

Internal
Audit
Report

Division of Human Resources – Office of Certification

**MSDE Certifications and
Maintenance Audit**

June 2023



Office of Certification



Baltimore County Public Schools
Office of Internal Audit

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Report Highlights

MSDE Certifications & Maintenance

June 2023

Objective

- To ensure that the monitoring and maintenance of certificated employees complies with MSDE and Code of Maryland requirements, and with HR SOPs.
- To ensure that an employee growth chart exists and that the certificated employee is paid accurately based on the growth chart and coursework.

Background

The OOC is responsible for ensuring that certificated employees achieve and maintain professional certification including, but not limited to, evaluating teacher credentials, issuing initial certificates, and renewing certificates. It also maintains growth charts and records coursework for certificated employees.

Audit Period

School Year 2022-2023

Summary of Results

Issue 1: The projected certificate letter and certification evaluation for certificated employees hired with a conditional certificate were not issued in accordance with Standard Operating Procedure (SOP) – 2-6.01 Maryland State Department of Education (MSDE) Initial Certification Requirements.

Issue 2: The Office of Certification (OOC), Division of Human Resources (HR), is manually tracking the MSDE teaching certificate status for the certificated employees. Additionally, the OOC must download documents and individually email them to certificated employees.

Audit Rating

Satisfactory

The OOC received a satisfactory audit rating for the MSDE certification process:

- Controls are largely operating in a satisfactory manner and provide some level of assurance.
- No high-rated or medium-rated issues were identified.
- The design of controls is largely adequate and effective in addressing key risks.

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BACKGROUND

Organizational Status & Purpose

The Office of Certification (OOC), a sub-unit of the Division of Human Resources, is responsible for ensuring that certificated employees achieve and maintain professional certification including evaluating educator credentials, issuing initial certificates, renewing certificates, and adding area endorsements. OOC staff serve as liaisons to the MSDE for certificated BCPS staff and serve as professional growth advisors.

The OOC is staffed with one manager, two analysts, one assistant, and one office secretary. Currently, the OOC verifies certifications for approximately 9,000 certificated employees. In FY23, BCPS hired more than 1,000 employees with conditional certificates, which is an 81% increase from the prior year.

MSDE Certification Process

Certification is the process of verifying that each educator required to hold a certificate has the qualifications and appropriate training to execute their professional responsibilities. Teachers, specialists, and administrators in Maryland public schools must hold a valid certificate appropriate to the “field of employment”. Certificates are issued through the Educator Application and Certification Hub (TEACH), Maryland’s portal for educator certification.

MSDE partners with BCPS to have OOC staff evaluate teacher credentials and issue/renew certificates through the TEACH system MSDE requires OOC analysts to complete training and earn the Certification Authorized Partner (CAP) designation before they are authorized to perform certificate issuance and renewals. Three OOC staff have the CAP designation and a fourth is scheduled to complete the training in Fall 2023.

During the hiring process, teacher candidates that do not meet the MSDE professional certification requirements must be evaluated and approved for a conditional certificate before they are hired. The review and evaluation of the candidates’ credentials is completed by the HR officers in the Office of Staffing. The OOC CAPs are consulted if needed. Final approval to hire is given by the director of staffing if the candidate is eligible for a conditional certificate.

Once hired, the OOC CAPs must also perform a detailed review and evaluation of the credentials for the conditionally certificated employees. The teacher must be provided with an evaluation of their credentials and a projected certification letter, which highlights the requirements still needed to obtain full certification. MSDE does not recognize the evaluation work completed by the Office of Staffing as the staff have not earned the CAP designation.

The OOC also tracks when certificates are due for renewal and sends periodic reminders to certificated employees. Certificated employees with a conditional certificate must renew after two years, professional certificates are renewed every 5 years. The CAPs review and evaluate coursework for the renewal prior to certificate issuance in accordance with MSDE regulations.

Growth Chart and Salary Lane Advancement

Certificated employees must complete continuing education coursework to satisfy MSDE certification requirements. When applicable, the completed coursework is also applied to the certificated employees' BCPS Growth Chart¹ to determine which Salary Lane² the certificated employee is assigned. Salary Lane advancements are granted as additional advanced degrees and credits are earned. Additional compensation is earned with each advancement.

