



MARYLAND OFFICE OF THE INSPECTOR GENERAL FOR EDUCATION



Investigative Report Summary

OIGE Case 23-0011-I

Issued: October 20, 2025



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



October 20, 2025

To the Citizens of Maryland and Prince George's County,

The General Assembly, at its First Session after the adoption of the Maryland Constitution, established throughout the State a thorough and efficient System of Free Public Schools and shall provide by taxation, or otherwise, for their maintenance.¹ The Maryland Office of the Inspector General for Education (OIGE) plays a vital role in protecting state funds allocated to local school systems. Our primary mission is to prevent and identify fraud, waste, abuse, and educational mismanagement within School Boards, the Maryland State Department of Education (MSDE), the Interagency Commission of School Construction (IAC), the 24 local education agencies (LEAs), and non-public schools receiving state funding throughout Maryland. Unless under limited exceptions, the Inspector General is generally prohibited from revealing the identity of the source of a complaint or the source of information received.

EXECUTIVE SUMMARY

The Office of the Inspector General for Education (OIGE) investigated allegations of irregular grade-changing practices at Suitland High School within Prince George's County Public Schools (PGCPS). The investigation found that five sections of an English 11 course lacked a dedicated teacher or substitute. Reportedly, only four grades were entered into the district's grading system during the fourth quarter. Following parents' complaints, administrators identified the issue at the end of the school year.

A PGCPS document dated June 29, 2022, called for the affected students' quarter four grades to be 50, 70, or 90. This was determined by attendance, prior performance in English 11 during quarters one through three, and overall academic performance during the fourth quarter. As a result, students received grades for English 11, in which instruction was not provided.

Based on interviews, document review, and policy analysis, OIGE found that staff at Suitland High School failed to comply with several administrative requirements. Specifically, staff failed to:

- Ensure the proper entry of required grades, which is inconsistent with Administrative Procedure 5121.3; and

¹ Constitution of Maryland, Article VIII, Education, Section 1

- Follow established grade-change procedures, which are inconsistent with Administrative Procedure 5116.

Insufficient supervision and long-term staff absences led to procedural inconsistencies and disruptions in education. The ongoing shortage of qualified teachers and the difficulty in filling vacancies do not justify ignoring grading and instructional policies. The investigation highlights the need for PGCPs to strengthen safeguards, such as conducting random audits of grading practices and improving oversight of teacher assignments and attendance.

BACKGROUND

Prince George's County Public Schools (PGCPS) is the 18th-largest school district in the United States and the 2nd-largest in Maryland. It serves 132,854 students across 201 schools and centers, with a staff of 22,000 employees. The annual budget is \$2.3 billion.²

Suitland High School is a Title I School located in Suitland, Maryland. All Title 1 schools in Prince George's County operate Schoolwide Programs that provide funded resources to all students, teachers, and parents.³ During the 2021-2022 school year, School Administrator 1 (SA1) led the school, and School Administrator 2 (SA2) was one of eight assistant principals. Additionally, SA2 served in other critical chairperson roles as an assistant principal.

According to the Maryland Teacher Workforce report released by the Maryland State Department of Education (MSDE), attrition has remained steady in Maryland over the past five years. Nearly all local educational agencies (LEAs) began the 2021-2022 school year with more vacancies than in previous years, with 10% of teachers not returning from the previous school year. The attrition rate in PGCPS was reported to be 11%. At the beginning of the school year, there were 422 teacher vacancies; at the end, there were 714.⁴

The MSDE report also states that the number of people completing teacher education programs nationwide is steadily decreasing. Under Article 8, § 1, of the Maryland Constitution, students are guaranteed a free public-school education.⁵ Despite teacher vacancies, schools must adapt and make modifications during teacher shortages to ensure students continue to receive instruction.

During an investigation into alleged wrongful grade changes at Suitland High School, PGCPS provided a Grade Change Justification document. The document stated that students enrolled in five sections of English 11 should receive a quarter four grade of 50, 70, or 90 because they did not receive direct instruction from a dedicated classroom teacher, nor was a long-term substitute

² Prince George's County Public Schools – Facts and Figures. <https://www.pgcps.org/about-pgcps/facts-and-figures> (last accessed August 12, 2025).

³ Prince George's County Public Schools – Title I Schools. <https://www.pgcps.org/offices/essa-and-title-1/title-i-schools> (last accessed August 12, 2025).

⁴ Maryland State Department of Education – Maryland Teacher's Workforce – Supply, Demand, and Diversity. (last accessed July 26, 2022). <https://www.marylandpublicschools.org/stateboard/Documents/2022/0726/TabGBlueprintAndDataDeepDiveTeacherPipelineAndDiversity.pdf> (last accessed August 21, 2025).

