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Student Information System Follow-Up Audit

*for the Fort Bend Independent
School District*

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Student Information System Follow-Up Audit

Executive Summary

As part of the fiscal year 2015 audit program, Gibson Consulting Group, Inc. (Gibson/audit team) conducted a follow-up audit of the 13 recommendations made in the spring 2014 *Internal Audit of Student Information Systems*.

As part of the follow-up audit, the audit team reviewed all available documentation regarding Fort Bend Independent School District (Fort Bend ISD/the District) management's responses to the 13 recommendations made in Gibson's initial audit report. Gibson conducted a site visit to the District during the week of February 16, 2015 to interview staff responsible for implementing the recommendations (see Appendix A). The audit team reviewed and verified the actions taken by the District in response to the recommendations. Finally, Gibson performed tests against the District's data and systems to verify the District's progress with recommendations. This report includes verifications for each recommendation in Appendix B.

Overall, Fort Bend ISD has made good progress toward implementing the majority of the recommendations made. The Department of Student Information Systems, working with school administrators, has improved the accurate and timely entry of student data. The District also added new software, which will improve student data accuracy in Fort Bend ISD.

Table 1 presents the audit team's assessment of status with respect to each of the internal audit report recommendations.

Table 1. Summary of Results – Implementation Status

Recommendation	Status
Recommendation 1: The District should continue the efforts to add redundant internet connectivity to address the vulnerability inherent in a single internet connection provider.	Not Complete
Recommendation 2: Fort Bend ISD should consider replacing the ODBC connection and provide the data to these vendors by extracting the data and submitting it through secure file transfer.	Not Complete
Recommendation 3: Fort Bend ISD should work with its <i>Skyward</i> vendor to improve data entry validation controls. The District should evaluate the rules applicable to student data and develop special purpose reports to detect and correct errors.	Substantially Complete
Recommendation 4: The EASTR group should continue to evaluate and revise the access rights of users of <i>Skyward</i> who require the "skip LDAP" flag. The users with this flag should be periodically reviewed to ensure that all users still require this exception.	Complete
Recommendation 5: The EASTR group should continue to evaluate the access roles and security settings of all users to determine that multiple roles and rights to data of multiple locations are still appropriate	Substantially Complete

Recommendation	Status
Recommendation 6: As training for this area is updated for presentation in the future, these issues arising at Schiff Elementary and Crockett Middle should be considered to ensure that the school-based staff district-wide is fully informed of the responsibilities for documenting first day “No Shows” and taking attendance	Substantially Complete
Recommendation 7: The District should run reports periodically for all schools with “W” coded absences that have not be resolved. The staff at each school should review these lists and clear all instances	Partially Complete
<p>Recommendation 8: The District should take the following steps to address the issues arising with respect to attendance taking:</p> <ul style="list-style-type: none"> ▪ Complete the analysis of teachers who did not take attendance (see Table 5) for the remaining schools, as well as the actual attendance (i.e., number of students per class) of each class where attendance was not taken. ▪ Determine the attendance (number of students) in those classes where attendance was after the time allotted for attendance (i.e., 12:00 Noon). ▪ Calculate the overall impact on Average Daily Attendance (ADA) and the total potential effect on funding. ▪ Consult legal advisors regarding the appropriate approach in submitting future PEIMS attendance reports, for example PEIMS Submission 3 this summer. Also, consider the approach to working with TEA to resolve potential errors in prior period submissions. 	Partially Complete
Recommendation 9: The District should review the documentation required for each leaver code and provide a checklist to campus staff to ensure that the correct forms are used, that the forms filled out completely and that all school officials have signed the forms as required.	Complete
Recommendation 10: School-based staff should be trained further to ensure that all documentation for disciplinary action is maintained and available for review.	Partially Complete
Recommendation 11: The coordination between the Truancy Office and campus staff should be improved to ensure that truancy incidents are appropriately documented in <i>Skyward</i> . The District should explore ways in which actions in the Truancy database can be uploaded to <i>Skyward</i> directly to improve the reconciliation of the two systems.	Initiated but No Significant Progress
Recommendation 12: The LEP Coordinator should continue to reconcile the students classified as LEP/ESL/BIL in <i>Skyward</i> with those identified by individual teachers at each school. The goal of this effort should be to identify all differences and the related source	Partially Complete
Recommendation 13: The District should review the files for students eligible for special services (GT, CTE, Immigrant, Migrant, etc.) to determine that adequate documentation for coding in <i>Skyward</i> is available. The District should also consider running periodic reports to screen students whose demographic data is inconsistent with coding.	Complete

Source: *Internal Audit of Student Information Systems*, Gibson Consulting Group, Inc., 2014

The remainder of this report provides the following items:

- Each recommendation contained in the *Internal Audit of Student Information Systems*
- Fort Bend ISD management’s responses to the reported recommendations

- The most recently reported status for each recommendation as provided by Fort Bend ISD management on September 30, 2014¹
- Follow-up audit verification and tests conducted by the audit team
- The audit team's conclusions and implementation statuses determined

In parentheses following each recommendation, this report lists the page number on which the recommendation appeared in the original report. It also includes the full *Internal Audit of Student Information Systems* report in Appendix C.

This report will not reiterate the strengths and background information documented in the original report, as the purpose of this follow-up audit report is to provide implementation status updates for Gibson's initial recommendations.

Follow-Up Audit Detailed Results

Student Information System Technical Environment

Recommendation 1: *The District should continue the efforts to add redundant internet connectivity to address the vulnerability inherent in a single internet connection provider. (page 10)*

Fort Bend ISD Management Response 1: *The District supports the recommendation to add redundant internet connectivity to address the vulnerability inherent in a single internet connection provider. The Information Technology Services group will research, design, and implement a cost effective solution to provide redundant connectivity (multiple paths to the Internet) to reduce business interruptions.*

Fort Bend ISD Status as of September 30, 2014: No action taken year to date.

2015 Follow-Up Audit Verification and Tests: According to the documentation that the District provided, Fort Bend ISD is in the process of acquiring the necessary hardware which will enable the District to add more internet connectivity for its hosted student information system (SIS). However, at the time of the follow-up audit, the District did not have a redundant internet connectivity provider for its SIS and had not established a timeline for when the District would add one.

Fort Bend ISD did double the existing connection from two 1 gigabyte to two 2 gigabytes to provide faster connection for its users.

Status Update of Recommendation: Not Complete

¹ Although the District was working on a more recent audit update during the time that Gibson conducted this follow-up audit, the District did not make that update available to the auditors before the site visit.

The District still only has a single internet connectivity provider for its connection to the SIS, but it is taking steps to remedy the situation.

Fort Bend ISD Management Response to Status Update: *In November 2014, the community approved a Bond providing the District with funding to address the concern over a single internet service provider. The District has completed the first step by replacing the Internet Filter. Our next steps include selecting a second internet service provider as recommended.*

Recommendation 2: *Fort Bend ISD should consider replacing the ODBC (open database connectivity) connection and provide the data to these vendors by extracting the data and submitting it through secure file transfer. (page 11)*

Fort Bend ISD Management Response 2: *The District understands this recommendation. Currently, an ODBC connection is our only option for PCG and SuccessEd. We will discuss this recommendation with our vendors and develop a plan for increased security for future data exchange.*

Fort Bend ISD Status as of September 30, 2014: The District will continue ODBC connections using the specifically developed ODBC tool when there is a vendor to vendor relationship established with Skyward. Student and Staff information will be transferred in a flat file configuration with PGP encryption over SFTP.

2015 Follow-Up Audit Verification and Tests: ODBC (open database connectivity) allows the District and vendors whom the SIS's vendor has approved to access, update, and delete certain tables in the District's SIS. Through ODBC, vendors may have access to more data than they actually need. For this reason, the audit team continues to believe ODBC is less secure than the District controlling and providing the data exchange between the District's SIS and the vendors that need access to it.

Based on the interviews with the Department of Student Information Systems, the district has dropped one vendor (PCG) using ODBC, but added another one (Certify).

Status Update of Recommendation: Not Complete

It is not clear whether the District intends to implement this recommendation. Although the District staff indicated in interviews that they are working with existing and future vendors to eliminate cases of ODBC connections, the District's software selection proposals do not include a written requirement regarding the ODBC connection. If the District wishes to implement this recommendation, management should make "non-ODBC" part of their software requirements when selecting a new software product that may access the District's SIS. If management believes that this requirement would limit their ability to select the best software products, then they will need to continue to manage this risk.

Fort Bend ISD Management Response to Status Update: *We have investigated the rights that are forwarded to the accounts used in the connection to Skyward by SuccessEd and Certify and have concluded that the account permissions that are set in the database are restrictive in accordance in allowing for proper use of the service for each of these vendors. While the audit team believes this is less secure, no reason or evidence is given as to why. Even though there is an ODBC connection, the data is secure using*

a secure transport and we have had no known incidents with the controlled ODBC connections since inception. However, we are reassessing this methodology of how vendors obtain data from our Student Information System with a goal of reducing the need for ODBC connections.

Recommendation 3: *Fort Bend ISD should work with its Skyward vendor to improve data entry validation controls. The District should evaluate the rules applicable to student data and develop special purpose reports to detect and correct errors. (page 12)*

Fort Bend ISD Management Response 3: *The District supports the recommendation and will continue to work with Skyward to improve data entry validation controls. We will continue to evaluate the rules applicable to student data, develop additional special purpose reports, and train campus staff in using these reports at monthly Learning Community meetings.*

Fort Bend ISD Status as of September 30, 2014: The Department of Student Information Systems (formerly EASTR) met with representatives of *Skyward* to discuss possible data entry controls that might be created within the system. In May Learning Communities, checklists and reports were shared with campus [administrators] so that data could be verified and corrected before the *Skyward* year-end process in July. FBISD has also purchased *Certify*, a product that will assess data within the student information system daily and automatically notify campus administrators of anomalies that need to be addressed.

2015 Follow-Up Audit Verification and Tests: During the follow-up site visit, the District was concluding the pilot phase of the implementation of the new *Certify* system. The audit team reviewed the reports and alerts that the District's new system generated as well as the training documentation that the Department of Student Information Systems (formerly EASTR) provided to the schools and system users.

