



# MARYLAND OFFICE OF THE INSPECTOR GENERAL FOR EDUCATION



## Investigative Report Summary

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OIGE Case 20-0003-I

Issued: June 7, 2022



MARYLAND OFFICE OF THE  
INSPECTOR GENERAL FOR EDUCATION  
Richard P. Henry, Inspector General



June 7, 2022

To the Citizens of Maryland and Baltimore City,

The Maryland Constitution guarantees a student a thorough and efficient system of free public schools<sup>1</sup>. The Maryland Office of the Inspector General for Education (OIGE) plays an important role in safeguarding that right and the State funds provided to local school systems. Our primary mission is to prevent and detect fraud, waste and abuse, and educational mismanagement within the Maryland State Department of Education (MSDE), the Interagency Commission of School Construction (IAC), and the twenty-four (24) local school systems (LSS) throughout the State of Maryland. Except under limited exceptions, the Inspector General may not disclose the identity of the source of a complaint or information provided.

### **Summary**

The OIGE initiated an investigation based on information provided, in part, by the former Office of Education Accountability, alleging that the Baltimore City Public School (BCPS) system had incorrectly documented and promoted students by changing failing grades to those of passing grades. The complaint further alleged that teachers had been pressured to change grades by either their Assistant Principals (APs), Principals, or both. Additionally, it was alleged that APs and principals received the same pressure from other education executives assigned to the Baltimore City Public Schools headquarters building, also known as "North Avenue."

From the beginning of our investigation, BCPS staff were extremely concerned with speaking to OIGE investigators. Some staff expressed concern for their jobs, while others said nothing would change. A culture of fear and a veil of secrecy affected the BCPS system and kept many from speaking freely about misconduct. Regrettably, these actions delayed the completion of this investigation and hindered the truth-seeking process.

We interviewed former and current teachers, administrative staff members, and managers. In addition to interviews, investigators examined information, including student data, records, and grade change forms. Additionally, the OIGE interviewed the Chief Executive Officer (CEO) for

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<sup>1</sup> Constitution of Maryland, Article VIII, Education, Section 1.

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Baltimore City Public Schools, Dr. Sonja Brookins Santelises, the Chief Academic Officer (CAO), Dr. Joan Dabrowski, and the Chief of Schools (COS), Mr. John Davis. As COS, Mr. Davis oversaw daily classroom instruction, school system operations, and the school police department and functioned as the *de facto* second-in-command of BCPS.

Our investigation revealed differing interpretations, applications, and adherence to appropriate grade change procedures among teachers, school staff, APs, Principals, Instructional Leadership Executive Directors (ILED), and those asserted policies and curricula described by Drs. Santelises, Dabrowski, and Mr. Davis. The physical documents examined, and interviews conducted by investigators revealed several disparities.

The interviews, review of statutes, regulations, policies and procedures, and student records ultimately informed our findings. Our investigation revealed misunderstandings, misapplications, and non-compliance of grade change procedures which increased the risk of inappropriate grade changes and could have a significant impact on BCPS graduation rates. Based on our investigation, the OIGE recommends that the Maryland State Department of Education (MSDE) issue an emergency procurement for an independent performance audit of the BCPS to evaluate the efficiency and effectiveness of selected functional areas related to the governance and administration of grading policies and procedures.

## **Background**

In September 2020, the OIGE initiated an investigation into allegations of systemic grade changes occurring within BCPS. The OIGE had received several complaints, including from the former Office of Education Accountability. The OIGE's initial request for information pertained to grades K-12. Due to BCPS policies governing grades 2 through 8, the OIGE shifted its initial focus to only that of students enrolled at the High School level.<sup>2</sup>

At the end of the 2019 school year, the BCPS posted a statement on their website in response to a media report by Fox 45's *Project Baltimore*. The media report alleged grades were being improperly changed at some schools to inflate student achievement and reduce rates of failure and retention. BCPS described the report as having possible mischaracterizations, inaccuracies, and sensationalism. The BCPS release also provided the following explanation as to why a student's grade may be changed:

*There are valid reasons that grades may be changed after a teacher first records them: 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*

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<sup>2</sup> BCPS guidance on grading states that students enrolled in grades 2 through 8 that receive a grade below 60% will receive a grade of NC. An NC will be coded as “not completed” which means the student will not receive a grade for the class. This code reflects unfinished learning for a student and will inform support for students in the next school year and beyond. <https://www.baltimorecityschools.org/grading>, “How does a student receive an NC?”, “How does Academic Performance factor into an NC?”

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*mathematical error might need to be corrected. The vast majority of grade changes are made for these and similarly legitimate purposes.*<sup>3</sup>

The OIG reviewed BCPS Policy IKA-RA, regarding Grading and Reporting. Within this policy, Section II(G)(2)(c) – Failing Grades states: “If a student receives an F as a marking period grade, the numerical equivalent of that grade cannot be lower than a 50 when used to calculate the student’s final grade. If a student failed a marking period by earning a 50-59 that score should remain unchanged when calculating the student’s final grade. This requirement is meant to allow students to improve their grade through diligent work in subsequent marking periods to pass the course.”<sup>4</sup> The minimum passing grade for a BCPS student is a D- or 60%. A grade below 60% is an F.

BCPS also provides guidance to students and families regarding grading. This information is contained in their annual “Family Guide to City Schools” publication. In this communication, BCPS provides the following explanation about grading:

*Under the revised grading policy, 70 percent of students' grades are based on a variety of assessments (projects, labs, essays, tests, quizzes). The other 30 percent is based on a school's discretion.*<sup>5</sup>

As stated earlier, the BCPS does have policy IKA-RA Grading and Reporting Regulation which directs educational staff on how to determine a student’s grade. Additionally, the BCPS provides its schools leeway (approximately 160 different BCPS grading policies) on how teachers and administrators determine the breakdown when evaluating the 30 percent discretionary value of a grade.

Prior to 2019, the Code of Maryland Regulations (COMAR) requirements regarding grading and reporting requirement allowed only a single signature, by the LSS's principal or their designee, when changing a student's grade. MSDE revised this requirement on October 1, 2019.

The revised COMAR standard requires that a grade change form contain 1) an explanation for the requested change and 2) the signatures of both the requesting teacher and the principal or their designee.<sup>6</sup> Before this revision, a principal had the sole authority to review and change any grade.

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<sup>3</sup> <https://www.baltimorecityschools.org/grade-changing>, Statement on Reporting about Allegations of Grade Changing, June 4, 2019

<sup>4</sup> Baltimore City Public School, Administrative Regulation, Grading and Reporting, Policy IKA-RA April 29, 2020 <https://go.boarddocs.com/mabe/bcpss/Board.nsf/goto?open&id=8GWSKE710C8F#>

<sup>5</sup> Family Guide to City Schools, [https://www.baltimorecityschools.org/sites/default/files/inline-files/BacktoSchool-July2019-GuideEnglish\\_0.pdf](https://www.baltimorecityschools.org/sites/default/files/inline-files/BacktoSchool-July2019-GuideEnglish_0.pdf)

<sup>6</sup> Md. Code Regs. 13A.03.02.08B(5)(c)

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## Verification Of Grade Change Data

Based on data provided by BCPS, the OIGE identified the top ten BCPS schools responsible for grade changes from failing to passing between 2016 through 2020. In addition to identifying the top schools, the OIGE was also able to identify those individuals who made the respective changes within the BCPS student identification system or Infinite Campus (IC).

