



Internal Audit

Public Education Information Management System (PEIMS) Audit

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Date: November 9, 2023

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

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

Subject: Public Education Information Management System (PEIMS) Audit

Executive Summary

The Dallas Independent School District (District) Office of Internal Audit (OIA) has completed the Public Education Information Management System (PEIMS) Audit.

The audit focused on the District's processes and controls surrounding PEIMS reporting of student data to ensure that information reported is accurate and compliant with state standards set by the Texas Education Agency (TEA). PEIMS reporting functions are managed by the District's State Reporting Team within Enterprise Applications, Educational Technology Administration (State Reporting); however, the data reported is maintained by the District's campuses and various departments.

Overall, the State Reporting Team has implemented processes to manage risks associated with PEIMS student data reporting.

Opportunities for improvement were identified in the following areas:

1. Sufficient documentation to support leaver coding should be maintained.
2. Processes to accurately code immigrant students for PEIMS reporting purposes should be established.
3. The District should have adequate monitoring to ensure that a consistent six-weeks reporting process is followed.
4. User access controls for the OnData Suite System should be enhanced.

Implementation of the recommendations in this report would assist State Reporting, campuses, and departments in strengthening District-wide administration over state reporting processes.

Background

PEIMS encompasses all data requested and received by the TEA about public education, including student demographics and academic performance, personnel, as well as financial and organizational information. In compliance with the Texas Education Code, PEIMS collections contain data that is necessary for the legislature and TEA to provide oversight for public education. This data must be reported in accordance with Texas Education Data Standards which includes data elements, coding tables, business rules, and validations needed in order to load the data into the Texas Student Data System (TSDS), the state's reporting system.

For student data, PowerSchool, the District's student information system, serves as the system of record. State Reporting provides training and support for PEIMS reporting data maintained in PowerSchool; however, the input of this data is conducted at the campuses with oversight by various departments.

Background information for the PEIMS reporting processes reviewed during this audit are noted below.

Enrollment and Attendance

Enrollment and attendance are the primary drivers of the District's funding, with each student in average daily attendance (ADA) earning an allotment of up to \$6,160, excluding students in certain specialized instructional programs.

All students enrolling in the District must complete an enrollment application in SchoolMint, the District's registration platform. After the enrollment application is completed, the campus registrar will review the enrollment application and run a search in PowerSchool to confirm any prior enrollment in the District. Prior enrollment dictates whether a new student identification number is assigned. Upon approval by the campus registrar, the student's information is transferred and stored in PowerSchool. Attendance taking and tracking is submitted daily by the teachers and substitutes in the PowerTeacher Pro module within PowerSchool. PowerSchool attendance is maintained by the registrars and/or the data controllers at each campus.

Leavers

A student is considered a "leaver" when they discontinue attendance at Dallas Independent School District (DISD). The District must track and report all students that leave an individual campus to determine where the student went and why. Typically, students leave a particular school due to promotion to a higher-level school within the District (i.e., from elementary to middle school within the same district) or move among schools of the same level (i.e., from one district high school to another). Students may also leave a school to enroll at another Texas public or charter school. These types of transfer students are known generally as movers. The campus registrars and data controllers must record a corresponding reason (i.e., "leaver" code) for why the student is leaving the District and are responsible for obtaining documentation to support the different leaver codes.

The accurate coding of leaver students is important for districts as accountability ratings are impacted by the number of students who are determined to be dropouts, identified as Code 98. If a non-98 leaver code cannot be assigned to a student, the student is considered to be a dropout. Similarly, if supporting documentation is not maintained for any leaver with a code other than 98, TEA could require the district to change the leaver code to a 98, negatively impacting accountability ratings.

Immigrants

The District receives additional funds to enhance instructional opportunities for students identified as immigrants. A student is identified as an immigrant when they were born outside of the United States (U.S.) and have been enrolled in a U.S. school district for less than three years. New to the country students are registered, oriented, and assessed at the Margaret and Gilbert Herrera International Welcome Center (Welcome Center). Immigrant status is verified by reviewing the birth certificate to validate that the student was born outside the U.S. In addition, immigrant students qualifying as Emergent Bilingual (EB) are required to complete a Student History

Worksheet to identify the number of years the student had been enrolled in U.S. schools outside of the District. Immigrants may only be claimed for PEIMS purposes for three years.