Status Update of Recommendation: Substantially Complete

Once fully implemented, *Certify* will have a significant impact on reducing data errors that a lack of data entry validation controls in the District's SIS may generate. In addition to the new system, the District should continue to work with *Skyward* to enhance its data entry validation controls.

Fort Bend ISD Management Response to Status Update: *The District purchased and has fully implemented "Certify" by Certica Solutions. This validation tool assesses data within the student information system daily and automatically notifies District administrators, campus administrators, and clerical staff of anomalies that need to be addressed. The District is also utilizing the Skyward Pre-PEIMS and data validation reports that have been available since our Skyward implementation to analyze data and help ensure errors do not go undetected reducing the need for data entry validation controls.*

Recommendation 4: *The EASTR group should continue to evaluate and revise the access rights of users of Skyward who require the "skip LDAP" flag. The users with this flag should be periodically reviewed to ensure that all users still require this exception. (page 12)*

Fort Bend ISD Management Response 4: *The District supports the recommendation to continue to evaluate and revise the access rights of users of Skyward who require the "skip LDAP" flag. Staff members*

with duplicate employee ID's will be resolved by the Human Resources group. All Skyward users with the "skip LDAP" flag will be monitored monthly by senior level EASTR staff to ensure that all users still require this exception.

Fort Bend ISD Status as of September 30, 2014: The Department of Student Information Systems will review quarterly the access rights of users of *Skyward* with the "skip LDAP" flag.

2015 Follow-Up Audit Verification and Tests: Fort Bend ISD uses Lightweight Directory Access Protocol (LDAP) services to manage the access to all of the District's information technology resources. Deactivation of a user from LDAP service prevents access to all of the District resources. Using LDAP to control access to all resources eliminates the problem of keeping user rights in sync among different information technology systems when each system has its own authentication protocol. *Skyward* has a security setting flag that allows users to skip the LDAP authentication protocol when accessing *Skyward*. *Skyward* calls this setting, "skip LDAP". The District uses this flag on an exception basis. The District may need this functionality, but the District should use it in a limited capacity and periodically monitor it.

The audit team queried the system again for users that have "skip LDAP" flags and found 12 users. Four of these users are contractors that actively work with Fort Bend ISD. Because they are not the District's employees, they have the "skip LDAP" flag on. The District will continue to use the "skip LDAP" flag on contractors due to the nature of the system security design. The District uses two of the "skip LDAP" accounts for *Skyward* support and testing purposes. It created four accounts for a pilot project that allows the District staff to capture tardy status in *Skyward*. The remaining two accounts belong to human resources employees that have "skip LDAP" on because of their unique job codes. When compared to the number of system users, the number of users with the "skip LDAP" flag is limited and the reasons for why these users have the "skip LDAP" flag is valid.

The District, working with the Department of Human Resources, has remedied the issue of duplicate employee IDs that caused the majority of the "skip LDAP" users during the initial audit.

Status Update of Recommendation: Complete

The District should review reports that show "skip LDAP" users monthly and investigate these users to ensure they have a valid reason to be in this category.

Fort Bend ISD Management Response to Status Update: *The Department of Student Information Systems will continue to regularly review the access rights of users of Skyward with the "skip LDAP" flag. Skip LDAP access will continue to be kept to a minimum and all users allowed to skip the LDAP authentication protocol when accessing Skyward will continue to be documented and kept on file.*

Recommendation 5: The EASTR group should continue to evaluate the access roles and security settings of all users to determine that multiple roles and rights to data of multiple locations are still appropriate. (page 13)

Fort Bend ISD Management Response 5: *The District supports the recommendation that the EASTR group should continue to evaluate the access roles and security settings of all Skyward users to determine that multiple roles and rights to data of multiple locations are still appropriate. These security roles will be reviewed annually to align with District staff responsibility. In addition, the EASTR group will work closely with the Human Resources group to assure that processes are put in place to assign multiple locations to staff as appropriate in the PeopleSoft HCM system, so that manual maintenance is reduced.*

Fort Bend ISD Status as of September 30, 2014: Plans have been put in place to review and evaluate the security of users with multiple roles and/or locations at the end of each semester. Out-of-date security will be removed.

2015 Follow-Up Audit Verification and Tests: The Department of Human Resources maintains control of each employee's job role and location. When an employee's position requires access to *Skyward*, the SIS automatically establishes security settings in accordance with the appropriate role and location in the District's human resources application. If an employee needs access to multiple locations, or because of multiple responsibilities needs access to the system beyond his/her normal job duties, the Department of Student Information Systems gives or takes these rights away manually on a case-by-case basis.

To verify that the system reflected information on the forms, the audit team tested 30 manual security role change request forms against the District's *Skyward* system and found no discrepancies. However, due to the manual nature of the process, granting and removing access for users with multiple roles and locations will continue to be a risk area.

Status Update of Recommendation: Substantially Complete

Fort Bend ISD should work with Oracle PeopleSoft, the District's human resources system vendor, to find ways to have multiple roles and locations for users so that the system can automatically update the District's student information system.

Fort Bend ISD Management Response to Status Update: *The Department of Business Information Systems will work with the Oracle PeopleSoft vendor and the Human Resources Department to investigate the possibility of developing and implementing a solution in PeopleSoft that allows for the coding of staff with multiple work locations. The Department of Student Information Systems will work with Skyward to investigate the possibility of modifying the nightly staff import process that grants security access to staff to automatically accommodate the addition of multiple staff work locations. Requests for "multiple roles access" are expected exceptions during some job role transitions and will continue to be handled through a monitored, manual process.*

Attendance and Eligibility

Recommendation 6: As training for this area is updated for presentation in the future, these issues arising at Schiff Elementary and Crockett Middle should be considered to ensure that the school-based

staff district-wide is fully informed of the responsibilities for documenting first day “No Shows” and taking attendance. (page 17)

Fort Bend ISD Management Response 6: *The District supports the recommendation to ensure that the school-based staff district-wide is fully informed of the responsibilities for documenting first day “No Shows” and taking attendance. The Department of School Leadership will ensure that campus administrators designate appropriate campus staff as “back-up” for key campus positions for beginning of the year processes in the case of vacancies, leaves of absence, or last minute hires. Additionally, the Department of School Leadership will ensure campus administrators oversee the timely completion of those tasks that directly impact the ability to accurately complete first day counts including completion of the master schedule, new student enrollment, and fully scheduling students into classes. The EASTR group will continue to provide training to new staff as well as “back-up” designees.*

Fort Bend ISD Status as of September 30, 2014: *Department of School Leadership:* The Department of School Leadership, in conjunction with the SIS Department, established Master Schedule Completion timelines for campuses. Both departments also communicated with campuses regarding enrollment processes for new students by continuously updating new enrollee spreadsheets to campuses and requiring campus staff to contact prospective enrollees to complete the registration process prior to the first day of school. These direct parent contacts took place during August 2014 leading up to 8/25/2014. The Department of School Leadership requested daily reconciliation (enrollment balancing and count updates) from each campus for the first 10 days of school. This daily reporting from campuses to the Department of School Leadership was scheduled from 8/25/2014 to 9/8/2014. By September 30, 2014, the Department of School Leadership will also require principals to designate and submit the names of office staff members, who will be cross trained by the Student Information Systems Department so that additional campus staff members are prepared to complete student accounting tasks during the absence of the responsible employee.

Department of Student Information Systems: The Department of Student Information Systems trained campus Principals during the District Nuts and Bolts training outlining the First Day Reconciliation procedures and the role of campus administrators in the successful completion of the process. Campus principals received documentation including checklists outlining the steps to be taken during the First Day Reconciliation of enrollment. Campus attendance clerks, registrars, and data entry clerks were also trained at the “Back to School” Symposium on August 8, 2014.

Expected Outcome Recommendation 6:

- Fort Bend ISD First Day Reconciliation of enrollment for the 2014-15 school year will be completed accurately and in a timely manner.

2015 Follow-Up Audit Verification and Tests: The audit team reviewed the training documentation that the Department of Student Information Systems provided regarding the First Day Reconciliation procedures. According to the Department’s records, 89% of the schools had completed the First Day

Reconciliation of enrollment for the 2014-15 school year on the first day of school. Table 2 shows the number of schools and the date that they completed the First Day Reconciliation.

Table 2. First Day Reconciliation Dates and Schools

Date	Number of schools	Percentage
08/25/2014 (First day of school)	65	89%
08/26/2014	5	7%
08/27/2014	2	3%
08/29/2014	1	1%
Total	73	100%

Source: Fort Bend ISD Department of Student Information Systems

According to the First Day Reconciliation procedures, schools should not record absences on the first day of school. Instead, the school should count students not in attendance on the first day of school as a “no show”. The initial audit found 31 instances of recorded absences on the first day of school. The follow-up audit test revealed only one recorded absence in the system.

Status Update of Recommendation: Substantially Complete

The Department’s increase in First Day Reconciliation training activities and its close work with the Department of School Leadership has improved its First Day Reconciliation related data accuracy.

Fort Bend ISD Management Response to Status Update: *The Department of Student Information Systems will continue to work in collaboration with the Department of School Leadership in all first day training activities related to First Day Student Reconciliation.*

Recommendation 7: The District should run reports periodically for all schools with “W” coded absences that have not be resolved. The staff at each school should review these lists and clear all instances. (page 20)

Fort Bend ISD Management Response 7: *The District supports this recommendation and already has documented procedures in place for campuses to review daily the “Principal’s Dashboard” which displays this data. At the beginning of each school year, the Department of School Leadership will communicate to campus administrators the importance of accurate attendance recording and reporting. The monitoring of this data will continue to be a part of the rebranded O&A system.*

Fort Bend ISD Status as of September 30, 2014: The Department of School Leadership provided all campus principals with e-mail reminders sent with high importance on September 2, 2014 regarding accurate and timely attendance accounting responsibilities. The Department of School Leadership will receive 6 weeks reports for each campus that will track teacher attendance accounting accuracy for monitoring and follow-up with campus principals.

2015 Follow-Up Audit Verification and Tests: The District rebranded its “Oaths and Affidavits” (O&A) process to “Data Affirmation” process. The Data Affirmation process includes the reviewing, approving, and physically signing off on six-week’s attendance and various PEIMS submission reports by the appropriate campus and district staff. Although the name changed, the process remains the same.

