Make the Mark.

Atlanta Public Schools | March 2024

Student Services Internal Audit – Report #FY24-03

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Contents

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March 15, 2024

Connie Brown, CPA, CIA, CRMA
Executive Director, Internal Compliance
Atlanta Public Schools
130 Trinity Avenue
Atlanta, GA 30303-3624

Dear Connie:

Plante Moran has performed consulting services for Atlanta Public Schools ("APS") consisting of an internal audit of the student services function, as summarized in our professional services agreement dated June 27, 2022, and statement of work dated August 18, 2023.

We were not engaged to, and did not perform an audit, the objective of which would be the expression of an opinion on APS's internal control environment. Accordingly, we do not express such an opinion. Had we performed additional procedures; other matters might have come to our attention that would have been reported to you.

This report is solely for the information and use of the management and the Atlanta Public Schools Board of Education and is not intended for use by anyone other than these specified parties.

We would like to recognize and thank the management and staff of APS for their cooperation and courtesy extended to us throughout this process.

Sincerely,

Troy A. Snyder, CISA
Engagement Partner

Executive Summary

Project Overview

The Atlanta Public Schools ("APS") Audit Committee approved an internal audit of the student services function per the 2023-2024 risk assessment and internal audit plan on June 15, 2023. The Office of Internal Compliance ("OIC") engaged Plante Moran to perform the internal audit of the student services function.

Objective & Scope

Plante Moran evaluated the student services function, with a focus on student attendance, academics, and discipline. Specifically, we assessed District policies, procedures, and practices in alignment with Board policy. Our audit objectives included a review over the alignment of student administration with Board policy, identification of internal controls to support timely and accurate record-keeping and reporting, and identification of gaps and recommendations to mitigate risk to the District. Further detail regarding the audit objectives tested may be found on page seven of this report.

The scope of the audit included all non-charter system schools[1] for the 2022-2023 school year. Audit objectives were assessed for a risk-based selection of thirty high schools, middle schools, and elementary schools across all clusters within the District.

Methodology

To evaluate the adequacy of the policies, procedures, and internal controls in place, Plante Moran performed the following:

- Inspected District policies, procedures, and documentation in alignment with Board policy related to student attendance, academics, and discipline.
- Performed sample-based testing of student attendance, academic, and discipline records for thirty schools.
- Identified student discipline-related training requirements and inspected training records.
- Inspected user access modification requests for Infinite Campus, the District's student information system.
- Identified roles and responsibilities of key stakeholders in the student attendance, academics, and discipline processes.
- Conducted a series of walkthrough interviews with key stakeholders, such as school principals, to discuss practices and confirm observations.

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[1] Please refer to page eighteen for the list of in-scope schools.

Summary of Themes

The table below highlights overarching thematic areas of development that were identified during audit fieldwork.

No.	Area	Theme
1	Retention of Student Records/Documentation	Infinite Campus is not consistently utilized to document information related to student attendance and discipline. As a result, documentation such as evidence of contact with the student's parent or legal guardian, reasons for modifying records, and explanation of action taken on disciplinary offenses could not be provided for many samples tested.
2	Student Discipline Policy and Practices	Administrators and teachers are allowed to use discretion when identifying appropriate progressive discipline interventions, supports, and responses in alignment with District policy. The policy allows for judgment to be applied to discipline cases depending on various circumstances, such as prior offenses. Additionally, discipline training on policies and practices is offered to principals but not teachers and administrative staff and does not address all key elements of the District policy. This results in the application of judgement resulting in outcomes that deviate from District-wide discipline policy.
3	Student Discipline Support System	We observed two key non-uniform practices in disciplinary support systems within the District. 1. We observed that disciplinary programs differ across schools, which may lead to inequitable discipline outcomes for students. For example, some schools have in-school suspension programs while others do not. 2. The number and type of support staff varies from school to school. The support staff mentioned in our interviews include some combination of counselors, behavioral specialists, non-instructional aids, Assistant Principals, or other various support staff to assist teachers with student discipline cases. However, despite both of these non-uniform practices, school administration expressed that they have no concerns with the disciplinary programs and system of support for teachers and administrative staff to address student discipline incidents at their school.