Pathways in Technology Early College High School (P-TECH)

Students enrolled on TEA-designated P-TECH campuses will generate an additional \$50 for each student's ADA. The campus must be designated by TEA and listed on the Texas Education Standards website. Students enrolled on the TEA-designated P-TECH campus are reported on the PEIMS submissions.

Gifted and Talented

The District is able to receive additional funding for each Gifted and Talented (G/T) student, determined by multiplying the basic ADA allotment by 0.07 for students served in a G/T program.

To participate in the G/T program, a student initially needs to be nominated, assessed, and qualify for enrollment in the program. Nominations are documented in the G/T Parent Nomination Packet. Parental consent must be obtained for both the assessment and enrollment in the program and is documented on the G/T Program Parent Permission Form. Once the student is assessed and meets the qualifications in at least three of the required areas, their case will be reviewed and approved by the G/T committee, with assessment results and committee consent documented on the Identification Summary Sheet. Students served are documented on the DISD G/T Student Roster.

Six-Week Reporting

To ensure enrollment and attendance data submitted for PEIMS reporting is accurate, the campus registrars or elementary data controllers are responsible for generating the Campus Summary Reports which show the student populations and other information applicable to individual programs reported for PEIMS purposes. The reports must first be verified by the principal and registrar or data controller. Additionally, the reports are reviewed by each special program lead (special services, gifted and talented, career and technical education, etc.) to verify that what is reported is reasonable.

Accompanying these reports is the Campus Summary Checklist, a tool the District has implemented to make sure the reports are reviewed and approved by the responsible parties. The checklist is also used to gather the signatures of the parties that reviewed the individual reports as signatures are a requirement of TEA. All campuses must send this documentation to State Reporting for review. The original reports and signatures should be maintained by the campus registrar or data controller.

PEIMS Submissions

Student data reporting is submitted in the fall, summer, and extended year of each year. In preparation for each submission deadline, State Reporting will extract the data from PowerSchool and collaborate with the campuses to resolve any edits or inconsistencies prior to the submission deadline. Once the data has been prepared, it is then uploaded to TSDS for state reporting.

In addition to these processes, both State Reporting and the campuses utilize OnData Suite System (ODS) as a valuable reporting tool to enhance their overall efficiency in managing education data. ODS serves as a versatile platform for not only streamlining general data management but also ensuring that specific data related to special programs is accurately collected, analyzed, and reported. ODS pulls student data to be reported for PEIMS directly from PowerSchool.

Scope

This audit focused primarily on current PEIMS related processes and data activity from fiscal year (FY) 2020-2023.

Objective

The objective of the audit was to review and assess the District's processes and controls surrounding PEIMS reporting.

Methodology

OIA reviewed District processes, controls, and supporting documentation surrounding PEIMS reporting for certain types of student data. Auditors interviewed key personnel, conducted walkthroughs, and performed the following: ¹

1. Leavers Reporting – To determine if students reported as leavers were accurately coded for PEIMS reporting purposes, auditors conducted the following:

- Auditors obtained the enrollment data for FY 2020-2021, FY 2021-2022, and FY 2022-2023 PEIMS fall snapshots from ODS to review any data inconsistencies or trends in student enrollment. Auditors identified students reported as enrolled in the 12th grade for FY 2020-2021, unenrolled in FY 2021-2022, and reenrolled in 12th grade FY 2022-2023. From the comparison, auditors noted six students and reviewed the student profiles in PowerSchool to verify they were properly retained and should not have been marked as graduate leavers.

No observations noted.

- Auditors obtained a list of students classified as leavers on the FY 2021-2022 fall PEIMS snapshot noting 13,366 students were reported as leavers. Auditors then excluded graduates from the population, resulting in 4,933² leavers remaining. From the population, auditors made the following sample selections for testing:
 - 15 of the 430 students identified as code 16 – Student returned to family's home country.
 - 15 of the 171 students identified as code 60 – Student is homeschooled.
 - 15 of the 146 students identified as code 81 – Student enrolled in a private school in Texas.
 - 21 of the 558 students identified as code 82 – Student enrolled in a public or private school outside of Texas.
 - 21 of the 3,536 students identified as code 98 - Other (reason unknown or not listed above)

¹ For this audit, auditors reviewed PEIMS reporting for a selection of student data. Some areas were excluded as they were covered in recent prior year internal or external audits.

