

Internal
Audit
Report

*Division of Curriculum and Instruction, Department of Social-
Emotional Support*

**Student Enrollment Process & Data
Accuracy**

May 2023



Baltimore County Public Schools
Office of Internal Audit

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Report Highlights

Student Enrollment Process & Data Accuracy

May 2023

Objective

To determine if students are properly enrolled in BCPS and related data is accurate within the student information system.

Background

Staff in the Department of Social-Emotional Support (SES) and the Office of School Climate and Culture (SCC) work collaboratively with schools to support students and their families with enrollment in BCPS.

Enrollment liaisons (administrative and record secretaries) at the schools are responsible for entering data into Focus during the enrollment process.

Audit Period

FY 2022 & FY 2023

Summary of Results

Issue 1: System-wide training is not provided for newly hired enrollment liaisons.

Issue 2: The presentation of student enrollment information on the BCPS website is not concise or user-friendly.

Issue 3: Required documentation for newly enrolled students was not available to verify Baltimore County residency in accordance with Superintendent's Rule 5150.

Issue 4: Shared Domicile Disclosure Forms and renewals are not completed and approved in accordance with Superintendent's Rule 5150.

Issue 5: Data in the Focus student information system is not accurate or sufficient to identify special permission transfer students attending a school outside of their home school.

Issue 6: Special permission transfers due to medical/student adjustment are not completed and approved in accordance with Superintendent's Rule 5140.

Issue 7: Data in Focus is not accurate to identify special enrollment placement students.

Issue 8: Enrollment related help desk requests are not resolved timely.

Audit Rating

Unsatisfactory

The results of this audit are rated as unsatisfactory due to:

- Non-compliance with Superintendent Rules.
- Lack of documentation and communication of controls/policies/procedures.
- Issues were rated as high and urgent corrective actions are necessary.

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BACKGROUND

Responsibilities

Central Office

The Department of Social-Emotional Support (SES) and its sub-unit, the Office of School Climate and Culture (SCC), are part of the Division of Curriculum and Instruction. SES and SCC staff work collaboratively with schools to support students and their families with enrollment in BCPS schools. The Executive Director of the SES is also the process owner for the BCPS student information system, Focus. Responsibilities of the department related to enrollment include:

- Training for school-based administrative and record secretaries.
- Help desk support for Focus and enrollment issues.

Specific responsibilities for the SCC office¹ include providing support to students and their families with situations such as:

- Initial shared domicile
- Special enrollments:
 - homelessness
 - kinship and hardship
 - agency-placed enrollments
- Special permission transfers (Form B):
 - behavioral adjustment
 - medical placements

School-based

Enrollment liaisons (administrative and record secretaries) at the schools are responsible for entering data into Focus during the enrollment process. Additionally, they receive, review, and maintain all documentation required for enrollment such as:

- Renewals for shared domicile
- Special permission transfers (Form A):
 - terminal grade
 - program of study
 - change in residence
 - child of employee
 - child care
 - boundary change, or
 - sibling of currently enrolled student.

¹ The Pupil Personnel Workers (PPW) are part of the Office of SCC, and receive, review, and maintain documentation required for initial shared domicile, special enrollment placements, and special permission transfers.

Regulations

The SES and the SCC are governed by Board of Education (Board) Policy and Superintendent's Rule 5110 - Admission, 5140 - Assignment and/or Special Permission Transfer, and 5150 - Resident and Nonresident Student Eligibility for enrollment.

COMMENDATIONS

Communication

The Executive Director of SES and the Director of SCC were prompt in their submission of audit requests and provided detailed explanations when follow-up was requested.

Annual Training²

The SES and SCC provide student enrollment training annually. The most recent training was offered for three days in March 2023. Although the training was strongly recommended for all enrollment liaisons, it was not mandatory. Our review of the training material found that SES and SCC provided useful information for the enrollment and residency processes, including:

- Reminders and updates to special permission transfers under Superintendent's Rule 5140.
- Reminders and updates to special enrollments under Superintendent's Rule 5150; shared domicile, homeless/McKinney-Vento, informal kinship/hardship, and state supervised care.
- Available support for multilingual families.
- Introduction of new automated alerts in Focus to indicate when enrollment renewals and residency reverifications are due.
- Feedback received from various audits of the enrollment process.

