

# BALTIMORE CITY PUBLIC SCHOOLS

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

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

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

April 18, 2022

Richard Henry  
Inspector General for Education  
Maryland Office of the Inspector General for Education  
100 Community Place  
Crownsville, Maryland 21032

**Re: Response to OIGE Investigative Audit 21-0005-A**

Dear Mr. Henry:

The purpose of this letter and the accompanying attachment is to provide additional context in response to the investigative audit conducted by the Maryland Office of the Inspector General for Education (“OIGE”) regarding state aid enrollment counts for the 2016-17 through 2020-21 school years. We understand that the OIGE conducted this investigative audit of Baltimore City Public Schools (“City Schools”) in conjunction with similar reviews of state aid enrollment counts for three other school systems and the Maryland State Department of Education (“MSDE”).

We appreciate the OIGE’s thorough review, its collaborative approach, and its recognition that, overall, City Schools has “instituted effective centralized processes” in its due diligence tracking of student enrollment for funding eligibility purposes. The OIGE further acknowledged that City Schools’ “rigorous” protocols “resulted in decreased instances of subsequently reported ineligibilities during [OIGE’s five-year] review period,” except for the 2020-2021 school year when the COVID-19 pandemic presented challenges.

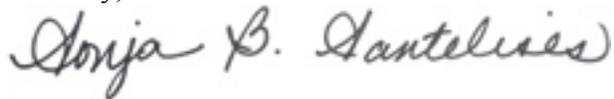
City Schools has prioritized these efforts despite the state’s long-standing legacy of systemic underfunding and the limited access at the school level to the intensive resources that are required to support the enrollment reporting process. Despite these funding challenges, City Schools “compares favorably to other LEAs reviewed” by the OIGE.

Concerning the remaining discrepancies flagged in the OIGE’s report, the OIGE acknowledged that they were “a result of isolated situations.” Overall, they represent just 0.3% of City Schools’ total students eligible for state funding over the OIGE’s five-year review period. The discrepancies were primarily concentrated in the earlier years of the review period, except for some entirely understandable challenges presented by a small number of schools in tracking students during the COVID-19 pandemic.

The issues identified by the OIGE were previously reported in enrollment data that City Schools regularly shares with MSDE. Moreover, the point-in-time funding model utilized by MSDE acknowledges significant fluctuations in enrollment counts. Especially in an urban school system like City Schools, with a highly mobile population, more students typically enter the school system after the effective date of the state’s enrollment count than those who exit. If funding were fully reconciled for *both* entries and exits of students during the school year, City Schools would likely be eligible for additional funding.

With the benefit of the OIGE's review, City Schools looks forward to working with MSDE to continue to enhance our monitoring of student enrollment. City Schools is committed to implementing the enhancements recommended by the OIGE in ways that do not undermine our equally essential efforts to re-engage students who struggle to attend school consistently. The state's educational funding model does not fully compensate City Schools for these re-engagement efforts. However, our priority is to work with students and their families to provide every opportunity to complete school, pursue a career, and contribute productively to our civic life. This is good for Baltimore City and our entire state.

Sincerely,

A handwritten signature in cursive script that reads "Sonja B. Santelises".

Sonja B. Santelises  
Chief Executive Officer

CC: Clarence C. Crawford, President, Maryland State Board of Education  
Mohammed Choudhury, Maryland State Superintendent  
Baltimore City Board of School Commissioners

Enclosure



MARYLAND OFFICE OF THE  
INSPECTOR GENERAL FOR EDUCATION

Richard P. Henry  
*Inspector General*

Douglas H. Roloff, III  
*Deputy Inspector General*

***Investigative Audit Recommendation Response Form***

Local Education Agency (LEA): Baltimore City Public Schools

Investigative Audit Number: 21-0005-A

Investigative Audit Title: Baltimore City Public Schools' State Aid Enrollment Counts

**Recommendation 1:** Baltimore City Public Schools (BCPSS) should ensure that all subsequently recorded no-shows are identified, properly coded to MSDE, and addressed at the school level to improve recordkeeping. BCPSS should consider proactive steps to identify and assist schools at risk of incorrectly recording attendance for no-show students.