The District requires the following positions to physically sign off on and provide documentation for each six-week period and for each PEIMS submission (i.e., generally the fall, summer submissions, and re-submissions):

- Bilingual Coordinator
- ESL Coordinator
- Title I Coordinator
- Student Support Services Coordinator
- Chief of Police
- Gifted and Talented Director
- Career and Technical Education Coordinators
- Career and Technical Education Administrator

According to the documents provided by the Department of Student Information Systems, not all positions have signed off on and provided the required documentation stated in the Data Affirmation process to the Department. Table 3 indicates the position and the time frame for required documents not submitted.

Table 3. Positions Missing Documentation According to Data Affirmation Process

Title/Position	Time Frame
Title I Coordinator	First six weeks, Second six weeks, Fall PEIMS Submission
Gifted and Talented Coordinator	First six weeks, Second six weeks, Fall PEIMS Submission, Fall PEIMS Resubmission
ESL/Bilingual Coordinator	First six weeks, Second six weeks, Fall PEIMS Submission, Fall PEIMS Resubmission

Source: Data Affirmation Report from Department of Student Information Systems

In addition to checking the required documentation according to the District process, the audit team tested the system for the existence of the “W” temporary absence code.

When a teacher records a student as absent, the *Skyward* system assigns a temporary code (“W” or Web Absent) for that day or period. When the student provides documentation as evidence of the reason for the absence, staff will change the “W” code to an “E” code indicating an excused absence. Staff use other codes (“M”, “R”, “O”, etc.) for excused absences that the District counts as present for funding purposes. These types of excused absences also require appropriate supporting documentation.

If the District does not receive a valid excuse, it will change the absence code to a “U” code indicating unexcused absence. The frequency of unexcused absences within a given period form the basis for truancy actions. The District should ultimately re-code all absences when the District resolves them. According to the District rules, campus staff should convert all “W” codes in the system to the proper absentee codes (“E”, “U”, etc.) five days after they enter the “W” code into the system.

During the initial audit, the audit team tested to determine whether the SIS contained any temporary student absence “W” codes from school year 2012-13. During the follow-up audit, Gibson also tested for the presence of “W” codes in the 2013-14 school year. Table 4 shows the number of remaining “W” codes from both tests. The audit team excluded summer school from testing.

Table 4. Students with “W” Code Attendance Records, By School Type

School Type	2012-13	2013-14
High Schools	12	3
Middle Schools	105	17
Elementary Schools	305	356
Total	422	376

Source: Skyward Information System

Status Update of Recommendation: Partially Complete

Although the District has made progress toward implementing this recommendation at Fort Bend ISD middle schools and high schools, the elementary schools have not made progress. The District should continue to emphasize the importance of the Data Affirmation process to its staff. It should also work with campuses to eliminate all temporary absence codes from the system after five days.

Fort Bend ISD Management Response to Status Update: The District will continue to emphasize the importance of the Data Integrity Affirmation process to its staff. Department and campus administrators will increase their ability to use, navigate, and successfully access data related to their specific departments or campuses in the approved FBISD software systems. Additionally, administrators will increase the level of attention given to the data validation process and put measures in place to monitor and ensure the data integrity affirmation process is adhered to by all responsible staff.

The Department of Student Information Systems will develop and provide an automated monthly report to the Department of School Leadership identifying all students by campus with temporary absence codes in the system older than five days. The report will be utilized as an additional tool to monitor and communicate with campus administrators the importance of accurate attendance recording and reporting. In addition, the Department will continue to offer training opportunities for approved FBISD software systems for department and campus staff.

Recommendation 8: The District should take the following steps to address the issues arising with respect to attendance taking:

- *Complete the analysis of teachers who did not take attendance (see Table 5) for the remaining schools, as well as the actual attendance (i.e., number of students per class) of each class where attendance was not taken.*
- *Determine the attendance (number of students) in those classes where attendance was after the time allotted for attendance (i.e., 12:00 Noon).*
- *Calculate the overall impact on Average Daily Attendance (ADA) and the total potential effect on funding.*
- *Consult legal advisors regarding the appropriate approach in submitting future PEIMS attendance reports, for example PEIMS Submission 3 this summer. Also, consider the approach to working with TEA to resolve potential errors in prior period submissions. (page 22)*

Fort Bend ISD Management Response 8: *The District supports the recommendation that an analysis be completed district-wide to determine the extent and potential impact of teachers not taking attendance and taking attendance late. Once the analysis is complete, the District will determine an appropriate course of action.*

Fort Bend ISD Status as of September 30, 2014: The Department of Student Information Systems met with campus Principals and outlined an Attendance Review and Corrections Process. Findings from the audit concerning the time teachers were taking attendance and teachers not taking attendance were also shared. In addition, a session was held for all attendance clerks during the Back to School Symposium in August that specifically addressed the attendance requirements and expectations. Attendance clerks will set up and schedule the required daily attendance reports in their first Learning Communities.

Elementary Campuses were to review the reports supplied by the SIS Department and have any corrections made by June 7, 2014.

Reports supplied to the elementary school campuses included:

- **Attendance Not Taken – Teacher Present Report.** Campus staff reviewed student absence notes for the 2013-14 school year. Students whose notes indicate an absence on days when teachers failed to take attendance were identified. The ADA Clerk entered absences in *Skyward* based on the notes. The Principal completed and signed the **FBISD Teacher Not Taken Form (ATT01)** and forwarded it to the appropriate Assistant Superintendent. The report was stored in the campus audit box for future documentation.
- **Attendance Not Taken – Teacher Absent Report.** Campus staff compared the manual rosters submitted by staff responsible for taking attendance to the report. The ADA Clerk verified that all manual attendance had been entered into the *Skyward* Student Information System. When entering attendance not previously recorded, a notation was entered to document the reason for

the change. If manual attendance rosters were missing, the **Missing Manual Attendance Form (ATT02)** was completed and signed by the Principal and then forwarded to the appropriate Assistant Superintendent. The report was stored in the campus audit box for future documentation.

Secondary Campuses were to review the reports supplied by the SIS Department and have any corrections made by June 7, 2014.

Reports supplied to secondary school campuses included:

- **Attendance Anomaly Report.** This report identified students with inconsistencies in period absences (e.g. absent 1st period, present 2nd period, but absent the remaining periods of the day). Campus staff reviewed the report and made corrections by marking the student absent with the appropriate reason code in *Skyward*. Notations were added in *Skyward* to document the reason for any changes made. All changes were noted on the report and the report was stored in the campus audit box.
- **Attendance Not Taken – Teacher Present Report.** Campus staff reviewed student absence notes for the 2013-14 school year. Students whose notes indicate an absence on days when teachers failed to take attendance were identified. The ADA Clerk entered the absences in *Skyward* based on the notes. The Principal completed and signed the **FBISD Teacher Not Taken Form (ATT01)** and forwarded it to the appropriate Assistant Superintendent. The report was stored in the campus audit box for future documentation.
- **Attendance Not Taken – Teacher Absent Report.** Campus staff compared the manual rosters submitted by staff responsible for taking attendance to the report. The ADA Clerk verified that all manual attendance had been entered into the *Skyward* Student Information System. When entering attendance not previously recorded, a notation was entered to document the reason for the change. If manual attendance rosters were missing, the **Missing Manual Attendance Form (ATT02)** was completed and signed by the Principal, then forwarded to the appropriate Assistant Superintendent. The report was stored in the campus audit box for future documentation.

All Principals were to notify the appropriate Assistant Superintendent when the entire process was completed.

Timeline: Campus staff were to have completed the attendance review process and have communicated the completion of all steps by June 7, 2014.

Expected Outcome Recommendation 8:

- Fort Bend ISD student attendance was reported with greater accuracy in the 2013-2014 Summer PEIMS Submission. In addition, the awareness by campus administrators and key campus staff of future PEIMS submissions.

2015 Follow-Up Audit Verification and Tests: Teachers take official attendance at Fort Bend ISD schools daily during the significant period. Significant period for elementary campuses is 10:00. Significant period for secondary campuses is the beginning of the period which contains 10:00. This is second period for middle schools and third period for high schools. Attendance recorded during significant period is used for purposes of determining the average daily attendance used for Foundation School Program (FSP) funding. In addition, the district requires all secondary teachers to take attendance at the beginning of each period.

Teachers take attendance online in *Skyward*. All teachers and long-term substitutes have a unique user name and password to log into the *Skyward* system for this purpose. Even if all of their students are present, teachers must still log into *Skyward* daily in order to provide evidence that they took attendance by positive affirmation in the system of 100% students present. In accordance with TEA rules, attendance should represent a “snapshot” of the students present at a given time each day. Fort Bend ISD instructs teachers to take class roll each day at the established time (10 a.m. for elementary campuses or at the beginning of the period containing 10 a.m. for secondary campuses). The District gives teachers a window of 15 minutes to complete the task online. The *Skyward* system maintains logs of all teachers logging in and taking attendance. These records and the system’s “Unrecorded Class Attendance reports” make it possible for the District to determine whether the teachers, in fact, take attendance daily.

Unrecorded Attendance

Based on the recommendation made as a part of the initial audit, the District ran unrecorded attendance reports for all schools for the significant period and compared the results to the previous year. Table 5 shows what teachers electronically documented in the SIS from August 26, 2014 to January 20, 2015 in terms of recorded versus unrecorded attendance during the significant period. The last column shows the percentage point change from the prior year’s Percent Taken percentage.