Detailed Audit Results

Approach

To assess student attendance, academics, and discipline, Plante Moran performed sample-based testing to evaluate compliance with District policies and documented procedures. Our sample-based testing included the following audit objectives:

No.	Audit Objective Description
1	Validate that student absences were managed and documented appropriately in accordance with the District's policy.
2	Assess whether personnel duties and accountability functions for excessive unexcused absences were carried out in accordance with the District's policy.
3	Validate that modifications to historical student attendance records were authorized and were made under reasonable circumstances.
4	Validate that modifications to historical student academic records were authorized and were made under reasonable circumstances.
5	Assess whether student attendance records were entered in a timely manner.
6	Evaluate whether student discipline training addressed all key aspects of the Student Discipline Handbook.
7	Evaluate whether staff completed student discipline training in a timely manner.
8	Evaluate whether the student discipline reporting structure provides adequate support to teachers and administrators.
9	Validate that Infinite Campus access modification requests received appropriate approvals and access was appropriately provisioned.
10	Assess whether student discipline was applied equally across the school District in accordance with the Student Discipline Handbook.

Summary of Findings and Recommendations

Our observations below are based upon corroborative inquiry with APS personnel as well as inspection of sample documentation. In response to our observations, recommendations are included for the District's consideration on how to resolve gaps where internal controls were not in place, internal controls were not designed effectively, or opportunities exist to reduce risk to APS.

Each recommendation was rated high, moderate, or low based on priority in terms of impact on the process, internal controls, or efficiency of operations.

1. **High priority** indicates that the finding requires immediate attention, and the recommendation may have a significant impact on risk mitigation.

2. **Moderation priority** indicates that the finding should be addressed timely, and the recommendation may have a meaningful impact on risk mitigation.

3. **Low priority** indicates that the finding should be addressed as time and resources permit, and the recommendation may have a low impact on risk mitigation.

The following table summarizes the findings identified through the audit.

Category	High Priority	Moderate Priority	Low Priority	Total Findings
Discipline	3	5	1	9
Attendance	0	4	2	6
Access Provisioning	0	1	0	1
Academic Recordkeeping	0	1	0	1
Total Findings	3	11	3	17

The table below summarizes the findings and related recommendations identified through the audit:

No.	Observation	Recommendation	Priority
FINDINGS			
Discipline:			
1	Completion of the optional student discipline learning plan, which includes three training modules, is not enforced by District administration. In addition, it is only offered to Principals and Assistant Principals.	Completion deadlines for the student discipline learning plan should be enforced by District administration. Additionally, District administration should monitor to ensure that all personnel who are responsible for student discipline complete the student discipline learning plan in a timely manner.	High

Management Response #1:

- Action: Principals and Assistant Principals will complete all three modules of the Student Discipline Learning Plan at the beginning of each school year.

- Monitoring & Accountability: Attendance rosters will be pulled and shared with the Division of Schools.

Implementation Date:

- A system to track completion of modules will be developed by September 20, 2024

- Training completion window: July 1, 2024 to September 30, 2024

- Reminders sent on July 30, 2024, August 30, 2024 and September 15, 2024

Responsible for Implementing Recommendation:

- Training: Director of Student Discipline

- Tracking System: Executive Director of Data and Information Group (DIG)

- Monitoring and Accountability: Deputy Superintendent/Chief of Schools

FINDINGS			
No.	**Observation**	**Recommendation**	**Priority**
2	Optional student discipline training provided on a District-wide level does not comprehensively address all key aspects of the Student Code of Conduct, such as: a. Progressive discipline policy, interventions, & plans b. Teacher reporting and removal of disruptive students	The existing District-wide discipline training is captured through the student discipline learning plan. The student discipline learning plan should be updated to include training modules that address all key aspects of the Student Code of Conduct related to discipline. All newly hired and existing District personnel, including both administration and teachers, should be required to complete this comprehensive training periodically.	High

Management Response #2: Principal and Assistant Principal Trainings will be updated to include the progressive discipline policy, interventions, and behavior intervention plans. Teacher training recommendations will be addressed in response #4.

