



MARYLAND OFFICE OF THE  
INSPECTOR GENERAL FOR EDUCATION

Richard P. Henry  
*Inspector General*

Yvonne K. Brooks, Esq.  
*Deputy Inspector General*

October 26, 2023

**VIA EMAIL (sbsantelises@bcps.k12.md.us)**

Dr. Sonja Brookins Santelises  
Chief Executive Officer  
Baltimore City Board of Education  
200 E. North Avenue  
Baltimore, Maryland 21202

Ref: OIGE Case 22-0009-I

Dear Dr. Santelises,

The Office of the Inspector General for Education (OIGE) received multiple complaints alleging ineffective and abusive leadership and financial mismanagement of school funds at Western High School (Western). OIGE's investigation focused on financial mismanagement concerning the Student Activity Fund (SAF), specifically regarding the student musical production of "The Wiz," specific disbursements, and abuse of authority relating to a PayPal account established for the school.

The investigation revealed a lack of training and oversight regarding the SAF and an abuse of authority by Western's Principal, who instructed a school employee to open a personal PayPal Account on behalf of the school to collect donations. OIGE could not determine if donated funds were mismanaged or misappropriated based on the limited information provided by Western school officials. However, the account's existence violated Baltimore City Board of School Commissioners (BCBSC) Policies and Administrative Regulations.

The OIGE found that collecting electronic donations via PayPal was not contrary to any BCBSC policy before 2021. The Principal explained there was no other way to collect electronic donations. When BCBSC policy was updated in 2021<sup>1</sup>, the OIGE found the continued use of PayPal violated the revised policy. Despite the Principal's claim that an employee volunteered to open the PayPal account in their name, the Principal is in a position of authority and should not have asked the employee to do so.

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<sup>1</sup> BCBSC (2021). *Policies and Administrative Regulations* (DMA-RA I (E)(12)).

Additionally, the investigation revealed that expenditures for the musical production were reconciled with invoices and receipts. However, the OIGE found in its limited review that other purchases, specifically pictures and services to remove a water fountain, were not reconciled with supporting documentation. Although the Principal believed purchases made through the principal's discretionary account<sup>2</sup> were permissible and for the benefit of students and staff, BCBSC policy does not distinguish this type of account under SAF policy.<sup>3</sup> Finally, the Principal explained they did not receive training in the appropriate use of the SAF, although it is a requirement under the 2011 BCBSC policy.

The OIGE determined that BCBSC created the appropriate policies governing the SAF and donations, but they were ineffectively implemented by the Principal, leading to a gap between policy intent and management. The OIGE recommends ensuring all Baltimore City School principals complete the appropriate training to manage their respective SAFs effectively.

At this time, the OIGE is declining any further investigation into this matter and is referring this issue back to the Baltimore City Public Schools for further review and consideration.

Respectfully,



Richard P. Henry  
Inspector General

cc: Joshua Civin, Esq., Chief Counsel – Baltimore City Public Schools  
Yvonne Brooks, Esq., Deputy Inspector General – OIGE  
H. Brandis Marsh, Esq., Assistant Attorney General, Principal Counsel - OIGE

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<sup>2</sup> The OIGE found that the use of a Principal's Discretionary Fund is a term and practice within BCPS; however, it is not defined within BCBSC Policy.

<sup>3</sup> BCBSC (2011). Policies and Administrative Regulations (DMA-RA I (E)(2) and (DMA III (D)(4) and (8)).