⁵ Maryland Manual On-Line. <https://msa.maryland.gov/msa/mdmanual/43const/html/08art8.html>

teacher in place. Their grades were based on their prior performance in English 11 during quarters one through three, attendance, and overall academic performance during quarter four. SA2, in a chairperson's role, and other staff members signed the document. However, it was not dated.

PGCPS administrative procedures clearly define policies for the required number of grades based on how often courses are offered each week. However, there is no policy or procedure for managing disruptions to instruction caused by a teacher's absence or the unavailability of a substitute. Additionally, the procedures explain how grades are adjusted, and a separate policy covers student attendance.

Code of Maryland Regulations

Maryland state agency regulations are outlined in the Code of Maryland Regulations (COMAR). Title 13A.03.02.08, Grading and Reporting, requires each local school system to develop an annual written grading and reporting policy and submit it to the State Superintendent of Schools by October 1st.

The policy must include procedures for grade changes, including explanations of the following: the timeline for final grade changes, the personnel authorized to make grade changes at both the school and area office levels, the documentation maintained to support grade changes, an overview of the audit process to verify the validity of grade changes, and the appeal procedures. Additionally, this section requires an explanation of how attendance affects students' grades.

Prince George's County Public Schools Board of Education Policy

Prince George's County Public Schools Board Policy 5121, effective February 7, 2008, on Grading and Reporting for Elementary and Secondary Students, standardizes grading processes and procedures. It mandates that the Superintendent develop a policy to govern grading.

The policy states:

Further, this policy affirms the Board of Education's belief that grades will be reflective of student mastery of and demonstration of actual achievement relative to the rigorous academic standards that undergird the Maryland Voluntary State Curriculum and are reflected in the state assessments.

Prince George's County Public Schools Policies

PGCPS Administrative Procedure 5121.3, Grading and Reporting for High School Grades Nine through Twelve (effective August 24, 2021), provides guidance for grading. Under the Grading Elements section, the interpretation of letter grades is outlined as follows:

90-100%	Excellent progress toward meeting course objectives and learning outcomes
70-79%	Average progress toward meeting course objectives and learning outcomes
50%	Good faith effort for students who complete assignments with persistence and accuracy

Additionally, in Administrative Procedure 5121.3, the requirement for weekly graded assignments was outlined under the Reporting and Recording Grades section. It specified that classroom

teachers must record at least two numerical grades each week in SchoolMAX, PGCPS's grading system. If a class meets only once a week, then only one grade should be recorded. Principals or their designees are responsible for overseeing the entry of these numerical grades each week. Teachers are also instructed to return graded papers and assignments promptly, providing ongoing and timely feedback to students and parents.

PGCPS's comprehensive administrative procedure for employees regarding grade changes was Administrative Procedure 5116, Grade Change Authorization and Appeals, dated September 8, 2021. This policy outlines the mandatory steps for implementing grade changes.

A grade change was defined as "Changes in SchoolMAX to an existing quarter and/or final grade after the close of the grade publishing window per the approval process." The assigned teacher, principal, instructional director, or Student Intervention Team Chair could submit grade change requests for quarter and final grades within the grade change window. All grade change requests were to be entered and processed using the Grade Change Authorization Form (PS-140) and justified. Documentary evidence, such as student work, SchoolMAX reports, and other relevant documentation, was required to support the grade change. Once the principal approved the grade change, the grade manager was notified to update the grade, adjust the student's Grade-Point-Average (GPA), and complete the grade manager action in the PS-140 portal to record the changes. The grade manager also ensured that all documentation and supporting evidence for each grade change were filed in the student's cumulative folder.

Administrative Procedure 5113, Student Attendance, Absence, and Truancy, dated September 2, 2021, provides definitions related to attendance. The policy states that a student is "chronically absent" if they have been enrolled in school for at least 10 days and are absent for 10% or more of the school days. A student is considered "habitually truant" if enrolled for 91 days or more and unlawfully absent for over 21% of any marking period. Legal consequences are mentioned. It should be noted that the policy does not specify the impact of chronic absence or truancy on students' grades.

