

**Columbus City Schools
Office of Internal Audit**



**SY 2021-2022 Schools Audit
Academic Grade Change
Audit Report**

Report Date: January 26, 2023

Table of Contents

<u>Title</u>	<u>Page</u>
Executive Summary	3
Background	6
Report Issues and Management Responses	9
Audit Objectives	16
Audit Scope	16
Methodologies	16

Executive Summary

The Columbus City Schools (District) Office of Internal Audit (OIA) recently completed an audit of the Academic Grade Change process. Accurate grade information is important in order to determine if the student has mastered the class and is eligible to receive credit for the class. Our audit mainly involved the Department of Transformation and Leadership, whose staff are charged with overseeing and approving the academic grade change requests. Additionally, the building administrators are charged with updating the student information system, Infinite Campus, with the approved grade change when the request is for the current school year. We also included the Department of Student Services, who oversees the final approval and update of Infinite Campus when the grade change is for a prior school year as well as grade change updates in Infinite Campus for grades PS-5 processed through the Infinite Campus Support Ticket process. Finally, the Department of Strategic Performance Initiatives is responsible for the accurate reporting to the State as part of the Education Management Information System (EMIS) process. This general audit evaluated objectives selected by OIA to assess the internal controls of the academic grade change processes.

OIA initiated this audit considering the risks associated with improper grade changes resulting in the student receiving credit for a course they did not pass. Accurate grade and course credit information is necessary in order to determine if the student is ready to advance to the next grade as well as to determine if the student is ready to graduate from the District. Accurate information from this process directly affects all three of the District's goals: Strengthen Reading Proficiency, Develop Portrait Ready Graduates, and Close Opportunity Gap as well as accurate reporting to the State for determination of the building and District grade card results. Our audit objectives were designed to ensure that processes included necessary internal controls that were operating effectively and to identify any gaps in the current processes.

Our audit was conducted in accordance with the *International Standards for the Professional Practice of Internal Auditing* established by the Institute of Internal Auditors. Our audit included such procedures as we deemed necessary to provide reasonable assurance regarding the audit objectives. Internal auditing is an independent, objective assurance and consulting activity designed to add value and improve an organization's operations. The internal audit function helps an organization accomplish its objectives through a systematic, disciplined approach to evaluating and improving the effectiveness of risk management, control, and governance processes.

OIA reported six issues and developed ten associated recommendations. OIA rated the risk associated with the six issues as follows:

High	Moderate	Low
0	3	3

During the course of the audit, we made school leadership and the staff of the Departments of Transformation and Leadership and Student Services aware of our

issues and recommendations for improvement. Good discussion took place regarding the recommendations. OIA appreciates the cooperation extended to us and the assistance of all staff we interacted with as we performed our audit. The OIA issues noted during the audit are classified as follows:

<p>Risk Ratings, defined:</p> <p>1 – High/unacceptable risk requiring immediate corrective action;</p> <p>2 – Moderate/undesirable risk requiring future corrective action; and</p> <p>3 – Low/minor risk that management should assess for potential corrective action.</p>

Issues	Risk Rating		
	1	2	3
Objective 1: To determine if there is guidance for the academic grade change process for all grade levels.			
Issue 1 – Management has not updated the District policy to be consistent with the current academic grade change process.			X
Issue 2 – Management has not updated the District administrative guidelines to be consistent with the current academic grade change process.			X
Issue 3 – Management has not updated the academic grade change procedure documents to be consistent with the District policy, administrative guidelines, and Columbus Education Association Master Agreement 2019-2022.			X
Objective 2: To determine if there is evidence maintained to support the academic grade change reason.			
Issues	Risk Rating		
	1	2	3