Implementation Date: June 30, 2024

Responsible for Implementing Recommendation: Director of Student Discipline

FINDINGS			
No.	Observation	Recommendation	Priority
3	Student's full names were found in behavior referrals, resulting in the potential for Family Educational Rights and Privacy Act (FERPA) violations.	1. Teachers and administrative staff are instructed to exclude full student names in behavior referrals entered into Infinite Campus due to the potential for Family Educational Rights and Privacy Act (FERPA) violations. The District should reinforce expectations to comply with FERPA while completing behavior reports during student discipline-related training. 2. Behavior administrators should review behavior referrals and remove any identifiable student information, such as full names.	High

Management Response #3:

- There will be a separate annual training for staff that enter discipline incidents.
- This training will also be available in ELIS.
- We will collect the names of everyone that enters discipline incidents and email them about specific issues mentioned in this Audit.
- This issue will also be in the annual teacher and administrator training.

Implementation Date:

- Collection window: February 21, 2024 to March 15, 2024
- E-mail: March 18, 2024
- Training completion window: July 1, 2024 to September 30, 2024

Responsible for Implementing Recommendation:

- Training and Email: Director of Student Discipline

FINDINGS			
No.	Observation	Recommendation	Priority
4	Student discipline training for teachers is inconsistent across schools. Nineteen out of twenty-three schools interviewed indicated there was some form of student discipline training for teachers. However, the methods for training were inconsistent across schools.	A standardized student discipline training program should be developed by the Office of Student Discipline and delivered District-wide. The training should reflect the requirements per the Student Handbook and Regulation JCDA-R(1) – Student Code of Conduct. The training should also reflect the process for a teacher to complete a behavior referral in Infinite Campus.	Moderate

Management Response #4:

- Action: An annual teacher training for discipline and the code of conduct will be developed and implemented.

- Monitoring and Accountability: Attendance Rosters will be shared and reviewed by the School Administrators and Division of Schools, and appropriate action will be taken.

Implementation Date:

- Training written by June 30, 2024

- Training completion window: July 1, 2024, to September 30, 2024

Responsible for Implementing Recommendation:

- Training: Director of Student Discipline, Assistant Superintendent of Student Services, Chief Academic Officer

- Monitoring and Accountability: Deputy Superintendent/Chief of Schools

FINDINGS			
No.	Observation	Recommendation	Priority
5	Student behavior reports were not filed promptly.	District administration should reinforce the responsibility for school teachers and administrators to file student behavior referrals within one day of a student exhibiting behavior that repeatedly or substantially interfered (1) with the teacher's ability to communicate effectively with the students in their class or (2) with the ability of such student's classmates to learn in compliance with Georgia Department of Education Rule 160-4-8-.15.	Moderate

Management Response #5:

- Action: This will be included in the annual Administrator training and the discipline entry training. This information will also be in the discipline entry email.

- Monitoring and Accountability: The current Behavior dashboard will be updated to show each school's average days between incident date and entry date. School Administrators and Associate Superintendents will monitor.

- Proposed APS Language: Referrals will be entered after due process is provided and an investigation is completed not to exceed five school days. Students should not be suspended or sent home prior to the investigation being concluded and referral entered.

Implementation Date:

- Email by March 18, 2024

- Training completion window: July 1, 2024 to September 30, 2024

Responsible for Implementing Recommendation:

- Training and email: Director of Student Discipline

- Dashboard update: Dr. Monique O'Bryant, Research and Evaluation Director

- Discipline Monitoring and Accountability: Division of Schools

FINDINGS			
No.	**Observation**	**Recommendation**	**Priority**
6	Discrepancies were identified between the student behavior reports filed and the guidance per the 2022 – 2023 Student Handbook and Regulation JCDA-R(1) - Student Code of Conduct.	1. The District should consider revising the Student Handbook and Regulation JCDA-R(1) - Student Code of Conduct to ensure consistency and clarity of responses to disciplinary offenses. These policies should align on responses based on the level of offense and include specific language to ensure minimal judgment can be applied by the school administration. 2. District administration should reinforce the expectation for school teachers and administrators to adhere to the guidelines established in the annually published Student Handbook and Regulation JCDA-R(1) - Student Code of Conduct when documenting behavior events and identifying appropriate interventions, supports, and actions as a response. 3. Expectations should be reinforced through mandatory periodic training for school administrators, teachers, and all other stakeholders responsible for addressing student discipline offenses.	Moderate

	FINDINGS		
No.	**Observation**	**Recommendation**	**Priority**

Management Response #6:

- Action: The annual discipline training for administrators and teachers will include a component that will norm on the type, level, and duration of removal. A discipline matrix visual will also be developed and used for training.

