



MARYLAND OFFICE OF THE  
INSPECTOR GENERAL FOR EDUCATION

Richard P. Henry  
*Inspector General*

Douglas H. Roloff, III  
*Deputy Inspector General*

January 25, 2023

**MEMORADUM**

To: Dr. Monifa McKnight  
Superintendent  
Montgomery County Public Schools  
850 Hungerford Drive  
Rockville, Maryland 20850

RE: Investigative Audit of Montgomery County Public Schools (MCPS) State Aid Enrollment Counts (22-0003-A)

The Maryland Office of the Inspector General for Education (OIGE) has completed an investigative audit of Montgomery County Public Schools' (MCPS) state aid enrollment counts for the school years 2016-17 through 2021-22. The investigative audit was conducted as a follow-up to a previous statewide investigative audit of enrollment counts (22-0001-A).

The investigative audit results and recommendations are included in the attached final report.

The OIGE provided a draft report to MCPS on December 19, 2022. The Superintendent provided responses to the report's recommendations on January 25, 2023. The responses are included as Appendix A to this report and indicate MCPS's concurrence with all four recommendations.

This report details the findings and recommendations of the OIGE, Office of Investigative Audit division. Please contact Mr. Dan Reagan, CPA, Supervisory Inspector General at (443) 721-4889 or by email at [dan.reagan@maryland.gov](mailto:dan.reagan@maryland.gov) if you have any additional questions or concerns.

Respectfully,

Richard P. Henry  
Inspector General

Enclosures

cc: Mr. Clarence C. Crawford  
President, Maryland State Board of Education

Mr. Mohammed Choudury  
Maryland Superintendent of Schools

Ms. Brenda Wolff  
President, Board of Education, Montgomery County Public Schools

Ms. Megan Davey Limarzi, Esq.  
Inspector General for Montgomery County



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**Office of the  
Inspector General  
for Education**  
State of Maryland

**Richard P. Henry**  
Inspector General

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**Investigative Audit 22-0003-A**

**Montgomery County Public  
Schools**

**State Aid Enrollment Counts**

**Final Report**

January 25, 2023

# ***Executive Summary***

## ***Investigative Audit of Montgomery County Public Schools' State Aid Enrollment Counts***

### ***Objectives:***

To determine whether Montgomery County Public Schools (MCPS) students deemed eligible for state aid funding met Code of Maryland Regulations requirements for attendance and enrollment.

### ***Scope:***

School Years 2016-17 through 2021-22

### ***Recommendations and Response:***

This report contains four recommendations to assist MCPS in improving their ability to accurately report enrollment counts to the Maryland State Department of Education (MSDE). Responses to the recommendations will be provided by MCPS.



### ***Results in Brief:***

OIGE discovered **604\*** instances of ineligible students being included on MCPS' enrollment counts for state aid, which resulted in over **\$4.4 million** in misallocated funds to MCPS.

The errors in eligibility determination were a result of attendance not always being properly recorded, and school staff not properly withdrawing chronically absent students in the short timeframe available to Local Educational Agencies.

Further, MCPS has not initiated effective county-wide initiatives to identify schools with attendance accuracy and withdrawal processing issues. As such, the number of annual discrepancies has increased during the investigative audit scope.

Despite the noted discrepancies representing only a small percentage of the overall enrollment counts for MCPS, a failure to correct identified shortcomings could result in further funding misallocations in the future.

\*403 of the 604 instances were previously identified in OIGE Investigative Audit 22-0001-A, *Maryland State Department of Education State Aid Enrollment Counts*, April 2022.

Maryland Code, Education Article §9.10, established the Office of the Inspector General for Education to serve as a central point for coordination of and responsibility for activities that promote educational accountability, integrity, and efficiency in government.

The Maryland Office of the Inspector General for Education is an independent entity within the government of the State of Maryland. The office is responsible for examining and investigating the management and affairs of county education boards, local school systems, public schools, and nonpublic schools that receive state funding to determine if established policies and procedures comply with federal and state laws.