Table 5. Recorded Versus Unrecorded Attendance, August 26, 2014 to January 20, 2015, By School

Schools	Percent Taken	Percent Not Taken	Total Taken	Total Not Taken	Improvement From Last Year
High Schools					
Kempner H S	98.8%	1.2%	9574	117	8.6%
William B Travis H S	98.7%	1.3%	12002	157	3.2%
Lawrence E Elkins H S	97.7%	2.3%	9334	217	14.3%
Dulles H S	96.8%	3.2%	9593	317	9.9%
Stephen F Austin H S	96.7%	3.3%	10927	376	9.8%
Ridge Point H S	96.7%	3.3%	8982	311	5.8%
Clements H S	96.6%	3.4%	11229	394	4.1%
George Bush H S	96.5%	3.5%	10047	362	3.4%
Hightower H S	96.2%	3.8%	10121	396	5.3%
Thurgood Marshall H S	93.8%	6.2%	6185	408	15.1%
Willowridge H S	93.1%	6.9%	6431	478	13.1%
Middle Schools					
Fort Settlement MS	99.1%	0.9%	5309	46	5.5%
Billy Baines MS	99.1%	0.9%	6769	63	5.2%
Sartartia MS	98.5%	1.5%	5225	78	7.2%
David Crockett MS	98.4%	1.6%	4898	82	6.3%
Hodges Bend MS	98.3%	1.7%	6727	118	6.5%
Sugar Land MS	97.9%	2.1%	6066	130	2.8%
James Bowie MS	97.6%	2.4%	4949	124	4.1%
Macario Garcia MS	97.2%	2.8%	6294	181	4.8%
Dulles MS	96.5%	3.5%	5698	209	4.8%
First Colony MS	96.3%	3.7%	5479	211	8.3%
Missouri City MS	94.2%	5.8%	5874	364	2.0%
Lake Olympia MS	92.2%	7.8%	5573	474	5.0%
Christa McAuliffe MS	90.0%	10.0%	4666	516	-1.6%
Quail Valley MS	89.4%	10.6%	4464	531	23.6%

Elementary Schools						
Sienna Crossing E S	99.7%	0.3%	4330	14		0.7%
Cornerstone E S	99.7%	0.3%	4293	14		6.3%
Walker Station E S	99.7%	0.3%	3656	12		3.4%
Scanlan Oaks E S	99.7%	0.3%	4220	14		3.1%
Brazos Bend E S	99.6%	0.4%	2808	12		1.0%
Colony Meadows E S	99.4%	0.6%	3543	22		1.7%
Meadows E S	99.4%	0.6%	2252	14		10.7%
Colony Bend E S	99.3%	0.7%	2577	18		3.3%
Oakland E S	99.3%	0.7%	5550	39		1.9%
Lexington Creek E S	99.3%	0.7%	2407	17		1.5%
Walter Moses Burton E S	99.3%	0.7%	3862	28		12.2%
Settlers Way E S	99.3%	0.7%	3949	29		4.3%
Mission Glen E S	99.2%	0.8%	3043	23		4.6%
Hunters Glen E S	99.2%	0.8%	1985	17		11.8%
Mission Bend E S	98.9%	1.1%	3751	40		4.8%
Commonwealth E S	98.9%	1.1%	4536	51		2.2%
Jan Schiff E S	98.9%	1.1%	4624	53		9.3%
Townwest E S	98.7%	1.3%	3562	48		5.5%
Highlands E S	98.6%	1.4%	2896	41		5.2%
Barrington Place E S	98.6%	1.4%	3764	54		4.6%
Lakeview E S	98.5%	1.5%	2560	38		0.7%
Pecan Grove E S	98.5%	1.5%	3093	47		3.2%
Sugar Mill E S	98.3%	1.7%	2891	49		1.8%
Oyster Creek E S	98.3%	1.7%	3747	64		3.0%
Mary Austin Holley E S	98.2%	1.8%	3708	67		4.2%
Palmer E S	97.9%	2.1%	3004	65		0.3%
Lantern Lane E S	97.8%	2.2%	2498	57		8.1%
Heritage Rose E S	97.8%	2.2%	2657	61		3.1%
Arizona Fleming E S	97.6%	2.4%	3427	85		5.6%
Edgar Glover Jr E S	97.5%	2.5%	2897	74		11.8%
Barbara Jordan E S	97.4%	2.6%	4201	110		3.0%
Rita Drabek E S	97.3%	2.7%	4021	113		2.3%
Ridgemont E S	97.2%	2.8%	3640	104		5.0%
Juan Seguin E S	97.1%	2.9%	3765	114		-0.1%
Ridgegate E S	97.0%	3.0%	3540	108		2.1%
Dulles E S	96.7%	3.3%	3080	105		5.1%
Austin Parkway E S	96.4%	3.6%	4304	162		5.8%
Briargate E S	96.1%	3.9%	2120	87		9.9%
Mission West E S	95.9%	4.1%	4023	174		10.3%
Rosa Parks E S	95.5%	4.5%	2909	136		15.6%
Blue Ridge E S	94.8%	5.2%	3343	182		0.0%
Dr Lynn Armstrong E S	93.7%	6.3%	3096	207		2.6%
Quail Valley E S	93.4%	6.6%	2438	173		-0.8%
E A Jones E S	91.8%	8.2%	2893	258		1.3%
Lula Belle Goodman E S	87.2%	12.8%	3211	471		29.9%
Specialized Schools						
Technical Education Cen	97.1%	2.9%	2109	63		15.5%
Fort Bend Co Alter	95.5%	4.5%	528	25		12.9%
Ferndell Henry Center Fo	91.6%	8.4%	2099	193		10.1%
Progressive H S	87.1%	12.9%	1466	218		0.0%
MR Wood Center For Lea	86.9%	13.1%	2254	341		16.4%

Source: Fort Bend ISD Department of Student Information Systems

Table 5 does not include those significant periods for which the teacher was absent and a substitute teacher took the attendance manually. Although the report included only those days when teachers were present, some schools had manual attendance forms for unrecorded attendance. Some of the common reasons for this included the following items:

- Teacher was present but attending a training or event within the District or school
- Teachers did not have login information for the SIS (The District experienced delays in getting teachers their *Skyward* login credentials due to the high volume of hiring activity in the beginning of the school year)
- *Skyward* system was down
- Power was out for the school
- The teacher’s computer was malfunctioning

In order to measure the impact of manual attendance forms on the attendance-taken percentage, the audit team reviewed the manual attendance forms that corresponded to the days of unrecorded attendance for the same period at six randomly selected schools:

- Thurgood Marshall High School
- Willowridge High School
- Christa McAuliffe Middle School
- Quail Valley Middle School
- Lula Belle Goodman Elementary School
- Quail Valley Elementary School

With the use of manual attendance forms, four out of the six schools have increased their attendance-taken percentage more than 5 percentage points. Table 6 shows the attendance taken percentage before and after the inclusion of manual attendance forms in the calculation.

Table 6. Attendance Percentage Change with Manual Attendance Forms

	Without Manual Attendance Forms		With Manual Attendance Forms		Change with manual forms
Thurgood Marshall H S	93.8%	6.2%	97.1%	2.9%	3.3%
Willowridge H S	93.1%	6.9%	93.8%	6.2%	0.7%
Christa McAuliffe M S	90.0%	10.0%	95.9%	4.1%	5.8%
Quail Valley M S	89.4%	10.6%	95.3%	4.7%	5.9%
Quail Valley E S	93.4%	6.6%	99.2%	0.8%	5.9%
Lula Belle Goodman E S	87.2%	12.8%	94.1%	5.9%	6.9%

Source: Gibson Consulting Group

Schools also reported to the Department of Student Information Systems different circumstances that they thought were causing the system to generate instances of unrecorded attendance for their teachers. Those included:

- Teachers taking attendance using the *Skyward* mobile app

- If the teacher joins the school after the first day, the system shows his or her days prior to joining as attendance not recorded
- Although the teacher is in the system and has a class schedule in the system, he or she never joined the District

The Department of Student Information Systems is working with *Skyward* to address these issues.

Late Attendance

During the initial audit, the audit team reviewed the reports that the Department of Student Information Systems ran districtwide (this was during the same time period as the unrecorded attendance reports) regarding the late attendance taking. While progress has been made districtwide in late attendance taking, data suggest that late attendance taking continues to have a significant financial impact for the District. This is particularly noteworthy in elementary schools where late attendance taking increased in 2014-15 compared to same time frame in 2013-14.

Table 7 shows summary information from the report the Department of Student Information Systems ran regarding the late attendance taking in 2014-15 and 2013-14. Details regarding 2013-14 are included in Appendix D.

Table 7. Late Fiscal Impact of Late Attendance Taking

School	Number of classes with recorded attendance on or after noon in 2013-14	Number of classes with recorded attendance on or after noon in 2014-15	Estimated number of students with attendance recorded late in 2013-14	Estimated number of students with attendance recorded late in 2014-15	Potential financial impact from attendance recorded late in 2013-14	Potential financial impact from attendance recorded late in 2014-15
High School Totals	6,443	4,195	161,075	10,4875	\$4,993,325	\$3,251,125
Middle School Totals	3,093	2,995	77,325	74,875	\$2,397,075	\$2,321,125
Elementary School Totals	3,052	4,994	67,144	10,9868	\$2,081,464	\$3,405,908
Specialized School Totals	549	494	17,559	5,802	\$544,329	\$179,862
District Totals	13,137	12,678	323,103	295,420	\$10,016,193	\$9,158,020

Source: Department of Student Information Systems; See Appendix D of this Report for Calculations

The District has made improvements in the area of unrecorded attendance, but not in the area of late attendance. The Department of Student Information Systems is working closely with the Department of School Leadership to increase awareness among principals and teachers about the importance of on time attendance taking and attendance related activities. From the related attendance reports and correspondence samples that the audit team reviewed, it is evident that principals and campus staff run attendance-related reports (such as “unrecorded class attendance”) frequently and are working with teachers to reduce the number of instances of unrecorded and late attendance. As part of Fort Bend ISD’s efforts to improve attendance taking, the District included this area in the teacher appraisal system

(PDAS). As such, principals will now directly monitor the recording of attendance. Additionally, the District will include attendance recording in teacher evaluations.

Status Update of Recommendation: Partially Complete

With the exception of three schools (Christa McAuliffe Middle School, Quail Valley Elementary School, and Juan Seguin Elementary School) all Fort Bend ISD schools have shown improvement in unrecorded attendance. This demonstrates that the District's efforts towards full attendance taking is having a significant impact. However, despite improvements from last year and a more than 90% recorded attendance rate in all but three schools, the District should continue to work towards and strive for 100% recorded attendance for teachers that are present to take attendance.