- Monitoring and Accountability: School Administrators and Division of Schools will monitor the dashboard.

Implementation Date:

- Discipline matrix visual developed by June 30, 2024

- Training completion window: July 1, 2024 to September 30, 2024

Responsible for Implementing Recommendation:

- Training: Director of Student Discipline

- Monitoring and Accountability: Deputy Superintendent/Chief of Schools

FINDINGS			
No.	**Observation**	**Recommendation**	**Priority**
7	Documentation of notifying a parent or legal guardian of the student's behavior incident in accordance with the 2022 – 2023 Student Handbook was not retained in Infinite Campus for several samples tested.	1. District administration should reinforce the expectation for school teachers and administrators to adhere to the guidelines established in the annually published Student Handbook when notifying students' parents or legal guardians of the behavior incident. 2. The District's procedures surrounding notifications to students' parents or guardians should be updated to indicate that the contact must be documented in the Infinite Campus contact log. The procedures should be disseminated to all schools to maintain consistency and to ensure complete and accurate records are maintained to support student discipline offenses.	Moderate

Management Response #7:

- Action:
  - The training for administrators will include a requirement to enter this communication in the parent contact log in Infinite Campus.
  - School staff also need to log the suspension letter in the parent contact log.
  - This information will be included in the discipline entry email.
- Monitoring and Accountability: We will sample this data from discipline hearings.

Implementation Date:

- Email: March 18, 2024
- Training completion window: July 1, 2024 to September 30, 2024

Responsible for Implementing Recommendation:

- Training and Email: Director of Student Discipline
- Monitoring and Accountability: Deputy Superintendent/Chief of Schools

FINDINGS			
No.	Observation	Recommendation	Priority
8	We observed that some schools have in-school suspension programs while others do not, which may lead to inequitable discipline outcomes for students.	The district may want to evaluate whether additional schools within the District may benefit from an in-school suspension program to ensure all students in the same grades have appropriate disciplinary responses available.	Moderate

Management Response #8:

- This is allowable through our district charter which provides local flexibility and autonomy.

- Every school should have alternatives to suspension documented in their annual plan for Tier-1 behavior and attendance plan as of the 2023-2024 school year. This plan will be reviewed in the annual training for administrators and teachers. In the 2024-2025 school year, the Division of Schools will ensure that all schools turn in these plans.

Implementation Date:

- Training completion window: July 1, 2024-September 30, 2024

Responsible for Implementing Recommendation:

- Training: Director of Student Discipline

- Tier 1 Attendance and Behavior Plan Approval: MTSS Coordinators and Director of School Social Work

FINDINGS			
No.	Observation	Recommendation	Priority
9	Inconsistencies exist between the 2022 – 2023 Student Handbook and Regulation JCDA-R(1) – Student Code of Conduct.	The District should ensure the annually published Student Handbook and Regulation JCDA-R(1) - Student Code of Conduct are in alignment.	Low

Management Response #9: The Discipline Committee will review and resolve inconsistencies between the FY25 Student Handbook and Board policy.

Implementation Date: July 1, 2024

Responsible for Implementing Recommendation: Director of Student Discipline

FINDINGS			
No.	Observation	Recommendation	Priority
Attendance:			
10	Written documentation of an excused absence from a student's parent or legal guardian must be retained until the end of the school year per the APS Retention Schedule. The excused absence documentation retention period utilized by several schools is less than the District's approved retention schedule.	District administration should reinforce expectations of compliance with the District's retention schedule to school teachers and administrators. This may be communicated through required District-wide annual training to ensure attendance records are consistently maintained in Infinite Campus alignment with the retention period.	Moderate

Management Response #10:

- Implementation of Excuse Note Retention Process:
    - Associate Superintendents collaborate with schools to ensure a standardized process for retaining excuse notes.
    - Principals communicate their processes to all relevant staff members and document attendance.
    - Training on the new process is provided to ensure understanding and compliance.

- Monitoring and Evaluation:
    - Associate Superintendents conduct periodic audits to assess compliance with the retention schedule and excuse note retention process.
    - Feedback is gathered from schools to identify any challenges or areas for improvement.
    - Adjustments are made to the training and processes as necessary based on evaluation findings.