**LEA Responses:**

<b>Opinion</b> (Concur/Non-Concur)	<b>Correction Action Plan</b> (Provide Narrative Response)	<b>Current Status of Corrective Action</b> (Implemented/Partially Implemented/Not Yet Implemented)	<b>Estimated Date of Full Implementation of Corrective Action</b>
Concur with the context provided in the attachment.	See attachment.	Partially implemented.	End of the 2022-23 school year.

\*If applicable, please include attachments that may provide better context regarding planned corrective actions.

**Recommendation 2:** BCPSS should add time guidelines into their *Withdrawal Directions and Due Diligence Requirements* documents to ensure that withdrawals are entered timely for inclusion in the September Attendance Collection.

**LEA Responses:**

<b>Opinion</b> (Concur/Non-Concur)	<b>Correction Action Plan</b> (Provide Narrative Response*)	<b>Current Status of Corrective Action</b> (Implemented/Partially Implemented/Not Yet Implemented)	<b>Estimated Date of Full Implementation of Corrective Action</b>
Concur with the context provided in the attachment.	See attachment.	Partially implemented.	End of the 2022-23 school year.

\*If applicable, please include attachments that may provide better context regarding planned corrective actions.

**Recommendation 3:** BCPSS should amend coding in Infinite Campus to allow for withdrawals to be properly dated in all situations in order for students to be properly coded for state aid.

**LEA Responses:**

<b>Opinion</b> (Concur/Non-Concur)	<b>Correction Action Plan</b> (Provide Narrative Response*)	<b>Current Status of Corrective Action</b> (Implemented/Partially Implemented/Not Yet Implemented)	<b>Estimated Date of Full Implementation of Corrective Action</b>
Concur with the context provided in the attachment.	See attachment.	Partially implemented.	End of the 2022-23 school year.

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## **Baltimore City Public Schools** **Response to OIGE Investigative Audit 21-0005-A**

### **Background Context**

The Maryland Office of the Inspector General for Education (“OIGE”) conducted its investigative audit to determine whether students deemed eligible for state funding during the 2016-17 through 2020-21 school years ultimately met all attendance and enrollment requirements. During this five-year period, OIGE found 928 total instances where students were initially deemed eligible for funding in the state’s enrollment count. Baltimore City Public Schools (“City Schools”) later provided updated information to the Maryland State Department of Education (“MSDE”) documenting that its subsequent review determined that those students did not meet the criteria for funding eligibility due to their lack of attendance or withdrawal from the school system.

These 928 findings represent just 0.3% of City Schools’ total students eligible for state funding over the OIGE’s five-year review period. Moreover, the total yearly numbers and percentages of ineligible students have declined due to significant process improvements recognized by the OIGE and described further below, with the exception of the 2020-2021 school year, where the challenges of the COVID-19 pandemic also affected enrollment counts.

<b>School Year</b>	<b>Total Enrollment</b>	<b>Total Students Eligible for State Aid</b>	<b>OIGE Finding 1 Ineligible Students</b>	<b>OIGE Finding 2 Ineligible Students</b>	<b>Total Ineligible Students</b>	<b>Ineligible as Percentage of Funding Eligible</b>
<b>2016-17</b>	82,354.00	76,443.75	219	38	257	0.3%
<b>2017-18</b>	80,592.00	74,673.00	126	0	126	0.2%
<b>2018-19</b>	79,297.00	73,383.25	146	12	158	0.2%
<b>2019-20</b>	79,187.00	73,329.50	85	1	86	0.1%
<b>2020-21</b>	77,856.00	72,862.25	299	2	301	0.4%
<b>Total</b>	399,286.00	370,691.75	875	53	928	0.3%

In its investigative audit of City Schools and the corresponding reviews of MSDE and other local school systems, the OIGE identified shortcomings of the point-in-time enrollment funding model that has been utilized throughout the state for many years. Pursuant to this funding model, state funding is based on enrollment as of September 30 each year.