OBSERVATION

Since the responsibilities for proper student enrollment are shared between central office staff and school-based staff, an in-depth review of the shared responsibilities should be conducted to determine which part of the organization should be responsible for general enrollment, shared domicile, special permission transfers, and special enrollments.

² Although the annual training addressed important updates, Internal Audit noted that there is no initial training offered to newly hired enrollment liaisons, see Issue #1.

RESULTS

Issue 1: System-wide training is not provided for newly hired enrollment liaisons.

Issue Rating	High
Criteria	School based enrollment liaisons must have timely training to ensure that students are enrolled in accordance with applicable Board Policies and Superintendent Rules.
Issue	The SES and SCC do not provide enrollment liaison training to newly hired school secretaries responsible for the enrollment process. New hires typically learn the process from other users.
Cause	The SES and SCC are not informed when new school secretaries, responsible for the enrollment process, are hired. Additionally, a new hire training course has not been developed.
Effect	When new enrollment liaisons are not properly trained in the enrollment process: <ul style="list-style-type: none">• students may not be enrolled timely.• student records may not be accurate.• incorrect practices learned from other users may be perpetuated.• Reports submitted to MSDE may not be accurate.
Recommendation	The executive director should: <ul style="list-style-type: none">• work with the Department of Employee Training & Development to develop and implement online enrollment training for newly hired enrollment liaisons.• work with the Division of Human Resources to ensure that newly hired enrollment liaisons are trained.

Management's Corrective Action

A year-long induction and support program is being developed for office professionals including those who serve as enrollment liaisons. All office professionals—regardless of job title and specific responsibilities—are strongly encouraged to participate in the induction and support program. Making the training available to all office professionals serves several purposes: 1) addresses gaps in learning due to inadequate training; 2) corrects misunderstandings of enrollment practices and procedures; and 3) eliminates delays in students' enrollment due the enrollment liaison's unavailability.

Each month, training on a different clerical-related topic will be provided. Immediately following the training, the presentation, print materials, and video snippets will be made

available to reinforce the learning outcomes and to be used with new hires throughout the year.

A procedural manual for enrollment liaisons will be developed, shared during training, and uploaded to Schoology for future reference.

The directors will collaborate with representatives from the Office of Staffing to develop a process for identifying new hires.

Responsible Person(s)

- Director of Student Support Services
- Director of School Climate and Culture
- Coordinator of Pupil Personnel Services
- Executive Director of Social Emotional Support

Anticipated Completion Date

- Induction and support program – implementation began April 2023; implementation to continue monthly throughout 2023-2024 school year.
- Collaboration with Office of Staffing – June 2023 throughout 2023-2024 school year.
- Procedural Manual- developed by August 2023 and shared during 2023-2024 school year training.

Issue 2: The presentation of student enrollment information on the BCPS website is not concise or user-friendly.

Issue Rating	High
Criteria	Student enrollment information must be presented to the public in a concise and organized way to streamline the enrollment process and obtain all required information and documents efficiently.
Issue	<p>The BCPS website does not provide clear guidance to the community regarding the student enrollment process. A parent/guardian must access multiple links within the BCPS website for enrollment information and some links do not take the user to the correct or most useful page:</p> <ol style="list-style-type: none">1. There are two links on the main BCPS webpage under the header Team BCPS Spotlights titled Enrollment and Parent Portal, however the associated links are switched. The Enrollment link takes the user directly to the Parent Portal page and Parent Portal link takes the user to a Parents page with quick links that include Enroll your Child, Log into Focus Parent Portal, School Zone Charts, and others. The Enroll your Child link takes the user to a Parent Portal Registration page which has very little information regarding the actual enrollment process.2. There are additional enrollment links on the main BCPS webpage in the blue header:<ul style="list-style-type: none">• Under the SCHOOLS tab, the Register Your Child link takes the user to the Pupil Personnel Services and Responsive Student Programing page. This page includes important information regarding registration including a link for a BCPS Registration Checklist, however, the user must scroll through other non-relevant information to see the registration information. Additionally, there is conflicting information indicating that parents may begin the enrollment process through the Focus Parent Portal, then further down the page it indicates that families should register with their zoned home school by downloading and completing several forms.• Under the STUDENTS tab, Enroll in BCPS, and the PARENTS tab, Enroll Your Child, the links take the user to the Office of Homeschooling page. This page includes important information regarding registration for homeschooling but not for general enrollment. The names of the links for this page are misleading as they do not inform the user that the pages relate only to homeschooling enrollment.

