

Board of Education
Office of Internal Audit
FY24-27 Work Plan –
Quarter 1 Update

The proposed audit projects and other audit activities continue to be ambitious. We designed this work plan to address what we consider to be risk areas, while limiting the scope of work to what we can realistically accomplish with the available staff resources.

BALTIMORE COUNTY PUBLIC SCHOOLS

Myriam Yarbrough, Ed.D. ♦ Superintendent ♦ 6901 North Charles Street ♦ Towson, MD ♦ 21204

October 19, 2023

Members of the Audit Committee:

This Office of Internal Audit – FY24 Quarter 1 (Q1) update provides information on the Office of Internal Audit activities from July 1, 2023 through September 30, 2023. This includes the status of current audit projects, a list of planned audits not yet started, and audit reports issued during this period. All audit reports issued as of September 30, 2023 have been posted to our webpage.

Some projects may become more critical to complete than others, creating a shift in project prioritization and the need to complete unplanned projects. Consequently, start and completion dates for each audit project is an estimate because future circumstances may cause delays such as:

- delays in receiving data for review,
- the number and nature of findings that require further evaluation, and
- additional discussions with management to demonstrate the validity of our findings and recommendations for improvement are necessary.

Board policy 8400 now requires us to provide quarterly summaries of significant audit issues and an update of corrective measures taken related to prior audit issues and recommendations to the Board and Superintendent. This information can be found beginning on page 7 of this report.

Please be aware that we issued a report under a separate cover related to the administration of the fraud, waste, and abuse hotline and the investigations that were completed from July 1, 2023 through September 30, 2023.

The Office of Internal Audit would like to extend its gratitude and appreciation to the Board, the Audit committee, the Superintendent and her cabinet, and all members of BCPS management and staff for providing cooperation and input into the development of our risk-based audit plan and for supporting the general mission of the office throughout the year.

Respectfully submitted,

Andrea M. Barr

Andrea, M. Barr, CGAP, CBM

Plan Summary

Work Plan Approval	Annually, the Office of Internal Audit submits its work plan to the Board of Education of Baltimore County and the Audit Committee for its review and approval.	Delivery of Services	The Office of Internal Audit will maintain the Audit Services Unit and the Investigative Unit in the delivery of its services to the Board and school system.
Vision and Mission Goals and	The Office of Internal Audit developed its vision and mission to ensure alignment with the Board and school system's objectives. The Office of	Non-Salary Budget Request	The proposed Office of Internal Audit FY24 non-salary budget is \$49,779. A similar non-salary budget request is anticipated for FY25.
Strategies Available Resource Hours	Internal Audit will continue to focus on its goals of integrity, quality, and efficiency. The Office of Internal Audit has a total of 15,285 available resource hours in FY24 and is projected to have 15,285 in FY25.	Meetings	The Office of Internal Audit routinely meets with stakeholders to provide project status updates and other relevant information.

FY24 Fraud, Waste, and Abuse Hotline Administration: The Office of Internal Audit will continue to administer the fraud hotline and investigate any allegations related to fraud, waste, and abuse to ensure a culture of integrity, quality, and effectiveness.

FY24 Internal Audit Projects by Division

OVERALL OBJECTIVE FOR ALL FY24 PROJECTS: To review the objectives, risks and controls related to the Audit Focus areas. Specific audit objectives will be determined during the planning phase of each project.