² Auditors focused on the leaver types associated with a higher number of students. Certain leaver types with lower counts were excluded from testing.

For each selection of students, auditors requested the student withdrawal forms, leaver checklists, and any other documentation required to verify the leaver status was properly supported.

See Recommendation 1 in this report.

2. Immigrant Reporting – To determine if immigrant students are accurately coded for PEIMS reporting purposes, auditors obtained a listing of all students coded as immigrants from the FY 2022-2023 fall PEIMS submission data from ODS noting 9,057 students were identified as immigrants as of the testing date. Auditors made a sample selection of 12 students and obtained the birth certificate and the date of enrollment in a U.S. school from PowerSchool and verified the students met the following criteria:

- The student was born outside of the United States.
- The student is between the age of 3 and 21 years old.
- The student has been in U.S. schools for fewer than three years.

See Recommendation 2 in this report.

3. P-TECH Reporting – To determine if P-TECH students were accurately coded for PEIMS reporting purposes, auditors obtained a list of all students with a P-TECH code from the FY 2022-2023 fall PEIMS submission data from ODS and verified the students attended P-TECH campuses designated by the Texas Education Agency (TEA).

No observations were noted.

4. Gifted and Talented (G/T) Reporting – To determine if G/T students were accurately coded for PEIMS reporting purposes, auditors obtained a list of students coded as gifted and talented on the FY 2022-2023 fall PEIMS submission data in ODS as of the testing date noting 26,603 students were coded as G/T. Auditors made a sample selection of eight students and conducted the following:

- Obtained the Parent Nomination Packet to validate parent consent was received prior to an assessment being conducted.
- Obtained the Identification Summary Sheet and verified the required assessments were conducted and the results qualified the student for enrollment in the program.
- Verified a three-person committee approved the student's entrance to the G/T program and documented the approval on the Identification Summary Sheet.
- Obtained the Program Parent Permission Form to validate parent consent was received prior the student's placement into the G/T program.
- Verified the student was listed as receiving G/T services on the DISD G/T Student Roster in PowerSchool.

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

5. PEIMS Six-Week Reporting – To determine if campuses performed the six-week reporting duties as required by TEA, auditors made a sample selection of 20 campuses. For the selection of campuses, auditors obtained the Campus Summary Reports and Cycle Campus Summary Checklists for every six-week reporting period in FY 2022-2023 and verified the following:

- The grade levels utilized for student enrollment listed on the Campus Summary Report were equivalent to the grade levels assigned to the campus in PowerSchool.
- A campus registrar/data controller signature was documented on the Campus Summary Checklist verifying all unsubmitted attendance is clear for each reporting cycle and attendance rates for each grade level is reasonable compared to the same reporting cycle in the prior year.
- The PEIMS Special Programs Verification Reports were reviewed by each special program lead and a signature was obtained on the Campus Summary Checklist, where applicable.
- The registrar/data controller and principal signature was documented on the Campus Summary Report to attest to computations used in the Campus Summary Report were accurate.

See Recommendation 3 in this report.

6. Application Controls – To determine if access to data maintained in ODS is properly restricted, auditors reviewed application controls surrounding user access.

See Recommendation 4 in this report.

Primary criteria used for this audit were:

- 1) Texas Education Data Standards, February 2023
- 2) TEA Enhancing Instructional Opportunities for Immigrant Students Identification and Procedural Companion, 2017
- 3) Student Attendance Accounting Handbook, September 2022
- 4) National Institute of Standards and Technology (NIST) Security and Privacy Controls for Information Systems and Organizations, September 2020

Audit Observations and Recommendations

Observation 1 – Sufficient documentation to support leaver coding should be maintained.

Condition

To determine if leaver students are accurately coded for PEIMS reporting purposes, auditors obtained a list of students classified as leavers in FY 2021-2022 and made the following sample selection of student leavers:

- 15 students identified as code 16 – Student returned to family's home country
- 15 students identified as code 60 – Student is homeschooled
- 15 students identified as code 81 – Student enrolled in a private school in Texas
- 21 students identified as code 82 – Student enrolled in a public or private school outside of Texas
- 21 students identified as code 98 - Other (reason unknown or not listed above)

For the samples listed above, auditors obtained the Student Withdrawal Form, Leaver Audit Checklist, and supporting documentation to verify the appropriate code was applied and adequately supported.