SCHOOLS								
<i>Fail to Pass Grade Changes</i>	<b>2016-2017</b>	<b>2017-2018</b>	<b>2018-2019</b>	<b>2019-2020(1)</b>	<b>Total (3)</b>	<b>Top Three Grade Changers By Position</b>		
<b>Patterson HS</b>	711	271	367	41	1,390	<i>Guidance Counselor (829)</i>	<i>Teacher – Staff Developer (297)</i>	<i>Assistant / Non-Instructional (149)</i>
<b>Mergenthaler HS</b>	132	330	279	48	780	<i>Assistant Principal (578)</i>	<i>Department Chair (40)</i>	<i>Manager – Scheduling/Grading IT Support (39)</i>
<b>Digital Harbor HS</b>	194	116	224	58	592	<i>Assistant Principal (157)</i>	<i>Secretary (149)</i>	<i>Principal (134)</i>
<b>Vivien T. Thomas HS</b>	134	170	79	36	419	<i>Assistant Principal (349)</i>	<i>Other/Null (36)</i>	<i>Manager – Scheduling/Grading IT Support (15)</i>
<b>Calverton Elementary (4)</b>	275	58	68	0	401	<i>Paraeducator (317)</i>	<i>Educational Associate (54)</i>	<i>Other/Null (14)</i>
<b>Benjamin Franklin HS</b>	114	129	131	18	392	<i>Assistant Principal (251)</i>	<i>Guidance Counselor (134)</i>	<i>Analyst – Scheduling &amp; Grade Reporting (4)</i>
<b>Frederick Douglas HS</b>	64	135	104	68	371	<i>Assistant Principal (103)(2)</i>	<i>Secretary (72)</i>	<i>Assistant Principal (41)(2)</i>
<b>Western HS</b>	85	165	67	25	342	<i>Teacher – Special Education (264)</i>	<i>Assistant Principal (24)(2)</i>	<i>Assistant Principal (23)(2)</i>
<b>ConneXions (4)</b>	24	51	244	15	334	<i>Assistant Principal (247)</i>	<i>Other/Null (20)</i>	<i>Analyst – Scheduling &amp; Grade Reporting (12)</i>
<b>Career Academy</b>	2	88	179	43	312	<i>Assistant Principal (284)</i>	<i>Guidance Counselor (14)</i>	<i>Analyst – Scheduling &amp; Grade Reporting (14)</i>

*Notes:*

- 1) *BCPS SY' 2019-2020 data is inconclusive. Data identified indicates changes recorded in IC prior to the national COVID-19 crisis and BCPS's decision to advance students at the end of the school year.*
- 2) *Indicates schools who employed more than one Assistant Principal as a grade changer.*
- 3) *The OIGE did not review student grade changing data for SY' 2020-2021 due to the BCPS BOE's decision to advance all students due to issues associated with the virtual learning.*
- 4) *Although data obtained in IC indicated this school had a high number of grade changes, the OIGE did not review grades 2 through 8 / elementary school level grade changes.*

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## High School Analysis

### 1. Patterson High School

The OIGE's review of grade changing data concluded that Patterson High School (Patterson) had the highest number of identified failing grades changed to a passing grade(s)<sup>7</sup> during the school years of 2016 through 2020.

The below chart illustrates the total number of grade changes at Patterson as a percentage:

Schools	Failing Grade to Passing Grade Change
Patterson High School	1,390
All BCPS Schools	12,542
Patterson % of Total	11.1%
Patterson Rank Among BCPS Schools	<b>1st</b>

During interviews with Patterson staff, members reported to the OIGE that BCPS administrators had advised them that no student should have a final numeric grade of a 58 or 59. Grade reporters were expected to electronically change any grade recorded as a 58 or 59 to a 60. Additionally, staff members stated that during IC training sessions, it was reiterated that numeric grades of 58.0 or 59.0 should be changed to a 60.0. Furthermore, staff members claimed they were present during phone conversations with North Avenue, instructing them to change any numeric grade of a 58.0 or 59.0 to a 60.0.

The OIGE interviewed a BCPS manager assigned to North Avenue who stated that a student "should not be one point away" from a passing grade and that it was "common sense" to change the grade to reflect a passing score if the student deserved the change. The BCPS manager also stated, "*any teacher that doesn't do that (change 58's or 59's to a 60) is neglectful.*"

The OIGE also reviewed emails from Patterson staff pertaining to grade changing and discovered an email dated February 18, 2018. This email was addressed to "Administrators" at Patterson and included a spreadsheet of students that received a final grade of either 58 or 59. The email implies that Patterson personnel should submit a grade change form as IC did not automatically round the grades of 58 or 59 to a 60. (See included email)

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<sup>7</sup> A failing grade is identified as a received grade between a 0 and 59 and is marked as a letter grade of an F. A passing grade is determined to be a received grade between a 60 and 100. During our interviews, staff referenced their interpretation for the Rule of Rounding. If the last digit is less than 5 (i.e., 59.4), you should round to the previous digit down or a grade of 59. However, if the last digit is 5 or more (i.e., 59.5), you should round the previous digit up to a grade of 60.

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From: [REDACTED]  
Sent: 2/18/2018 [REDACTED]  
To: [REDACTED]  
Subject: Grade Change Form  
Attachments: Grade Change Form Letter-Admin Override.docx:S1 Final Grades to 60s.xlsx

Administrators,

Attached is a spreadsheet of the students that received a final grade of 58 and 59 by cohort. Infinite Campus does not automatically round these grades to a 60 D-. In order to do so, please complete and sign the grade change form.

Thanks,

[REDACTED]  
[REDACTED]  
Patterson High School

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In addition to the email, an Excel spreadsheet was attached for all email recipients to review. The spreadsheet contained a breakdown of 57 identified students having a final numeric grade from 56 through 59 and contained identification numbers, names, courses, and respective grades. (Due to Family Educational Rights and Privacy Act (FERPA) restrictions, the spreadsheet referenced is not included in this report.)

During a subsequent interview, a Patterson staff member provided a grade change form dated April 23, 2018, and signed by the school's principal. The form contained two (2) digital text boxes indicating "See Attached" in the sections related to student name and grade information. The form stated, *"I have this decision for the following reason(s): Infinite Campus does not round up from 58 and 59 to 60."* (See included Grade Change Form, signed 4-23-18)

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# BALTIMORE CITY PUBLIC SCHOOLS

Catherine E. Pugh  
Mayor, City of Baltimore

Cheryl A. Casiani  
Chair, Baltimore City Board of  
School Commissioners

Dr. Senja Brookins Santillan  
Chief Executive Officer

Ms./Mr./Mrs. <Teacher's Name Here>,

I am writing to inform you of my decision to change the following report card grade(s):

Student Name: \_\_\_\_\_ ID Number: \_\_\_\_\_  
 Course Name: **See Attached** Course Number: \_\_\_\_\_  
 Course Section: \_\_\_\_\_ Date of our Consultation: \_\_\_\_\_

(MP= Marking Period; EX1= 1<sup>st</sup> Semester Exam; S1=1<sup>st</sup> Semester, T1 = Trimester 1, etc.)

	MP1	MP2	EX1	S1	MP3	MP4	EX2	S2	Final Grade	T1	T2	T3
Original Grade:			<b>See Attached</b>									
Change To:												

I have this decision for the following reason(s):

Infinite Campus does not round grades up from 58 and 59 to 60.

Infinite Campus does not round grades up from 58 and 59 to 60.

This letter will be maintained in a digital file and will be sent to my supervisor. The grade will be maintained by my supervisor as the Principal's grade.

