



Office of Internal Audit

Audit at a Glance

March 28, 2024

Why We Did This Audit

All students have the right to learn, and no student has the right to disrupt the learning activities of others. The safety and security of our students is the District's highest priority, and the District is committed to providing a safe learning environment for our students. Complete and accurate behavior incident reports and resolution documentation is important for the District to determine success and gaps in the current behavior policies.

Risk Drivers

- Consistent use of the behavior guidance and behavior resolution by building administration;
- Proper monitoring of behavior processes and procedures used by building administration;
- Sufficient oversight of the reasons for suspensions involving Pre-K through 3rd grade students; and
- Inaccurate reporting of behavior events and related attendance.

Background

- The District has robust behavior guidance; however, the monitoring and oversight of the behavior processes need enhanced in order to ensure the guidance is followed with fidelity and the District is in compliance with regulatory requirements.
- HB318 was passed by the Ohio General Assembly in August 2018 to support alternatives to suspensions and expulsions and to phase out suspensions for students in Pre-K through 3rd.

Student Behavior Audit

WHAT WE FOUND

Issue 1 – Administrative Guidelines have not been created for Board Policies po5606: Suspension / Expulsion of Students with Disabilities and po5610.01: In-School Discipline. (Risk Rating: Low)

Issue 2 – Behavior guidance has not been applied consistently resulting in incomplete and/or inaccurate behavior incident reports and resolutions. (Risk Rating: Moderate)

Issue 3 – Pre-kindergarten through 3rd grade students have been suspended for reasons deemed unallowable by HB318. (Risk Rating: Moderate)

Issue 4 – Discrepancies were noted between the behavior resolution and the behavior attendance entry. This contributed to incomplete and inaccurate attendance and behavior data being reported. (Risk Rating: Moderate)

Issue 5 – Behavior notification letters are not consistently agreeing with the behavior resolution matrix and/or behavior guidance. These letters are not consistently maintained in the student information system to document that due process was followed. (Risk Rating: Moderate)

Issue 6 – An all-inclusive report identifying all behavior incident reports and the resolution of those incidents does not exist. This makes it difficult to evaluate if deleted entries were appropriate. (Risk Rating: Moderate)

WHAT WE RECOMMENDED MANAGEMENT DO

Issue 1 – The missing Administrative Guidance should be created as required by Board Policy.

Issue 2 – Management should create a monitoring process to ensure the behavior incident reports and behavior resolutions are completed according to the district established behavior guidance.

Issue 3 - Management should systematically review Pre-kindergarten through 3rd grade out of school suspensions to determine if the out of school suspension was for an allowable reason as noted in HB318.

Issue 4 – Management should establish a monitoring process to ensure agreement between the behavior resolution and related attendance entry.

Issue 5 – Management should establish a monitoring process to ensure behavior notification letters are maintained and agree with the behavior resolution matrix and behavior guidance.

Issue 6 – Management should develop a process to periodically review behavior incident report deletions for reasonableness.