The District still has more work to do in the area of late attendance taking. The Department of Student Information Systems should continue to work with the Department of School Leadership, principals, and teachers to reduce the number of late attendance taking districtwide. As part of this effort, the District should consider providing frequent summary reports on both unrecorded and late attendance to the superintendent until the District achieves 100% on-time recorded attendance.

Fort Bend ISD Management Response to Status Update: *The District will continue to work towards and strive for 100% on-time recorded student attendance for teachers that are present to take attendance. The Department of Student Information Systems will develop and provide an automated monthly summary report identifying both unrecorded and late attendance to the Superintendent and the Department of School Leadership. The report will be utilized as an additional tool to monitor and communicate with campus administrators the importance of teachers taking on-time, daily student attendance.*

The campus administrative teams will continue to monitor teachers taking on-time student attendance on a daily basis when present. Additionally, the campus administrative teams will implement a process to monitor ADA Clerks generating and completing the manual attendance roster process when a teacher is absent and a substitute needs to record student attendance manually. The process will include random inspections of the manual student attendance rosters to ensure the attendance data has been entered into the Skyward system and the rosters have been filed in the campus audit box.

As the District continues its efforts to improve on-time attendance taking and to ensure all manual student attendance data has been entered into the Student Information System, FBISD will continue to include attendance taking in the PDAS teacher appraisal process. Additionally, the District will also include accurate and complete attendance data entry and coding in the ADA Clerk evaluation process.

Leavers

Recommendation 9: The District should review the documentation required for each leaver code and provide a checklist to campus staff to ensure that the correct forms are used, that the forms filled out completely and that all school officials have signed the forms as required. (page 24)

Fort Bend ISD Management Response 9: *The District supports this recommendation, and the EASTR group will continue to provide the required documentation for leaver codes from Appendix D of the PEIMS Data Standards. The EASTR group will also create a checklist for campus staff to ensure that the correct forms are used. The Department of School Leadership will work closely with campus administrators to ensure compliance and oversight.*

Fort Bend ISD Status as of September 30, 2014: Leaver code requirements from the 2014-15 PEIMS Data Standards, Appendix D, will be reviewed in the September Learning Communities for high school registrars and assistant registrars and for middle school data entry clerks. Weekly reports of leaver coding will be initiated in late September and will be submitted to the Department of School Leadership and the Department of Accountability.

2015 Follow-Up Audit Verification and Tests: During the initial audit, the audit team performed tests on the documentation supporting the leavers reported in *Skyward* for the 2013 school year. The audit team selected a non-statistical sample of 35 cases of leavers across the District and reviewed the documentation for all leaver codes used in 2013. As part of the follow-up audit, the audit team selected a non-statistical sample of 20 cases of leavers across the District. The results are summarized in Table 8 below.

Table 8. Summary of Leaver Code Review

Description	Initial Audit	Follow-Up Audit
Documentation is complete and fully supports the reported leaver code.	29	20
Documentation is incomplete or the leaver is coded incorrectly, but the error does not lower the campus dropout rate.	5	0
Documentation does not support the reported code and the error does lower the campus dropout rate.	1	0
Withdrawal information does not include leaver code documentation for the student (i.e., incomplete, invalid, or not found).	0	0
Total	35	20

Source: Leaver Code Documentation Maintained at each Campus

Status Update of Recommendation: Complete

The audit team found that the leaver cases it tested were coded properly and that their supporting documentation was in order. The Department of Student Information Systems also shared the training materials and training attendance information regarding leavers for District and campus staff.

The Department of Student Information Systems should continue to provide in-depth training regarding leavers.

Fort Bend ISD Management Response to Status Update: *The Department of Student Information Systems will continue to provide in-depth training regarding accurate coding of leavers. The Department of*

Accountability and the Department of School Leadership will continue to monitor and collect campus leaver summary reports on a weekly basis.

Discipline

Recommendation 10: School-based staff should be trained further to ensure that all documentation for disciplinary action is maintained and available for review. (page 25)

Fort Bend ISD Management Response 10: *The District supports this recommendation. The Department of Student Affairs in conjunction with the Legal Department will continue to provide annual training regarding discipline decision making and documentation. The EASTR group will continue to provide annual discipline data entry training emphasizing proper electronic documentation. The Department of School Leadership will work closely with campus administrators to ensure compliance and oversight.*

Fort Bend ISD Status as of September 30, 2014:

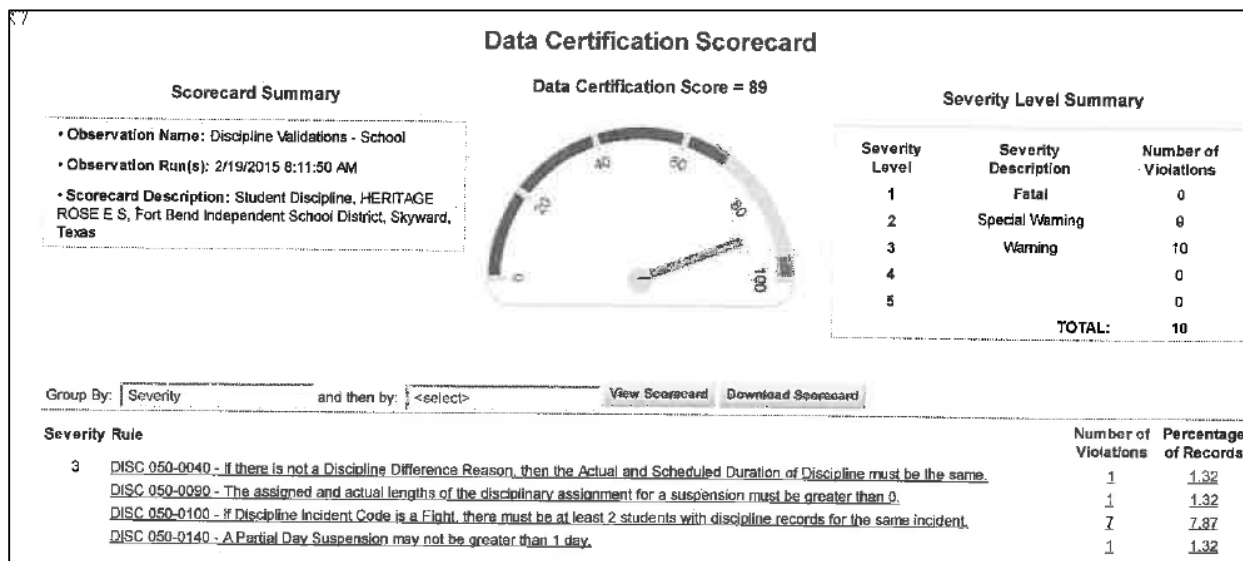
The Department of Student Information Systems: Discipline data entry training has been scheduled in early September for all new campus administrators. Discipline refresher training for returning staff has been offered through a live webinar. In addition, the webinar has been recorded and will be available for any campus staff to view at their convenience.

The Department of Student Affairs: The Department of Student Affairs is providing extensive training and resources to all campus principals regarding discipline, discipline decision-making, and documentation. Additionally, procedures have been tightened for discretionary placements to the DAEPs.

The Department of School Leadership: The Department of School Leadership will review the monthly truancy reports with principals to monitor accurate entry of truancy discipline into the *Skyward* database. The Department of School Leadership will require that each principal confirm that their administrative team has received the relevant *Skyward* discipline entry training or discipline update training that is offered quarterly by the SIS Department. The Department of School Leadership will monitor and discuss with campus principals the compliance data from quarterly disciplinary reports and provide guidance to principals when irregularities are noted in the disciplinary documentation.

2015 Follow-Up Audit Verification and Tests: As previously noted, Fort Bend ISD recently purchased the software system *Certify* from Certica Solutions. This data validation and compliance software allows the District to automatically validate and monitor the student information system data on a daily basis. The software checks the District's data daily and compares the data against the list of rules that are based on PEIMS standards and regulations. If the software identifies a data issue, it generates a report that has the issue and applicable rule so that the users can take action. The software also generates a scorecard for the District and campuses that rates their data daily based on the number of issues it found and their severity. The software has a large set of rules regarding discipline data. Figure 1 shows a screen shot of discipline data generated from the system.

Figure 1. *Certify* Software Campus Scorecard View for Discipline Data, Heritage Rose Elementary School, February 19, 2015



Source: *Certify* Data Certification Scorecard Report, Fort Bend ISD

During the site visit for this follow-up audit, the Department of Student Information Systems was in the process of finalizing the pilot phase of the *Certify* implementation. Once all campuses use the software, the District will have a complete picture of data errors and compliance issues in several areas including discipline.

Status Update of Recommendation: Partially Complete

District staff and campuses should use *Certify* and its reports for all data validation and compliance areas, including discipline.

Fort Bend ISD Management Response to Status Update: *Since the full implementation of *Certify*, District and campus administrators have been and will continue to use the *Certify* system’s automated reports in their daily data validation process, including student discipline data. District staff is also utilizing the Skyward Pre-PEIMS and data validation reports that are available to them in the Skyward Student Information System.*

Recommendation 11: The coordination between the Truancy Office and campus staff should be improved to ensure that truancy incidents are appropriately documented in Skyward. The District should explore ways in which actions in the Truancy database can be uploaded to Skyward directly to improve the reconciliation of the two systems. (page 26)

Fort Bend ISD Management Response 11: *The District supports the recommendation that the coordination between the Truancy Office and campus staff be improved to ensure that truancy incidents are appropriately documented in Skyward. The Department of Student Affairs will address the expectations of consistent data entry for truancy incidents as part of their annual discipline training. The District will explore ways in which actions in the Truancy database can be uploaded to Skyward directly to improve the*

reconciliation of the two systems. The Department of Student Affairs will develop a method to monitor the consistency between the Truancy system and Skyward.

Fort Bend ISD Status as of September 30, 2014: The Department of Student Affairs has identified that there had been an over-reporting of truancy in *Skyward*. The procedure has now been adjusted to assure that only after the Court has made an official filing of truancy is there an entry into *Skyward*. The three District Student Attendance Specialists will only report final truancy charges to campus administrators for input into *Skyward*. Additionally, the Department of Student Affairs will continue to work with the EASTR Department and all Student Information System stakeholders to determine better ways for truancy reconciliation between *Skyward* and the truancy system.