Sincerely,

[Redacted Signature]

4-23-18

CC: <Principal Supervisor's Name>  
<College and Career Readiness Office Designee>

During the interview phase, the Patterson staff member explained that the principal had directed them to submit a spreadsheet of students' names and respective grade changes with the pre-signed grade change form to North Avenue. Furthermore, the staff member revealed that the principal did not review the form and spreadsheet before submission. The OIGE did confirm with the BCPS Office of Legal Counsel that 34 of the 57 students listed in the spreadsheet received grade changes that increased their individual grades from failing to passing.

## Interview with Patterson High School Principal

The OIGE interviewed the Patterson High School principal concerning BCPS's grading and reporting policy. During the interview, the principal stated he understood the policy. The principal was asked of his understanding about the policy and stated that a grade of 59 and below was a failing grade and a 60 while above was passing. Furthermore, the principal asserted he was

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unaware of any formal or informal policy requiring changing a 58 and 59 to a 60. He stated, "*the only way grades are changed is through teacher permission.*"

The principal was presented with a version of the grade change chart (referred to on page 4 of this report). Following his review, the principal stated, "*looks high.*" Moreover, he could not account for the reduction in grade changes from school year (SY) 2017 through 2018.

The principal described that although he has authority to change grades, he never exercised this and explained the reasoning as, "*I don't want to be here*" (referring to his interview with the OIGE). He also denied having pressured or coerced any of his administrators or teachers to change grades for the same reason. The principal further claimed he was never pressured by his superior(s) to change grades from failing to passing.

The principal stated he would review documentation of student work and sign the grade change form before it was forwarded to North Avenue. The principal was adamant that he checks the grade change forms for each student. The OIGE asked if he had ever pre-signed grade change forms and stated: "*never*" and reiterated his earlier statement, "*cause I don't want to be in here*" (Again, referring to his interview with the OIGE). He stated, "*I'm a businessman; there is nothing I would sign that has nothing on it.*" The principal further stated he would not even sign a blank document for a family member, as he felt it was equivalent to signing a blank check.

During the interview and in the presence of a member of the BCPS Office of General Counsel, the principal was shown an email which was generated on his behalf and himself carbon copied (CC'd) as a recipient from a Patterson staff member. After reviewing the email, the principal stated, "*absolutely not,*" denying authorizing a spreadsheet to be attached to any grade change forms.

### **Patterson Findings**

An analysis was conducted by the OIGE, confirmed that the staff at Patterson High School changed 1,390 grades from SY' 2016 through 2020. Our analysis indicated that Patterson ranked first among BCPS high schools for grade changes. Of those grade changes identified, 266 were changed to a percentage above the minimum passing grade of 60.0 percent. Our analysis further indicated that 1,124 grades were changed from a failing grade (below 60.0 percent) to the minimum passing grade of 60.0 percent or a letter grade of D-. The below chart illustrates grade changes at Patterson and within BCPS.

School	Failing Grades Changed to 60.0
Patterson High School	1,124
All BCPS Schools	4,723
Patterson % of Total	23.8%
Patterson Rank Among BCPS Schools	<b>1st</b>

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The OIGE further substantiated that the identified grade changes included a subset of changes from a grade range of 58 and 59 to 60.0. The 58/59 subset comprised 886 grade changes. The remaining 238 changes reflect grades originally recorded in a 57 or lower range.

School	Failing Grades Changed from 58/59 to 60.0
Patterson High School	886
All BCPS Schools	1,887
Patterson % of Total	47.0%
Patterson Rank Among BCPS Schools	<b>1st</b>

The OIGE analyzed of the recorded grade changes for SY's 2016 through 2020. Below is a chart indicating the breakdown by school year, including failing grades changed to passing.

School Year	Failing Grades to Passing Grade Changes	Failing Grades Changed to 60.0	Failing Grades Changed from 58/59 to 60.0
2016-2017	711	634	497
2017-2018	271	198	133
2018-2019	367	263	228
2019-2020	41	29	28
<b>Total</b>	<b>1,390</b>	<b>1,124</b>	<b>886</b>

Our analysis indicates that over 80% of Patterson's failing to passing grade changes were made to the minimum passing grade of 60 percent. Given BCPS's previous descriptions of valid grade changes (makeup work completed, mathematical errors), this percentage of grade changes made to the minimum passing grades indicates a statistical likelihood that many of these grade changes were not made for valid reasons.

## 2. Mergenthaler Vocational Technical High School

The OIGE analyzed failing grade to passing grade changes associated with the Mergenthaler Vocational Technical High School (MERVO) for school years 2016 through 2020. Our analysis found MERVO to have the second-highest change rate among high schools within the BCPS. The below chart illustrates the total number of grade changes at MERVO as a percentage of the BCPS.

School	Failing Grades to Passing Grade Changes
MERVO High School	780
All BCPS Schools	12,542
MERVO % of Total	6.2%
MERVO Rank Among BCPS Schools	<b>2nd</b>

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The OIGE reviewed a principal override grade form (Same as the one shown on page 7) dated to school year 2017 through 2018. Here the student earned a grade of 58, and the principal changed the grade to a 60 without any supporting documentation. The OIGE learned this process was most common when seeing grades changed from failing to passing without justification.

Based on staff concerns at Patterson and MERVO regarding past practices of changing grades without supporting documentation, the OIGE reviewed earlier emails. Our review found an email dated May 6, 2015, addressed to a MERVO AP requesting changes of students' grades from a failing to passing without any justification attached. This practice predated the implementation of the IC system and corroborated the unofficial past practice of changing marginally failing grades to passing without justification.

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From: [REDACTED]  
Sent: Wednesday, May 06, 2015 9:38 AM  
To: [REDACTED]  
Subject: Grade Change

Good Morning,

Please change the following students' progress from failing to passing...

10<sup>th</sup> Grade

1. [REDACTED]

12<sup>th</sup> Grade

1. [REDACTED]
2. [REDACTED]
3. [REDACTED]
4. [REDACTED]
5. [REDACTED]

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A MERVO teacher requested a MERVO AP to change a student's grade from failing to passing in another reviewed email<sup>8</sup>. The document described the mismatch in the numbering and lettering of grades and the lack of communication between the Gradebook calculation and the final grading process.

The OIGE interviewed a department head who had been at MERVO for approximately 15 years and was responsible for 40 of the identified grade changes from failing to passing. The teacher claimed they had not had access to grades for the previous seven years apart from summer school

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<sup>8</sup> Email, Subject: Grade Change Request, March 2, 2017.

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and did not recall making the changes. They suspected their username was the default for that department if teachers did not have access to the system.

The OIG interviewed another BCPS employee who had been an AP and a grade reporter at MERVO. She advised there were issues of teacher turnover mid-year which resulted in numerous grade changes. As a grade reporter, she would have to rectify grade issues when a teacher left unexpectedly. She provided examples of teachers leaving due to illness or parental leave and students' grades not being entered into the IC grading system. That event required many grades to be reconciled when the grading period ended. The grade reporter had to merge the assigned teacher's Gradebook with the substitute's grade book to determine the student's final grade. She stated the information was often incongruous, as the assigned teacher's grade book was within the IC system and the substitute's grade book was a hard copy. She believed that many of MERVO's grade changes fell under her name and credentials within IC. Before BCPS implemented IC, she believed that institutional practice rounded a student's grade from 58 or 59 to 60. This practice was not in writing and was an implied policy.

The OIG then interviewed a BCPS North Avenue employee with approximately 16 years of service responsible for 38 of the grade changes at MERVO. This employee described that she was responsible for making changes as requested by schools. During the 2015 through 2016 school year, the requests did not have to be accompanied by documentation. In 2017 and after the new IC grade system was launched, BCPS Administration drafted a new grading policy that required proof of why the grade change was necessary. This employee stated that supervisors verbally admonished her after she voiced her concerns regarding the lack of layers of approval for grade change forms.