The OIGE operates a Hotline so anyone can easily report allegations of fraud, waste, abuse, or financial misconduct within the State. The OIGE receives numerous reports from concerned employees, vendors, and the public, most of which are either investigated by the OIGE or referred to local school system administrators for investigation and disposition. You may report educational fraud, waste, or abuse by calling *1-844-OIGETIP*, emailing *oige.tips@maryland.gov*, or our website at [www.oige.maryland.gov](http://www.oige.maryland.gov).

# **Investigative Audit of Montgomery County Public Schools' State Aid Enrollment Counts**

## **Table of Contents**

<b>Background</b>	<b>2</b>
<b>Objectives</b>	<b>4</b>
<b>Scope</b>	<b>4</b>
<b>Methodology</b>	<b>4</b>
<b>Audit Results and Recommendations</b>	
<b>Finding 1</b>	<b>5</b>
<b>Finding 2</b>	<b>7</b>
<b>Finding 3</b>	<b>9</b>
<b>Audit Team</b>	<b>10</b>
<b>MCPS Response</b>	<b>Appendix A</b>

# Investigative Audit of Montgomery County Public Schools’ State Aid Enrollment Counts

## Background

In April 2022, the Maryland Office of the Inspector General for Education (OIGE) published Investigative Audit 22-0001-A, *Maryland State Department of Education State Aid Enrollment Counts*. The report indicated that the Maryland State Department of Education (MSDE) had failed to correctly identify ineligible students included in Local Educational Agencies (LEA’s) state aid enrollment counts. The LEAs with the most noted discrepancies were Baltimore City Public Schools (BCPS), Prince George’s County Public Schools (PGCPS), and Montgomery County Public Schools (MCPS). OIGE had conducted parallel investigative audits of BCPS and PGCPS enrollment counts, and those reports were published in April and June 2022. Our investigative audit reports provided specific recommendations to improve processes at those LEAs.

## ***Attendance Requirements***

LEAs are responsible for maintaining attendance records in compliance with the Maryland Student Records Systems Manual, codified in the Code of Maryland Regulations (COMAR). A student is recorded as “present” if they attend an instructional program approved by the State, local school system, or school. If students are not participating in an approved instructional program, they are considered “absent,” and school systems must record an absence code. The absence code indicates whether the absence is lawful or unlawful.

MCPS Regulation JEA-RA, *Student Attendance*, outlines specific procedures for schools to follow and comply with the Maryland Student Records Systems Manual. The regulation states that the classroom teacher is responsible for daily recording student attendance and tardiness in the student information system. The student information system serves as a daily attendance log for each day and class.

MCPS utilized the OASIS student information system until July 2020, when they transitioned to Synergy. Student attendance defaults to present for both systems if a teacher does not actively mark attendance.

## ***Withdrawal Requirements***

The Maryland Student Records Systems Manual provides specific requirements for the dating of student withdrawals. For students who do not attend school at all (no-shows), the withdrawal should be dated July 1. For exits during the school year, the withdrawal date is the first school day after the last day of attendance. Further, it states, “after ten school days of consecutive unlawful absences, the student should be exited from the school with an Exit Status ‘W’ and Exit Code ‘50’.” Exit Code 50 is described as “Not Accessing Educational Services.”

The MCPS Student Record Keeper Manual provides specific instructions for MCPS personnel to enter and document student withdrawals. The Student Record Keeper

# Investigative Audit of Montgomery County Public Schools’ State Aid Enrollment Counts

Manual does not require a withdrawal after ten days of consecutive unexcused absences. However, it does outline several scenarios that impact state aid eligibility to guide school personnel. MCPS Form 565-4, *Student Permanent Withdrawal*, must be completed when students are withdrawn using a dropout code.

School staff handles the withdrawal process, including the registrar, professional school counselors, and Pupil Personnel Workers (PPWs).

## ***Foundational Program Funding Process***

MSDE is required to obtain records of all students enrolled in Maryland public schools. This information is used to determine State Aid eligible students and the amount of State Aid to be distributed to local school systems. State financial assistance to Maryland’s 24 public school systems is made through the Foundation Program and targeted student grants for Compensatory Education, Limited English Proficiency, Special Education, and Disabled Student Transportation.

The Foundation Program is the State’s major general education aid program for public schools and accounts for nearly half of state education aid. Prior to FY23, the Foundational Program’s total state and local costs were determined annually through a complex formula codified by the Bridge to Excellence in Public Schools legislation. Beginning in FY23 the formula is codified in the Blueprint for Maryland’s Future legislation. Both formulas incorporate local economic indicators and an annual student enrollment count<sup>1</sup>.