INVESTIGATION

Data Analysis

On December 4, 2024, the OIGE received documentation from PGCPS regarding an alleged grade-changing investigation at Suitland High School. The documentation included an undated Grade Change Justification form. The form indicated that five sections of English 11 were not given direct instruction or a long-term substitute during the fourth quarter of the 2021-2022 academic year. Department Chair School Employee 1 (SE1) was reported to have assigned work but did not grade or post the grades in SchoolMAX. Because of the lack of instruction and missing assignments, the affected students were to receive a grade of 50%, 70%, or 90% based on:

- Attendance
- Prior performance from Q1-Q3
- Academic performance during the 4th quarter in all classes

SA2 signed the document in the chairperson’s role, and three other staff members also signed. The investigation revealed that the document was created and signed on June 29, 2022. PGCPS reported that the last day for teachers was June 23, 2022, so only administrators and teachers in specialized roles remained at the school on June 29. According to the PGCPS Grading Planning Calendar, June 29, 2022, was the last day for teachers to change grades and the date when report card grades were posted online for students and parents.

Attendance

PGCPS provided a spreadsheet with attendance numbers for 95 students enrolled in the English 11 classes, broken down by quarter. Each student's grade for quarter four, as of June 29, 2022, was also included. A student was considered “chronically absent” if they missed more than 10% of the days during a quarter. Since quarter four had 46 days, any student missing five or more days was classified as “chronically absent.” During quarter four, 61 students missed five or more days. “Truancy” was defined as absences exceeding 20% of the marking period, or nine or more days. In total, 34 out of 96 students, or 45%, missed over ten days during quarter four. Additionally, 15 students were reported to have been absent for more than half of quarter four.

Days absent Q4	5-9	10-19	20-29	30+
# of students	27	19	9	6

Prior Performance of Q1-Q3

PGCPS provided a spreadsheet showing academic performance in English 11 during quarters one through three. Upon review, the average grades for 14 students did not match the fourth-quarter grades they received.

Grade average range for Q1-Q3	Grade received	# of students
81-87	70	8
47-52	70	3
71-79	90	2
61	50	1

Academic Performance During Quarter Four in All Classes

PGCPS forwarded a spreadsheet showing the academic performance of English 11 students during quarter four across all classes. According to this spreadsheet, 79 students received a fourth-quarter

grade of 90%, 70%, or 50% for English 11. Conversely, 18 students did not benefit from the SIT committee's decision on June 29th. The grade breakdown for these eighteen students is as follows:

Grade received	0	20-26	34-43	60-69	79	98
# of students	6	3	3	4	1	1

Twenty-four students received English 11 grades that did not accurately reflect their performance in other classes. Two examples are shown below.

Student A earned a 50% in English 11, while the average for their other quarter four courses was 85%.

- Classic Piano Theory 3 95%
- Foundations Comp 74%
- Applied Music Band 100%
- Psychology 78%
- Jazz Ensemble 70%
- Chemistry 81%
- Advanced Band 88%
- World History 95%

Student B earned a 90% in English 11, while the average for the other quarter four courses was 56%.

- Business Comm 26%
- Environmental Science 79%
- World History 86%
- Blended BioGeoChem 21%
- Spanish 2 58%
- Academic Resource 99%
- Algebra 2 71%
- Fashion Design 2 7%

PGCPS provided 100 PS-140s for the English 11 students. The OIGE identified clerical errors in the production, resulting in 96 PS-140s. Three were duplicates, and one was for a different quarter. All but one student received the Grade Change Justification. That student was shown to have a PS-140 for June 29, 2022; however, the student's parent appealed the failing grade for the course on August 11, 2022. The documentation indicated that the fourth-quarter grade was changed from 43% to 90%.

SA2 initiated all the PS-140s on June 29, 2022, which included the explanation, "Student did not receive direct instruction during Q4." SA1 approved the grade changes on June 29, 2022. According to leave documentation received from PGCPS, SA1 was on leave that day. The Grade Change Justification was the only supporting documentation attached to each PS-140. There were no examples of student work, nor was there any evidence of student attendance or prior performance in English 11 or other classes.

The OIGE reviewed the Suitland High School Administrative Team Rolling Agenda notes from September 22, 2021, to June 8, 2022. The meetings took place at least once a month, during which the administrative team discussed new ideas, issues, concerns, and challenges at Suitland High School. SA1 led the sessions in the bullet points below, highlighting specific directives for grading and teacher absences. Staff absences and coverage were discussed in many of the meetings.