The OIG interviewed a former AP at MERVO who remains employed by the BCPS. While at MERVO as an AP, this individual served as a grade reporter during 2019 and 2020. She heard of rounding grades that were a 58 or 59 to a 60 from several veteran teachers but personally believed students earned the grade they were given. Many of the requests for grade changes she received were from teachers whose grades were submitted beyond the grading window and thus needed the grade reporter to enter them. Furthermore, she explained that many of the grade changes within IC are misleading as grades are mismatched with a numerical grade. Those corrections are entered as a change. She was never pressured to change any failing grades to passing by any teachers or administrators. She was aware that with the onset of COVID and in the last quarter of 2020, the BCPS adopted a new grading policy enabling teachers to give an extra six grade points to students attempting to complete their assignments and engage in schoolwork. Students who were trying to engage in schoolwork but not mastering the material were not punished with failing scores but instead given a score of 55 with the understanding that the extra six points would raise their score to passing.

The OIG interviewed a previous MERVO principal. The principal provided details of a grading directive. The directive went into effect in the last quarter of 2020 (the onset of the COVID-19 pandemic.) The new policy for the district allowed students a six grade-point cushion

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when calculating their final grade, which brought the minimum passing score to a 54. The OIGE questioned grades being changed (during a review of grade change binders maintained at schools) from a 50 to a 55. This individual stated these changes reflected students' effort and assignments completed during the shutdown. She advised if a student minimally performed and attempted to complete assignments and was still failing, that effort was recognized as a score of 55.

In contrast, she stated that if the student made no effort, the failing score of 50 remained. She advised that no member of the BCPS administration pressured her to change grades, nor would she succumb to that type of pressure. Teachers initiated the grade changes she observed at MERVO because of a calculation error, make-up, extra work, or a numerical to letter grade mismatch. She believes that the MERVO application admission process results in highly motivated students, resulting in minimal failing grades.

**Mergenthaler Findings:**

Grade changes were made in each year reviewed. OIGE confirmed that staff at MERVO changed 780 grades from 2016 through 2020. The analysis indicated 277 grades were changed to the minimum passing grade of 60.0 percent and 125 grades were changed from a 58/59 to a 60.0. Both figures ranked 3rd among BCPS schools. See the below chart for a breakdown.

School Year	Failing Grade to Passing Grade Changes	Failing Grades Changed to 60.0	Failing Grades Changed from 58/59 to 60.0
2016-2017	132	48	26
2017-2018	330	136	65
2018-2019	270	90	34
2019-2020	48	3	0
<b>Total</b>	<b>780</b>	<b>277</b>	<b>125</b>

The below chart illustrates changes from a failing grade to the minimum passing grade of 60.0:

School	Failing Grades Changed to 60.0
MERVO High School	277
All BCPS Schools	4,723
MERVO % of Total	5.7%
MERVO Rank Among BCPS Schools	<b>3rd</b>

The investigation determined that staff at MERVO relied on institutional past practices when changing grades from failing to passing. Interviews revealed that most teachers, administrators, and guidance counselors know of the practice. The source policy for grade changes has yet to be identified or located in writing. The OIGE learned no interviewee to date had seen a written directive explaining and instructing this practice.

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The OIGE identified a lack of continuity and training in grade keeping. MERVO's policy is for teachers to enter student grades into a separate grade book function within the IC system and record student progress and assignments. This function is only accessible by the teacher of record for the class. In instances of long-term absence, career change, or lack of accurate record-keeping, this function does not accurately reflect student grades.

At the end of every marking period, the grade reporter reconciles the student's grades. Only the grade reporter has access to the grading system used for official reporting. This policy results in the grade reporter being responsible for identifying discrepancies, amending them, and keeping them accurate. Each amendment results in the grade recorder recording a grade change.

### 3. Digital Harbor High School

The OIGE analyzed failing grade to passing grade changes at Digital Harbor High School (Digital) from school years 2016 through 2020 and found Digital to have the third most changes of any school within the BCPS. The below chart illustrates the total number of grade changes at Digital as a percentage of the BCPS.

School	Failing Grades to Passing Grade Changes
Digital Harbor High School	592
All BCPS Schools	12,542
Digital Harbor % of Total	4.7%
Digital Harbor Rank Among BCPS Schools	<b>3rd</b>

The OIGE recovered email communications, including an Assistant Principal's email to all members of the school listed as email group "Sch416" stressing that grades of 58 and 59 "must be changed" to a 60. (*Circles added for clarity.*)

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From: [REDACTED]  
 Sent: Wednesday, June 07, 2017 [REDACTED]  
 To: Sch416 [REDACTED]  
 Subject: 4th Quarter Grading Procedures

Good afternoon Teachers,

We have accomplished great work with grading this year!

This is our final memo for the 2016-2017 school year, and it is loaded. It is imperative that we follow all timelines because the last day of school is June 13, 2017, and we have limited time to post make-up exams and process report cards before you leave for a well-deserved summer break.

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The posting window is now open. Our internal deadline to post grades will be COB on June 12, 2017.

The posting window closes on June 13, 2017. We will run calculations by 10:00 a.m. on the last day of school. If you have any grade changes after this time, you will be required to complete a grade change form and report to the pathway office to enter grades manually.

*It is my recommendation to post grades on Monday afternoon, and then re-post for any make-up exams on June 13, 2017 by 10:00 a.m. for optimum results.*

Points to remember:

- If you enter exam grades manually, you must enter matching numerical and letter grades. If not, it will generate an error, and you will have to enter them manually in the 2<sup>nd</sup> Floor Pathway Office.
- Per Principal [REDACTED] all 58's or 59's must be changed to a 60. Please review your final grades to ensure that students don't receive a 58 or 59 for the final grade.
- If you miss the posting window, you will need to submit a grade change form, and transcripts must be updated manually.
- Report cards must be mailed by June 15<sup>th</sup>: therefore, it is imperative that you follow all guidelines. Counselors need this information to send out time-sensitive information for Summer School registration.
- For close out procedures, please print a hard copy of your grade book with final grades on June 13, 2017, and attach the failure list.

| will send out another grading memo specifically for seniors who have earned credits by June 13, 2017 and are eligible to graduate in August. | have previously mentioned that you have done an outstanding job meeting the challenges with Infinite Campus and grading, and I am confident that this submission will be no different.

As always, thank you for your hard work and dedication to our students.

Respectfully,

[REDACTED]  
Assistant Principal  
Digital Harbor High School

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A member of this school contact group (email string) replied:

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From: [REDACTED]  
Sent: Sunday, June 11, 2017 [REDACTED]  
To: [REDACTED]  
Subject: RE: 4th Quarter Grading Procedures

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I have a number of students whose grades from earlier marking periods do not appear on the final grades page of infinite Campus. Some of them were moved from one of classes to another, so I have their scores but am Unable to update the report. I am sorry if I missed this in an earlier email, but how can I see their final grades if the system does not apply first semester scores to find the final grade?

Secondly, I saw your email about the 58/59 grades, but I have a couple of students in that range who did not appear for the final. If they do not show on Monday, I have a really hard time giving them any points. Just want you to be aware.

I will follow up on Monday when we see who comes to school, but please let me know about those missing grades.

Respectfully,

[REDACTED]  
[REDACTED]

Digital Harbor High School  
1100 Covington Street

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The Assistant Principal replied to the email:

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Message

From: [REDACTED]  
Sent: 6/12/2017 [REDACTED]  
To: [REDACTED]  
Subject: RE: 4th Quarter Grading Procedures

Good morning,

Thanks for your due diligence!

I will generate the missing grades report, and you can identify the grades for input.