Cause	Multiple offices have posted enrollment information on the website in silos. A single office is not responsible for coordinating the enrollment information that is presented to the public on the BCPS website.
Effect	<p>When parents/guardians cannot find or understand enrollment information:</p> <ul style="list-style-type: none"> • their students may not be enrolled in BCPS timely and miss out on critical learning. • staffing needs due to late registering students may lead to last minute changes/conflicts. • they may become frustrated with the BCPS website and not access it for other important information. <p>In addition, BCPS will lose funding for students who are not properly enrolled by September 30th of each year.</p>
Recommendation	The SES staff should work with other relevant offices to provide parents/guardians with all necessary enrollment information related to online and in-person registrations that can be accessed from one main student enrollment page. Include links to special services such as ESOL, homeschooling, shared domicile arrangement, and magnet programs.

Management’s Corrective Action

Recommendations for revising and restructuring the BCPS website will be made to the school system’s webmaster. The Office of Pupil Personnel Services’ webpage will be revised and restructured to provide greater clarity. Additionally, issues related to enrolling students via the Focus student information system will be addressed. A workgroup will be established for the purpose of making recommendations.

Responsible Person(s)

- Director of School Climate and Culture
- Director of Student Support Services
- Executive Director of Social Emotional Support
- BCPS Office of Communications and Webmaster
- Central Office Based Webmasters
- Technology Solutions Department

Anticipated Completion Date

- May 10, 2023- Initial Meeting with BCPS Office of Communications
- May 17, 2023 – Meeting with small stakeholder group and BCPS Office of Communications to discuss draft.
- June 2023 – Final draft completed and link to main BCPS page posted.

Issue 3: Required documentation for newly enrolled students was not available to verify Baltimore County residency in accordance with Superintendent's Rule 5150.

Issue Rating	High
Criteria	Per Superintendent's Rule 5150, the parent(s)/guardian(s) have the burden of establishing a bona fide domicile in Baltimore County to attend a BCPS school. The parent/guardian must provide proof of identity, proof of home ownership or lease agreement, and three documents to verify their name and address at the residence.
Issue	<p>For 37 of 60 newly enrolled students, appropriate documentation was not available from the school to verify Baltimore County residency:</p> <ol style="list-style-type: none">1. For 22³ of the 37 students, acceptable proof that a parent was a homeowner or leaseholder in Baltimore County was not available.2. For 23 of the 37 students, three <u>acceptable documents</u> with the parent's name and address were not available to verify that the parent resides at a Baltimore County residence. Documents were not acceptable because:<ul style="list-style-type: none">• they were dated beyond 60 days of receipt by the school,• not on the acceptable document list,• received after the student enrolled, or• did not include the parent's name and/or address.
Cause	School staff enroll children without appropriate documentation while they work with the family to obtain needed documents. Additionally, school staff were unfamiliar with Superintendent's Rule 5150 documentation requirements. Exceptions to Superintendent's Rule 5150 that were made during the pandemic to get students enrolled in school continue to be made.
Effect	When required documents are not obtained or retained to prove residency in Baltimore County, out-of-county students may be enrolled unlawfully. This may lead to overcrowding, loss of out-of-county tuition fees, and missed educational and extracurricular opportunities for lawfully enrolled students. In addition, BCPS may lose funding if documentation is not obtained as required by BCPS policies and procedures.

³ For 13 of these 22 students, the school provided a Real Property Data Search printout from the Maryland Department of Assessments and Taxation as proof of home ownership. According to the Director of the SCC office, the Real Property Data Search is currently used as acceptable proof of domicile, however, this documentation is not on the acceptable document list in accordance with Rule 5150.