2015 Follow-Up Audit Verification and Tests: During the initial audit, the audit team compared truancy-related records, specifically “truancy letter” codes in *Skyward* and the truancy database. If the campuses entered “truancy letter” incidents according to the information they received from the truancy database, the numbers should be identical, if not very close. Table 9 presents the results during the initial audit.

Table 9. Truancy Database and *Skyward* Discipline Record Differences, 2012-13

School	Number of Incidents from Truancy Database Regarding Truancy Letter	Number of Incidents from <i>Skyward</i> Discipline Module Regarding Truancy Letter
Barrington Place	50	None
Rosa Parks	101	4
Quail Valley	86	33
Macario Garcia	134	34
Willowridge	1,261	92
Stephen F Austin	549	750

Source: Truancy Database and *Skyward*

Table 10 shows the results of the “truancy letter” records in the *Skyward* system and the truancy database for the same schools in 2014-15 school year.

Table 10. Truancy Database and *Skyward* Discipline Record Differences, 2014-15

School	Number of Incidents from Truancy Database Regarding Truancy Letter	Number of Incidents from <i>Skyward</i> Discipline Module Regarding Truancy Letter
Barrington Place	43	None
Rosa Parks	60	20
Quail Valley	71	7
Macario Garcia	75	39
Willowridge	730	1
Stephen F Austin	445	157

Source: Truancy Database and *Skyward*

As shown above, the District still has a large number of discrepancies between the two information systems. The procedures implemented have not resulted in consistent reporting between the two information systems storing discipline data.

Status Update of Recommendation: Initiated but No Significant Progress

The District should continue efforts to train and work with the schools regarding the discipline-related coding. In addition to training, Fort Bend ISD should continue to look for ways to electronically sync *Skyward* and the truancy database. This way the District would ensure that it enters all of the discipline coding into the *Skyward* system and that it does not have any discrepancies between the two systems.

Fort Bend ISD Management Response to Status Update: *To ensure student truancy data is accurately recorded in the Skyward Student Information System, the District has hired a temporary employee to work with the three Student Attendance Specialists in the Department of Student Affairs to review and ensure truancy data is entered into the Skyward system. In addition, the Student Information Systems department is investigating the possibility of importing truancy data into Skyward automatically from the District’s custom developed truancy system. The department will also investigate the possibility completing the desired truancy process solely in the Skyward system.*

Special Program Areas

Recommendation 12: The LEP Coordinator should continue to reconcile the students classified as LEP/ESL/BIL in Skyward with those identified by individual teachers at each school. The goal of this effort should be to identify all differences and the related source. (page 29)

Fort Bend ISD Management Response 12: *The District supports this recommendation. By working with an identified contact at each campus, the ELL Coordinator will continue to reconcile the students classified as LEP/ESL/BIL in Skyward with those identified by individual teachers at each school. The ELL Coordinator will provide training at appropriate monthly Learning Communities facilitated by the EASTR group. This*

data will be monitored by the ELL Coordinator and campus staff every six weeks through the rebranded O&A process.

Fort Bend ISD Status as of September 30, 2014: The LEP/ESL/BIL Department was able to decrease the discrepancies to 21 students at the end of the year. For 2014-15 the campus administrator will be responsible for LPACs. The newly created position of Elementary Campus Compliance Coordinators (ECCC), will assume responsibility for appropriate coding.

2015 Follow-Up Audit Verification and Tests: According to the documents reviewed as part of the follow-up audit, the LEP/ESL/BIL Department has provided 12 professional development opportunities for the campus staff from September 09, 2014 to February 12, 2015. In addition to providing more training opportunities for campus staff, the documentation reviewed revealed that the LEP/ESL/BIL Department staff are working closely with campus staff to reconcile LEP/BIL/ESL student counts. Although the audit team requested documentation from Fort Bend ISD regarding the number of LEP student count discrepancies, Fort Bend ISD has not provided it at the time of this report. As a result, the audit team cannot confirm the reduction in discrepancies.

Status Update of Recommendation: Partially Complete

The LEP/ESL/BIL Department should continue to provide additional training and work with related campus staff frequently to reconcile the student numbers in *Skyward*.

Fort Bend ISD Management Response to Status Update: *The Department of Special Programs, English Language Learners will escalate its level of training by conducting on-site visits to ensure that campus personnel are fully trained in the ELL procedures and in coding program data in the Skyward Student Information System in addition to providing assistance by phone. Special Program department administrators will continue to improve the reconciliation process of student data by increasing their ability to use, navigate, and successfully access special program data in the Skyward system. The Department will also work closely with the Department of Student Information Systems to identify additional reports needed to assist in the efficiency of the reconciliation process.*

Recommendation 13: The District should review the files for students eligible for special services (GT, CTE, Immigrant, Migrant, etc.) to determine that adequate documentation for coding in Skyward is available. The District should also consider running periodic reports to screen students whose demographic data is inconsistent with coding. (page 30)

Fort Bend ISD Management Response 13: *The District supports this recommendation. By working with an identified contact at each campus, the Special Program Administrators will continue to reconcile the students enrolled in special programs with those coded as such in Skyward. Special Program Administrators will provide training to appropriate campus staff. This data will be monitored by the Special Program Administrators and campus staff every six weeks through the rebranded O&A process.*

Fort Bend ISD Status as of September 30, 2014: The Elementary Campus Compliance Coordinators (ECCC), a newly created position at each elementary school, were asked to pull students' files for special programs

(i.e. 504, SPED, etc.) and *Skyward* reports to ensure alignment of coding and services are in place. ECCC's, along with other campus staff (i.e. counselor, ESL, and administrators), will build campus procedures to ensure communication systems related to coding in *Skyward* are in place. The ECCC's have the responsibility of entering at risk coding data into *Skyward*. They will work with special program staff to ensure data is valid and updated appropriately. Training efforts have begun starting with a review of at risk coding terminology and procedures to be followed by *Skyward* training for entering at risk data

2015 Follow-Up Audit Verification and Tests: In addition to having the newly created position called the Elementary Campus Compliance Coordinators (ECCC) and an increased focus on special program data validation issues, districtwide usage of *Certify* will provide campus and District staff ongoing daily warnings and reports on special program data validation and entry errors and issues. The District has also purchased a new software, *Eduthings*, that automates coding as well as processes related to career and technology programs.

Status Update of Recommendation: Complete

The District has fully implemented this recommendation and should continue working on data validation and coding issues as they arise with new tools and staff.

Fort Bend ISD Management Response to Status Update: *The District will continue its special program data validation process by conducting on-site visits to review the files for students eligible for special services (GT, CTE, Immigrant, Migrant, etc.) and validate the data has been entered and accurately coded in the Skyward system. Campus staff will continue to review daily Certify reports and available Skyward reports in their efforts to eliminate any coding issues in special program data.*

Appendix A – Staff Interviewed

Name	Title
Long Pham	CIO
Mitzi Patin	Director of Business Information Systems
Lisa Mirza	Director of Student Information Systems
Mark Foust	Assistant Superintendent
Patricia Sanchez	Lead English Language Learners (ELL) Coordinator
Almas Walji	BIL/ESL Clerk
MaryEllen Edge	Principal Austin High School - corrected
Pat Larson	Manager of Training and Student Information Support
Barbara Benzaia	Manager of Student Information System Services
Chuck Nguyen	Application Support Specialist
Jennifer Treat	Application Support Specialist
Rick Sanders	Information Security Advisor
Charlene Spinks	PEIMS Coordinator
Candi Ihnen	Data Quality Specialist
Barbara Belter	SIS Specialist

Appendix B – Audit Recommendation Verification

Recommendation	Type of Verification
Recommendation 1	Documents provided by the District and interviews
Recommendation 2	Documents provided by the District and interviews
Recommendation 3	Documents provided by the District, interviews, reports from <i>Certify</i> software and observation of the software <i>Certify</i> .
Recommendation 4	Interview, Querying against the relevant tables of the SIS system
Recommendation 5	Documents provided by the District, interviews test 30 manual form information against the records in SIS.
Recommendation 6	Documents provided by the District, interviews, first day reconciliation report, SIS absence records for the first day of school.
Recommendation 7	Documents provided by the District, interviews, data affirmation process documentation, Query SIS system for existence of W absence code for school year 2013-14
Recommendation 8	Documents provided by the District, interviews, Unrecorded attendance report, Manual testing of six schools manual attendance forms, late attendance fiscal impact report
Recommendation 9	Documents provided by the District, interviews, 20 leaver file testing
Recommendation 10	Documents provided by the District, interviews, <i>Certify</i> reports
Recommendation 11	Documents provided by the District, interviews, Truancy letter reports from SIS system and Truancy letter reports from Truancy database.
Recommendation 12	Documents provided by the District, interviews, and training information and sample LEP student reconciliation documentation.
Recommendation 13	Documents provided by the District, interviews, <i>Certify</i> reports

Appendix C – Internal Audit of Student Information Systems



Internal Audit of Student Information Systems

For Fort Bend Independent School District

Submitted by:
Gibson Consulting Group, Inc.

Report Overview

One critical administrative function of the Fort Bend Independent School District (ISD) is to collect and report student information. Fort Bend ISD educates over 70,000 students, and it gathers information on each student in a variety of ways including demographic information such as age and ethnicity; academic performance such as course schedules and grades; and daily activities such as attendance and disciplinary matters.

Teachers and administrators use the information amassed to track the academic progress of each student to ensure that appropriate educational services are provided timely and effectively. The district also submits this information to the Texas Education Agency (TEA) to assess public school students on what they have learned and to maintain accountability for Texas school districts and their respective schools.

TEA also uses this information to determine the funding that the district will receive based on the attendance of students each day in Fort Bend ISD classrooms.

At the request of the Fort Bend ISD Board of Trustees, Gibson Consulting Group, Inc. (Gibson) conducted a review of the district's student information system as part of the 2014 Internal Audit Plan. Our review covered policies and procedures governing the collection, processing, maintenance, and reporting of student information during the 2014 and 2013 school years. We also reviewed operations and controls related to the district's primary student information system, *Skyward*.

We concluded overall that the district has adopted policies and procedures that comply in every material respect to standards established by TEA for collecting and reporting student information. The *Skyward* information system functions effectively to support the objectives of the district in managing student information. We also determined that the Enterprise Application Support, Training, and Reporting department (EASTR), with primary responsibility within the district for managing *Skyward*, has developed a thorough program of procedures and tools to support the student information system.