Certificated employees are required to submit proof of their credits twice:

1. Directly to MSDE through the Educator Application and Certification Hub (TEACH) for certification purposes.
2. Directly to the OOC for entry into the certificated employee's BCPS Growth Chart for salary lane advancements.

When a certificated employee submits a salary lane advancement request, the OOC reviews coursework within the certificated employee's Growth Chart to determine if the request is approved. If approved, the OOC advances the certificated employee to the next salary lane.

Regulations and Standard Operating Procedures (SOP)

There is one Code of Maryland (COMAR) regulation and three internal SOPs that are applicable to the responsibilities of OCC staff and related to the MSDE certification process.

- COMAR 13A.12.01.04 Options for Obtaining Initial Maryland Certification
- SOP – 2-6.01 MSDE Certification Requirements
- SOP – 2-6.02 MSDE Certification
- SOP – 2-6.05 Certificate Renewals

¹ The Growth Chart is a listing of courses completed by the educator that includes the course name, course location, credit earned, year earned, and current salary lane. Certificated employees access their Growth Chart through the Employee Self-Service (ESS) portal.

² There are five salary lanes ranging from bachelor's degree to doctorate degree.

COMMENDATIONS

Communication & Resources

Internal Audit determined that the OOC communicates with certificated employees using emails and Schoology. Information related to MSDE's TEACH system is provided to new certificated employees at onboarding and information regarding growth charts is provided to certificated employees.

Salary Review

Internal Audit determined that for the certificated employees sampled, growth charts with coursework existed and we verified that the certificated employee is paid accurately based on credentials summarized in the Advantage HR system³ certificated employees

³ We did not test certificated employees Growth Chart Reconciliation and Salary Lane Advancement Form submissions and the timeliness of any applicable updates.

RESULTS

Issue 1: The projected certificate letter and certification evaluation for certificated employees hired with a conditional certificate were not issued in accordance with Standard Operating Procedure (SOP) – 2-6.01 MSDE Initial Certification Requirements.

Issue Rating	Low
Criteria	Credentials for conditional certificated employees must be reviewed and a projected certificate letter, as well as certification evaluation (if applicable) are issued and sent to the employee within 60 days of their hire date, per the SOP 2-6.01 MSDE Initial Certification Requirements.
Issue	<p>The OOC did not review and send 16 newly hired conditional certificated employees their projected certification letter and certification evaluation within the required 60 days from their date of hire:</p> <ul style="list-style-type: none">• Thirteen were sent their projected certification letter and evaluation between 64 and 128 days after their hire date.• Three exceeded 60 days since their hire date and had not yet received their projected certification letter or evaluation.
Cause	The manager of the OOC indicated the volume of newly hired conditional certificated employees in SY2022-2023 doubled, compared to the usual number. Additionally, only certification analysts, earning the CAP designation from MSDE, can complete certification evaluation and the projected certificate letter. There are currently only three CAPs for approximately 9,000 teachers.
Effect	This may delay the issuance of MSDE professional certificates to employees, because newly hired conditional certificated employees lack guidance on their outstanding certificate requirements.
Recommendation	The manager of the OOC should ensure that evaluations and projected certificate letters are issued to conditionally certificated employees in accordance with the SOP 2-6.01 MSDE Initial Certification Requirements.

Management's Corrective Action

Human Resources leadership concurs with the issue noted in the audit results report. As noted in the report, the number of conditional hires increased 81% from the prior school year. The number of trained certification representatives does not meet the demand to support conditional teachers with obtaining MSDE professional certification. The Office of Certification (OOC) has elected team members to participate in the MSDE

Certification Authorized Partner (CAP) and Certification Authorized Partner Associate (CAPA) trainings. Currently, a team member is due to complete CAPA training by the end of June 2023. This will free up the CAPs to focus on conditional teachers and follow up with a projected certification letter and evaluation within a timely manner. MSDE has placed CAP training on hold due to pending new regulations. The OOC will continue to evaluate staffing to ensure teachers receive information in a timely manner.

SOP 2-6.01 MSDE Initial Certification Requirements will be revised to address the current national teaching shortage and subsequent increase of conditional teachers. Due to the Conditional Certification timeline noted in COMAR, the OOC provides information and resources that are accessible to conditional teachers. Additionally, training on conditional certification is provided to Consultant Teachers, Resource Teachers, and Staff Development Teachers so they may support and provide the appropriate guidance. NEO Facilitators for 2023-2024 will be trained on conditional certification as well. Typically, conditional teachers have completed no professional education coursework or testing required by COMAR. Therefore, teachers are strongly recommended to utilize resources and coursework opportunities to begin working towards achieving professional certification prior to receiving the MSDE evaluation.