Each school year, MSDE collects student information as of September 30 from LEAs to determine the student enrollment count (September Data Collection). Data from each LEA student information system is submitted to MSDE through a Web Data Collection System.

LEAs are required to report a State Aid Eligibility Code for each student. Code 01 is titled “Eligible for State Aid,” and the remaining codes are classifications of ineligibility. Eligibility for State Aid is determined by requirements listed in COMAR 13A.02.06.03. Regarding attendance and enrollment, a student must be present at least one day in September and have not been determined to have withdrawn on or before September 30 to be classified under Code 01. MSDE works with LEAs to reconcile, correct, and update the information submitted and verify the Eligibility Codes’ accuracy.

When the reconciliation process is completed, each LEA Superintendent takes accountability for the accuracy of the final enrollment count by signing a Verification of Enrollment Count.

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<sup>1</sup> A full explanation of funding formulas can be found at Appendix J of the Department of Legislative Services’ Fiscal and Policy Note for House Bill 1300.



# **Investigative Audit of Montgomery County Public Schools’ State Aid Enrollment Counts**

MSDE inputs all enrollment counts into funding formulas to determine the total local and state costs for all components of state aid for the following year. The cost determination is forwarded to the Department of Budget and Management to be included in state budget proposals presented to the General Assembly. Once finalized, MSDE disburses 12 equal monthly payments to LEAs beginning in July of the following year.

For MCPS, the Office of Accountability manages the September Data Collection process by collecting and providing up-to-date information from Synergy and reconciling discrepancies identified by MSDE.

## ***Subsequent Reporting from LEAs***

To increase accountability and ensure that continuous records are kept for each student throughout the year, MSDE also requires that LEAs submit student information on a chosen date in March and June each year. The subsequent collections are referred to as the “Early” and “End of Year” Attendance Collections. They include each student’s entrance and exit information and attendance totals from the beginning of the school year through the collection date.

For MCPS, the Office of Accountability manages the Early and End of Year Attendance Collections (subsequent reporting) in the same fashion they manage the September Data Collection.

## **Objectives**

The objective of the investigative audit was to determine whether MCPS students deemed eligible for state aid met the COMAR requirements for attendance and enrollment.

## **Scope**

The scope of the investigative audit was students reported by MCPS as eligible for state aid (Code 01) for the school years 2016-17 through 2021-22.

## **Methodology**

To accomplish the objective, OIGE conducted interviews with key personnel to determine how MCPS records and reports enrollment figures and how MSDE collects and processes those figures to determine funding amounts. OIGE conducted data analysis of all enrollment and attendance figures reported by MCPS to MSDE for the school years 2016-17 through 2021-22 for students deemed eligible for state aid funding.

In addition, OIGE selected a risk-based judgmental sample of 179 students from the following five high schools to determine whether MCPS records supported their eligibility for state aid:

# Investigative Audit of Montgomery County Public Schools’ State Aid Enrollment Counts

- Gaithersburg High School
- Watkins Mills High School
- John F. Kennedy High School
- Montgomery Blair High School
- Northwood High School

The students selected for review had low reported September attendance or had an early October withdrawal date. OIGE determined these students to be at a higher risk of being incorrectly coded as eligible for state aid.

In addition, OIGE conducted interviews with school personnel at the five selected high schools to evaluate the effectiveness of controls as they pertained to the attendance and withdrawal processes at the school level.

**Note:** As an external entity, OIGE did not have direct access to MCPS or MSDE data for this investigative audit. All findings are based on data provided by MCPS and MSDE personnel.

## Audit Results and Recommendations

### **Section I – Judgmental Sample**

The following issues were noted during the review of the judgmental sample of 179 students at five selected schools:

#### **Finding 1: Ineligible Students Included in Enrollment Counts**

Of the 179 students in OIGE’s judgmental sample, MCPS records indicated that **43** students (23%) did not meet the state aid eligibility requirements in COMAR.