Below is the breakdown of exceptions:

- 40 out of 87 (46%) leaver students did not have completed withdrawal forms.
- 45 out of 87 (52%) leaver students did not have a Leaver Audit Checklist.
- 33 out of 87 (38%) leaver files did not have sufficient evidence to support the applied leaver code.

Cause

Leaver documentation is not managed in the system, but rather is manually completed and maintained. While the District does have several layers of monitoring processes in place, physical documentation is often difficult to effectively track and monitor. Due to high turnover rates and staff shortages, data controllers and registrars are often asked to conduct duties outside their typical responsibilities not allowing time for them properly manage leaver students or other PEIMS data. Additionally, the data controller and registrar positions do not currently require the qualifications needed to properly administer this vital data, which demands advanced knowledge and experience.

Effect

PEIMS data, specifically leaver data, has a big impact on the District's accountability ratings. If documentation to properly support the leaver status is not maintained, TEA could require the district to report the student as a code 98, negatively impacting the District's accountability ratings. Additionally, as the data controller and registrar positions do not currently require the qualifications needed to manage this vital data, there is an enhanced risk of compliance issues as well as the inability to make well informed decisions given data may be inaccurate.

Recommendation 1

To ensure leavers are accurately coded, reported, and documentation is properly retained, State Reporting in coordination with School Leadership should consider implementing electronic processes for documenting and supporting leaver codes. Auditors note the District is currently in the process of implementing electronic cumulative folders and should consider leaver documentation issues when evaluating methods for electronic storage of other student records.

Until an electronic process can be implemented, School Leadership and State Reporting could consider the following as potential remediation for the leaver documentation issues noted:

- Identify a leaver administrator at each campus and provide detailed training on leaver coding and documentation requirements.
- Conduct an audit at all schools to ensure leavers are properly coded and supporting documentation is retained.

Lastly, School Leadership should consider upgrading the qualifications for data controllers and registrars to ensure these positions are filled with personnel that have the skills to manage PEIMS data that the District relies on for funding and accountability purposes.

Criteria

Texas Education Data Standards, Issued February 2023

Districts must document the withdrawal of students and maintain on file the appropriate paperwork associated with student withdrawals. Documentation is required for all leaver reason codes. Documentation supporting use of a leaver reason code must exist in the district at the time the leaver data are submitted, i.e., no later than the PEIMS Submission 1 January resubmission date.

Risk Level for Observation 1: High³

Observation 2 – Processes to accurately code immigrant students for PEIMS reporting purposes should be established.

Condition

When testing to verify that immigrant students were properly coded for PEIMS reporting purposes, auditors were unable to determine the dates immigrant students were enrolled in a U.S. school district. Immigrants are identified for PEIMS purposes when they were born outside of the U.S. and have been enrolled in a U.S. school for less than three years. The District's current process to identify immigrant students for PEIMS reporting uses the information populated in PowerSchool for the country of birth and the sum of years enrolled in DISD and does not consider any enrollment in other U.S. schools.

Additionally, when inquiring about how immigrant students are identified and subsequently removed from immigration status for PEIMS reporting purposes, auditors received various

³ See Attachment 1 for Definition of Risk Level.

responses for processes depending on whether the student was identified as EB. For example, the Dual Language ESL Department has a process to document the student's enrollment in prior schools via the Student History Worksheet; however, this information is not documented for non-EB immigrant students. It was also noted that while the enrollment history is documented on the paper worksheet, it is not consistently entered into PowerSchool.

Cause

Immigrant status is determined and maintained by several different departments and campuses including the Welcome Center, Dual Language, and State Reporting. Processes appear to be inconsistent among these areas; and, ultimately, there is no clear process for obtaining and documenting years enrolled in a U.S. school.

In addition, there appears to be a misconception that a student identified as immigrant correlates directly with a student being identified as EB. Immigrant students identified as EB are overseen by the Dual Language ESL Department and must be reported for other accountability purposes; however, oversight of non-EB immigrants is unclear.

Effect

Improper coding and reporting of immigrant students may lead to a misrepresentation of immigrant students reported by the District.