#	Entity	Audit Focus Area	Risk Level	Status as of 09/30/23
		No planned audits for FY24	MSK Level	07/30/23
DIVISIO	n of Fiscal Services	W 1 1 d 1 DE CODE		
1		Vendor relations and MBE/SBE	т.	N T 4 4 1
1	Office of Purchasing	programs	L	Not started
2	0.00	W-2, payroll taxes, deductions and	**	N T 1
2	Office of Payroll	wage attachments	Н	Not started
	Office of Accounting			
3	and Financial Reporting	Grants accounting and compliance	Н	Not started
Divisio	n of Curriculum and	Instruction		
	Office of English			
4	Language Arts PreK-12	ELA digital resources	M	Not started
	Office of ESOL &			
5	World Languages	Title II and III	M	Defer
	Office of Science,			
	Health & Physical	Health and PE curricular programs		
6	Education	and assessments	Н	Not started
	Office of Science,			
	Health & Physical	Science programs and risk		
7	Education	mitigation	M	Not started
	Office of Advanced			
8	Academics GT	Advanced academics eligibility	M	Fieldwork
	Office of Special			
	Education - Birth to 5	Infants and Toddlers Program and		
9	and Child Find	Community-based instruction	Н	Not started
	Office of Special			
	Education - DSE	Special Education Transportation		
10	Placement	services (ride time)	Н	Not started
	Office of Educational			
11	Opportunities	Online elearning opportunities	Н	Not started

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#	Entity	Audit Focus Area	Risk Level	Status as of
D	0011			09/30/23
Divisio	on of Schools			- 41 1
				Preliminary
10	Office of School		***	information
12	Climate	Extended suspensions/expulsions	Н	gathering
		Eligibility of psychological services		
12	Office of Psychological	for students under Section 504 and	11	NI-4 -44- 1
13	Services	IDEA	H	Not started
14	Office of School Safety	Sex Offenders	Н	Not started
				Preliminary
1.5			3.6	information
15	Office of School Safety	School safety measure programs	M	gathering
Divisio	on of Human Resource	es		
	Office of Benefits,			
	Leaves, and			
16	Retirements	Separation/Termination (COBRA)	Н	Not started
		Hiring processes for temporary		
	Office of Temporary	employees: Summer Program and		
17	Services	Substitutes	Н	Not started
	Office of Equal			
4.0	Employment	Discrimination claims process and	**	
18	Opportunity	ADA accommodations	Н	Not started
	Office of Investigations			
	and Records			
4.0	Management (includes	Criminal background checks and	3.6	
19	Fingerprinting)	fingerprinting	M	Not started
	Department of			
	Employee Training and			
	Development -			
	Technology Training			
20	and Compliance	Safe Schools, the online compliance	7.7	N T 4 4 4 1
20	Management	management system	Н	Not started
Divisio	on of Information Tec	nnology		
	Department of			
	Technology Support		_	
21	Services	Help Desk and repair shop services	L	Not started

FY24 Internal Audit Projects by Division

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#	Entity	Audit Focus Area	Risk Level	Status as of 09/30/23
Chie	ef Operating Officer			
	Department of			
	Research,			
	Accountability and			
22	Assessment	Strategic Plan management	M	Not started
	Office of Strategic	Educational Facilities Master Plan		
23	Planning	process	Н	Not started
Offic	ce of Law			
24	Office of Law	PIA requests	L	Fieldwork
FY2	3 Carry Over Projects			
	Division of Human	Overpayment of Separated		
25	Resources	Employees	Н	Reporting
	Office of Career &			
	Technical Education &			
26	Fine Arts	CTE accreditation	Н	Fieldwork
	Office of Special			
	Education –	Special Education dispute		
27	Compliance	resolution	Н	Fieldwork
		Programs and services to		
	Office of Health	prevent/mitigate health barriers to		
28	Services	learn	M	Review
				Preliminary
	Department of Network	Oversee the cloud environment and		information
29	Services	SAS applications	Н	gathering
20	Office of Facilities	II CE III B	т.	D
30	Operations	Use of Facilities Program	L	Report issued
	Office of Facilities	Change Orders: Consultants,		
2.1	Construction and	Construction Managers, and	3.4	F' 11 1
31	Improvement	Contractors	M	Fieldwork
				Preliminary
22	Office of Transmitted	Dug contractor management	11	information
32	Office of Transportation Division of Information	Bus contractor management	Н	gathering
22		IT Soonsity	II	Donortino
33	Technology	IT Security	Н	Reporting

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#	Entity	Audit Focus Area	Risk Level	Status as of 09/30/23
FY 24				
	Office of Food &			
34	Nutrition Services	Financial Review	M	Fieldwork
	Carroll Manor	School Activity Fund and		· · · · · · · · · · · · · · · · · · ·
35	Elementary School	Procurement card audit	L	Review

FY24 General Office Responsibilities: The Office of Internal Audit will continue to complete required general office responsibilities such as: maintain software applications, as well as attend regularly scheduled meetings and relevant staff development activities.