Fort Bend ISD provides extensive training to school-based staff on a wide range of topics germane to the management of student information. Each school level (i.e., elementary, middle, and high) is allocated sufficient staff – data entry clerks, attendance clerks, registrars, and counselors – to carry out daily responsibilities.

The following report details the district's systems and processes for student information, describes the methods we used to review each area, and presents our findings and recommendations for improvement in these systems and processes. We noted exceptions with respect to compliance with established policies and procedures in the following areas:

- In some classrooms, teachers are not taking attendance completely or in a timely manner. The *Skyward* system supports the taking of attendance through electronic, paperless means; however, each teacher must log into the system daily at pre-established times to call the roll for

the classroom and to positively identify those students in attendance and those absent. This is not occurring in all cases.

- Improvements needed in the *Skyward* system, as well as the network that supports the system, were identified.
- Information maintained in *Skyward* for disciplinary actions, particularly truancy matters, does not accurately reflect the actions taken by the district's Truancy Office.
- Documentation exceptions were noted in several areas. While not impacting the overall accuracy and completeness of Fort Bend ISD student information, these exceptions need to be reviewed and corrected. Future training sessions with school-based and program staff should emphasize the importance of consistency in documenting attendance, discipline, leavers, and student services.

Areas of Review

Gibson Consulting Group, Inc. was engaged by the Fort Bend ISD to conduct an internal audit of the district's student information system. The purpose of this project was to review the policies, procedures, and systems used by Fort Bend ISD to collect and report information related to student demographics and activity, including attendance, standardized state tests, disciplinary actions, and other student-related data. This is our report of the audit procedures performed and the findings and recommendations of our review.

The specific areas of our review were:

- **Policies and Procedures.** We reviewed the district's policies for collecting and managing student information in accordance with applicable state and TEA regulations. We also reviewed the procedures in place within Fort Bend ISD to record and report student information internally and to TEA.
 - The Texas Education Code, Section 42.006 requires that all school districts participate in the Public Education Information Management System (PEIMS). The purpose of PEIMS is to provide useful, accurate, and timely information on student demographics, student academic performance, personnel, and school district finances. This information is used by the TEA, the legislature, and other agencies to adequately oversee and evaluate the public education system.
- **Training.** We reviewed the programs in place in Fort Bend ISD for training teachers and staff regarding the compliance requirements of the district with respect to student information, as well as the systems and procedures developed for staff to follow as part of their daily responsibilities.
- **Information Systems.** We reviewed the computer systems maintained by the district to facilitate the collection and management of student information. We also reviewed computer system controls in place within *Skyward*, the district's primary student information system. These controls include system access, back-up of data files, updates, and system security.
- **Primary Areas of Student Information.** We reviewed the primary functional aspects of the student information system, including:
 - **PEIMS Reporting** – policies and procedures for validating and submitting student data through PEIMS pursuant to TEA regulations.
 - **Attendance** – policies and procedures for taking daily attendance at each school and class, as appropriate.
 - **Leavers** – documentation maintained as support for Fort Bend ISD students who move to other Fort Bend ISD schools, other Texas public schools, or who leave the Texas public school system.

- **Discipline** – documentation maintained to support the reasons for actions taken in response to student violation of school rules.
- **Special Programs** – documentation maintained to support the coding of students who participate in various special programs or who are classified with certain educational needs that require additional services. These include limited English proficiency, gifted and talented programs, career and technical education, immigrant or migrant status, pregnancy, and classification as Title I (i.e., economically disadvantaged, homeless, or other reasons).

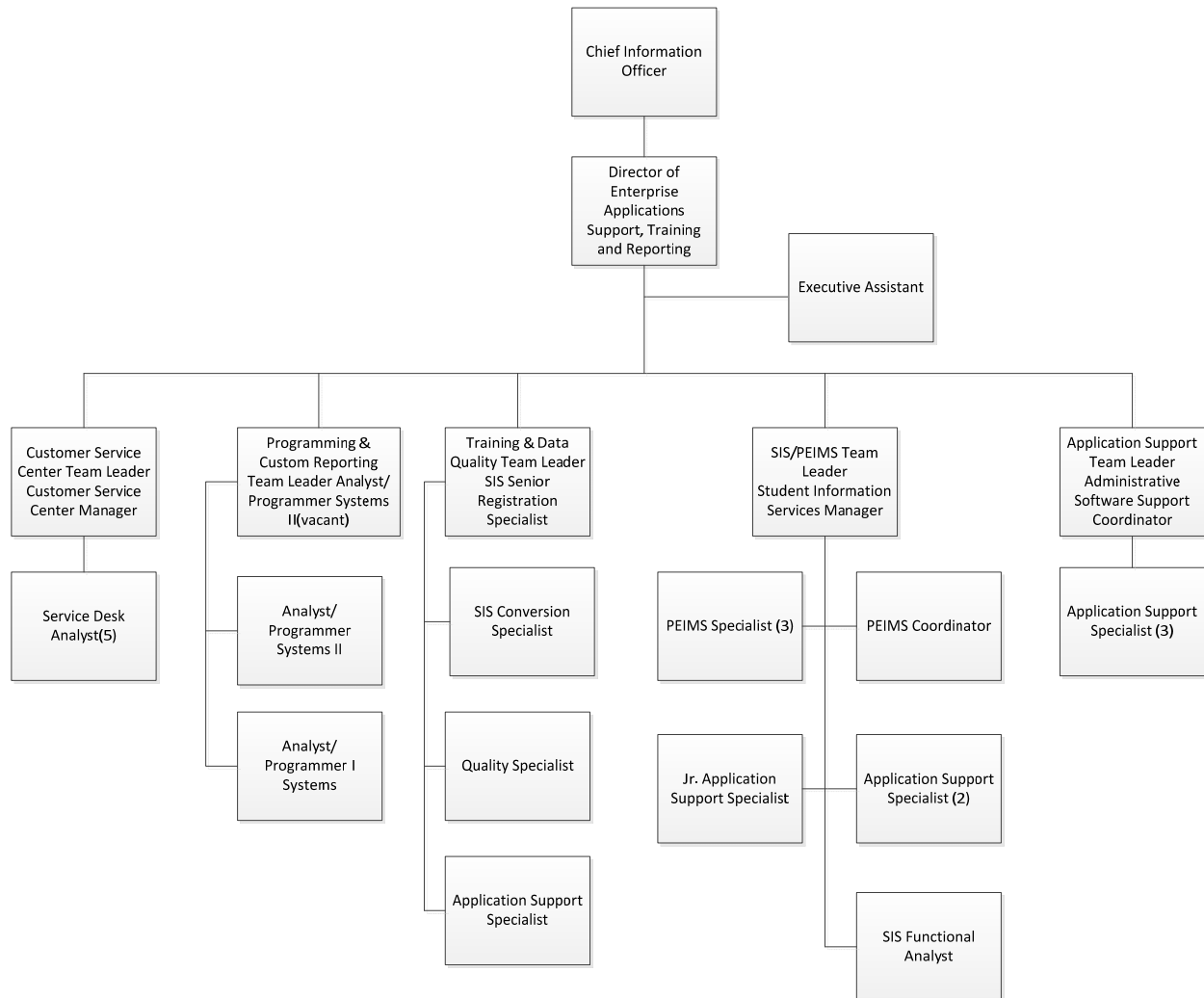
We discuss these objectives in further detail in this report, along with our findings and recommendations related to each area.

Organization

Management of student information for a school district the size of Fort Bend ISD with over 70,000 students requires specialized systems and processes. Many district staff members within the central office and at each school are tasked with gathering, validating, and reporting student information. The primary responsibility for maintaining the student information computer systems rests with the EASTR group within the district's Technology department. EASTR coordinates with school-based staff to gather student information through enrollment, attendance, and other daily activities during which student information is entered or updated within the *Skyward* system. The functions of *Skyward* are discussed in greater detail later in this report.

As its name implies, the department also provides training to school-based staff and works with other Fort Bend ISD employees to validate and report student information through PEIMS. The organizational chart for EASTR is shown in Figure 1.

Figure 1. EASTR Organizational Chart



Source: Enterprise Application Support, Training and Reporting

The department employs 16 staff members who support the *Skyward* system and who work with school-based staff to maintain student information. In addition to central office staff, each school has dedicated staff to manage student information. The staff positions that are allocated to each school and their primary responsibilities with respect to student information are shown in Table 1. Each of these employees has duties in addition to their responsibilities for maintaining student information.

Table 1. Responsibilities of School-Based Staff

School Type	Positions	Primary Responsibility	Total Staff
Elementary School	Attendance (ADA) Clerk	<ul style="list-style-type: none"> Process and maintain student attendance records. Also assist in enrollment and withdrawal of students updating demographic data. 	45
Middle School	Attendance (ADA) Clerk	<ul style="list-style-type: none"> Process and maintain student attendance records. 	14
	Data Entry Clerk	<ul style="list-style-type: none"> Process and maintain, both in <i>Skyward</i> and other external information systems, a wide range of student information including master schedules, teacher records, attendance, grades, transfers/withdrawals, and demographic data files. 	14
High School	Attendance (ADA) Clerk	<ul style="list-style-type: none"> Process and maintain student attendance records. 	14
	Data Entry Clerk	<ul style="list-style-type: none"> Process and maintain, both in <i>Skyward</i> and other external information systems, a wide range of student information including master schedules, teacher records, attendance, grades, and demographic data files. 	11
	Registrar	<ul style="list-style-type: none"> Responsible for all student and teacher records Oversee registration, withdrawal and transfers of students Determine student eligibility Process student transfers Support data analysis needs of campus Maintain records for grade point average determination and transcripts 	14
	Assistant Registrar	<ul style="list-style-type: none"> Assist the Registrar in performing his/her duties as assigned 	11

School Type	Positions	Primary Responsibility	Total Staff
Total Overall Staff			123

Source: Fort Bend ISD Enterprise Applications Support, Training, and Reporting

The Application Development and Maintenance group within the Technology department supports other Fort Bend ISD information systems that use student information from *Skyward*. As discussed in further detail below, certain student information, specifically data related to students who qualify for free or reduced meals, is entered into *Skyward* from other information systems. The Application Development and Maintenance group oversees the software and databases that facilitate the transfer of this information.