Recommendation 2

To ensure immigrant students are properly reported for PEIMS, State Reporting and Dual Language in collaboration with the Centralized Enrollment Department should consider implementing the following:

- Update the student enrollment application to add fields needed to capture student history when a country outside of the U.S. is selected. If the enrollment application does not allow for this, ensure other methods are taken to obtain dates and grade levels enrolled in another U.S. School at the time of enrollment in DISD.
- If viable, interface the student history obtained on the enrollment application with PowerSchool and update the script used to automatically code immigrant students using the dates of enrollment in a U.S. school rather than enrollment in DISD.
- Implement monitoring processes via uses of reporting tools to verify immigrant students are properly coded and reported and ensure the code is removed after three years of enrollment in a U.S. school.
- Ensure adequate training is provided to applicable departments and campus staff for any changes in processes.
- Collaborate with Evaluation and Assessment to ensure data reported for PEIMS purposes properly aligns with any other immigrant reporting.

Criteria

Texas Education Data Standards, Issued February 2023

Immigrant Indicator Code indicates whether the student is an identified immigrant under the definition found under Title III of the No Child Left Behind Act of 2001 (NCLB), where the term

'immigrant children and youth' is defined as, "individuals who are aged 3 through 21; were not born in any state; and have not been attending one or more schools in any one or more states for more than 3 full academic years. The term 'State' means each of the 50 States, the District of Columbia, and the Commonwealth of Puerto Rico.

TEA Enhancing Instructional Opportunities for Immigrant Students Identification and Procedural Companion, Issued 2017

Local Education Agencies are responsible for:

- Creating a formal process for reviewing the immigrant status of all students based on Title III, Part A immigrant children and youth definition,
- Understanding that the term immigrant is not synonymous with English learner (EL), as an immigrant student may not be an EL,
- Determining immigrant status for funding and reporting purposes in the Public Education Information System (PEIMS) based on the Title III, PRT A immigrant children and youth definition, and
- Removing the immigrant status in PEIMS when students have surpassed the allotted three years.

Risk Level for Observation 2: High⁴

Observation 3 – The District should have adequate monitoring to ensure that a consistent six-weeks reporting process is followed.

Condition

To determine if campuses performed the six-week reporting duties as required by TEA, auditors made a sample selection of 20 campuses and reviewed each of the Campus Summary Checklists and Campus Summary Reports for FY 2022-2023.

The following exceptions were noted:

- 10 out of 120 (8%) Campus Summary Checklists were not retained.
- 11 out of 120 (9%) Campus Summary Checklists did not have a registrar/data controller signature to ensure unsubmitted attendance was cleared for the six-week cycle.
- Five out of 87⁵ (6%) Campus Summary Checklists did not have a Teen Pregnancy and Parenting Services campus lead signature to ensure the number of students served.
- 20 out of 82⁶ (24%) did not have a lead CTE signature to ensure values are reasonable.
- 15 out of 120 (13%) did not have a lead G/T signature to ensure values are reasonable.
- Nine out of 120 (8%) Campus Summary Reports did not have a campus registrar or data controller signature to attest that attendance accounting values are accurate. As these reports can be generated at any time, without a signature, auditors were unable to confirm that they

⁴ See Attachment 1 for Definition of Risk Level.

⁵ The total number of six-week Campus Summary Reports is reduced because the schools sampled did not have a student categorized as this special program during this reporting period. In addition, this number excludes missing checklists, noted in the first bullet point, from the total population.

⁶ The total number of six-week Campus Summary Reports is reduced because the schools sampled did not have a student categorized as this special program during this reporting period. In addition, this number excludes missing checklists, noted in the first bullet point, from the total population.

- were reviewed to meet the six-week reporting requirement.
- Nine out of 120 (8%) Campus Summary Reports did not have a principal signature to ensure the accuracy and authenticity of the computations used for the Campus Summary Report.

Cause

Manual and time-consuming processes along with significant amounts of documentation requirements to conduct six-week reporting appear to be the cause for lack of documentation. Additionally, significant amounts of time campus registrars or elementary data controllers are pulled away from direct responsibilities contributes to the lack of required process be completed. The current monitoring process in place requires that campuses scan and send the signature sheets for the six-week reports to State Reporting. While State Reporting does review each document submitted and communicates directly with the campuses regarding missing or incomplete reports, the lack of manpower on the State Reporting team prohibits them from getting all campuses to the completion point. As a result, State Reporting must generate Campus Summary Reports themselves, although not fully compliant, for auditing purposes.