<p>Issue 4 – Academic grade change personnel are not consistently including relevant support for the academic grade change request and/or the grade change update in Infinite Campus is not consistent with the request.</p>		X	
<p>Objective 3: To determine if there are approvals for academic grade changes.</p>			
<p>No issues noted.</p>			
<p>Objective 4: To determine if the teacher of record, if not the initiator, is notified of the academic grade change.</p>			
<p>Issue 5 – School administration are not consistently retaining documented support the teacher of record was notified of the academic grade change request as per Columbus Education Association Master Agreement 2019-2022.</p>		X	
<p>Objective 5: To determine if there is monitoring and oversight of the academic grade change process.</p>			
<p>No issues noted.</p>			
<p>General</p>			
<p>Issue 6 – Management is unable to identify a comprehensive list of all academic grade changes occurring outside open grading window.</p>		X	

Background

As part of the FY22 Audit Work Plan approved by the Board of Education, the OIA completed the Academic Grade Change Audit. The update to the grade in the Infinite Campus report card and transcript is a manual process that is not systematically connected to the electronic academic grade change request for grade bands 6-12 in CCSDAS and requires the building administrator to update the report card grade in the student information system, Infinite Campus, for current year academic grade change requests.

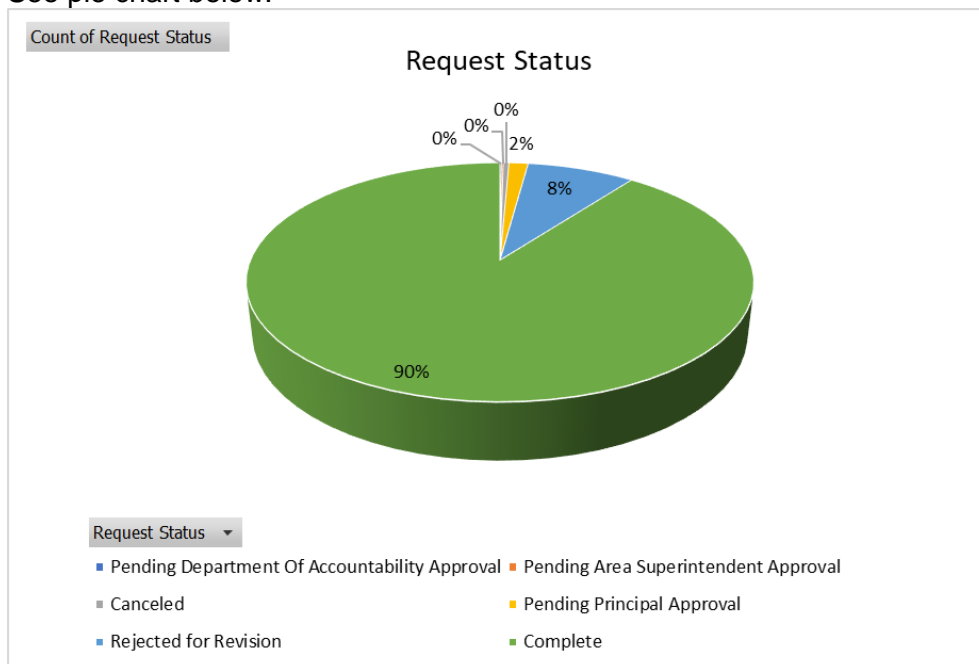
Currently, the academic grade change requests are initiated through CCADAS (middle school and high school) or Infinite Campus Support Ticket (elementary school). The detail review was limited to the requests that are processed through the CCSDAS process.

IT was able to provide some CCSDAS academic grade change data as OIA finalized the audit. As of September 30, 2022, the CCSDAS academic grade change request status was as follows:

21-22 CCSDAS Academic Grade Change Request Status	Count
Complete	2517
Rejected for Revision	230
Pending Principal Approval	41
Canceled	12
Pending Area Superintendent Approval	4
Pending Department of Accountability Approval	3

Source: CCSDAS academic grade change data pull provided by IT 9/30/2022 (SY 2021-2022)

See pie chart below.