- **12** students had no documented attendance on or before September 30. COMAR 13A.02.06.03 requires a student to be present at least one day in September to be included in the enrollment count for state aid funding.
- **31** students should have been withdrawn on or before September 30 based on their last documented day of attendance. COMAR 13A.02.06.03 states that students must have attendance on or after September 30 and cannot have been withdrawn on or before September 30 to be included in the enrollment count for state aid funding.

Regarding the students with no documented attendance, OIGE found that MCPS’ student attendance is not always recorded accurately. The process for withdrawing no-shows begins with school personnel running reports in the student information system during the first few weeks of school to identify students without any documented attendance. However, PPWs at several schools stated that students are often incorrectly marked present because the student information system defaults to present

# Investigative Audit of Montgomery County Public Schools’ State Aid Enrollment Counts

when a teacher does not actively record attendance. As a result, no-show students do not show up on any reporting identifying students for withdrawal. For example, a student at Watkins Mills High School had 30 days of school attendance in Synergy when the PPW determined through a conversation with a counselor in November that the student was in a General Education Diploma (GED) program and had not attended the school since the previous school year.

MCPS Office of Accountability stated that there was no coordinated central effort to improve attendance records accuracy during the reviewed investigative audit period. The Office of Accountability provided reminders to attendance secretaries to contact teachers having issues, but accountability for accurate attendance was mainly at the school level.

OIGE found several shortcomings in MCPS withdrawal procedures regarding students not being properly withdrawn. Examples include:

- MCPS Form 565-4 has a place to indicate the date of withdrawal to be entered into Synergy. However, the form does not guide the user in determining the correct withdrawal date. Multiple registrars stated that they do not review the last date of attendance in Synergy when processing withdrawals. One registrar said that she often uses October 1<sup>st</sup> as an estimated date. OIGE found that 63% of reviewed withdrawals were not dated the date after the last documented day of attendance, as required.
- MCPS personnel stated that they usually do not use MCPS Form 565-4 for withdrawals under Code 50 (Not Accessing Educational Services) because most of the form is focused on closing interviews with the student and the family, which do not occur for withdrawals under Code 50.
- Personnel at several schools stated that they were instructed never to withdraw a student under 18 until guidance changed in March 2020. For this reason, they are still often hesitant to do so.

Of the 31 students who were not correctly withdrawn before September 30, 9 were because of students being marked present during the Preliminary Scholastic Aptitude Test (PSAT) testing in mid-October. MCPS officials stated that these students were likely not in attendance, but that class attendance was defaulted to present even though no classes were held during PSAT testing. Their last day of actual attendance was likely September, but they were withdrawn in October or later due to inaccurate attendance records.

During the investigative audit period, each Maryland student represented an average of approximately \$7,392 in required state and local funding through the Foundational Program. The 43 ineligible students, therefore, represent approximately **\$318,000** of funds misallocated to MCPS through the Foundational Program. However, the systemic

# Investigative Audit of Montgomery County Public Schools’ State Aid Enrollment Counts

issues identified at the five selected schools indicate the risk of further discrepancies and misallocations beyond the small judgmental sample reviewed by OIGE.

**Recommendation 1:** MCPS should reassess the current practice of defaulting student attendance to present when a teacher does not actively take attendance. Special situations such as the PSAT should be considered.

If the current practice is to continue, the MCPS Office of Accountability should provide a centralized initiative to ensure the accuracy of attendance records. Reporting from Synergy should be used to proactively identify teachers and schools who routinely fail to take attendance actively.

**Recommendation 2:** MCPS should amend Form 565-4 to be applicable for all withdrawals, including those under Code 50. In addition, the form should provide instructions on how to date withdrawals in compliance with state and local requirements.

## **Section II – Comprehensive Data Review**

The following issues were noted during the comprehensive data review of all student information provided by MCPS to MSDE during the school years 2016-17 through 2021-22:

### **Finding 2: Inaccurate Initial Recordkeeping Resulted in State Aid Eligibility Discrepancies**

Updated records in OASIS and Synergy indicated that **561** ineligible students were included in state aid enrollment counts submitted to MSDE due to initially inaccurate recordkeeping. Of the 561 students, **422** did not have documented attendance on or before September 30, and **139** should have been timely withdrawn on or before September 30.

The number of discrepancies has increased over the past two school years. See Exhibit C.