Effect

Lack of completion of six-week reporting would result in non-compliance with TEA requirements. However, auditors noted through review of the documentation that the six-week reporting process does not appear to be sufficient in addressing the larger risk that students are not accurately coded for PEIMS purposes. Campuses that have large amounts of student data do not have an effective and efficient way to verify students are accurately coded. Inaccurate reporting will have a direct impact on the District's funding and accountability.

Recommendation 3

To ensure six-week reporting is conducted as required by TEA, State Reporting in coordination with School Leadership should consider utilizing a centralized repository and tracking system. If viable, implement a workflow within the centralized tracking system. Automated notifications within the workflow could be executed to alert the parties responsible for reviewing and approving documentation. Reporting tools could then be utilized to monitor that the reviews and sign offs are completed.

Criteria

Student Attendance Accounting Handbook, 2.3 Required Documentation, September 2022

The student attendance data asked for in an audit must be organized into three distinct data sets: the Student Detail Report, the Campus Summary Report, and the District Summary Report. Your district must generate Student Detail Reports, Campus Summary Reports, and District Summary Reports each six-week reporting period. For schools offering multiple tracks, student detail must be summarized by individual tracks. Data totals for all track level Student Detail Reports must add up to respective totals on the Campus Summary Report. Likewise, data totals for all Campus Summary Reports must add up to respective totals on the District Summary Report.

Campus Summary Reports should be generated each six-week reporting period and reviewed by the principal for reasonableness.

Campus Summary Reports must include a signature page, signed by persons recording data and persons approving data (This page may be signed each six-week reporting period or each semester at local discretion. If your district uses a paperless attendance accounting system, the electronic equivalent of a signature page [for example, a feature that allows approvers to indicate their approval of data electronically] is acceptable in lieu of a paper signature page.)

Risk Level for Observation 3: Low⁷

Observation 4 – User access controls for the OnData Suite System should be enhanced.

Condition

During the review of ODS application controls, auditors noted controls were not in place for properly restricting user access. Auditors noted access is manually granted and removed by the application administrators. There is currently no workflow to document review and approval of access. Auditors found 10 employees had access to ODS subsequent to their termination dates. Additionally, two-factor authentication is not required to gain access to the data within the application.

Cause

Currently, ODS access must be manually permitted. High turnover rates often make it difficult to manage access removal.

Effect

Although ODS only allows for viewing rights by end users, it houses student data, including personally identifiable information. Without controls to properly restrict access, unauthorized individuals may be able to gain access to this sensitive information.

Recommendation 4

State Reporting should consider implementing the following controls to ensure access to student data within ODS is properly authorized, tracked, and monitored:

- Develop formal processes and procedures for requesting, approving, and monitoring user access. If viable, access should be granted via RapidIdentity login credentials based on appropriate job titles. If not viable, a workflow could be established via other means such as Laserfiche to properly request, review, and grant user access.
- If access cannot be linked to RapidIdentity, a formal process should be implemented to continuously review user access for employees that are terminated or change job positions.
- Password controls should be implemented and consider best practices such as password

⁷ See Attachment 1 for Definition of Risk Level.

length and character requirements. The application should require passwords be reset after a predetermined period of time. Where viable, two-factor authentication should be required.

Criteria

National Institute of Standards and Technology – Security and Privacy Controls for Informational Systems and Organizations, AC-1 Policies and Procedures, September 2020

Policies and procedures contribute to security and privacy assurance. Therefore, it is important that security and privacy programs collaborate on the development of access control policy and procedures.

National Institute of Standards and Technology – Security and Privacy Controls for Informational Systems and Organizations, AC-2 Account Management, September 2020

Organizations should require approvals by organization-defined personnel for requests to create accounts.

Risk Level for Observation 4: Medium⁸

Conclusion

The District's State Reporting team has introduced processes to ensure that student data generated is accurate and compliant with state standards set by the TEA.

Overall, State Reporting has controls in place to manage PEIMS reporting processes. 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 State Reporting 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.

Respectfully submitted,



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

⁸ See Attachment 1 for Definition of Risk Level.

Cc: Pamela Lear, Ed.D., Deputy Superintendent, Chief of Staff and Racial Equity
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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 – Sufficient documentation to support leaver coding should be maintained.