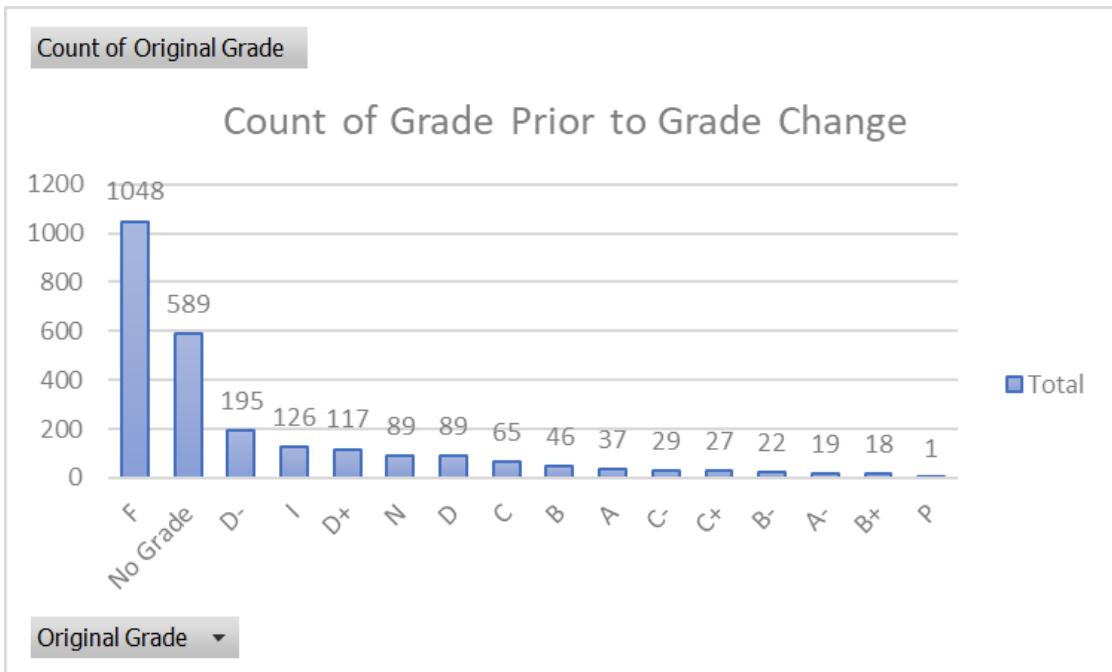


Source: CCSDAS academic grade change data pull provided by IT 9/30/2022 (SY 2021-2022)

Based on the 2,517 completed grade changes (a request may have more than 1 grade change request) processed through the CCSDAS academic grade change request process, the original grade (prior to change) was:

Grade Prior to Grade Change	Count
F	1048
No Grade	589
D-	195
I	126
D+	117
N	89
D	89
C	65
B	46
A	37
C-	29
C+	27
B-	22
A-	19
B+	18
P	1

Source: CCSDAS academic grade change data pull provided by IT 9/30/2022 (SY 2021-2022)

