



MARYLAND OFFICE OF THE  
INSPECTOR GENERAL FOR EDUCATION

Richard P. Henry  
*Inspector General*

Douglas H. Roloff, III  
*Deputy Inspector General*

July 8, 2022

To: The Honorable Clarence C. Crawford  
President  
Maryland State Board of Education  
200 W. Baltimore Street  
Baltimore, Maryland 21201

RE: Baltimore City Public Schools Response to Investigative Report Summary 20-0003-I

The Maryland Office of the Inspector General for Education (OIGE) has had an opportunity to review the Baltimore City Public Schools (BCPS) response (Attachment 1) to OIGE Investigative Report Summary 20-0003-I. The response indicates a commitment by BCPS to enhance processes and procedures that will improve the overall integrity of grades provided for students.

However, there are statements made within BCPS's response that require clarification based on evidence found during our investigation.

- **BCPS Statement:** City Schools launched a comprehensive overhaul of our grading policy and practices, beginning in 2017. The overhaul included significant revisions to strengthen Board Policy IKA (Grading and Reporting). The Baltimore City Board of School Commissioners adopted these changes in May 2019. These policy revisions, as well as updates to our administrative regulations, enhance safeguards against inappropriate grading practices, while also clarifying the circumstances when grade changes are necessary and entirely legitimate.
- **OIGE Clarification:** The OIGE acknowledges BCPS instituted a new policy in 2019, which aligned with the subsequent 2019 Code of Maryland Regulation (COMAR) update regarding grade change documentation requirements. However, our analysis of grade change data provided by BCPS does not support a conclusion that the risk of inappropriate grade changes was significantly decreased immediately following the policy revisions. We have provided an analysis of grade changes from May 14, 2019 (The date of updated BCPS IKA-RA Policy) to March 13, 2020 (The last day of in-person schooling prior to the COVID-19 closure) compared to the previous year.

<b>Time Period</b>	<b>Fail to Pass Grade Changes</b>	<b>Failing Grades Changed to a 60.0</b>	<b>58/59 to 60.0 Changes</b>
May 14, 2019 to March 13, 2020 (Following implementation of new policy.)	2,931	807	306
May 14, 2018 to March 13, 2019 (Previously comparable period and prior to policy implementation.)	3,281	1,149	385

Furthermore, OIGE found that documentation at reviewed schools was insufficient to determine the legitimacy of selected grade changes, both before and after the implementation of the new May 2019 policy.

- BCPS Statement:** City Schools welcomes the opportunity to contract with an external entity to ensure we maintain our path of continuous improvement. City Schools will focus this additional layer of review on grading practices during the 2022-2023 school year. That is the first school year after the main thrust of the COVID pandemic, offering current data in a hopefully near-normal school environment.
- OIGE Clarification:** OIGE acknowledges that the COVID-19 pandemic, which resulted in BCPS waiving all grades to that of passing from March 2020 through June 2021, may have delayed a more noticeable improvement of BCPS’s grade change practices and procedures. The OIGE and BCPS appear to agree that an extensive external review of more recent grade changes would best indicate the long-term effectiveness of the new policy instituted in May 2019.

However, the OIGE believes that any such external entity review should include the recently completed 2021-2022 school year. This school year took place during an entirely “in-person” educational environment and without impediment to compliance with BCPS’ grade changing policy. The OIGE further believes if the SBOE allows the BCPS the option to establish its own reviewable school year parameters, this would not provide a true and accurate representation of those grades changed and policy adherence for previous school years.

In closing, the OIGE remains steadfast in our resolve that pursuant to Maryland Code, Education Article §5-110, an emergency procurement for an independent performance audit of the Baltimore City Public Schools (BCPS) be approved to include school years 2016 through 2022.

Respectfully,



Richard P. Henry  
Inspector General

cc: Hon. Mohammed Choudhury, State Superintendent of Schools  
Ms. Johnette Richardson, Chair – Baltimore City Board of School Commissioners  
Dr. Sonja Brookins Santelises, Ed.D. – Chief Executive Officer  
Mr. Joshua I. Civin, Esq., General Counsel - Baltimore City Public Schools  
Mr. Elliott L. Schoen, Esq., Principal Counsel - Maryland State Department of Education  
Ms. Isabel Mercedes Cumming, Esq., Inspector General, Baltimore City  
All Members – Baltimore City Board of School Commissioners  
All Members – Maryland State Board of Education

Attachment: Baltimore City Public Schools Response Letter, dated June 29, 2022

# BALTIMORE CITY PUBLIC SCHOOLS

**Brandon M. Scott**  
Mayor, City of Baltimore

**Johnette Richardson**  
Chair, Baltimore City Board  
of School Commissioners

**Dr. Sonja Brookins Santelises**  
Chief Executive Officer

## **Response to the Maryland Office of Inspector General for Education's Investigative Report Regarding Grading Practices**

**June 29, 2022**

At the request of the Maryland Office of the Inspector General for Education (“OIGE”), Baltimore City Public Schools (“City Schools”) is providing this official response to the report that the OIGE issued on June 7, 2022, regarding its investigation of grading practices during the 2016-17 through 2020-21 school years ([Case 20-0003-I](#)).

From the outset of this investigation, City Schools has worked collaboratively with the OIGE, sharing gigabytes worth of data, thousands of pages of documents, and hours of interviews. In that spirit of collaboration, City Schools requested to review transcripts of interviews in which our leaders voluntarily participated, as well as documents and worksheets referenced by the OIGE in those interviews. We are disappointed that the OIGE did not agree to our requests, as the opportunity to review this material could have assisted in providing clarification and context to address several of our concerns with the report that are identified below.