Recommendation To ensure that appropriate documentation is obtained at the school when verifying Baltimore County residency:

- routinely communicate Superintendent's Rule 5150 to school principals (or designee) and enrollment liaisons, particularly prior to Spring enrollment when most new students are enrolled.
- determine if a printout from the Maryland Department of Assessments and Taxation database is an acceptable form of documentation to prove homeownership in Baltimore County. If so, revise Superintendent's Rule 5150.
- continue to conduct records reviews at schools and provide timely feedback to administrators and enrollment liaisons.

Management's Corrective Action

Policy and Rule 5150 will be shared with principals in the Fall to support the September 30th student enrollment count and in the Spring to support new student enrollment and the student record verification process.

Year-long induction and support program for enrollment liaisons will address deficiencies in the collection of residency documentation. Superintendent's Rule 5150 (Enrollment and Attendance) will serve as the foundation for the information shared during the training.

Student Record Reviews will continue to take place. Student Record Reviews are conducted to ensure that students' cumulative folders include the documentation required by MSDE and Policy/Rule 5150.

Superintendent's Rule 5150 is currently being revised to reflect some of the enrollment practices that were instituted during the pandemic and closure of schools. Once a revised rule has been approved, the approved version of the rule will be incorporated into the induction program's monthly training schedule. Additionally, principals will receive training on the revised rule.

Responsible Person(s)

- Director of Student Support Services
- Director of School Climate and Culture
- Coordinator of Pupil Personnel Services
- Executive Director of Social Emotional Support

Anticipated Completion Date

- June 2023 – June 2024

Issue 4: Shared Domicile Disclosure Forms and renewals are not completed and approved in accordance with Superintendent's Rule 5150.

Issue Rating

High

Criteria

The process for Shared Domicile requests begins with the parent:

- *Shared Domicile Disclosure Form (Initial)* - A parent must complete this form to request a Shared Domicile designation. The parent must provide proof of identity, proof of ownership or leaseholder interest by the owner/leaseholder, and three documents to verify their name and address at the shared residence. The form and documentation are submitted to the PPW or residency investigator of the school attendance area for approval or denial. Enrollment in a Shared Domicile agreement is only approved for one school year.
- *Shared Domicile Disclosure Renewal Form* - Schools send out an annual reminder to the applicable parents to complete the Shared Domicile Disclosure Renewal Form⁴. A parent must complete this form annually by no later than June 30. The parent must provide three documents to verify their name and address at the shared residence. The form and documentation are submitted to the school for the principal's approval or denial.

Issue

Documentation was not available or acceptable to verify that students were eligible for enrollment in BCPS due to a shared domicile arrangement with a homeowner in Baltimore County:

- For the seven students sampled that required a submission of an initial Shared Domicile Disclosure Form, the PPW did not obtain:
 - The documentation to support proof of ownership or leaseholder was not in accordance with Rule 5150 for verification of domicile for two students.
 - The three documents provided to verify the name and address of the parent at the shared domicile were not in accordance with Rule 5150 for two students.
- For the 27 students sampled that required a submission of a Shared Domicile Renewal Form, school personnel did not obtain:
 - The school did not have a completed Shared Domicile Renewal Form for the student for the school year selected for seven students.

⁴ The Executive Director of the Department of Social Emotional Support sends out a template letter to schools in early April as a reminder to begin the renewal process.

- The Shared Domicile Disclosure Renewal Form was not completed by the required June 30th deadline for five students.⁵
- The Shared Domicile Disclosure Renewal Form was not signed by the principal documenting the approval of the renewal for five students.
- The three documents provided to verify the parent resides at the shared domicile were not in accordance with Rule 5150 for two students.

Cause Exceptions to Superintendent’s Rule 5150 that were made during the pandemic to get and keep students enrolled in school continue to be made. Additionally, school staff delayed withdrawal to allow students to remain enrolled without appropriate documentation while they worked with the family to obtain needed documents.

Effect When shared domicile applications and renewals, are not obtained, reviewed for completeness, and approved by the principal, an in-eligible child may enroll in school. In addition, BCPS may lose funding if required documentation is not obtained.