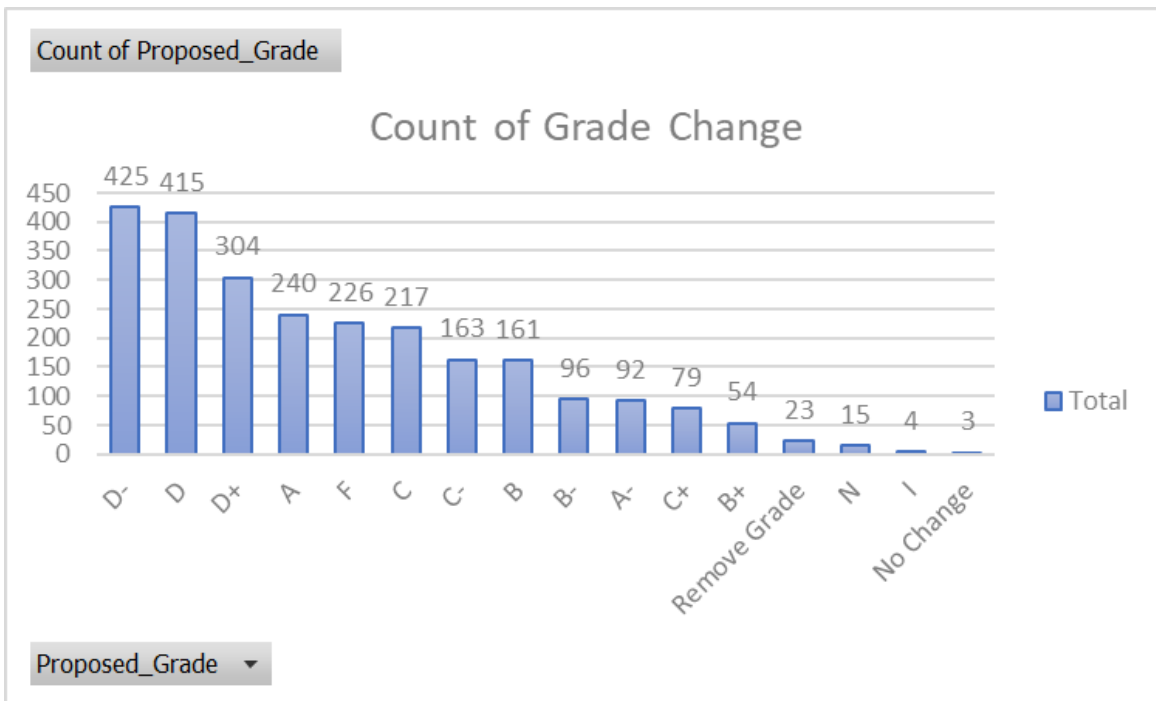


Source: CCSDAS academic grade change data pull provided by IT 9/30/2022 (SY 2021-2022)

The grades were changed to the following:

Grade After Grade Change	Count
D-	425
D	415
D+	304
A	240
F	226
C	217
C-	163
B	161
B-	96
A-	92
C+	79
B+	54
Remove Grade	23
N	15
I	4
No Change	3

Source: CCSDAS academic grade change data pull provided by IT 9/30/2022 (SY 2021-2022)



Source: CCSDAS academic grade change data pull provided by IT 9/30/2022 (SY 2021-2022)

Results of the Academic Grade Change Audit - Issues and Recommendations:

Issue 1 – Management has not updated the District policy to be consistent with the current academic grade change process. (Risk Rating: Low)

Board Policy po5421.01 – Academic Grade Change has not been updated to include the systematic Columbus City Schools Distributed Application Services (CCSDAS) electronic process and the Infinite Campus Support Ticket. The current board policy references the paper process. Additionally, the board policy references prior staff titles and District department names.

Management does not have a process in place to at least annually review the board policies to determine if any changes are needed due to process changes and/or regulatory changes.

Best practice is for at least an annual review of guidance, including board policy, for necessary changes due to process changes and/or regulatory changes.

Without updating the District Board Policies related to the academic grade change process, there is the increased risk that improper grade changes could occur. Improper grade changes can result in one or more of the following:

- Student receiving an inaccurate grade for the quarter, final, and/or course;
- Student advancing a grade when they have not mastered the content;
- Student receiving credit toward graduation for a course not passed;
- Inaccurate state reporting;
- Inaccurate improvements in state report card reported for school building; and/or
- Inaccurate improvements in state report card reporting for the District.

Recommendations

1. Management should update Board Policy po5421.01- Academic Grade Change to be consistent with the current academic grade change process, district department involvement, and district staff involvement.
2. Management should establish a process to at least annually, review board policies for necessary changes due to regulatory or process changes.

Management Response: *Absolutely, we agree. Government Policy & Advocacy Committee (GPAC) is aware of this and we are working to identify the appropriate business owner/s to drive this update.*

Implementation Date: *August 19, 2023*

Process Owner: *James Barnes, General Counsel, Chair GPAC; Dr. Angela Chapman, Chief Transformation & Leadership Officer; Dr. Todd A Walker, Chief Curriculum and Instruction Officer and Dr. Machele Kline, Chief Student Services Officer.*

Issue 2 – Management has not updated the District administrative guidelines to be consistent with the current academic grade change process. (Risk Rating: Low)

Board Administrative Guideline ag5421A – Processing Academic Grade Change has not been updated to include the systematic Columbus City Schools Distributed Application Services (CCSDAS) electronic process and the Infinite Campus Support Ticket. The current board administrative guideline references the paper process. Additionally, the board administrative guideline references prior staff titles and District department names.