It is well recognized that the point-in-time funding model utilized by MSDE effectively acknowledges significant fluctuations in student enrollment over the school year. Each year, for example, City Schools receives funding for some students who, ultimately, left the school system, while we also are not funded for students that we did educate because they enrolled after September 30. On average, approximately 2,500 funding eligible students exit after September 30, the “as of” date for September Attendance,

through March 15, the “as of” date for Early Attendance. In the 2016-2017 school year, there were almost 3,000 students who exited during this period, and that number has declined each year to 1,680 in the 2020-2021 school year.

Each year, City Schools also gained students after September 30. The table below includes counts of students enrolling after September 30 in each school year covered by the OIGE’s audit. Students with Disabilities (“SWD”) and English Learner (“EL”) students were included as City Schools would have been eligible for additional funding for these populations if they were enrolled prior to September 30. In sum, there are more students entering the school system after the effective date of the September 30 enrollment count than those who exit. If funding were fully reconciled for *both* entries and exits of students after September 30, City Schools likely would be eligible for additional funding.

<b>Entries after September 30</b>					
<b>School Year</b>	<b>Count of Students Entering after September 30</b>	<b>SWD Count</b>	<b>SWD Percentage</b>	<b>EL Count</b>	<b>EL Percentage</b>
<b>2016-2017</b>	3630	498	13.7%	852	23.5%
<b>2017-2018</b>	3373	525	15.6%	604	17.9%
<b>2018-2019</b>	3944	581	14.7%	1176	29.8%
<b>2019-2020</b>	2894	465	16.1%	620	21.4%
<b>2020-2021</b>	2171	297	13.7%	574	26.4%

City Schools has consistently completed all required MSDE attendance submissions on time and with the most accurate data available in our student information system, Infinite Campus. The OIGE recognized that City Schools compares favorably to other school systems based on our practice of correctly reporting backdated withdrawals to MSDE and following up with schools with high numbers of continuous record errors, as discussed further below. MSDE has focused on continuous records errors, and consequently City Schools has also had this focus. In its report, OIGE used a broader definition than that of MSDE to identify students that subsequently became ineligible for funding. In addition to continuous record errors, OIGE includes (1) students with retroactive exit dates that are after the first day of school and before September 30; and (2) students who were still enrolled on the Early or End of Year Attendance submissions, but had zero days of attendance.

**City Schools’ Process Improvements**

As noted in the OIGE’s report, City Schools staff “undergo a rigorous process to attempt to identify all no-shows.” Moreover, the OIGE acknowledged that this process is more challenging for “schools with fluid student enrollments,” which is particularly the case in City Schools. OIGE noted that City Schools’ “centralized process for student withdrawals and state aid coding controls in Infinite Campus have been effective in lowering the number of discrepancies with withdrawal dates.” City Schools utilizes technical and human processes to report the best possible attendance and enrollment data to MSDE. Errors are largely isolated situations, as the OIGE acknowledged. Moreover, errors that are subsequently identified after the September Attendance collection are accurately reported to MSDE in the Early and/or End of Year collection.

Below are overviews of several of the process improvements and ongoing investments that City Schools has made in recent years, many of which are expressly acknowledged in the OIGE report:

- **Enrollment Verification.** Beginning in the 2016-2017 school year, City Schools’ Office of Achievement and Accountability (“OAA”) has led a thorough enrollment verification process

annually. The process requires school leaders to review a list of students enrolled as of September 30 and verify their funding eligibility status. This process provides an additional review of student attendance and enrollment to supplement the data captured in Infinite Campus.