Recommendation To ensure that shared domicile applications and renewals are processed according to Superintendent’s Rule 5150:

- routinely communicate Superintendent's Rule 5150 to PPWs, residency investigators, school principals (or designee), and enrollment liaisons, particularly near the end of the school year when shared domicile requests and renewals are most common.
- identify students who are approved as a shared domicile placement and ensure that a shared domicile disclosure or renewal has been received and approved by the appropriate individual.
- work with the Chief of Schools to ensure that principals are monitoring students identified as shared domicile placements.
- determine if it is acceptable to delay withdrawal of a student whose renewal has not been completed until the beginning of the next school year. If so, revise Superintendent's Rule 5150.
- continue to conduct records reviews at schools and provide timely feedback to administrators and enrollment liaisons.

⁵ Rule 5150 states that the parent must submit the Shared Domicile Disclosure Renewal Form and supporting documentation to the student's home school by no later than June 30 for the following school year. Students are to be withdrawn if the information is not received by June 30. However, it is common practice to keep students enrolled over the summer to allow parents more time to submit documents. Students are withdrawn if the renewal documents are not received by the start of the school year.

Management's Corrective Action

Policy and Rule 5150 will be reviewed with PPWs, residency investigators and principals to ensure that they are aware of the required documents necessary to approve an initial shared domicile application and renew a shared domicile application.

Routine audits of initially approved shared domicile applications will be conducted to ensure that they are fully compliant.

Student Record Reviews will include routine reviews of shared domicile renewals.

Superintendent's Rule 5150 is currently being revised to reflect some of the enrollment practices that were instituted during the pandemic and closure of schools. Once a revised rule has been approved, the approved version of the rule will be incorporated into the induction program's monthly training schedule. Additionally, PPWs, residency investigators and principals will receive training on the revised rule.

Responsible Person(s)

- Director of School Climate and Culture
- Director of Student Support Services
- Coordinator of Pupil Personnel Services
- Executive Director of Social Emotional Support

Anticipated Completion Date

- June 2023 – June 2024

Issue 5: Data in the Focus student information system is not accurate or sufficient to identify special permission transfer students attending a school outside of their home school.

Issue Rating

Medium

Criteria

In accordance with Superintendent’s Rule 5140, each Baltimore County public school will have a designated school attendance area. Students shall attend the school serving the school attendance area in which the parent(s) have a bona fide domicile, however, a special permission transfer may be requested by the parent for students in Grades K – 12:

- *Application for Special Permission Transfer (Form A)* - A parent must complete this form to request a Special Permission Transfer for various reasons: Terminal Grade, Program of Study, Change in Residence (stay at former school after change or attend new school prior to change), Child of Employee, Child Care, Boundary Change, or Sibling of Currently Enrolled Student. **Form A is submitted to the principal of the requested school for approval or denial.**
- *Application for Special Permission Transfer - Medical/Student Adjustment (Form B)* - A parent must complete this form to request a Special Permission Transfer due to medical and/or student emotional or social adjustment reasons. Detailed documentation from the student's medical or mental health provider must also be provided to support the request. **Form B is submitted to the Director of SCC (or designee) for approval or denial.**

Due to school attendance boundary controls within Focus, the enrollment liaison must select an option in the Address Override Reason field before a student can be registered in a school outside of the attendance area assigned to their home address. The override reasons noted above under Form A and Form B, as well as additional reasons, are included in the list of 21 reasons currently available to choose from in a drop-down format in Focus.

Issue

For the 57 students sampled with an Address Override Reason in Focus that indicated a parent requested a special permission transfer for attendance at a school outside of the home school, only 10 special transfer permission students were identified. For the other 47 students:

- The Address Override Reason field was used by the enrollment liaison in error for 34 students. The student's address was within the school's attendance boundary, or the student

attended a special school with no attendance boundaries, therefore, the Address Override Reason field should not have been used.

- The Address Override Reason used by the enrollment liaison for 13 students was incorrect.
 - For 11 students, parents did not request a special permission transfer. The students were placed outside of their home school due to specific circumstances which include placement: at an ESOL center; of an employee's out-of-county child; by the Department of Special Education; and by the Office of Early Childhood (pre-school and pre-kindergarten students).
 - For two students the reason "Program of Study Not Available" was used, however, the students were homeless. Therefore, the Address Override Reason selected should have been "Homelessness".