Management does not have a process in place to at least annually review the administrative guidelines to determine if changes are needed due to process changes and/or regulatory changes.

Best practices are for at least an annual review of guidance, including administrative guidelines, for necessary changes due to process changes and/or regulatory changes

Without updating the District Board Administrative Guidelines related to the academic grade change process, there is the increased risk that improper grade changes could occur. Improper grade changes can result in one or more of the following:

- Student receiving an inaccurate grade for the quarter, final, and/or course;
- Student advancing a grade when they have not mastered the content;
- Student receiving credit toward graduation for a course not passed;
- Inaccurate state reporting;
- Inaccurate improvements in state report card reported for school building; and/or
- Inaccurate improvements in state report card reporting for the District.

Recommendations:

3. Management should update Board Administrative Guideline ag5421A – Processing Academic Grade Change to be consistent with the current academic grade change process, district department involvement, and district staff involvement.
4. Management should establish a process to at least annually, review administrative guidelines for necessary changes due to regulatory or process changes.

Management Response: *Updates will be made in line with updates to BOE Policy. Administrative Guidelines exist to support BOE Policy.*

Implementation Date: *August 19, 2023*

Process Owner: *Dr. Angela Chapman, Chief Transformation & Leadership Officer and Dr. Mabelle Kline, Chief Student Services Officer and Chair Accountability Committee*

Issue 3 – Management has not updated the academic grade change procedure documents to be consistent with the District policy, administrative guidelines, and Columbus Education Association Master Agreement 2019-2022 (Risk Rating: Low)

The District has specific instructions that details the process to access Columbus City Schools Distributed Application Services (CCSDAS), completing the academic grade change request form, support for grade change, approvals required for grade change, and notifications to teacher of record. There are detailed procedure instructions for students in grades 6-12; however, the procedures noted for students in grades PS-5 do not agree with Board Policy (po5421.01) and Administrative Guideline (ag5421A). The process for grades PS-5 has discrepancies with the Board Policy and Board Administrative Guideline. The existing Board Policy and Board Administrative Guideline do not differentiate between PS-5 and 6-12 students when notating the academic grade change requirements.

When the CCSDAS process was established, it was confined to grade bands 6-12 and did not include grade bands PS-5. Additionally, no reporting was established for the CCSDAS process to identify the population of the academic grade change requests initiated during the school year so management could monitor the process.

The Board Policy (po5421.01) and Administrative Guideline (ag5421A) do not differentiate the process to complete an academic grade change request. Additionally, the process for PS-5 does not allow a way to identify the requests made and do not require the building administrator to notify the teacher of record, when not the initiator, of the academic grade change request.

Without updating the academic grade change process guidelines, there is the increased risk that improper grade changes could occur. Improper grade changes can result in one or more of the following:

- Student receiving an inaccurate grade for the quarter, final, and/or course;
- Student advancing a grade when they have not mastered the content;
- Student receiving credit toward graduation for a course not passed;
- Inaccurate state reporting;
- Inaccurate improvements in state report card reported for school building; and/or
- Inaccurate improvements in state report card reporting for the District.

Recommendations:

5. Management should update the procedures for academic grade changes in order to ensure consistency between all other process guidance.
6. Management should establish a process to at least annually, review the guidance for district processes, including academic grade changes, to ensure consistency between guidance and conformance with any regulatory guidelines.

Management Response: #5 - Management has asked IT for an enhancement to the CCSDAS Academic Grade Change which would do an automatic email to the Teacher

of Record (TOR) providing the teacher with pertinent information regarding the grade change. This removes the human error component related to notification of grade changes. This procedure will be updated in the Infinite Campus Dashboard to ensure consistency.