- **Continuous Record Error Follow-up with Schools.** Prior to the COVID-19 pandemic, City Schools identified schools that had a minimum of 3-5 continuous record errors, and principals of these schools received an email (with their supervisor copied) explaining the issue and requiring a corrective action plan. In the 2021-2022 school year, given all the other challenges of the COVID-19 pandemic, City Schools prioritized schools with 20 or more continuous record errors, and OAA and the Schools Office convened follow-up meetings with each of those schools' leadership to go over our processes, identify any needed supports, and discuss corrective actions. As the OIGE noted, "[t]he feedback process had resulted in decreased instances of subsequently reported ineligibilities during the review period, until complications with the virtual learning environment of the 2020-21 school year resulted in the largest annual number of discrepancies."
- **Decline of Unsubmitted Attendance.** City Schools uses Infinite Campus to record student attendance. Student attendance defaults to present if attendance is not submitted by teachers or other school officials in order to not penalize students or trigger unnecessary follow ups if school staff fail to enter attendance on time. Because unsubmitted attendance may result in a student being marked present when an absence or other attendance code should have been used, City Schools has worked with schools to make significant reductions to unsubmitted attendance in recent years (from 3.4% in the 2015-16 school year to 0.5% in the 2021-22 school year to date). The Attendance team works directly with schools to support the weekly monitoring and improvement of unsubmitted attendance in schools, which has resulted in fewer continuous record errors in reported attendance.
- **Withdrawal Due Diligence Documentation in Infinite Campus.** Prior to Infinite Campus going live during the 2016-2017 school year, withdrawal requests and documentation were submitted via email. When Infinite Campus went live, withdrawal due diligence steps began to be recorded in Infinite Campus. Beginning in the 2018-2019 school year, it became mandatory to log withdrawal due diligence in Infinite Campus.
- **Supports to Schools around Re-Engagement.** City Schools has also continued to refine and enhance its re-engagement efforts. These efforts are part of City Schools' commitment to making every effort to educate all students including those who stop attending or otherwise disengage from their education for a variety of reasons. The Re-Engagement Center directly supports school-disconnected young people. Its staff directly work with students who are not attending through outreach by phone and home visits to students and families. Re-engaged students are then required to participate in an intake process with a Re-Engagement clinical school social worker to discuss and address barriers to attendance (e.g., homelessness/housing instability, pregnancy or access to childcare, employment, criminal justice involvement, etc.) and create a tailored support plan to mitigate those barriers. These efforts require a huge investment of resources that City Schools continues to expend in an effort to meet our obligation to educate our population, even though most of the students involved in the re-engagement process are not part of the funded enrollment count, and therefore, City Schools does not receive state funding as part of its state funding allotment to directly support such re-engagement efforts.
- **Supports to Schools around Attendance.** Within City Schools' central office, support for attendance monitoring and re-engagement of students with consecutive absences has increased over the last few years. In the 2016-2017 school year, the truancy process was changed to include additional outreach and communication with families to identify the causes of student absence and address them before referring a student to truancy court. In the 2019-2020 school year, the Attendance team was reorganized and expanded. Increased staffing allowed the Attendance team to focus more on direct outreach to families and schools. In the 2020-2021 school year, while students were attending virtually during the COVID-19 pandemic, a cross-departmental Attendance review group began meeting regularly to track attendance and support schools. This was part of City

Schools' larger focus on attendance during the COVID-19 pandemic and as part of our recovery efforts. This cross-departmental effort built upon an already robust cross-departmental collaboration each fall since the 2016-2017 school year, organized around the September 30 deadline for attendance and enrollment reporting.

### **Additional Context for OIGE Findings**

In addition to this background information, City Schools wishes to share additional context that is helpful to understand and interpret OIGE's specific findings fully:

**OIGE Finding 1: Subsequent Reporting Indicates Ineligible Students Were Funded.** The subsequent reporting provided by City Schools to MSDE from 2016-17 through 2020-21 indicates 875 students classified as "funding eligible" during the September Attendance Collection had not met COMAR attendance or enrollment requirements for the foundational program based on subsequent reporting to MSDE. City Schools previously identified all these students in its reporting to MSDE. This process has focused on reconciling continuous record errors, which are defined as students reported on September Attendance but retroactively withdrawn before the first day of school. For the audit period, 405 students were identified as continuous record errors and were noted during the Early and End of Year Attendance processes. Both MSDE and City Schools were aware that these students' enrollments were adjusted in Infinite Campus after the September Attendance collection was finalized and that they no longer met funding requirements.

In its report, OIGE used a broader definition than MSDE has used to identify students who subsequently became ineligible for funding. The OIGE's approach included: (1) students with retroactive exit dates that are after the first day of school and before September 30; and (2) students who were still enrolled on the Early or End of Year Attendance submissions but had zero days of attendance. Of the 470 students who fell into these two categories, 277 students (31.7%) fall into the first category, and 193 students (22.1%) fall into the second.