Cause

The only field in Focus that is used to identify a special permission transfer student is the Address Override Reason field. However, this field is also used to document other reasons for overriding an address during enrollment, that makes it difficult to accurately identify special permission transfer students:

- The school boundary controls in Focus ensure that the address entered for a student is valid and within the school's attendance boundary. As the address is typed, the system returns an address that matches what is typed. The enrollment liaison must select an option returned by the system. When the system returns an address that doesn't exactly match the address provided by the parent, such as Maple St. instead of Maple Rd. or Parkville, MD instead of Baltimore, MD, the enrollment liaison can select any reason in the Address Override Reason field to bypass the boundary controls and allow an address to be manually entered.
- The drop-down list for the Address Override Reason field does not include options for common circumstances such as placement at an ESOL center, by the Department of Special Education or for special transfers for pre-kindergarten and pre-school students. Additionally, there is no option specifically for special permission Form A or Form B transfers. Some drop-down reasons, especially "Medical Reasons" and "Behaviorial Adjustment", are used to account for multiple circumstances.
- The list of 21 options for the Address Override Reason field is in a random order and only the first 9 options are visible when the drop-down is opened. For example, the enrollment liaison must scroll through to the 19th option to find Homelessness.

Effect

When the Address Override Reason field does not contain accurate and specific data:

- Incorrect student addresses may be entered manually for fraudulent reasons. Additionally, the school may not be able to reach parents via U.S. mail if address data is not correct.
- The number of students attending schools outside of their attendance area via special permission transfer cannot be accurately determined, which may skew demographic data for schools.
- Reports submitted to MSDE may not be accurate.

Recommendation

To ensure compliance with Superintendent Rule 5140:

- continue to communicate the expected use of the Address Override Reason field in Focus to school principals (or designee) and enrollment liaisons to ensure:
 - that special permission transfer students can be accurately identified.
 - that the Address Override Reason field is not used to manipulate student addresses.
- identify and monitor students with an Address Override Reasons associated with special permission transfers to ensure that a Form A or B has been received and approved by the appropriate individual(s).

To increase accuracy and efficiency:

- evaluate the existing options included in the drop-down for the Address Override Reason for relevance and consider adding additional options to address all common reasons. Additionally, the list should be presented in a methodical order.
- consider an additional field or drop-down option to clearly identify students that are approved for special permission transfers via Form A or Form B.

Management's Corrective Action

Include in the year-long induction and support program for enrollment liaisons systemwide misuse of the address override feature in the Focus student information system. Central to the training on this finding will be a directory of address override reasons along with an explanation for when each reason should be selected.

Conduct periodic reviews of the address override report in Focus to ensure that the appropriate reason has been selected and is verified with the appropriate documentation specifically for special permission transfers, Form A and Form B.

Collaborate with members of the Office of Technology Solutions to clearly label the reasons comprising the address override directory. Specifically delineate and label override reasons for special permission transfers.

Responsible Person(s)

- Director of School Climate and Culture
- Coordinator of Pupil Personnel Services
- Executive Director of Social Emotional Support
- Technology Solutions Department

Anticipated Completion Date

- May 2023 – August 2023 Focus SIS Updates
- June 2023 – June 2024 – Training and Review

Issue 6: Special permission transfers due to medical/student adjustment are not completed and approved in accordance with Superintendent's Rule 5140.

Issue Rating	High
Criteria	The application process for a special permission transfer due to medical/student adjustment requires that the parent complete a Form B ⁶ and obtain detailed documentation from the student's medical or mental health provider to support the request. This information is submitted to the Director of School Climate (or designee) for approval or denial.
Issue	A Form A ⁶ was erroneously submitted by the parent and approved by the principal for three students who requested a special permission transfer due to Medical/Student Adjustment. A Form B is required for these situations, therefore, there is no documentation to support that the Director for School Climate approved the transfer as required by Rule 5140.
Cause	The principal failed to ensure that the correct form was used for a special permission transfer due to medical and/or student emotional or social adjustment reasons (Form B).
Effect	When Form B transfers are not reviewed and approved by the Director for School Climate, a student's physical, emotional, or mental health may be jeopardized if they are placed in a school that cannot meet their medical needs.
Recommendation	To ensure that special permission transfers are processed according to Superintendent's Rule 5140: <ul style="list-style-type: none">• routinely communicate Superintendent's Rule 5140 to school principals (or designee) and enrollment liaisons, particularly in the Spring when special permission transfer requests are required.• identify and monitor students with an Address Override Reason of "Medical Reasons" or "Behavioral Adjustment" to ensure that a Form B has been received and approved by the appropriate individual(s).