Acknowledgement of observation:

- ☒ Agree
☐ Disagree

Recommendation:

To ensure leavers are accurately coded, reported, and documentation is properly retained, State Reporting in coordination with School Leadership should consider implementing electronic processes for documenting and supporting leaver codes. Auditors note the District is currently in the process of implementing electronic cumulative folders and should consider leaver documentation issues when evaluating methods for electronic storage of other student records.

Until an electronic process can be implemented, School Leadership and State Reporting could consider the following as potential remediation for the leaver documentation issues noted:

- Identify a leaver administrator at each campus and provide detailed training on leaver coding and documentation requirements.
- Conduct an audit at all schools to ensure leavers are properly coded and supporting documentation is retained.

Lastly, School Leadership should consider upgrading the qualifications for data controllers and registrars to ensure these positions are filled with personnel that have the skills to manage PEIMS data that the District relies on for funding and accountability purposes.

Management's Response:

To ensure leavers are accurately coded, reported, and supporting documentation is aligned and retained, the following actions are put in place.

- Each campus principal will identify a designated Leaver Administrator (professional staff member).
- Annual Leaver/Mover training for the Leaver Administrator and campus registrar/CRC will be provided annual in the fall and spring semesters.
- Annual student withdrawal policy and procedures will be provided to campus registrars/CRC at the start of the school year.
- Each campus will maintain a Leaver Binder with required forms and supporting documentation.
- Each Leaver Administrator will submit the campus Mover Verification form every 3-weeks to Student Data Services team. Forms will be reviewed and scanned to the team's online drive.
- Student Data Services team will conduct a Leaver Audit at each assigned campus in the fall and spring. Results will be communicated to campus principal and School Leadership.
- State Reporting will generate a Potential Duplicate Enrollment report before Fall and Summer PEIMS Submissions and provide to campuses for clean-up of mis-coded Leavers. These reports are submitted to the State Reporting team for review and adjustments to the TSDS system.

- Potential Dropouts will be reviewed by campuses at the start of the school year for prior year and again in January for current year to assist with verification of correct Leaver code assignment. Working reports will be sent to the Student Data Services Team for review and uploaded to a shared online drive.

To support the improvement of student withdrawal procedures for movers and leavers, School Leadership will propose a review the position qualifications and responsibility of campus registrars and data controllers to address critical nature of student data accuracy and associated responsibilities.

Estimated Implementation Date:

- Identification a designated Leaver Administrator – November 10, 2023
- Annual Leaver/Mover training – January 2024
- Annual Beginning of year (BOY) training for campus registrars/CRC - August 2023
- Maintenance of Leaver Binder – January 2024
- Submission of campus Mover Verification form every 3-weeks – September 2023
- Leaver Audit – December 2023 & May 2024
- Proposal for position qualifications, responsibilities, and compensation – January 2024
- Potential Duplicate Enrollment report – October 2023
- Potential Dropouts – August 2023

Individuals responsible for implementation:

- Identification a designated Leaver Administrator – School Leadership
- Annual Leaver/Mover training – Michelle Thompson & Shawna Ohnesorge
- Annual Beginning of year (BOY) training for campus registrars/CRC – Shawki Freelon
- Maintenance of Leaver Binder – Campus Leaver Administrator
- Submission of campus Mover Verification form every 3-weeks – Shawki Freelon & Shawn Ohnesorge
- Leaver Audit – Shawki Freelon
- Proposal for position qualifications, responsibilities, and compensation – Michelle Thompson
- Potential Duplicate Enrollment report – Shawna Ohnesorge
- Potential Dropouts – SDS team and Shawna Ohnesorge

Observation 2 – Processes to accurately code immigrant students for PEIMS reporting purposes should be established.