- On September 22, 2021, it was noted under a bullet point regarding grading with teacher vacancies and those on leave: "**Students cannot receive a grade lower than 70%.**" (*Bold emphasis added*)
- On November 11, 2021, and March 10, 2022, Administrators were reminded to monitor gradebooks to ensure that the required number of grades were entered.
- On November 17, 2021, classes without teachers were addressed. For students with good attendance, the default grade would be 90% while those with poor attendance would receive 70%.
- On March 30, 2022, grades were directed to be based on attendance when teachers were on leave.
 - **90 if they are present**
 - **70 with "so-so attendance"**
 - **50 with poor attendance** (*Bold emphasis added*)
- On June 8, 2022, the administrators discussed basing grades solely on attendance for courses without teachers

Interviews

On February 20, 2025, OIGE interviewed SA2. As school administrators, they were the lead administrators for the graduating classes of 2022 and 2023 and served as chairpersons. The committee met periodically throughout the year to address students' needs. SA2 explained that the

Grade Change Committee was a subcommittee and was responsible for deciding whether to approve grade appeals submitted by parents, teachers, and administrators. The chairperson gathered supporting documentation for the Grade Change Committee meetings, including student attendance records, completed assignments, and grade book entries related to grade appeals. The committee's decision was then forwarded to SA1 for approval. All final decisions were posted within the PS-140 portal. After approval, the grade manager was notified to update the quarter or final report card grades, and the supporting documentation was filed in the students' cumulative folders.

When asked about teacher vacancies, SA2 said there were many, and ideally, when a teacher was on extended leave, a long-term substitute would run the class(es) as "their own." The English department advised that if a long-term substitute were unavailable, SE1 would oversee the class, assign work, and enter grades in SchoolMAX.

In response to the need to hold the committee meeting where the Grade Change Justification was signed, they said that the instructional director emailed them, instructing them to investigate a parent's complaint about missing grades and instruction in English 11. SA2 contacted the parent and recommended that they file a Grade Appeal. SA2 also mentioned that a former employee alerted administrators that several sections of English 11 were at risk of failing in quarter four. SA2 clarified that SE1 entered only four assignment grades for the fourth quarter.

SA2 explained that the Grade Change Justification document was created proactively during an Administrative Team Meeting earlier in the school year in response to classes without an assigned teacher or a stable long-term substitute. SA2 mentioned this approach was not supported by policy but was part of the Admin Rolling Agenda for 2022. After the committee meeting on June 29, 2022, SA2 stated that they had given SA1 a copy of the signed Grade Change Justification for approval. SA2 was unsure whether PS-140s were required to change the grades, since the grade changes occurred within the designated grade change period. Additionally, SA2 was unaware of who decided the grades for students in quarter four English 11.

Three staff members who signed the Grade Change Justification on June 29, 2022, were interviewed and collectively provided with the following information:

- There were only a few staff members in the building beyond the last day for teachers - June 23, 2022
- SA2 summoned them into a brief meeting
- SA2 explained that an unnamed person from the Area 3 Office informed her that the students enrolled in five sections of English 11 were in jeopardy of failing due to a teacher's absence
- The *Grade Change Justification* was prepared and presented for their signature
- All parties signed

- All denied assisting in determining the adjusted grade for the students impacted and were unaware who handled that task

On April 29, 2025, OIGE interviewed SA1. They explained that teacher vacancies were a constant challenge and that the number of teacher absences often exceeded the number of available substitute teachers. SA1 also stated that department chairs should support substitutes and assign work to students in classes without dedicated instructors. When asked who supervised SE1, they said it would be School Administrator 3 (SA3). However, they were on leave, so the responsibility fell to them.

When asked about the Grade Change Justification, SA1 stated that, in their role, they would usually approve the document. However, SA1 mentioned that SA3 was on leave from June 18, 2022, to mid-July, so it would have been approved by the School Executive Staff (SES1). SA1 denied that they were ever presented with the document as previously claimed. SA1 acknowledged responding by email to a parent's concerns about English 11 grades on June 29, 2022, even though they were on leave.

SA1 explained that the Grade Change Justification was usually used once or twice a year to address the lack of direct instruction. SA1 added that five classes missing instruction for an entire quarter was rare and that someone “dropped the ball.”

On April 30, 2025, SE1 was interviewed. When asked about their responsibilities during staff vacancies in the English department, SE1 stated that they had never taught a class without a dedicated instructor or substitute and were unaware of any policy for such situations. SE1 was shown the Grade Change Justification and the excerpt that states, “Students were given assignments in Google Classroom by SE1. Assignments were not graded or posted in the SchoolMax platform in a timely manner.” SE1 said they had not seen the document before and had no recollection of posting assignments in Google Classroom, grading them, or entering grades into the gradebook. SE1 added that this situation was unusual. SE1 mentioned that they would remember if they had assumed the role of teaching five additional classes with nearly 100 students, in addition to their assigned classes and duties as department chair.