Management's Corrective Action

Communicate the requirements of Superintendent's Rule 5140 to enrollment liaisons and school principals during the Spring before the special enrollment process begins.

Conduct periodic reviews of the address override report in Focus to ensure that the appropriate reason has been selected and is verified with the appropriate documentation specifically for special permission transfers, Form A and Form B.

⁶ See page 11

Responsible Person(s)

- Director of School Climate and Culture
- Coordinator of Pupil Personnel Services
- Executive Director of Social Emotional Support

Anticipated Completion Date

- July 2023 – June 2024

Issue 7: Data in Focus is not accurate to identify special enrollment placement students.

Issue Rating	High
Criteria	The review and approval process for special enrollment (Out-of-County Foster Placement, Hardship, or Homeless Student) requests are the responsibility of the PPW.
Issue	<p>For 9 of the 40 students tested, the student was erroneously identified in Focus with a special enrollment designation:</p> <ul style="list-style-type: none">• In five instances, the student was recorded as a special enrollment designation the previous school year; however, the student no longer qualified as a special enrollment placement. Focus was not updated by the enrollment liaison to reflect the student's current situation.• In four instances, the student was a special permission transfer or a shared domicile student, but was designated as special enrollment placement in Focus.
Cause	Focus must be manually updated by the enrollment liaison once the student is no longer eligible for a special enrollment placement. Additionally, enrollment liaisons confuse special enrollments with shared domicile arrangements when documenting these situations in Focus.
Effect	When the special enrollment placements are not accurately reflected in Focus, the number of students attending schools via special enrollment cannot be accurately determined.
Recommendation	<p>To ensure that special enrollment placements are processed according to Superintendent's Rule 5150:</p> <ul style="list-style-type: none">• routinely communicate Superintendent's Rule 5150 to PPWs, school principals (or designee), and enrollment liaisons.• identify and monitor special enrollment placement students has been received and approved by the appropriate individual(s).

Management's Corrective Action

The pupil personnel workers will also receive training related to monitoring the special enrollments that they approved. Pupil personnel workers will be shown how to run reports that identify special enrollments by type. The report can be used in the spring of each year to determine those students and families with whom contact needs to be made with regard to the upcoming school year.

The year-long induction and support program for enrollment liaisons will address the need to update students' enrollment type/status as changes occur after the pupil personnel worker's initial approval.

Responsible Person(s)

- Director of School Climate and Culture
- Coordinator of Pupil Personnel Services
- Executive Director of Social Emotional Support

Anticipated Completion Date

- July 2023- June 2024

Issue 8: Enrollment related help desk requests are not resolved timely.

Issue Rating	High
Criteria	School based enrollment liaisons must have timely information to ensure that students are enrolled in accordance with Board Policies and Superintendent Rules.
Issue	<p>We reviewed and analyzed the help desk inquiries related to the enrollment process for December 9, 2021 through December 13, 2022:</p> <ul style="list-style-type: none">• 68 of the 142 incidents were closed as of December 13, 2022.• The closed incidents were resolved within 0-155 days, with an average of 25.5 days.• The open incidents have been open for 5-340 days, with an average of 106 days.• 83 of the 142 incidents are greater than 30 days open.
Cause	Help desk tickets related to the enrollment process are currently handled by the Executive Director of SES or the Director of SCC. These director level employees also respond to many requests for assistance that come into the office via email and phone calls, however, these requests are not tracked. Due to other obligations, requests for assistance are not always the first priority of director level employees. The executive director indicated that she does not have staff available to assign this duty.
Effect	<p>When requests for assistance are not addressed timely:</p> <ul style="list-style-type: none">• students may not be enrolled timely.• student records may not be accurate.• staff time is wasted to get assistance.• staff may stop requesting assistance resulting in enrollment errors.• reports submitted to MSDE may not be accurate.
Recommendation	<p>The executive director should:</p> <ul style="list-style-type: none">• ensure that requests for assistance are addressed timely and that enrollment liaisons are supported.• work with the Department of Information Technology to address misrouted tickets and closing of tickets.