Thanks,

[REDACTED]

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The OIG conducted interviews of current and former staff at Digital Harbor HS. During our initial interview, a staff member stated they had been employed with BCPS for over 20 years. The OIG analysis indicated this individual had changed approximately 149 grades from failing to passing during SY' 2016 through 2020. The staff member stated that they had only entered missing grades and denied ever having changed grades from failing to passing. The staff member explained they believed that IC recognized their input of the missing grades as grade changes. The member further stated they had seen students graduate who should not have for many years. The member was adamant that students should receive failing grades if they earned them. This member was uncertain if they ever received a memo or training from BCPS administration referencing the changing of grades from a failing grade(s) of 58/59 to a passing grade of 60.

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The OIG interviewed a former staff member who had been an AP and grade reporter from 2016 to 2018. This individual had been employed for over 25 years and served in numerous roles, including teacher, Academic Dean, Academic Coach, AP, and Principal. According to the former employee, a grade reporter was responsible for ensuring that teachers entered grades correctly. Because the IC system restricted teacher grading access, the school's grade reporter would have to enter the teachers' respective grades manually. Mismatched grades and discrepancies between a letter grade versus a numerical grade were the primary reasons requiring grade changes. After becoming the school's grade reporter, this individual stated they employed a prior practice of using a grade change form (with documentation) for all requested changes. This member stated they previously served as a grade reporter at another BCPS school and modified that school's form for use at Digital Harbor. This individual alleged that before BCPS implemented the 2018 grade change policy, principals could tell teachers to round a grade of 58 and 59 to 60. They were unaware of what precipitated the policy change or if it had not been mentioned during BCPS training sessions.

The OIG conducted an interview with another staff member at Digital Harbor. This individual had a combined 25 years of teaching and administrative experience and served in numerous roles within BCPS. This individual had also served as a grade reporter during the period of this investigation. The individual stated they received no formal training in IC but had been trained in BCPS's previous reporting system: the School Administrative Student Information (SASI) system. The staff member stated that during 2017, the BCPS Administration began requiring schools to enter both a letter and numerical grade for students. Teachers were required to input corresponding letter grades to numerical grades, and if entered correctly, the school would be cleared to print report cards. When the SASI system locked a teacher(s) out of their "Gradebook"<sup>9</sup> for entering only a numerical grade and the corresponding letter grades, the staff member would be required to reconcile those grades in IC. This individual believed these changes would indicate a grade change in the system.

This individual further stated that substitute teachers could not enter a student's grade in the system. When a substitute teacher was needed, the individual would be either a long-term substitute or a teacher who had been scheduled with a free period but asked to cover the class. In either case, the teacher did not have access to that class's Gradebook. The lack of access would require an administrator's involvement if or after the grading window closed. This individual stated they were aware of the practice of rounding 58 and 59 to a 60. They said, "[I]t's always been a practice, not a policy." This employee stated they had searched for any written policy or guidance affirming grades should be rounded but was unsuccessful. This employee said they believed that grades should be rounded "[I]n the best interest of children." This individual further stated their guiding principle has always been, "[H]ow does this benefit the child." The member then explained their paradigm, "[I]f a student would not retain any more information from

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<sup>9</sup> Gradebook is an interactive software used by teachers to view and enter grades for students.

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repeating a class, and is on the cusp of passing, that student's grade should be rounded to a passing grade.”

As the interview was concluding, this individual stated that after the initial rollout of the IC grading system, teachers told her they were under the assumption that their grades would continue to be rounded from a failing to a passing grade. This employee said they believed that the previous grade system (SASI) had a filter built into it that would automatically round a grade of 57.5 up to a passing grade of 60. At the conclusion of the interview, the OIGE presented the staff member with a copy of a redacted grade change chart for Digital Harbor. The individual reviewed the chart and confirmed that the number of changes associated with SY’s 2016 through 2020 appeared to be accurate.

**Digital Harbor Findings:**

The OIGE analysis concluded that Digital Harbor staff operated under the belief that the earlier grading system (SASI) would automatically round grades of 58 and 59 grades to a 60. The interviews with staff also indicated that most members believed the former grading system rounded failing grades to passing. Interviewed staff advised investigators that having worked at various schools across the BCPS system, the practice of rounding failing grade to passing was common.

Like the analysis at Patterson and MERVOL High School, the identified grade changes conducted at Digital Harbor also included a subset of changes from 58 and 59 to 60.0. The 58/59 subset comprised 123 grade changes.

School	Failing Grades Changed from 58/59 to 60.0
Digital Harbor High School	123
All BCPS Schools	1,887
Patterson % of Total	6.5%
Patterson Rank Among BCPS Schools	<b>4th</b>

The OIGE learned that both teachers and administrators were unclear about how the student information system, Infinite Campus (IC), operated. Many teachers expressed naivness to the functions and capabilities of IC. Teachers assumed that IC would continue to automatically round grades, like the former student information systems. Furthermore, members believed that IC is only updated once every 24 hours. As a result, a student with multiple grading issues could have several grade changes. A second, third, or fourth grading issue may not be identified until IC resets. The only stopgap is if the errors are caught before teachers lose access to their grade books.

Staff stated that using substitute teachers without access to a Gradebook would also create an issue that required grade change interventions. While some substitutes were teachers in the same unit or subject area, they, along with long-term substitutes, did not have access to the Gradebook for the class they covered. As a result, grade changes were coded under the username of the person

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who entered the grade. OIGE reviewed several documents where grades were printed for substitutes.

The grade reports for students enrolled in the Home and Hospital program at Digital Harbor also had timeliness issues. The grade reporter had to submit a grade change request to record grades in all cases. A review of grade change files kept at Digital Harbor showed repeated Home and Hospital grades submissions after the grade window had closed.

An OIGE analysis of Grade Recorders showed grade changes from failing to passing in each of the identified years. The below chart indicates Digital Harbors breakdown.

School Year	Failing Grade to Passing Grade Changes	Failing Grades Changed to 60.0	Failing Grades Changed from 58/59 to 60.0
2016-2017	194	129	119
2017-2018	116	17	1
2018-2019	224	29	3
2019-2020	58	9	0
<b>Total</b>	<b>592</b>	<b>184</b>	<b>123</b>

### **Interviews with BCPS Headquarters Staff**

#### **Chief Executive Officer, Dr. Sonya Brookins Santelises, Ed.D.**

OIGE Inspectors interviewed BCPS Chief Executive Officer (CEO), Dr. Sonya Brookins Santelises (Santelises), in the presence of three (3) members of BCPS's Office of Legal Counsel.

By way of background, the BCPS Board of School Commissioners appointed Santelises CEO of BCPS in May of 2016. Santelises had previously served as BCPS's CAO from 2010 to 2013. Santelises explained that the BCPS system has approximately 10,000 employees and 78,000 enrolled students. Santelises stated her direct subordinates included the Chief Academic Officer (CAO), Chief of Schools (COS), Chief of Staff, Chief of Information Technology, Chief of Assessment, Research, and Accountability, Chief of Human Capital, Chief Financial Officer, and Chief Legal Officer.

The OIGE asked Santelises exclusively about the roles and responsibilities of the CAO (Dabrowski) and the COS (Davis). Santelises stated that the CAO is responsible for establishing the academic track for the district and supervises the departments of Teaching and Learning (TL) and College and Career Readiness (CCR).

Santelises stated the COS is responsible for overseeing school principals, supervising Instructional Leadership Executive Directors (ILEDs), and school managers. The Office of Human Capital hires and assigns ILEDs and principals based on their qualifications, openings, and

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needs. Santelises advised that she could reject a candidate but generally leaves those decisions to the COS.