#6 – The Accountability Committee will establish an annual meeting to review the alignment between BOE policy, administrative guidelines and procedural documentation. Policies, guidelines, process and procedures that have not changed from previous year will be exempt from review.

Regarding grades PS-5 - There have been two academic grade changes for PS-5 within the last five years that we could locate through the tickets in IC. They were both marks given to students that did not attend our district.

PreK-5 academic grade changes are not directly related to credit bearing courses. Furthermore, PreK-5 grades are based on a standards-based system where a student receives an indicator of mastery for each individual standard. They do not receive a summative mark per course.

Therefore, we determined this risk as very low and one we are willing to accept.

Implementation Date: August 19, 2023

Process Owner: #5 – V. Vandhana Veerni, Chief Information Officer; Dr. Angela Chapman, Chief Transformation & Leadership Officer & Dr. Machel Kline, Chief Student Services Officer

#6 – Dr. Machel Kline, Chief Student Services Officer and Chair Accountability Committee

Issue 4 – Academic grade change personnel are not consistently including relevant support for the academic grade change request and/or the grade change update in Infinite Campus is not consistent with the request (Risk Rating: Moderate)

OIA was unable to review the academic grade changes completed for the PS-5 students; however, we were able to review the academic grade changes processed through the CCSDAS process for grades 6-12. During detail review of the selected sample for grades 6-12, OIA found the following:

- 5 of 35 (14% error rate) support did not agree with the requested grade change.
- 8 of 35 (23% error rate) relevant support was not attached to the student file for the requested grade change; however, due to systematic control, all of the request had a document attached.
- 5 of 35 (14% error rate) of the academic grade change requests, the grade change did not match the entry in Infinite Campus.

Of the exceptions noted, the document attached was not relevant for the grade change requested, the document did not clearly identify what grade period the assignments applied to, the Infinite Campus grade was entered incorrectly, or the Infinite Campus grade was not entered.

Without documented support for the academic grade change process, we are unable to determine if the change request was valid and therefore a true representation of the student's mastery of the subject.

Without a true representation of the student's mastery of a subject (grade), the District is unable to determine if the student should advance a grade and/or receive credit for the course toward graduation.

Recommendations

7. Management should communicate to building staff who initiate academic grade changes what is relevant data and the requirement the actual support, not a reference, is attached to the request.
8. Management should establish a process to periodically review attached documentation to validate the support is relevant for the grade request and the Infinite Campus entry.

Management Response: #7: *Although this information has been previously distributed, the Office of Information Management will emphasize this process on our Infinite Campus Dashboard, highlight examples and place this in the Leader Board.*

#8. *The principals are serving as the instructional leader and are verifying the documentation when approving through the CCSDAS. When there is an academic grade change beyond the current year, the principal then the area superintendent and then the Chief of Student Services all approve the documentation.*

Management within Transformation & Leadership will develop and implement an oversight process for current year academic grade changes.

Implementation Date: *August 19, 2023*

Process Owner: #7 *Dr. Machel Kline, Chief Student Services Officer*
#8 *Dr. Angela Chapman, Chief Transformation & Leadership Officer*

Issue 5 – School administration are not consistently retaining documented support the teacher of record was notified of the academic grade change request as per Columbus Education Association Master Agreement 2019-2022. (Risk Rating: Moderate)

District staff are not consistently retaining support, in an easily retrievable manner, that the teacher of record, when not the initiator, are notified of the academic grade change request.

During detail testing of the requests that originated through the CCSDAS process, OIA found 6 of 15 (40% error rate) there was no evidence the teacher of record was notified of the grade change request or the originator and/or teacher of record were notified of the form rejection.

The requirement to notify the teacher of record of the grade change request is not periodically communicated to the staff involved in the academic grade change process. Additionally, some of the building administrators incorrectly believed that making a note on the grade card was sufficient notification to the teacher of record of the change.

The Columbus Education Association (CEA) Master Agreement 2019-2022 Article 201.03 requires the teacher of record, if not the initiator of the request, to be notified of the academic grade change request.