Management's Corrective Action

Address BCPS Serve tickets in a timely manner which includes re-routing to appropriate staff members and closing tickets that have been addressed.

Collaboration with members of the Office of Information Technology to discuss the routing of BCPS Serve tickets.

Responsible Person(s)

- Director of School Climate and Culture
- Executive Director of Social Emotional Support

Anticipated Completion Date

- May 2023- August 2023

AUDIT RATING

- Unsatisfactory** The results of this audit are rated as unsatisfactory due to:
- Non-compliance with Superintendent Rules.
 - Lack of documentation and communication of controls/policies/procedures.
 - Issues were rated as high and urgent corrective actions are necessary.

See **APPENDIX B** for the audit rating definitions.

OBJECTIVE, SCOPE & METHODOLOGY

Objective To determine if students are properly enrolled in BCPS and related data is accurate within the student information system.

Scope The audit period is FY 2022 & FY 2023.

Methodology To achieve the audit objectives, we performed the following:

- Planned the audit in cooperation with the Department of Social Emotional Support and the Office of School Climate and Culture to ensure an understanding of the enrollment process and entry of data in Focus.
- Interviewed key personnel knowledgeable of the enrollment of students in Focus.
- Reviewed the relevant Board policies, Superintendent Rules, and SOPs.
- Evaluated risks and controls over the enrollment of students in Focus process.
- Performed detailed tests to support our conclusions:
 - Reviewed communications provided to families regarding student enrollment, including online registration.
 - Reviewed the enrollment training materials available to school-based personnel.
 - Tested newly registered students for residency compliance with Rule 5150.
 - Tested special permission transfers for compliance with Rule 5140.
 - Tested special enrollment (homelessness, nonresident, kinship care, hardship) students for compliance with Rule 5150.
 - Tested shared domicile applications for compliance with Rule 5150.
 - Reviewed the Department of Social Emotional Support help desk requests for Focus.

APPENDIX A – Issue Rating Definitions

Issues will be rated high, medium, or low based on these factors:

1. Level of financial impact.
2. Extent of violation of external laws, regulations, and restrictions.
3. Lack of documented policy, procedure, or noncompliance with a policy in an important matter.
4. Lack of internal controls or ineffective controls and procedures.
5. Fraud, theft, inappropriate conflicts of interest or serious waste of school system resources.
6. Significant opportunity exists for real gains in processing efficiency.
7. Poor cost controls or potential for significant savings and/or revenue generation.
8. Condition places the school systems reputation at risk.
9. Ineffective reporting and/or communication structure results in financial risks and/or inefficient operations.
10. Post audit implementation review reveals little or no effort to implement an action plan in response to a previous audit finding.

APPENDIX B – Audit Rating Definitions

Audit Rating	Definition
<p>Unsatisfactory</p>	<p>Design - Design of controls is ineffective in addressing key risks Documentation and communication - Non-existent documentation and/or communication of controls/policies/procedures Operation/implementation - Controls are not in operation or have not yet been implemented Compliance - Significant breaches of legislative requirements and/or departmental policies and guidelines Risk management - Risks are not being managed Issues/deficiencies - Most issues were rated as high and urgent corrective actions are necessary</p>
<p>Needs Improvement</p>	<p>Design - Design of controls only partially addresses key risks Documentation and communication - Documentation and/or communication of controls/policies/procedures is incomplete, unclear, inconsistent, or outdated Operation/implementation - Controls are not operating consistently and/or effectively or have not been implemented in full Compliance - Breaches of legislative requirements and/or departmental policies and guidelines have occurred Risk management - Risks are not effectively managed which could result in failure to ensure school objectives are met Issues/deficiencies - Some high-rated and/or medium-rated issues were identified</p>
<p>Satisfactory</p>	<p>Design - Design of controls is largely adequate and effective in addressing key risks Documentation and communication - Controls/policies/procedures have been formally documented and are up to date but are not proactively communicated to relevant stakeholders Operation/implementation - Controls are largely operating in a satisfactory manner and are providing some level of assurance Compliance - No known breaches of legislative requirements and/or departmental policies and guidelines have occurred Risk management - Risks are largely effectively managed Issues/deficiencies - No high-rated or medium-rated issues identified</p>