Furthermore, the students subsequently identified as ineligible were not equally distributed across school years or schools. Only 10 schools had 25 or more of these errors over the five-year period, representing 57% of the total. Continuous record errors were also not evenly distributed across schools; only three schools had 25 or more errors over this period.

OIGE also identified that, on average, 105 days elapsed between the first consecutive unlawful absence and the first time a contact attempt was logged in the Withdrawal Due Diligence module of IC. This average is based only on 33 students at 14 schools selected by OIGE and do not represent the entire district. Furthermore, 22 of these 33 students were at just six schools.

As the identified issues were concentrated at a small number of schools, City Schools will incorporate targeted support going forward.

**OIGE Finding 2: City Schools' Attendance Records Indicate Further Ineligible Students Have Been Funded.** Of the additional 53 students identified in Finding 2, 47 of the errors were related to enrollment at two schools. Moreover, all except for three of the findings were related to enrollment issues during the 2016-2017 and 2018-2019 school years. These findings further attest to significant improvements in City Schools' due diligence processes over the five-year period that the OIGE reviewed.

Six students had misdated withdrawals that impacted state aid eligibility. OIGE connected this finding to students with IEPs being withdrawn only after the final IEP meeting is logged. However, only two of these six students had active IEPs at the time they exited.

## **City Schools' Response to the OIGE's Three Specific Recommendations**

*Recommendation 1:* OIGE's first recommendation is that City Schools should ensure that all subsequently recorded no-shows are identified, properly coded to MSDE, and addressed at the school level to improve recordkeeping. In addition, OIGE recommended that City Schools should consider proactive steps to identify and assist schools at risk of incorrectly recording attendance for no-show students.

- As OIGE's report acknowledges, City Schools' prior efforts in this area have yielded continuous reductions in the number and percentage of funding ineligible students. City Schools will continue these efforts going forward.
- Going forward for the 2021-2022 school year and beyond, City Schools plans to build on the school feedback processes described above and: (a) request corrective action plans for all schools with 3 or more continuous record errors; and (b) meet with school leadership for those schools with the highest numbers of errors to go over our processes, identify any needed supports, and discuss corrective actions.
- City Schools will also provide schools with greater support at the start of the year to properly capture attendance and enrollment and follow up with students who are not attending, with particular attention focused on schools that need targeted assistance due to high levels of student mobility. To this end, City Schools is investing funds in a pilot program that will provide schools with additional staff positions focused on enrollment and registration functions in its FY2023 operating budget.
- Through the strategies detailed above, district staff will monitor the enrollment verification process and support school staff as they promptly fulfill their roles in the processing and exit of students.

*Recommendation 2:* OIGE's second recommendation is that City Schools add time guidelines to its Withdrawal Directions and Due Diligence Requirements documents to enter withdrawals for inclusion in the September Attendance Collection promptly.

- City Schools intends to update its Withdrawal Due Diligence guidance to encourage timely completion and logging of the process in Infinite Campus while continuing to be informed by the district's commitment to re-engaging students that have become disconnected from school.

*Recommendation 3:* OIGE's third recommendation is that City Schools should amend coding in Infinite Campus to allow for withdrawals to be properly dated in all situations for students to be appropriately coded for state aid.

- This recommendation refers to a very small number of students; nonetheless, City Schools will refine its guidance. The Office of Achievement and Accountability will work collaboratively with the Office of Special Education and the Office of Legal Counsel to refine guidance on exit dates for students who are not attending school while awaiting an IEP meeting. This step will ensure alignment with enrollment requirements while fulfilling federal and state legal requirements for serving students with disabilities.
- City Schools notes that Infinite Campus does allow for withdrawals to be properly dated. Targeted support will be provided to schools with multiple incidents of improperly dated withdrawals.

Finally, City Schools acknowledges that the OIGE report indicated that the noted discrepancies in student enrollment could represent \$9.8 million in state and local funding. City Schools will continue to cooperate with MSDE to address the funding-based issues related to the report's findings, considering the additional context provided in this response.

Once again, City Schools appreciates the thoroughness of the OIGE's review. This investigative audit will lead to continued process improvements as part of City Schools' long-standing efforts to promote accuracy and accountability in our enrollment and funded enrollment counts.