Implementation Date: April 15, 2024

Responsible for Implementing Recommendation: Associate Superintendents

FINDINGS			
No.	**Observation**	**Recommendation**	**Priority**
11	Board Policy JB Student Attendance states that a student's parent or legal guardian must be notified of an unexcused absence. Evidence of notification to a parent or legal guardian was not retained in Infinite Campus for several unexcused absences tested.	1. The Infinite Campus contact log should be reviewed daily by an Attendance Clerk or designee to ensure that parents were notified of the student's unexcused absences in accordance with Board Policy JB Student Attendance. 2. District administration should ensure that automated calls are set up to notify parents or legal guardians of unexcused absences. Evidence of the automated call should be documented in the Infinite Campus contact log. 3. District retention policy should be updated to indicate the required retention period of documentation related to unexcused absences.	Moderate

Management Response #11:

- All schools will set up notifications.
- The automated calls are documented in the recipient log.
- The retention policy will be reviewed and updated accordingly for the retention of excuses.
- Student Information System (SIS) Team will retrain school staff on setting up automated calls for attendance if robocalls are not implemented with fidelity.

Implementation Date: April 12, 2024

Responsible for Implementing Recommendation:

- Compliance and Policy Review: Deputy Superintendent/Chief of Schools within the Division of Schools
- Training: SIS Director

FINDINGS			
No.	**Observation**	**Recommendation**	**Priority**
12	Evidence of attendance protocols performed for excessive unexcused absences was not documented in Infinite Campus for several samples tested.	1. Daily, an Attendance Clerk or designee should review Infinite Campus for students who have accumulated 3, 5, 8, or 10+ unexcused absences. The staff should either perform the respective accountability function for that milestone or escalate to the staff responsible for performing the accountability function. 2. The Attendance Clerk or designee should ensure documentation of the performance of the attendance protocols, including parent notification, referral to school social worker, or referral to Juvenile Court, is maintained within Infinite Campus. This may be performed through a weekly review of excessive unexcused absences.	Moderate

Management Response #12:

This is included in the SWARM social module and in the student's attendance intervention plan. The expectation is that the attendance protocol is evident through both places as appropriate. SWARM would come before an Intervention Plan. This is new for 2024-2025 school year and as such, remediation plan has been completed.

Implementation Date: Complete

Responsible for Implementing Recommendation: Director of Social Work and MTSS Coordinators

FINDINGS			
No.	**Observation**	**Recommendation**	**Priority**
13	Schools do not monitor modifications to attendance records to ensure all modifications are appropriate and made by authorized personnel.	Modifications to attendance records should be periodically reviewed by school personnel who do not have access to enter attendance records. The reviewer should ensure modifications appear reasonable and are only made by appropriate personnel based on their job responsibilities.	Moderate

Management Response #13:

- The APS Student Information System (SIS) team will generate the list of who currently has access to modify attendance records within each school.

- The Deputy Superintendent or designee will determine the appropriate number of personnel that can have access to attendance modification by school.

- This list will be reviewed by APS Principals and a master list of what roles can be authorized to modify attendance will be established.

- The APS Student Information System (SIS) team will adjust access accordingly.

- Designees from the Offices of the Deputy Superintendent/Chief of Schools and the Chief of Performance will explore best practice in attendance code change review monitoring both technically and from like districts nationally.

Implementation Date: May 10, 2024

Responsible for Implementing Recommendation:

- Deputy Superintendent will determine what roles can be authorized to modify attendance.

- Student Information System Director will update access based on recommendations from Office of Schools.

FINDINGS			
No.	**Observation**	**Recommendation**	**Priority**
14	We noted that there are many different staff positions at each school with the ability to modify attendance records. In addition, a reason for modifying student attendance records is not consistently documented in Infinite Campus across all schools. As such, we are unable to conclude whether modifications to attendance records were appropriate.	1. A reason for modifying an attendance record should be documented in all cases in Infinite Campus. 2. The District's policies and procedures surrounding student attendance should be updated to require comments in Infinite Campus to document explanations for student attendance record modifications. The policies and procedures should be disseminated to all schools to maintain consistency and to ensure complete and accurate records are maintained to support student attendance.	Low

Management Response #14:

- The APS Student Information System (SIS) team will generate the list of who currently has access to modify attendance records within each school.
- The Deputy Superintendent or designee will determine the appropriate number of personnel that can have access to attendance modification by school.
- This list will be reviewed by APS Principals and a master list of what roles can be authorized to modify attendance will be established.
- The APS Student Information System (SIS) team will adjust access accordingly.
- Designees from the Offices of the Deputy Superintendent/Chief of Schools and the Chief of Performance will explore best practice in attendance code change review monitoring both technically and from like districts nationally.