#### **Exhibit C:**

School Year	Number of Ineligible Students
2016-2017	89*
2017-2018	42*
2018-2019	69*
2019-2020	68*
2020-2021	135*
2021-2022	158
<b>Total</b>	<b>561</b>

\*Previously reported by OIGE as part of Investigative Audit 22-0001-A.

# Investigative Audit of Montgomery County Public Schools’ State Aid Enrollment Counts

As discussed in Finding 1, MCPS is failing to timely identify no-show students due to the lack of accurate attendance taking and the practice of defaulting non-recorded attendance to present.

The MCPS Student Record Keeper Manual explicitly addresses the need to timely withdraw students before data is submitted to MSDE for the September Data Collection. It states that students who were absent on September 30<sup>th</sup> and the first two weeks of October, with whereabouts unknown, should be withdrawn by mid-October. Schools are also provided an annual reminder of this process. However, school personnel at all five schools stated that there is no concerted effort to identify and withdraw students in early October.

The OIGE had found that prior to the 2021-2022 enrollment count, MSDE and MCPS had yet to identify or review the discrepancies in subsequent reporting to allow for any targeted remediation to schools struggling to timely identify no-shows and September withdrawals.

Beginning in 2021-2022, MSDE initiated a reconciliation process to identify subsequently reported ineligibilities and provided notice to all LEAs. The MCPS Office of Accountability (MCPS-OA) indicated that they would begin a concerted effort to improve the accuracy of future data submissions to MSDE beginning in the 2022-23 school year. In August 2022, MCPS-OA provided schools with specific instructions on how to improve September attendance recordkeeping. MCPS-OA indicated their intent to notify principals and schools who fail to promptly identify and withdraw students who do not attend school in September.

During the investigative audit period, each Maryland student represented an average of approximately \$7,392 in required state and local funding through the Foundational Program. The 561 ineligible students represent approximately **\$4,147,000** of funds misallocated to MCPS through the Foundational Program.

As a result of OIGE Investigative Audit 22-0001-A, MSDE is considering grant adjustments as part of its reconciliation process. MCPS may lose initially allocated foundational program funds for future identified inaccuracies.

**Recommendation 3:** MCPS should provide more effective training of school staff to ensure that students not attending school in early October are timely withdrawn before data submission to MSDE.

**Recommendation 4:** MCPS should begin actively reviewing subsequent no-shows and September withdrawals to identify and remedy recordkeeping issues at schools.

# Investigative Audit of Montgomery County Public Schools’ State Aid Enrollment Counts

## **Finding 3: Programming Error in Previous Student Information System Resulted in Inaccurate Reporting to MSDE**

Attendance for **791** students was inaccurately reported to MSDE during subsequent reporting from 2016-17 through 2019-20. The previous student information system, OASIS, deleted attendance records of earlier tenures when students re-entered MCPS later in the year, resulting in a significant underreporting of student attendance to MSDE. The discrepancies potentially impacted many programmatic and funding decisions for state initiatives regarding attendance.

*NOTE: Due to the incorrect attendance data provided by MCPS, in addition to confirmation from MCPS officials in February 2022, OIGE incorrectly concluded that the 791 students did not meet COMAR eligibility for inclusion in the enrollment count for state aid in the report for Investigative Audit 22-0001-A. However, OIGE independently discovered the issue with the student information system during this engagement and notified the Maryland State Department of Education of the error.*

No similar instances were noted for the 2020-21 or 2021-22 school years, managed under MCPS’s new student information system, Synergy. Therefore, there is no recommendation provided.

**Investigative Audit of Montgomery County Public Schools'  
State Aid Enrollment Counts**

**Investigative Audit Team**

**Dan Reagan, CPA, CIA, CFE**

Supervisory Inspector General for Investigative Audits



# Appendix A

Maryland's Largest School District

## MONTGOMERY COUNTY PUBLIC SCHOOLS

*Expanding Opportunity and Unleashing Potential*

OFFICE OF THE SUPERINTENDENT OF SCHOOLS

January 25, 2023

Mr. Richard P. Henry  
Inspector General  
Maryland Office of the Inspector General for Education  
100 Community Place, 4<sup>th</sup> Floor  
Crownsville, Maryland 21032