Santelises explained the COS is also responsible for performance evaluations of principals and ILEDs. The evaluations include data points such as assessments and community and faculty feedback. Grades are not a singular factor, as student grades may not improve, but other indicators such as district assessments may show improvement. Therefore, student achievement does factor into evaluations, including final grades. Santelises stated she meets with ILEDs, as a group monthly.

Santelises said after returning to BCPS in 2016, her primary review areas were physical plant needs, finances, and student achievement. Santelises stated she evaluated student achievement by comparing national trends in similar school districts. Santelises indicated that only 13% of students were proficient or advanced based on her evaluation in 2016.

Santelises said she did not immediately look at the grade changing policy upon returning as CEO in 2016. In 2017 and continuing through 2018, she implemented a "full reset" of the grading policy. Santelises explained that policy development is a Board process and, once adopted, it is given to the CCR department for guideline development and implementation. Everyone received professional development training on grading.

The OIGE showed Santelises a copy of BCPS's Grading and Reporting policy<sup>10</sup>. She stated it was the first time she had seen it. She said the guidelines are executed systemwide with the College and Career Readiness department "running point." For example, principals assure teacher adherence, and similarly, ILEDs supervise principals.

Santelises stated when she became CEO; Infinite Campus was the student information system or grading technology in use. Insofar as she is aware, IC does not round grades. OIGE asked if a 59.5 would round to a 60. Santelises stated that different systems operate differently, but from a mathematical perspective, 59.5 would round up. However, in most systems, anything under 59.5 would not move to a 60.

Santelises stated, "From where I sit, the real question is like, where are kids according to the standard? Where are kids in mastery of the material? The determining criteria would be at the level of the CAO and what the policy states, but they would work in concert with the COS. At the school level, the decision as to how closely to follow the policy would rest with the teacher." However, Santelises stated she would need greater context related to the rounding of a grade, such as where the student is in the grading process. Santelises did state that anything under a 59 is failing.

Santelises further stated that she initiated a review of grading patterns across Baltimore City, which was part of the "reset" previously mentioned. An erroneous grade change(s) would include a lack of mitigating circumstances and when someone unauthorized takes it upon themselves to

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<sup>10</sup> Baltimore City Public School, Administrative Regulations, Grading and Reporting, IKA-RA, Adopted: June 28, 2011, Revised: April 29, 2020.

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change grades. She described an example of a legitimate grade change as being a substitute teacher in the classroom whose grades do not reflect accurate student performance.

Santelises stated principals could change grades to make it appear students were doing better. She noted that changing grades would not make sense since several other data points determine school success. Santelises stated changing one data point would not make the difference a person might assume.

Santelises was shown an email<sup>11</sup>, dated October 10, 2017, from her BCPS email account to all BCPS employees, which addressed "widespread grade-changing" and listed district expectations to support grade integrity. The CCR analyzed grade data referenced in the email and flagged issues for her attention. The CCR analysis is revisited annually via an audit, but Santelises does not review the audit results personally.

Santelises advised that the delegation of a principal's grade change form responsibilities would be relative to issues such as the school size. For example, it would be acceptable to have an AP review document and flag any questionable matters for the principal's review. Santelises opposed a principal pre-signing grade change forms and handing them to grade reporters for submission without review.

Santelises stated she was unaware of undue pressure on principals to change grades but said that there is pressure for greater student achievement and making sure students learn. She openly "owns" this pressure. She stated there is room for improvement concerning invalid grade changes, and, in hindsight, she would have implemented a review process for grade changes much sooner than in 2018.

In closing, Santelises stated the takeaway is that the pressure to see students succeed, particularly in a system where the expectation is that they will not, will always be there. While the district will provide training, professional development, and support for struggling teachers and staff, it will not support shortchanging students' education. In Santelises' view, changing grades or trying to manipulate one of the data points of school success does precisely that.

### **Chief Academic Officer, Dr. Joan M. Dabrowski, Ed.D.**

OIGE Inspectors interviewed BCPS Chief Academic Officer, Dr. Joan Dabrowski (Dabrowski), in the presence of three (3) members of BCPS's Office of Legal Counsel.

By way of background, Dabrowski has worked in several school systems throughout the United States. Prior to her assuming her role in February 2021, Dabrowski served as the Boston Public School system's, Director of Literacy.

Dabrowski was asked to elaborate on the organizational structure for the CAO position. She stated as the CAO, she reports directly to the CEO, Dr. Santelises. Dabrowski said she oversees

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<sup>11</sup> Email, From: CitySchoolCEO, To: All City Schools Employees, Subject: Integrity in Grade Reporting, Dated: October 10, 2017.

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the entire academic office, including approximately 320 employees. She directly supervises the Executive Directors of the Offices of Teaching and Learning, Special Education, and College and Career Readiness. Dabrowski advised she is familiar with evaluations of employees under the academic office and utilizes goal-setting meetings to contribute to her annual report.

Dabrowski stated that Chief of Schools (COS) John Davis (Davis) supervises the Instructional Leadership Executive Directors (ILEDs). Before her coming to BCPS, she said Davis temporarily acted contemporaneously as both the CAO and COS. Dabrowski did not know when the former CAO (Sean Conley) left the position but believed Davis assumed the unofficial role as acting CAO upon Conley's departure. Dabrowski asserted that principals fall under the supervision of Davis's ILEDs. Dabrowski believed the principal assignments are the responsibility of the COS with input from the ILEDs.

Dabrowski said she learned of alleged improper grading at the Augusta Fells Savage Institute of Visual Arts after taking the position of CAO. Dabrowski believed that colleagues discovered issues at August Fells when they noticed grading, graduation, and course credit irregularities.

Dabrowski described the current grading system utilized by the BCPS as a traditional grading system of A through F. She did not know the policy's exact verbiage but knew it provided explicit instruction on what comprised a grade. (The current BCPS grading policy precedes Dabrowski's employment with BCPS.) Dabrowski believed the current system depicts a holistic way of coming to a grade and provides clear timelines for when grades are reported and finalized.

Dabrowski was asked regarding the BCPS grading policy. She stated a 50% is the lowest grade a student can receive within BCPS. She provided the following example: if the student fails to complete an assignment (i.e., should it be a 50% or 0%), a 50% is the lowest grade for reporting purposes. In Dabrowski's opinion, a 50% and a 59% have different impacts on a student's grade. Dabrowski believed Boston was comparable to the grading policy at BCPS, but she could not recall their policy. Dabrowski knew BCPS currently utilized IC for grading software but was unfamiliar with its operation since she does not use it regularly.

The OIGE provided Dabrowski with an overview of the investigation and its focus on the changing of grades from a failing to passing. Dabrowski provided multiple examples of legitimate grade changes and illicit ones. An illicit one has no extenuating circumstances to support the said grade change. Dabrowski believed students should receive numerous opportunities to demonstrate their learning, giving an example of a student receiving a 70% on a quiz and then retaking it to earn an 85%. She believed such changes are appropriate and that there are places in BCPS policy to support those changes.

Dabrowski said that based on her prior experience, she didn't believe it was an issue to round a numeric grade of 59.5% to 60% and described that change as, "*worthy of a conversation.*" When asked where the rounding should stop, Dabrowski stated, "I think that feels different than the 59.5. A 59.5 feels like a different conversation than a 58. And again, I think the rounding up at that level it would not seem appropriate to move up to a 60; that feels different."

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When asked why changing a 58 to a 60 is different, Dabrowski stated, "I think the 59.5 feels very close to the 60, and again I'm going back to the sort of rounding that we think of... and again, I would really need to get into the level of technical detail around if there have been decisions made on this."