Implementation Date: May 10, 2024

Responsible for Implementing Recommendation:

- Office of Schools
- SIS Director will ensure appropriate access based on Office of Schools recommendation.

FINDINGS			
No.	**Observation**	**Recommendation**	**Priority**
15	Attendance was not recorded for all class periods for several dates tested.	District administration should reinforce the expectation that all schools utilize the Classroom Monitor report for monitoring daily attendance. The school's Attendance Clerk or designee should ensure attendance is recorded for each class period daily. Follow-up should occur with the teacher promptly during each class period and again towards the end of the school day if attendance has still not been entered. If the teacher does not enter attendance, escalation to the Assistant Principal or Principal should occur. Each school should have an individual identified as a backup to perform this review in case of absences.	Low

Management Response #15:

- Middle and High School: Attendance Monitor Reports will be pulled each period to notify teachers if attendance has not been taken. Attendance Monitoring Reports will also be shared with administrators twice a day.

- Elementary School: Attendance Monitoring Reports will be pulled, and teachers will be notified after attendance is taken. Attendance Monitoring Reports will also be shared with administrators at the end of each day.

- Each school also must have an identified back-up and a system for students that arrive late.

Implementation Date: April 15, 2024

Responsible for Implementing Recommendation: Associate Superintendents

FINDINGS			
No.	**Observation**	**Recommendation**	**Priority**
Access Provisioning:			
16	Infinite Campus access provisioning and modification requests were not approved and/or explanations for access changes were not documented in Infinite Campus or Microsoft PowerApps for several samples tested.	All user access modifications/additions in Infinite Campus should be independently approved. Approval should be retained per the APS Retention Schedule within Infinite Campus or Microsoft PowerApps. In addition, reasons for modifications/additions should be noted within Infinite Campus.	Moderate

Management Response #16:

- Maintain current processes that do not allow changes to access outside of the established protocols.

- Requests for access can be submitted through the process developed in SharePoint.

Management's response does not appear to address the finding. Further discussions will occur with management to determine a course of action.

Implementation Date: March 18, 2024

Responsible for Implementing Recommendation: Student Information System Director

	FINDINGS		
No.	Observation	Recommendation	Priority
Academic Recordkeeping:			
17	Evidence of approval for grade changes was not received from schools for a majority of samples tested. Grade changes are approved via a process outside of Infinite Campus. As such, we were unable to conclude whether grade changes made were appropriate.	A user access review should be performed to ensure that the ability to record grade changes in Infinite Campus is limited to the Chief Accountability Officer's designee for each school in accordance with Regulation IHA-R(1): Grading Systems - Grading Expectations. This review should continue to be performed quarterly as a best practice to ensure access to make grade changes is appropriately restricted and segregation of duties conflicts do not exist.	Moderate

Management Response #17:

- Grade changes made after posting will only be completed by the Chief Performance Officer's designee, which is the school's assigned person serving in the capacity of the registrar.
- The APS Student Information System (SIS) team will review the list of who currently has access to make changes to posted grades and will make adjustments to ensure only the correct personnel have access.
- To connect the current APS Grade Change Request Form (located in SharePoint) to the Infinite Campus System, the school's assigned person serving in the capacity of the Registrar (Chief Performance Officer's designee) will place the Grade Change Request ID in the comments of the transcript entry being updated in Infinite Campus.
- The APS Student Information System (SIS) team will conduct a quarterly random sampling of the schools' grade change process to ensure that the grade change was approved by the Associate Superintendent prior to entry.
- The APS Student Information System (SIS) team will share the quarterly sampling results with the Principals and the Associate Superintendent to address any flags or concerns lifted in the grade change process.