Dear Mr. Henry:

Thank you for providing Montgomery County Public Schools (MCPS) staff the opportunity to review and comment on the findings and recommendations related to the investigative audit focused on state aid enrollment counts. MCPS staff members who participated in this review appreciate the collaborative process used throughout the audit process. Additionally, the district appreciates the time, attention, and hours provided by MCPS staff in responding to the myriad of data requests that support the audit preparation. Engagement in interviews and meetings to detail processes and procedures implemented in the district provided by MCPS staff during the investigative audit was valued and incorporated where appropriate. We agree with the four recommendations in the investigative audit report and offer the following comments upon final review.

MCPS is committed to ensuring accuracy in the reporting of enrollment counts and, as a result of what we have learned from this investigative audit, we are improving our record-keeping procedures and increasing clarity of communication to school staff to bring about positive changes for future reporting.

If you have questions regarding our responses or require additional clarification, please do not hesitate to contact Ms. Stephanie S. Sheron, chief of strategic initiatives, Office of the Deputy Superintendent, at 240-740-5652

Sincerely,



Monifa B. McKnight, Ed.D.  
Superintendent of Schools

MBM:PKM:SSS:alr

Copy to:  
Dr. Murphy  
Ms. Sheron





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: Montgomery County Public Schools  
 Investigative Audit Number: 22-0003-A  
 Investigative Audit Title: Montgomery County Public Schools State Aid Enrollment Counts

**Recommendation 1:** Montgomery County Public Schools (MCPS) should reassess the current practice of defaulting student attendance to present when a teacher does not actively take attendance. Special situations such as the PSAT should be considered.

If the current practice is to continue, the MCPS Office of Accountability should provide a centralized initiative to ensure the accuracy of attendance records. Reporting from Synergy should be used to proactively identify teachers and schools who routinely fail to take attendance actively.

**Local Education Agency (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	While the modification of the default attendance option to present is not viable at this time, MCPS will implement additional accountability processes at both the central office level and the school level to improve in this area. MCPS currently provides training and reports in the student information system – Synergy – that allows for ongoing monitoring of student attendance. Guidance is provided by the Office of Shared Accountability in alignment with MSDE expectations, it is evident from these findings that accountability for accurate attendance at the school level requires additional methods. Principals are responsible for the accurate attendance taking to support record keepers at each school site. The following improvements will be implemented:	Partially Implemented	August 1, 2023

<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>
	<ul style="list-style-type: none"> <li>• The Office of School Support and Well-Being (OSSWB), which provides direct oversight of principals and schools, will conduct checks of attendance accuracy using reports available in the student information system.</li> <li>• The Office of Shared Accountability (OSA) will examine historical patterns of attendance taking from 2021 through 2023 to identify schools in need of additional support with accuracy and fidelity in the attendance taking process. This list will be shared with OSSWB.</li> <li>• Flag in Synergy to identify teachers and schools</li> <li>• MCPS will provide clear guidance on attendance taking for PSAT and SAT School Day testing. School autonomy has led to inconsistency in practice and recognizes that communication in this area can be improved.</li> <li>• The OSA will continue to refine and update the requirements in the Student Record Keeper Manual and provide to all record keepers annually and identify revisions during trainings of staff.</li> <li>• The OSA will continue to provide memos to school staff detailing the procedures to follow regarding no show students. More detail on the training provided to school staff is addressed in recommendation 3.               <ul style="list-style-type: none"> <li>• <b>Beginning of the School Year Districtwide Attendance Taking Procedures and Identification of ‘No Show’ Students</b> – New procedure for attendance taking/verification during the first two weeks of school that may lead to identifying students who need to be ‘no showed’. A memo addressed to Principals and Administrative Teams.</li> <li>• <b>Maintaining Student Enrollment and Daily Attendance</b> – Process for recording attendance during the first month of school. Specific procedures for school record keepers to help identify possible ‘no show’ students who were enrolled but not scheduled/sectioned were also highlighted in our student information system. These reports are:                   <ul style="list-style-type: none"> <li>○ STU706 – elementary schools</li> <li>○ SCD503 – secondary schools</li> </ul> </li> </ul> </li> </ul>		

**Maryland Office of the Inspector General for Education**

<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>
	<ul style="list-style-type: none"> <li>• <b>Beginning of the Year In-Person Record Keeper Meetings</b> – The above processes were reiterated with elementary attendance secretaries, middle school counseling and attendance secretaries, and high school registrars and attendance secretaries.</li> </ul>		

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

**Recommendation 2:** MCPS should amend Form 565-4 to be applicable for all withdrawals, including withdrawals under Code 50. In addition, the form should provide instructions on how to date withdrawals in compliance with state and local requirements.