Dabrowski said she believed grades being rounded up en masse by a teacher or principal is unacceptable. She stated, "I don't believe that's appropriate to do a wide-scale change of all grades," and "there has got to be a clear, compelling extenuating circumstance" to support mass changes. Dabrowski was unsure of the current technology parameters to round grades. When asked concerning prior experiences with rounding grades from 59.5 to 60%, she could not recall and stated she would have to refer to previous formulas.

Dabrowski was asked if teachers are encouraged to change grades. She stated, "I don't think, as a rule, I would make a recommendation around that level of technical work. I think I'm more in the space of saying how are we supporting our students to have multiple opportunities to do and show their best work to us and to use that to inform our grades the way they are. So I wouldn't be in a space that I would spend time around rounding. I would, that's just not my purview, and again if we have a system that has an outline where those decisions lie, then I think that's a matter of the policy."

Dabrowski was asked if she knew of BCPS supervisors pressuring personnel to change grades. She denied any knowledge of the practice. When asked why principals would round or change grades, Dabrowski said there would need to be extenuating circumstances requiring a grade change. If it were outside the grading period, the principal would need to be involved. She reiterated that grade changes should be individualized to each student and not as a rule.

Dabrowski was shown the grade changing chart and she described the 711 changes at Patterson as "a large number," but the figure was worthy of further explanation and understanding. When questioned whether she could think of anything to justify those numbers, she stated she would want to know what the grades and respective classes were and if the grade changes were within policy.

Dabrowski confirmed to investigators that grade change forms need to be filled out after turning in final grades. The principal should fill out the form after consultation with the teacher. If the teacher is unavailable, the principal should consult with the ILED before changing the grade. She stated there must be extenuating circumstances surrounding the grade change. She said that an ILED and the principal might need to sign the form, but she would still need to review the form.

Dabrowski was asked if it would be appropriate for a principal to broadly change grades from a 58 or 59 to a 60 and if these changes would benefit a principal's performance rating. She stated this would not be in alignment with BCPS policy or regulations and referred the rating issue to BCPS Human Capital.

The OIGE described the incident at Patterson in which the principal pre-signed a grade change form and directed an employee to attach a spreadsheet of grades to be changed. Dabrowski did

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not believe it would be in alignment with BCPS policy for principals to pre-fill grade change forms. She stated the appropriate way for the grades to be changed is on an individual basis and not through a spreadsheet to change the grades unilaterally. Dabrowski advised that the ILED or the COS needed to handle any required corrective actions. She believed there were legitimate reasons, such as organizational, for using spreadsheets in the classroom. Dabrowski stated individualization is the reason BCPS utilizes the grade-changing form.

Dabrowski said in her experience; she looked to identify the problem and the support needed to correct it. Dabrowski advised the leader of a school has a role to play in the outcome of the students. It is not currently in her purview to decide whether a principal should be left in charge of the school if negative patterns continue.

Dabrowski was asked how she would rectify the grade changing situation if she were the CAO at the time. She said that BCPS is currently building clear guidelines, annual updates, and policy changes around grading.

Dabrowski was shown a grade changing memo<sup>12</sup> written from Daniel Heller to Sean Conley. Dabrowski told the OIGE that she was briefed on the situation once she took her position and learned from an internal investigation that the BCPS has a significant teacher turnover rate, indicating the need for yearly technical grading and reporting training. She further stated, that BCPS annually reviews its policies, and each school is allowed to make its specific grading policy if it aligns with the BCPS policy.

The OIGE revisited the subject of pressures placed on the principals at each school and asked Dabrowski why, if the principals could change grades en masse, would they not choose to change the grades. Dabrowski stated there is never a reason to make changes not aligned with policy or in the student's best interest. She stressed one should make the moral decision to do what is right.

The OIGE asked Dabrowski if she had any issues with grade changing in other school districts where she worked. She asserted it wasn't in her purview but knew the topic comes up regularly. She stated grades are paramount to a student and any grade change decisions need to be made based on policy.

### **Chief of Schools, Mr. John L. Davis, Jr., MA**

OIGE Inspectors interviewed BCPS Chief of Schools, Mr. John Davis (Davis), in the presence of three (3) members of BCPS's Office of Legal Counsel.

By way of background, Davis worked in the Washington, DC public school system for approximately ten years before joining BCPS. While in Washington, DC, he had several positions,

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<sup>12</sup> Memo From: Sean Conley, Chief Academic Officer, To: Danny Heller, Manager, College and Career Readiness, Re: Project Proposal: Grade Change Protocols, Dated: July 29, 2017

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including Chief of Schools. Davis said he became the COS for BCPS in August 2017. Davis stated he also served as BCPS's Acting CAO from June 2019 to February 2021. Upon the hiring of Dr. Dabrowski, he returned to his role as COS.

Davis stated as the COS, he reports directly to CEO Dr. Santelises. Davis said he is responsible for supervising ILEDs, the School Police Department, and Student and School Operations Support. He advised the roles and responsibilities of the BCPS COS are, "something that you can't easily define." He further stated that, "about everything falls into the Chief of Schools Office to some degree and in some ways nothing does."

Davis said he "influences" the placement of principals, but it is a "large process" that includes input from the ILEDs and CEO. Davis claimed the COS is not directly responsible for the evaluations of school principals because the ILEDs handle it. Davis stated, "an evaluation is about developing the people but is also about making sure they've got goals and are pushing in the right direction." Furthermore, Davis stated grades are not a standard "thing" reviewed during evaluations but more about whether students are "on track."

Davis was asked as to what, if any, overlapping responsibilities there are between the COS and the CAO. Davis stated, "We work closely together, and we collaborate." He further stated, "we want the best instruction, and we want our kids to be educated as best as possible. That's where the overlap is; the rest is collaboration and discussion."

Davis said he did not document concerns brought to his attention in meetings with principals at the beginning of each school year. Davis explained he would have a conversation about problematic issues and direct principals wherever needed. He would not expressly delegate any follow-up action to the ILEDs because they "naturally" do that (follow up). Davis stated that he, as the COS, did not have anything to do with the BCPS grade change policy.

Davis was asked concerning media scrutiny relating to grade changing and whether he disagreed with the characterization that BCPS received, "a lot of scrutiny." Davis replied, "I don't remember that; no, I would not characterize it as a lot of scrutiny." Davis explained he had just returned to BCPS and was getting to know the principals in 165 different schools.

Davis was asked regarding the rounding of grades. He could not "characterize" the rounding of grades but provided the example of a 62.8 rounded up to a 63. He believed the BCPS student information system (IC) works as follows; "if there is a grade of 73.1, it rounds to 73," and the rounding only occurs in the tenths column. Davis believed any grade under 60% is failing and that grade rounding occurs without human input within the student information system. Davis clarified; currently the grading system used by BCPS is called IC. He said he was not familiar with SMS (utilized before IC).

Davis was asked if it was his understanding that IC automatically rounded grades from a 59.5 to a 60. Davis stated, "I believe so, I want to be super clear about something, right, like you are asking me very detailed questions, right, and I am worried about like the big picture of the school

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system and, right, the big picture of like 165 principals so, I just, I just need to be very clear about this, especially if I am on the record about all these detailed minor questions.”

Davis further explained, "I believe so." Davis believes details regarding grading and scheduling fall under the purview of the CAO (Dabrowski). He elaborated those specific details handled by the College and Career Readiness Office or the Academics Office.