As Dr. Sonja B. Santelises, Chief Executive Officer of City Schools, shared in her interview with OIGE staff, we have been unapologetic in galvanizing all our staff to promote academic excellence in every one of our schools. This commitment is directly contrary to any pressure to manipulate grades. If grades do not accurately reflect what students have achieved, teachers cannot provide the instruction and support that students need to succeed.

For these reasons, City Schools launched a comprehensive overhaul of our grading policy and practices, beginning in 2017. The overhaul included significant revisions to strengthen Board Policy IKA (Grading and Reporting). The Baltimore City Board of School Commissioners adopted these changes in May 2019. These policy revisions, as well as updates to our administrative regulations, enhance safeguards against inappropriate grading practices, while also clarifying the circumstances when grade changes are necessary and entirely legitimate. For example, a student may have done make-up work that should be included; an assignment or test may have been left out by accident; a child on long-term medical absence may be doing work through an alternative program; or a mathematical error might need to be corrected.

Based on City Schools’ policy revisions, principals received detailed guidance; revised and updated training was developed for grade reporters; and central office staff designed protocols for reviewing requests for grade changes to ensure consistency with Board policy. For instance, the grade change process now utilizes a technology platform, which permits better tracking and monitoring, as well as a historical grade auditing process; and City Schools is implementing checks and balances so that no single school staff person is solely responsible for any aspect of the grading

entry or review process. Funds also have been allocated for additional central office positions to support, review, and audit school grading practices.

City Schools appreciates the OIGE’s acknowledgement of these improvements over time. In addition, the last sentence of the report clearly states that the OIGE “**identified issues of concern that would not constitute a criminal violation of State law**” (emphasis added). Moreover, the specific incidents described in the OIGE’s report do not illustrate systemwide pressure to change grades. These incidents largely occurred before the policy changes adopted by the Baltimore City Board of School Commissioners in 2019, as well as revisions by the Maryland State Department of Education (“MSDE”) to its grading regulations in the same timeframe. As the OIGE noted and City Schools agrees, there is still more work to be done to fully and consistently implement these policy changes. City Schools is committed to doing this work.

The OIGE’s review primarily focused on approximately 12,500 grade changes from failing to passing at the high school level from 2016-2017 through 2019-2020. It is important to note that these changes accounted for far less than one percent of the approximately 2,400,000 grades earned by high school students during the four-year period that the OIGE reviewed.<sup>1</sup>

While any improper grading practices deserve scrutiny, there are many valid reasons that grades may be changed after a teacher first records them, as described above. The OIGE acknowledged this distinction, but it did not delve into or describe the specific circumstances that gave rise to most of these grade changes. And the evidence that the OIGE did provide is insufficient to rule out that these grade changes were made for entirely legitimate purposes. The OIGE spotlighted the smaller subset of grade changes from a failing grade of 58 or 59 to a passing grade of 60. Yet, as John Davis, Chief of Schools, noted in his interview with the OIGE, students often are motivated to make up work and demonstrate mastery of academic material to earn the last one or two points for a passing grade.

In its report, the OIGE also made allegations about a “culture of fear” and a “veil of secrecy” in City Schools. The report does not support these allegations. City Schools’ Office of Legal Counsel offered to contact employees to set up interviews, make clear that we were fully cooperating with the investigation, and allay any concerns about participating. But the OIGE instead reached out directly to employees, most of whom had never been contacted by a state investigating agency, thereby creating unnecessary anxiety and confusion.

In addition, City Schools encourages teachers and principals to elevate grading questions or concerns for constructive dialogue and guidance. And before the OIGE launched its investigation, City Schools proactively analyzed grading data to identify potential concerns and launched a series of internal investigations. Although the OIGE reviewed records of these investigations, its report did not mention them or the actions that City Schools took to respond to substantiated misconduct.

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<sup>1</sup> As a conservative estimate, in each of the four years reviewed by the OIGE, City Schools enrolled approximately 20,000 students in grades 9 through 12. High school students typically take at least five courses per semester and would have received three grades in each course (the final grade and two quarter grades). Thus, high school students received approximately 600,000 grades over the multiple courses that they took each year—or an estimated 2,400,000 grades over the entire four-year period.

Where appropriate, City Schools took personnel actions, worked with students and their families to develop individualized graduation plans, and addressed lessons learned. For example, City Schools' recent investigation and follow up at Augusta Fells Savage Institute of Visual Arts are summarized in a report available on our website at this [link](#).

City Schools has prioritized these efforts despite the state's long-standing legacy of systemic underfunding, resulting in limited access to resources that are available in other school systems. As context, it would have been helpful for the OIGE's report to benchmark grading practices, as well as central and school-based staffing, systems, and other resources that support grading, elsewhere in Maryland and nationwide.

In terms of next steps, the OIGE did not make specific recommendations other than further review through an independent performance audit. **City Schools welcomes the opportunity to contract with an external entity** to ensure we maintain our path of continuous improvement. City Schools will focus this additional layer of review on grading practices during the 2022-2023 school year. That is the first school year after the main thrust of the COVID pandemic, offering current data in a hopefully near-normal school environment.

In addition, City Schools will provide additional guidance and training, as well as more robust data monitoring centrally and in schools. City Schools greatly appreciates the support offered by MSDE to assist in these further improvement efforts. If other government entities are interested, City Schools is open to sharing information and insight with them, pursuant to their statutory authority, to ensure a clear understanding of student grading.

In sum, City Schools takes the integrity of grades extremely seriously. We acknowledge that there is room for improvement, and we plan to continue to build on our progress, so that students, families, teachers, and the entire community can be confident that students' report cards reflect the grades they have earned.