Implementation Date:

- March 18, 2024
- Quarterly Random Sampling Process: June 1, 2024

Responsible for Implementing Recommendation: Student Information System Director

Appendices

Appendix 1: Background Narrative

MAINTENANCE OF STUDENT ATTENDANCE RECORDS

Attendance Entry & Modification

Teachers are responsible for entering student attendance for each class period in Infinite Campus, the District's Student Information System. There is no District-wide directive that states when teachers must enter attendance records, but the expectation is that attendance is entered daily. Teachers may record students as present, absent, or tardy.

Each school's front office is responsible for taking attendance on behalf of the teacher if the teacher assigned to the section is unable to record attendance. The front office may also update student attendance records after entry by the teacher. This includes instances such as changing student absences to excused or unexcused or correcting attendance records.

If a student has an acceptable excuse to be absent from school, Board Policy JB: Student Attendance states that the student must provide a note signed by the student's parent or legal guardian stating the reason for the absence upon return to school. The 2022-2023 Student Handbook further specifies that evidence of an excused absence must be obtained by the school within 3 school days after the student's return to school. Per the District's record retention schedule, notes documenting the reason for a student's absence are only required to be retained through the end of the school year.

Board Policy JB: Student Attendance also states that parents should be notified if the student is absent from school or class without prior notice and approval.

The 2022-2023 Student Handbook documents varying levels of attendance protocols to be performed by APS personnel when a student accumulates 3, 5, 8, and 10 unexcused absences.

Attendance Monitoring

Daily Attendance Monitoring

Each school has a designated individual who is responsible for monitoring student attendance daily. The school's Secretary is responsible for monitoring attendance for most elementary schools in the District. The school's Attendance Clerk is responsible for monitoring attendance for most middle and high schools in the District.

Weekly Attendance Monitoring

Each school has a student attendance committee that meets weekly to monitor student attendance.

MODIFICATIONS TO STUDENT ACADEMIC REPORT CARD AND TRANSCRIPT RECORDS

All classroom teachers must finalize grades before posting to the report card or transcript by verifying and signing their individual grades report for each course/section assigned. The front office keeps copies as verification that teachers reported the grades as correct.

Per Regulation IHA-R(1): Grading Systems- Grading Expectations, challenges to a report card grade are considered by the school's Principal within 15 school days of the issuance of the final report card. Any grade changes approved by the Principal must be documented in writing within Infinite Campus with a detailed explanation of the rationale. Any disputes are settled by the school's Associate Superintendent.

Further, Regulation IHA-R(1) states that the school's registrar or registrar's designee must initiate the request to change a grade after the final grade has been posted. The request must state the reason for the change and the name of the person requesting the grade change. The grade change request must be approved by the Principal and Associate Superintendent. Once approved, the change is made by the Chief Accountability Officer's designee. The student's parent or legal guardian is notified of the grade change via the Infinite Campus Messenger.

STUDENT DISCIPLINE

The Student Code of Conduct describes student behavior standards, support processes to address behavior problems, age-appropriate progressive discipline processes, and parental involvement processes. The Student Code of Conduct is distributed to each student at the beginning of the school year or upon enrollment via the annually published Student Handbook. Violations of the Student Code of Conduct are considered behavior incidents. Responses to behavior incidents are administered in proportion to the severity of the behavior, its impact on the school environment, the student's age and grade level, the student's previous discipline history, and other relevant factors. Behavior incidents are organized into three levels of offenses with minimum and maximum disciplinary responses.

Behavior and Incident Management

Per Regulation JCDA-R(1): Student Code of Conduct - Student Code of Conduct, when a student code of conduct violation is reported or suspected, the school's principal or designee determines whether an investigation is warranted and, if so, will instruct appropriate personnel to conduct an investigation. At an appropriate time during or after the investigation, the student's parent or guardian will be notified.

Further, Regulation JCDA-R(1): Student Code of Conduct – Student Code of Conduct states the teacher must submit a report documenting a student's violation of the student code of conduct which repeatedly or substantially interferes with the teacher's ability to communicate effectively with the students in his or her class or with the ability of such student's classmates to learn within one school day of the most recent occurrence of such behavior. Within one day of receiving the report, the principal or principal's designee must send a copy of the report to the student's parents or guardians with their contact information. The principal or the principal's designee must send written notification to the teacher and to the student's parents or guardians of the student support services being utilized or the disciplinary action taken within one school day. A reasonable attempt should be made to confirm the student's parent or guardian received the notification.