Davis stated there are a "ton of reasons" for changing grades. He clarified by saying legitimate reasons would be if the student could work with their teacher to make up a test, homework, or something that demonstrates they know the material. Other reasons would be a long-term substitute teacher that does not have access to IC or if school operations were lagging, leading to a missed deadline. These events may appear as grade changes in IC but are grades reported after established deadlines. Davis asserted that the critical analysis is whether the student and teacher worked together to understand the material and whether the student earned the grade. Davis further stated, "we have to trust our teachers and principals to be able to do that because there are just different situations."

Davis was shown the grade changing chart (Page 4) and asked about the 711 grade changes from failing to passing at Patterson High School during SY' 2016-2017. Davis expounded that if there were 1,500 kids at the school, each with eight classes and six marking periods, that would be approximately 72,000 grades for 2016, so 711 grades is a "pretty small percentage."

Davis advised he may not be aware of the situation around these grade changes but believes when a student has a 58 or 59, there is extra motivation to get the last 2 points to bring it to a passing grade.

Davis claimed he had never been made aware of any grade-changing issues at Patterson. Upon reviewing the grade changing chart, Davis added that outside the year 2016, Patterson's grade changes appear to be at an appropriate level taking student population size into account.

Davis does not see any subjectivity in the grading system because the students do the work assigned to them during the grading period. The BCPS curriculum has associated standards, mostly called the common core standards, and the curriculum links to the common core standards. Davis advised that students could demonstrate they learned the material in the units of study.

In response to OIGE's question regarding how a teacher changes a grade, Davis indicated that for a teacher to submit a grade change form, the teacher must fill out and submit the grade change form with a department head (AP) and principal's signature to show that the student earned the grade. The teacher must also provide an explanation to justify the new grade.

Davis confirmed that the BCPS grade change policy intends to be specific to the student. The OIGE showed Davis an email<sup>13</sup> dated February 18, 2018. After reviewing the email, Davis identified the recipients as the Patterson leadership team but did not know the email's author or

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<sup>13</sup> Email, Subject: Grade Change Form, Dated: February 18, 2018

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why the author would have sent it. Davis stated he would ask questions about allegations of a spreadsheet used to change grades en-masse before automatically assuming anything was inappropriate. When asked how he would accomplish this, Davis responded, "I wouldn't question it, right like this is the kind of stuff that doesn't necessarily get brought to me."

The OIGE requested Davis place the February 18, 2018, email next to the grade-changing spreadsheet and asked if he saw any problems with the numbers for Patterson. Davis responded, "I know that in cases like this, there is a ton of context; I know that there could be a lot of different situations, and in fact, you asked me questions where I have given you a ton of different things around grade changing that are real." Davis reiterated that a 59.5 would round to a 60 in IC, but a 58 would not. Davis stated he has no idea why the email's author wrote it, nor does he know its context.

Davis advised that a principal must sign off on all grade change forms and he felt the policy is appropriate. When the OIGE explained that at least one BCPS school had pre-signed grade change forms, Davis said he would, "want to know a lot of contexts first" before speaking about the matter. When asked to expand on what context pre-signing grade change forms would be appropriate, Davis stated, "off the top of my head, I am not completely sure." Davis eventually theorized that it could be reasonable if teachers did not submit grades on time. He expounded that if a class had 30 kids and no grades entered, he could see pre-signing the grade change forms as acceptable. Davis further said he did not encourage the policy of rounding 58 or 59 grades to a 60 and that, "any type of grade change that was not earned, I am never going to support, and we don't support."

In closing, Davis said he did not feel there is pressure on ILEDs or principals to change grades and believes the only pressure they are under is the stress to create a good environment for kids to learn and succeed. When questioned about allegations that ILEDs or Executive level leadership placed pressure on the principals to change grades, Davis stated, "I would say that I don't have any evidence of that."

### **Information Technology Environment**

OIGE Inspectors interviewed BCPS's Director of Information Technology in the presence of BCPS's Office of Legal Counsel.

The IT Director provided background information on the student information system, Infinite Campus (IC), utilized to manage the grading system within the BCPS. The IT Director referred to IC as "the system of truth." The BCPS Board of School Commissioners (Board) approved the purchase of IC in September 2015. Approximately one year later, every institution within BCPS employed the use of IC.

The IT Director stated there are different modules within IC. Teachers use a "Gradebook module" to maintain grades and attendance records. The school year (180 calendar days) is broken into four separate quarters (45 days.) Teachers issue progress reports throughout the quarters.

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Teachers have approximately four to five days to "finalize" their grades at the end of each quarter, and then the grades are "published." Published grades then transfer to a "student grading module."

The Board determines the quarterly deadline for teachers to enter grades into IC. A teacher must submit a Grade Change Request via a ticketing process to request a grade change after the deadline. The Grade Change Request is then forwarded or routed to the respective principal. Principals can change grades in IC throughout the calendar year. This process can be done without any oversight and is not limited to the quarterly deadline requirement of a teacher. The IC system logs all changes when entered and backs up the data at the BCPS central office.

The IT Director stated a principal can request grade changes as needed after a school year has concluded through a ticketing system called a "Heat Ticket." The Heat Ticket process would allow a window of time for the principal to complete the changes.

The IT Director explained that all grade changes made in IC create a digital signature that can be detected through an audit, regardless of who caused the changes. There generally are "less than five" audit requests per year relating to grade changes. Typically, the BCPS central office requests audits and they do so by way of "Heat Ticket."

Attendance records are also maintained in IC and consist of three categories: absent, present, or tardy. The default for all attendance records is the "present" category. The IT Director stated that it was "too much work" to have teachers mark every student as "present" and it was more efficient to teachers only mark students "absent" or "tardy". Principals can specify which absences are "excused" after initially marked by a teacher. Elementary and middle schools document attendance for mornings and afternoons. High Schools document their attendance on a per-class period basis. If a student is absent, IC generates a robocall (to the phone number on file) advising the student is absent.

## **Recommendation**

Our investigation revealed a differing interpretation, application, and adherence to appropriate grade change procedures among school staff at the teacher, principal, ILED, and school system executive levels. The misunderstanding, misapplication, and non-compliance of grade change procedures increased the risk of inappropriate grade changes, which could significantly impact graduation rates. Based on complaints of grade manipulation to alter/change grades and increase graduation rates and our investigative findings, the OIGE recommends that pursuant to Maryland Code, Education Article §5-110, the Baltimore City Board of School Commissioners request the Maryland State Board of Education and the State Superintendent of Schools issue an emergency procurement for an independent performance audit of the Baltimore City Public Schools (BCPS) to evaluate the efficiency and effectiveness of selected functional areas related to the governance and administration of grading policies and procedures.

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The OIGE understands information may be changed or updated after completing an investigation. The OIGE appreciates the cooperation provided by Baltimore City Public School CEO Dr. Sonja Santelises, CAO Dr. Joan Dabrowski, COS Mr. John Davis, and the many members of the Baltimore City Public School system who assisted in this investigation.

Consistent with Education Article §9.10-104, the Inspector General having identified issues of concern that would not constitute a criminal violation of State law, the Inspector General will report the issues of concern to the Governor, the General Assembly, the State Board of Education, and the State Superintendent of Schools.

Respectfully,



Richard P. Henry  
Inspector General

Cc: Hon. Lawrence J. Hogan, Jr, Governor – State of Maryland  
Hon. William C. Ferguson IV, President – Maryland State Senate  
Hon. Adrienne A. Jones, Speaker – Maryland House of Delegates  
Hon. Clarence C. Crawford, President – Maryland State Board of Education  
Hon. Mohammed Choudhury, State Superintendent of Schools  
Ms. Johnette Richardson, Chair - Baltimore City Board of School Commissioners  
Dr. Sonja Brookins Santelises, Ed.D., Baltimore City CEO/Superintendent of Schools  
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

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