Later, PGCPs sent an email containing correspondence between SE1 and a parent from June 15, 2022. In the email body, SE1 wrote:

Moreover, because there was no teacher assigned to the class, as the Department Chair, I was extremely fair with posting assignments for students, as they had one assignment a week to complete, taken from the curriculum, to ensure that students were getting content-related assignments and weren't stressed out due to not having face-to-face instruction.

FINDINGS

The OIGE found that Suitland High School failed to abide by administrative procedures.

1. Failure to provide students with the required number of graded assignments.

Reportedly, only four graded assignments were entered into SchoolMax for students enrolled in the five sections of English 11. SE1 stated that they were unaware of this responsibility and did not assign work to the students. In turn, the affected students received grades based on factors unrelated to mastery of the course content. This violates the assignment requirement in Administrative Procedure 5121.3 and the mastery-of-content requirement in Board Policy 5121.

RECOMMENDATION

PGCPS should ensure that all education staff are aware of their role and responsibilities as representatives of the school system. OIGE further recommends that PGCPS staff attend an orientation session before the beginning of the school year, which identifies their roles and responsibilities, and that this session also be included as part of the employees' annual or semi-annual Performance Evaluation Period.

2. Failure to oversee the entry of the required number of grades weekly.

The principal or their designee did not monitor grade entry for English 11 while the assigned teacher was absent. If this task had been completed, students would not have received grades they did not earn. This was not in line with Administrative Procedure 5121.3.

RECOMMENDATION

PGCPS should review all relevant policies and procedures concerning the assignment of lessons, grade entry, and the monitoring and grading of assignments during the absence of a primary or substitute teacher. Principals should ensure all staff understand their duties, responsibilities, and expectations.

3. Failure to supervise.

SE1 was directly supervised by SA3, who was reportedly often on leave. According to their own admission, SA1 should have assumed the supervisory responsibility of SE1 during their absence.

RECOMMENDATION

PGCPS should review policies and procedures governing the delegation of authority and the roles and responsibilities of staff during extended staff absences. The principal is the school's leader and is directly responsible for overseeing assistant principals and other key administrative staff. In this role, the principal is responsible for delegating roles, assigning clear duties, and ensuring the administrative structure is well-established.

PGCPS should also develop a management plan to address the teacher shortage, including both short-term strategies to reallocate staff and restructure class assignments, as well as long-term solutions focused on teacher recruitment and retention.

4. Failure to follow grade change policies.

The grades that the English 11 students received were based on their attendance, previous performance in quarters one through three, and academic performance in other courses during that quarter. No supporting documentation was attached to each student's Grade Change Authorization

form or document to justify the awarded grade, including the reason for the change. OIGE could not find, nor did PGCPs provide, a reason to support the rationale, and it is unknown who determined the students' grades. The only evidence supporting the grade changes was the Grade Change Justification. This practice is not in compliance with Administrative Procedure 5116.

RECOMMENDATION

PGCPs should review its grading practices to ensure compliance with MSDE regulations, COMAR 13A.03.02, and the Maryland Education Article, § 7-205.1, governing High School Curriculum and Graduation Requirements. MSDE requires that all students in Maryland earn a minimum of four credits in English. The practice used during our investigation could jeopardize a student's eligibility to graduate from high school.

OIGE is concerned that grade manipulation practices identified during the 2017 PGCPs performance audit and the 2018 follow-up audit by Alvarez & Marsal Public Sector Services, along with the recommendations made, are not being followed. During their audit, A&M noted⁶ that 1) PGCPs staff did not consistently adhere to policies and procedures related to grading and graduation certification, and 2) school-level recordkeeping related to grading and graduation certification is poor.

OIGE understands that information may change or be updated after an investigation is completed. The OIGE appreciates the cooperation from the members of Prince George's County Public Schools, Prince George's County School Law Office, and the staff of the Suitland High School Office during this investigation.

In accordance with Education Article §9.10-104, since the Inspector General has identified concerns that do not constitute a criminal violation of State law, the Inspector General will report these concerns to the State Superintendent and the State Board of Education.

Respectfully,



Richard P. Henry
Inspector General

Cc: Brannndon D. Jackson, Chairperson, PGCPs Board of Education
Dr. Joshua L. Michael, Ph.D., President, Maryland State Board of Education
Dr. Carey M. Wright, Ed.D., State Superintendent of Schools
Darnell L. Henderson, Esq., Principal Counsel, PGCPs
Frank S. Turner, II, Integrity and Compliance Officer, PGCPs

⁶ Independent Performance Audit Prince George's County Public Schools Graduation Rates, October 31st, 2017, RFP # R00R8400170, Alvarez & Marsal Public Sector Services, LLC.