To be compliant with the notification requirement, it is important for the building administrators to maintain, in an easily retrievable manner, support the teacher of record, if not the initiator, was notified of the academic grade change request.

Recommendation

9. Management should communicate to all staff involved in the academic grade change process, the requirement to notify the teacher of record, if not the initiator of the request, of the academic grade change request. This reminder should commence at least twice a year

Management Response: *Management has asked IT for an enhancement to the CCSDAS Academic Grade Change which would do an automatic email to the Teacher of Record (TOR) providing the teacher with pertinent information regarding the grade change. This removes the human error component related to notification of grade changes. We have also included read only access for the CCSDAS Academic Grade Change for our Internal Auditors. Our initial Requirements Meeting was held on Monday, November 7, 2022.*

Implementation Date: *August 19, 2023*

Process Owner: *V. Vandhana Veerni, Chief Information Officer; Dr. Angela Chapman, Chief Transformation & Leadership Officer; & Dr. Mabelle Kline, Chief Student Services Officer*

Issue 6 – Management is unable to identify a comprehensive list of all academic grade changes occurring outside open grading window. (Risk Rating: Moderate)

The District is unable to produce a comprehensive list of all the academic grade change requests initiated outside the normal grading window.

The CCSDAS academic grade change process for grades 6-12 does not have a reporting capability. The lack of reporting functionality was an oversight during the development of the CCSDAS process. Additionally, The Infinite Campus Support

Tickets for grades PS-5 does not have a unique identifier to separate academic grade change requests from other Infinite Campus Support Ticket items. There is not a consistent academic grade change process across all grade bands.

The District should be able to identify all of the academic grade change requests initiated during the school year in order to monitor the process and ensure accuracy of the information utilized to support grade advancement, course credit, graduation, and state reporting.

Without a comprehensive list of academic grade change requests performed during the school year, District management is unable to monitor the process to ensure the grade changes are supported, approved, and the teacher of record notified of the change according to the CEA Master Agreement 2019-2022. Additionally, management is unable to ensure grade advancements, course credit, graduation, and state reporting are accurate.

Recommendation

10. District staff should establish a consistent process, across all grade bands, to process the academic grade change requests and ensure the process includes reporting functionality to identify all of the requests in order to monitor the requests for completeness, accuracy, and conformance with guidance.

Management Response: *We do not agree that this is across all grade bands as PK-5 we are willing to accept this risk.*

We have placed an IT request to enhance the current CCSDAS Academic Grade Change to include date of request, date of completion/rejection and read only IA access. Our initial Requirements Meeting was held on Monday, November 7, 2022.

Implementation Date: *August 19, 2023*

Process Owner: *V. Vandhana Veerni, Chief Information Officer and Dr. Mabelle Kline, Chief Student Services Officer*

Audit Objectives

OIA established the following objectives for the audit:

- To determine if there is guidance for the academic grade change process for all grade levels.
- To determine if there is evidence maintained to support the academic grade change reason.
- To determine if there are approvals for the academic grade changes.
- To determine if the teacher of record, if not the initiator, is notified of the academic grade change.
- To determine if there is monitoring and oversight of the academic grade change process.

Audit Scope

The OIA engagement scope for this project was limited to the academic grade changes initiated during the SY 2021-2022 (July 1, 2021 through June 9, 2022) and the supporting documentation.

Methodologies

To accomplish the audit objectives, OIA generally used inquiry, observation, and document/record examination and the following tasks as they relate to those objectives:

- Inquired with senior management on the academic grade change process.
- Reviewed District policies and administrative guidelines related to academic grade changes.
- Reviewed Ohio Department of Education guidance.
- Reviewed state and federal guidance.
- Reviewed CCSDAS data related to academic grade changes.
- Obtained evidence of academic grade change request support.
- Obtained approvals based on request type, date of request, and initiator of request.
- Obtained evidence of teacher of record being notified of academic grade change request.
- Inquire of management and obtain evidence of oversight and monitoring of the academic grade change process.