Acknowledgement of observation:

- ☒ Agree
☐ Disagree

Recommendation:

To ensure immigrant students are properly reported for PEIMS, State Reporting and Dual Language in collaboration with the Centralized Enrollment Department should consider implementing the following:

- Update the student enrollment application to add fields needed to capture student history when a country outside of the U.S. is selected. If the enrollment application does not allow for this, ensure other methods are taken to obtain dates and grade levels enrolled in another U.S. School at the time of enrollment in DISD.
- If viable, interface the student history obtained on the enrollment application with PowerSchool and update the script used to automatically code immigrant students using the dates of enrollment in a U.S. school rather than enrollment in DISD.
- Implement monitoring processes via uses of reporting tools to verify immigrant students are properly coded and reported and ensure the code is removed after three years of enrollment in a U.S. school.
- Ensure adequate training is provided to applicable department and campus staff for any changes in processes.
- Collaborate with Evaluation and Assessment to ensure data reported for PEIMS purposes properly aligns with any other immigrant reporting.

Management's Response:

We are currently working with Student Applications Team to ensure the current script is working as expected based on current data fields in use.

State Reporting will coordinate with E & A to review their list of immigrants and ensure this coding matches reporting for those grade levels.

State Reporting will collaborate with EB to update to current method to identify immigrant students and support training efforts by the EB Team.

Estimated Implementation Date: September 2024

Individuals responsible for implementation:

Traci Pesina, Director, Student Systems, Enterprise Applications, Educational Technology Administration

Shawna Ohnesorge, Manager State Reporting, Enterprise Applications, Educational Technology Administration

Amanda Clymer, Director II, Dual Language ESL Department

Observation 3 – The District should have adequate monitoring to ensure that a consistent six-weeks reporting process is followed.

Acknowledgement of observation:

- ☒ Agree
- ☐ Disagree

Recommendation:

To ensure six-week reporting is conducted as required by TEA, State Reporting in coordination with School Leadership should consider utilizing a centralized repository and tracking system. If viable, implement a workflow within the centralized tracking system. Automated notifications within the workflow could be executed to alert the parties responsible for reviewing and approving documentation. Reporting tools could then be utilized to monitor that the reviews and sign offs are completed.

Management's Response:

As a result of limited State Reporting staff, we have partnered with the SDS team. Coordinators are focused on ensuring their group of campuses complete this review process on time and as expected. Once documents are collected, they are stored in a shared Google folder that State Reporting has access to.

To minimize the number of documents to work from, therefore increasing efficiency in the process, State Reporting will condense the Campus Summary Checklist and the QRG – Campus Summary Report into a single document by August 2023.

State Reporting will develop a calendar for campuses and will provide newsletters on a regular basis reminding campuses of upcoming due dates. State Reporting offers 1 on 1 help for campuses during monthly open labs. Also available are Newbie labs specifically started to support campuses users with less than 2 years in their campus role.

Not having a campus registrar or principal signature is likely due to the campus not submitting the Campus Summary and State Reporting to be partially in compliance (run as required but not signed).

Automated notifications are not a capability PS offers at this time.

We will request program signatures be added to the Campus Summary (from PowerSchool). Those will be available depending on the PowerSchool State Release timeline.

Estimated Implementation Date: June 2024

Individuals responsible for implementation:

Traci Pesina, Director, Student Systems, Enterprise Applications, Educational Technology Administration

Shawna Ohnesorge, Manager State Reporting, Enterprise Applications, Educational Technology Administration

Observation 4 – User access controls for the OnData Suite System should be enhanced.

Acknowledgement of observation:

- ☒ Agree
☐ Disagree

Recommendation:

State Reporting should consider implementing the following controls to ensure access to student data within ODS is properly authorized, tracked, and monitored:

- Develop formal processes and procedures for requesting, approving, and monitoring user access. If viable, access should be granted via RapidIdentity login credentials based on appropriate job titles. If not viable, a workflow could be established via other means such as Laserfiche to properly request, review, and grant user access.
- If access cannot be linked to RapidIdentity, a formal process should be implemented to continuously review user access for employees that are terminated or change job positions.
- Password controls should be implemented and consider best practices such as password length and character requirements. The application should require passwords be reset after a predetermined period of time. Where viable, two-factor authentication should be required.

Management's Response:

State Reporting will collaborate with the Rapid Identity team to see if access via Rapid is viable. Starting in August of 2023 we implemented a monthly review of users based on our Oracle APEX report.

State Reporting will research with the vendor options for password reset, lengths, and requirements.

Estimated Implementation Date: November 2024

Individuals responsible for implementation:

Traci Pesina, Director, Student Systems, Enterprise Applications, Educational Technology Administration

Shawna Ohnesorge, Manager State Reporting, Enterprise Applications, Educational Technology Administration