Behavior incident referrals are submitted by APS personnel in the Behavior Management tool within Infinite Campus. Incident information such as the date of the incident, time of the incident, location, event type, description of the incident, dollar value of damages, context, participant(s), and participant role(s) are documented within the referral.

Behavior resolutions are added based on the support services utilized or disciplinary actions taken by APS staff. Resolution information such as the resolution type, resolution assignment date, resolution start date, resolution end date, behavior administrative personnel name, details, continuation of services (if applicable), and auxiliary code (if applicable) are documented within the referral. The Student Information Services team has resources on their website with specific details for completing a behavior incident referral report.

Training

The 2022-2023 Student Discipline Training for School Administrators learning plan was assigned to all Assistant Principals and Principals in the District's online learning platform, E-Lectronic Information System ("ELiS"). The learning plan contained 3 courses conducted by Parker Poe:

1. Student Discipline: Code of Conduct
2. Student Discipline: From Incident to Hearing
3. Student Discipline: Discipline of Disabled Students

Per the learning plan's course description, the training was required. Principals were directed to complete all 3 courses by July 18, 2022, as preparation for the in-person 2022 Summer Administrator Training Session sponsored and delivered by the Office of Student Discipline on July 20, 2022. Assistant Principals were directed to complete all 3 courses by August 22, 2022, in preparation for the in-person Assistant Principals meeting on August 24, 2022.

However, per inquiry with the Director of Student Discipline, completion of the learning plan was not mandated. Training on student discipline is also not required for teachers.

INFINITE CAMPUS ACCESS

Infinite Campus is the student information management system APS uses to collect, maintain, and report student information data for mandated state and federal data collection. The Student Information Services ("SIS") team is responsible for managing Infinite Campus access.

A user must have Active Directory access to be granted access to Infinite Campus. Users are granted access when assigned to a group. Various groups exist based on job title, function, and school location. Each group has a set of read, write, modify, and delete rights within Infinite Campus.

Personnel who are newly hired will have Infinite Campus access granted automatically based on job type through a nightly batch process between the District's Human Capital Management software and Infinite Campus.

Additional access may be needed based on the personnel's specific responsibilities. If additional access is needed, an Infinite Campus access change form must be completed. Personnel may complete the access change form for themselves or on behalf of other personnel. Details of the access change and the reason for the access change should be input in the form. The form is routed via a Microsoft PowerApps workflow to the personnel's supervisor to approve or reject. If rejected, the requester is notified. If approved, the form is routed to the SIS team. If additional information is needed, the SIS team follows up with the requester or the approving supervisor. Then, the SIS team approves or rejects the request. If rejected, the requester is notified. If approved, the SIS team will subsequently make the change to the user's Infinite Campus access.

Appendix 2: Selected Schools

The below APS schools were selected for inclusion in the student services internal audit sample testing.

	School Name		
1	Atlanta College & Career Academy	16	G. W. Carver Early College High School
2	Atlanta Virtual Academy	17	Henry Louis Hank Aaron New Beginnings Academy
3	Beecher Hills Elementary School	18	John Lewis Invictus Academy Middle School
4	Benjamin E. Mays High School	19	John Wesley Dobbs Elementary School
5	BEST Middle School & High School Academy*	20	Joseph Humphries Elementary School
6	Booker T. Washington High School	21	Maynard H. Jackson High School
7	Burgess-Peterson Elementary School	22	Michael R. Hollis Innovation Academy
8	Coretta Scott King YWLA Middle School & High School	23	Midtown High School
9	Crawford Long Middle School	24	Morningside Elementary School
10	D. M. Therrell High School	25	North Atlanta High School
11	D. T. Howard Middle School	26	Phoenix Academy
12	Deerwood Academy	27	Ralph Bunche Middle School
13	Frederick Douglass High School - Main Campus	28	South Atlanta High School
14	Frederick Douglass High School - 9th Grade STEAM Academy	29	Sylvan Hills Middle School
15	Garden Hills Elementary School	30	Willis A. Sutton Middle School

Interviews were held with Principals and other personnel as needed at the above schools. The school above with an asterisk (*) did not attend the scheduled interviews or respond to the internal audit's email inquiries.

Thank you.

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Troy Snyder

Partner
248.223.3273
Troy.Snyder@plantemoran.com