- Management periodically reviews control activities to determine their continued relevance, and refreshes them when necessary

COSO Internal Control – Integrated Framework, May 2013, Principle 14 – Communicates Internally

The organization internally communicates information, including objectives and responsibilities for internal control, necessary to support the functioning of internal control:

- A process is in place to communicate required information to enable all personnel to understand and carry out their internal control responsibilities
- Communication exists between management and the board of trustees so that both have information needed to fulfill their roles with respect to the entity's objectives

COSO Internal Control – Integrated Framework, May 2013, Principle 11 – Selects and Develops General Controls over Technology

The organization selects and develops control activities over technology to support the achievement of objectives:

- Management understands and determines the dependency and linkage between business processes, automated control activities and, technology general controls
- Management selects and develops control activities over the technology infrastructure, which are designed and implemented to help ensure the completeness, accuracy, and availability of technology processing

Risk Level for Observation 2: Medium²

Conclusion

SEAS management has introduced a process and an automated system to provide school campuses with the means to identify and capture student behavior infractions, administer suitable student intervention plans, monitor individual cases, and manage referrals to completion and resolution.

Overall, SEAS management has controls in place to manage student referrals and resolutions. Implementation of the recommendations in this report could improve the effectiveness and efficiency of the process, data reliability management, information reporting, student and stakeholder satisfaction, and user buy-in.

We would like to thank SEAS for their cooperation and assistance with this audit.

The audit was conducted in accordance with the Institute of Internal Auditors' *International Standards for the Professional Practice of Internal Auditing*. Those standards require OIA to plan and perform the audit to obtain sufficient and appropriate evidence to provide a reasonable basis for our observations and conclusions based on our audit objectives. OIA believes the evidence obtained provides a reasonable basis for our observations and conclusions based on our audit objectives.

² See Attachment 1 for Definition of Risk Level.

Respectfully submitted,

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Cc: Pamela Lear, Ed.D., Deputy Superintendent, Chief of Staff and Racial Equity
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Acknowledgments:

Eva Narten, CPA, CIA, CISA, Deputy Chief, Internal Audit
Sam Willson, CFE, Audit Manager
Donald Woods, CIA, Internal Auditor II
Dzung Van Nguyen, CPA, Internal Auditor II

Definition of Risk Level

Risk Level	Definition
High	High probability of occurrence that would significantly impact District operations and have a significant financial or compliance risk. These observations are defined as an issue identified by an internal audit that, if not addressed timely, could directly impact achievement of a strategic or important operational objective of the District.
Medium	Risks are considered to be undesirable and pose a moderate level of risk exposure to District operations. Without appropriate controls, the risk will happen on a consistent basis.
Low	The risks are considered to be undesirable and could moderately expose the District. Without appropriate controls, the risk will occur some of the time.

Management Response

Observation 1 – The process for identifying and tracking at-risk students should be standardized.

Acknowledgement of observation:

- ☒ Agree
☐ Disagree

Management's Response:

Principals received a Google Doc and training at the start of school that explains the major components of the Student Code of Conduct. In addition, there are several links in the document that provide guidance and direction on how to handle various behavior situations and how to better support students. Staff will continue to provide resources, tools and strategies to support staff and students struggling with behavior concerns.

Estimated Implementation Date:

Beginning of the school year – August 14, 2023

Individuals responsible for implementation:

Keisha Crowder-Davis, Executive Director, Student Engagement and Support

Observation 2 – Student Engagement and Support should develop guidelines for how supplemental student discipline referral documentation is to be maintained.

Acknowledgement of observation:

- ☒ Agree
☐ Disagree

Management's Response:

Department Managers will work with Reset Coordinators to ensure proper documentation of referrals and services and continue to provide on-going training in this area. The managers are also checking in regularly with Campus Behavior Coordinators to ensure proper record keeping at that level and to provide on-going support.

The IT department will configure SPBS to upload and download documents.

Estimated Implementation Date:

Beginning of 23-24 School Year when the training schedule is provided by School Leadership

Individuals responsible for implementation:

Keisha Crowder-Davis, Executive Director, Student Engagement and Support