Status of Project Findings and Management Corrective Action Plans

As noted above, Board policy 8400 now requires us to provide quarterly summaries of significant audit issues and an update of corrective measures taken related to prior audit issues and recommendations to the Board and Superintendent.

There were 34 findings identified in 10 of the FY23 audits we completed. Six of the findings were verified and closed to indicate that management successfully implemented the corrective action noted in the final audit report. In nine instances, management completed its corrective action, however, we need to complete a follow up to verify that the corrective action was implemented. In the remaining 19 instances, management requested additional time to complete its corrective action.

Status of Project Findings and Management Corrective Action Plans

Item	Finding	Recommendation	Status	Due Date		
1 E	Educational Opportunities: Homeschool	Programs				
	Home school student data is not integrated into the BCPS Student Information System.	Integrate home school data into the Student Information System.	Closed-Verified	8/31/2023		
2 E	2 ESOL: New Immigrant Enrollment					
	1. The ESOL office cannot fully accomplish their mission at their current staffing level.	Provide the proper staffing to the ESOL Office.	In Progress	Full completion date TBD		
	2. The home language survey data (HLS) is not always documented when students enroll in BCPS via the Parent Portal or when former students re-enroll.	HLS data must be documented when a student is enrolled.	In Progress	Full completion date TBD		
	3. There is no data to support that all newly enrolled non-English speaking students were assessed or are receiving ESOL services.	Have Focus automatically determine eligible students and set their EL Status to Assessment Pending.	In Progress	April 2024		
	4. The ESOL Welcome Center student assessment area is not adequate.	Provide privacy to adequately assess student for ESOL services	Schedule follow- up for December 2023	10/31/2023		
3 F	acilities Operations: Use of Facilities Pro	gram				
	1. Proof of insurance was either not obtained or retained as required for UOF activities.	Retain insurance documentation in the software and update SOP to include Recreation and Parks insurance requirements.	Schedule follow- up for December 2023	11/30/2023		
	2. Applicable permits and/or licenses were not obtained or retained for various UOF activities.	Required documentation must be obtained and retained for all UOF activities.	Schedule follow- up for December 2023	10/1/2023		
	3. Use of Facilities fees may not cover the actual costs associated with community use of BCPS properties.	The fees charged to use BCPS facilities should be increased.	Closed-Verified	10/1/2023		
	4. The Office of Facilities Operations lacks an established fee collection process.	Payment request letters should be sent consistently so that fees are collected timely.	Schedule follow- up for December 2023	10/1/2023		
	5. Use of Facility requests were denied because requests became stalled in the Event Manager system.	Regular training for school administrators to timely approve requests.	Schedule follow- up for December 2023	10/31/2023		
4 [Magnet Programs: Magnet Admissions					
	1. Required approvals for magnet seat projections were not properly documented in accordance with the SOP.	Obtain and Document Approvals for Magnet Seat Projections	In Progress	11/6/2023		
	2. Disqualification reasons were not consistently documented.	Document all reasons for student disqualification.	Closed-Verified	2/1/2023		
5	Certification: MSDE Certifications and M					
	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.	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.	In Progress	7/1/2024		