Note: MSDE has recommended the repeal and replacement of Title 13A, Subtitle 12 which includes changes to initial teacher licensure. Teachers will be required to complete a traditional or alternative teacher preparation program. Transcript analysis will not be an option. In the event the new regulation is approved, the need to evaluate transcripts and complete MSDE evaluations for new conditional teachers will not be required.

Responsible Person(s)

- Manager OOC
- Acting Senior Executive Director Department of Human Resources Recruitment and Staffing

Anticipated Completion Date

July 1, 2024

Issue 2: The OOC, Division of HR, is manually tracking the MSDE teaching certificate status for the certificated employees. Additionally, the OOC must download documents and individually email them to certificated employees.

Issue Rating	Low
Criteria	<p>Best practice indicates that a human resources information system should be able to address the needs of all offices in the Division of Human Resources (HR) and should make information easily accessible. For the OOC, the system should:</p> <ul style="list-style-type: none">• Maintain all certificated employee files including document attachments.• Communicate directly from the system to certified certificated employees.• Utilize monitoring and reporting features.
Issue	<p>The OOC's MSDE certification monitoring process is a manual process that is external to Advantage HR. The OOC uses multiple software systems to manually track the MSDE teaching certificate status for the certificated employees. Additionally, the OOC must download documents and individually email them to certificated employees.</p>
Cause	<p>Advantage HR lacks the capabilities to allow OOC to maintain its processes in one software system.</p>
Effect	<p>The use of multiple software systems leads to a higher risk for human error in the transferring of information and is inefficient, especially with limited staffing resources.</p>
Recommendation	<p>The manager of the OOC should communicate the needs of her office to the implementation team for the newly selected enterprise resource planning system.</p>

Management's Corrective Action

Human Resources leadership concurs with the issue noted in the audit results report. After the audit kick-off, the Department of Information Technology (DoIT) initiated an RFP for an Enterprise Resource Planning (ERP) system. RFP requirements include a system's ability to track and maintain employee MSDE certification status and schedule notifications to employees such as renewal reminders. Also required features include document management and reporting tools. The RFP has not concluded. Once an ERP system is selected, the OOC will work with the vendor to implement streamlined and automated processes.

Responsible Person(s)

- Manager OOC
- Acting Senior Executive Director Department of Human Resources Recruitment and Staffing

Anticipated Completion Date

Completed

AUDIT RATING

- Satisfactory** The OOC received a satisfactory audit rating for the MSDE certification process:
- Controls are largely operating in a satisfactory manner and provide some level of assurance.
 - No high-rated or medium-rated issues were identified.
 - The design of controls is largely adequate and effective in addressing key risks.

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

OBJECTIVE, SCOPE & METHODOLOGY

- Objective**
- To ensure all certificated staff achieve and maintain professional certification.
 - To ensure that an employee growth chart with coursework exists.
 - To determine that a sample of certificated employees are paid accurately based on reviewed growth chart and coursework.
- Scope** The audit period is School Year 2022-2023.
- Methodology** To achieve the audit objectives, we performed the following:
- Planned the audit in cooperation with the Certification Manager to ensure an understanding of the MSDE certification process.
 - Interviewed the Certification Manager who is knowledgeable of the MSDE certification process.
 - Reviewed regulations and SOPs –
 - COMAR 13A.12.01.04 Options for Obtaining Initial Maryland Certification
 - 2-6.01 Maryland State Department of Education (MSDE) Certification Requirements
 - SOP – 2-6.02 Maryland State Department of Education (MSDE) Certification
 - SOP – 2-6.05 Certificate Renewals
 - Evaluated risks and controls over the MSDE certification process.
 - Randomly selected samples of new hires and existing employees to ensure that their certification is tracked and monitored.
 - Verified that OOC provides written direction/instructions for the MSDE TEACH system to certificated employees.
 - Verified that OCC compares Advantage HR information to the MSDE TEACH system.
 - Reviewed OOC’s Schoology resources for growth chart information.

- Determined whether growth charts with coursework existed for the sampled employees and verified that the employee is paid accurately based on credentials summarized in Advantage HR system.

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. Conditions place the school system's 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>