**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	It was found during the investigative audit that schools were not using MCPS Form 565-4 for Code 50, whereabouts unknown withdrawals because of other areas needed for completion on the form. To remedy this issue, the OSA will ensure the language in the Student Record Keeper Manual that explicitly details form 565-4 to be used with all Code 50 withdrawals. Additionally, this clarity will be embedded in training for essential staff.	Partially Implemented	August 1, 2023

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

**Recommendation 3:** MCPS should provide more effective training of school staff to ensure that students not attending school in early October are timely withdrawn prior to data submission to MSDE.

**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	<p>Although MCPS provides multiple trainings, many that are mandatory, to key staff responsible for student attendance procedures, it is recognized that there is room for improvement to ensure knowledge obtained during the trainings is retained and implemented with fidelity. Leveraging the work of Thomas Guskey, MCPS will gauge the impact of professional learning by examining four of the five levels espoused by Guskey:</p> <ul style="list-style-type: none"> <li>• Level 1: Participants’ Reactions</li> <li>• Level 2: Participants’ Learning</li> <li>• Level 3: Organizational Support and Change</li> <li>• Level 4: Participants’ Use of New Knowledge and Skills</li> </ul> <p>MCPS staff charged with developing and leading professional learning sessions will develop feedback surveys and self-assessment surveys that will be used to improve professional learning as it relates to attendance taking. At the conclusion of each training and/or meeting, participants will be asked to complete a survey to share their feedback and indicate their learning. The information obtained from these surveys will be used to improve future professional learning and identify areas where additional learning is needed.</p>	Partially Implemented	August 1, 2023

<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>
	<p>Additionally, registrars and record keepers will be required to attend and sign off on completing the trainings.</p> <p><b>Background</b>            It is important to note that during the audit of MCPS, there was no request for documentation related to trainings provided to school staff. All requested documentation was focused on policies and/or guidance manuals with supportive conversations held with school-based staff and central office staff who support attendance reporting to MSDE. The OSA, specifically the Central Records team provides training at the beginning of each school year and throughout the school year. These trainings underscore the importance and essential role of record keepers regarding September 30<sup>th</sup> attendance taking. Additionally, the Student and Data Systems team provides training materials that are used to support and train staff annually and throughout each year. Information on withdrawing and ‘no shows’ is integrated throughout each of the registrar and record keeper meetings.</p>		

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

**Maryland Office of the Inspector General for Education**

**Recommendation 4:** MCPS should begin actively reviewing subsequent “no shows” and September withdrawals to identify and remedy school recordkeeping issues.

**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	<p>As indicated in the response recommendation 1, the district will examine historical patterns of attendance taking from 2021 through 2023 to identify schools in need of additional support with accuracy and fidelity in the attendance taking process. This list will be shared with OSSWB who will provide direct oversight and accountability of school leaders.</p> <p>The district will continue to provide guidance and forms for teachers regarding their attendance being taken accurately, specially during the first few weeks of the school year.</p> <p>Additionally, MCPS will reduce the threshold for no shows from 15 days to 10 days. Reducing this threshold may allow for a more intentional focus on who is not attending, in collaboration with the implementation of the other stated enhanced practices.</p> <p>The district will continue to communicate and share training materials available in the student information system that support attendance taking procedures.</p> <p>The district will continue to provide mandatory training for record keepers as detailed in responses 1 and 3.</p>	Partially Implemented	July 1, 2023

<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>
	Implementing these procedures is purported to help increase accuracy and reduce retroactive withdrawals of students after September 30 <sup>th</sup> .		

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

**Maryland Office of the Inspector General for Education**

100 COMMUNITY PLACE, CROWNSVILLE, MARYLAND 21032 Phone: 410-697-9692