Item	Issue	Recommendation	Status	Due Date
	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.	The manager of the OOC should communicate the needs of her office to the implementation team for the newly selected enterprise resource planning system.	Closed-Verified	6/13/2023
6 P	ayroll: FY 22 Manual Payroll Audit			
	Manual payroll payments were not accurate.	Ensure that time records are processed accurately, including supervisory review of time records processed. Consider conversion of manual payrolls to automated processes.	In Progress	Overdue - new date TBD
	2. Manual payroll payments were not supported by an approved time record.	Ensure that all manual payroll payments are supported by properly approved documentation.	Schedule follow- up November 2023	November 2022
	3. Internal controls were not in place to adequately address key risks.	Develop and implement standard operating procedures, a listing of payroll approvers and a duplicate direct deposit report.	In Progress	Overdue - new date TBD
7 P	urchasing: Contracts, Agreements, and	Leases		
	Purchasing has not completed corrective action related to prior audit reports	Implement and finalize corrective action that is cited in BCPS' response to Recommendation 2a in the OLA Financial Management Practices Audit Report from November 2020.	In Progress	7/1/2025
8 S	chool Safety: SRO Program			
	1. SROs are not consistently providing DARE at middle schools.	Ensure all SROs are trained to teach DARE and ensure that DARE is taught to all 6th graders.	In Progress	6/30/2024
	2. The BCoPD Chief of Police and BCPS Superintendent do not meet on a regular basis.	The BCPS Superintendent should meet with the BCoPD Chief of Police on a regular basis.	In Progress	6/30/2024
	3. SRO program evaluations are not completed.	Implement a policy requiring all applicable school administrators to evaluate the overall effectiveness of the SRO program on an annual basis.	In Progress	10/31/2024
	4. Former SRO's have access to BCPS technology.	Develop and implement a policy to inform DoIT when an SRO is no longer assigned to BCPS so their account can be immediately deactivated.	Schedule follow- up for October 2023	4/26/2023
	5. BCoPD is not reporting information of students witnessing traumatic events to BCPS.	Ensure that information related to students witnessing traumatic events is properly reported.	Schedule follow- up for October 2023	10/1/2023
	6. BCoPD did not submit the date of charge for reportable offenses to BCPS.	Monitor the timeliness of the reporting of reportable offenses and work with BCoPD to ensure that all reportable offenses are reported to BCPS within 24 hours of the charge.	Schedule follow- up for October 2023	3/8/2023
	7. Professional development is not provided to BCPS Building Security Monitors	Ensure that all building security monitors receive professional development as agreed upon by both agencies.	In Progress	Overdue - new date TBD

Item	Issue	Recommendation	Status	Due Date			
9 S	9 Social and Emotional Support: Student Enrollment Data in Focus						
	1. System-wide enrollment liaison training is not provided for newly hired school secretaries.	Newly hired secretaries should receive enrollment liaison training.	In Progress	6/30/2024			
	2. Student enrollment information on the BCPS website is not concise or user friendly.	The presentation of concise student enrollment information on the BCPS website should be coordinated by the Office of Social and Emotional Support.	Closed-Verified	9/1/2023			
	3. Required documentation for newly enrolled students was not available to verify Baltimore County residency in accordance with Superintendent's Rule 5150.	Ensure that the proper documentation is obtained for all newly enrolled students.	In Progress	6/30/2024			
	4. Shared Domicile Disclosure Forms are not completed and approved in accordance with Superintendent's Rule 5150.	Ensure that the appropriate form and proper documentation is completed and approved for all Shared Domicile designations.	In Progress	6/30/2024			
	5. Data in Focus is not accurate or sufficient to identify students attending a school outside of their home school via an approved Application for Special Permission Transfer.	Ensure that the Address Override Reason field is used appropriately so that special permission transfer students can be accurately identified.	In Progress	6/30/2024			
	6. Special permission transfers are not completed and approved in accordance with Superintendent's Rule 5140.	Ensure that the appropriate application form is completed and approved for all special permission transfers.	In Progress	6/30/2024			
	7. Data in Focus is not accurate to identify students attending a school via Special Enrollment	Ensure that the appropriate form and proper documentation is completed and approved for all Special Enrollments.	In Progress	6/30/2024			
	8. Enrollment related help desk requests are not resolved timely.	Dedicated staff should be assigned to assist registrars with enrollment assistance.	In Progress	Overdue - new date TBD			
10 S	10 Special Education: Third Party Billing Self-Monitoring						
	Inadequate documentation of case management and health-related services.	Continue training to ensure compliance.	Closed-Verified	1/1/2023			