In addition to the groups discussed above, each of the following departments has responsibilities for validating student information that relates to special programs and services.

- Child Nutrition
- Gifted and Talented Education
- Career and Technical Education
- Limited English Proficiency (LEP/ESL/BIL) Education
- Truancy Office
- Student Support Services (At-Risk, Homeless, etc.)
- Special Education
- Testing
- Curriculum and Instruction

The remainder of this report is organized into the following sections:

- **Student Information System Technical Environment**
- **Attendance and Eligibility**
- **Leavers**
- **Discipline**
- **Special Program Areas**

Student Information System Technical Environment

Fort Bend ISD uses the Student Management Suite developed by Skyward, Inc. This student information management system (*Skyward*) is one of two preferred vendors for student information systems by TEA. Fort Bend ISD is on the latest *Skyward* software release of 05.14.02.00.03-10.2. The application and related databases are hosted in a data center in Mequon, Wisconsin by a related company, ISCorp.

Fort Bend ISD student information production system and database files are backed-up nightly to ISCorp servers in Wisconsin. Backup data are duplicated and stored locally in Wisconsin on disk to facilitate rapid data restores in the event of a problem. Data are also replicated by ISCorp to the other ISCorp data center so that they can be used for disaster recovery between the two facilities. As an additional security measure, data are copied to tape each day. Tapes are encrypted and sent to an offsite tape vaulting service each business day. The Fort Bend ISD *Skyward* databases are backed up each day, Monday through Saturday, with an incremental backup, and a full system backup is performed on Sunday.

In order to provide for recovery of *Skyward* systems and data in the event that a significant disaster renders one site inoperable for an extended period of time, ISCorp replicates the nightly backup data for *Skyward* customers between the Dallas and Mequon datacenters. Mequon replicates to Dallas and Dallas replicates to Mequon. Each site is preconfigured with the necessary recovery systems to perform the restoration of the databases, recovery of other key functions, and to take over operations in the event of a disaster.

Fort Bend ISD Staff and SIS Data

There are multiple departments, groups, and individuals at both the district and campus levels involved in collecting, validating, and reporting student information at Fort Bend ISD. The EASTR group of the district's Technology department supports the student information system and PEIMS-related activities at the district level. In addition to the EASTR group, the Application Development and Maintenance group maintains a local, special-purpose SQL database containing a sub-set of Skyward system records for integration with other district applications. In addition to these technology groups, individuals in several other district departments, such as Career and Technical Education, Gifted and Talented Education, Child Nutrition, and Student Services groups, have access to the system for reporting purposes only. Access for data entry and updates is limited to campus-based staff.

Connectivity/Vulnerability Issues

The system network is shown in detail in Appendix 2 and includes the main components of the *Skyward* system as it is configured for Fort Bend ISD. The connection to the hosted *Skyward* system and databases are provided by a single internet provider at Fort Bend ISD. Although there are two 1GBps connection to the ISCorp data center, a technical problem with Fort Bend ISD's internet provider would cause Fort Bend ISD to lose connection to the *Skyward*-hosted application and databases until the connection was restored by the internet provider.

Skyward uses Fort Bend ISD's Lightweight Directory Access Protocol (LDAP) service to authenticate most of Fort Bend ISD's *Skyward* users. Since this is the primary means of authenticating users, a technical problem with Fort Bend ISD's single internet provider would disrupt not only users that are inside the district network, but also those users connecting from home or other non-Fort Bend ISD locations.

In order to address these potential issues, Fort Bend ISD is in the planning stage in implementing redundant services with another internet provider and create replicated LDAP service in ISCorp's data center. These changes will allow Fort Bend ISD to continue to access *Skyward*'s Wisconsin-based systems from outside the Fort Bend ISD network even when Fort Bend ISD's LDAP service is not accessible.

Recommendation 1: *The district should continue the efforts to add redundant internet connectivity to address the vulnerability inherent in a single internet connection provider.*

Management Response 1: *The District supports the recommendation to add redundant internet connectivity to address the vulnerability inherent in a single internet connection provider. The Information Technology Services group will research, design, and implement a cost effective solution to provide redundant connectivity (multiple paths to the Internet) to reduce business interruptions.*

Data Connections to Student Information Systems

Since *Skyward* maintains all Fort Bend ISD student information, it is also the data source for other student-related information systems in Fort Bend ISD, such as those in Transportation and Child Nutrition. In order to effectively connect and extract data from *Skyward* to other Fort Bend ISD systems, the Application Development and Maintenance group created a local database in Fort Bend ISD servers that has the necessary tables from *Skyward* to accommodate the data needs of other Fort Bend ISD applications. Fort Bend ISD does not use the local database for any PEIMS or state reporting purposes. All required PEIMS reports or other state or federal reports are generated directly with live production data using the current version of the *Skyward*-hosted application system in Wisconsin. This local database is refreshed nightly with updated information from *Skyward*.

The applications that use information from the local database are presented graphically in Appendix 3. Child Nutrition's WebSMARTT and Transportation's Transfinder systems are the only two systems that not only receive data from *Skyward*, but that also send revised data back to *Skyward*. In addition to uploads from Transportation and Child Nutrition, LDAP and Human Resources data from the district's enterprise resource planning system is uploaded nightly to keep user access information current in *Skyward*.

In addition to the nightly extract from *Skyward* to update the Fort Bend ISD local database, extracts of specific data are provided to certain external vendors with which Fort Bend ISD has agreements, such as with Rank One, Naviance, and Edgenuity. These systems utilize Fort Bend ISD student information data to provide other services to teachers and staff such as college preparation and instructional support.

Certain other vendors, such as PCG, SuccessEd and School Messenger, have direct open database connectivity (ODBC) access to *Skyward* for the purpose of extracting student information. Because ODBC cannot limit the vendor's access to data at the granular level, we believe that this method is less secure than if Fort Bend ISD extracted the data from *Skyward* and provided it directly to them.

Recommendation 2: *Fort Bend ISD should consider replacing the ODBC connection and provide the data to these vendors by extracting the data and submitting it through secure file transfer.*

Management Response 2: *The District understands this recommendation. Currently, an ODBC connection is our only option for PCG and SuccessEd. We will discuss this recommendation with our vendors and develop a plan for increased security for future data exchange.*

SIS System User Input Control Issues

Student information systems should incorporate controls that are designed to detect and prevent erroneous data entry. These controls function by encoding the operating rules that govern student information management and screening data entries that fall outside of expected parameters, such as a student's birthday that is inconsistent with the recorded grade level.

We noted that the *Skyward* system allows entry or update of certain data fields where user input is not validated and data rules are not developed and enforced. Examples of validation that would be appropriate are:

- Birth Country – For birth country, the system will accept blanks and country names typed in by the user. This means, for example, that Korea and Kyrgyzstan will be shown as different countries from South Korea and Kyrgyzstan. The birth country could also be Kansas or Paris.
- Certain "Date" fields are not validated to ensure that the input is a date. The system will accept "212" as a valid year.
- Correlation of disciplinary actions with disciplinary offenses; date validation for truancy citations within the ranges allowed for enforcement.
- Student status may indicate active, but student may have a withdrawal date.
- Blank student address when parent address is recorded.
- Recording absences or changing absent codes after a certain time limit.

Fort Bend ISD staff is aware of many of these limitations of the *Skyward* system and are taking steps to improve input controls and to review data for potential errors that result from the absence of data entry validation. These weaknesses require staff to spend additional hours to verify and clean data, and there is risk that errors will remain and go undetected.

Recommendation 3: Fort Bend ISD should work with its Skyward vendor to improve data entry validation controls. The district should evaluate the rules applicable to student data and develop special purpose reports to detect and correct errors.

Management Response 3: The District supports the recommendation and will continue to work with Skyward to improve data entry validation controls. We will continue to evaluate the rules applicable to student data, develop additional special purpose reports, and train campus staff in using these reports at monthly Learning Community meetings.

User Access Issues

The EASTR group is responsible for managing user access to the Skyward system. Fort Bend ISD uses LDAP services to manage the access to all of the district's information technology resources. Deactivation of a user from LDAP service prevents access to all district resources. Using LDAP to control access to all resources eliminates the problem of keeping user rights in sync among different information technology systems when each system has its own authentication protocol.

We noted areas of concern with respect to managing users' rights to the Skyward system. The first area of concern is the use of a security setting that allows users to skip the LDAP authentication protocol when accessing Skyward. At the time of our review, we noted over 30 users whose profile allowed them to skip LDAP authentication. We notified the EASTR group and most of those users' profiles were corrected.

For the remaining users (fewer than 10), the "Skip LDAP" flag was still necessary because these users had been assigned duplicate employee identification numbers by Human Resources. These employees cannot be authenticated through LDAP and must have unique user identifications and passwords specific to Skyward.

Recommendation 4: The EASTR group should continue to evaluate and revise the access rights of users of Skyward who require the "skip LDAP" flag. The users with this flag should be periodically reviewed to ensure that all users still require this exception.

Management Response 4: The District supports the recommendation to continue to evaluate and revise the access rights of users of Skyward who require the "skip LDAP" flag. Staff members with duplicate employee ID's will be resolved by the Human Resources group. All Skyward users with the "skip LDAP" flag will be monitored monthly by senior level EASTR staff to ensure that all users still require this exception.

A second area of concern arises with users that have more than one job role or serve more than one location. The Human Resources Department maintains control of each employee's job role and location. When an employee's position requires access to Skyward, the system automatically establishes security settings in accordance with that role and location. If an employee needs access to multiple locations, or

because of multiple responsibilities needs access to the system beyond his/her normal job duties, these rights are determined on a case-by-case basis.

An issue arises in validating the security access of the employee over time as his/her job duties change. This is particularly problematic since those additional roles and access rights may relate to responsibilities that are not tracked closely by Human Resources or communicated timely to EASTR.

We noted that four of five users with multiple roles that we reviewed no longer required the security access rights that had been assigned to them. The EASTR group corrected the security settings for these employees. EASTR group should periodically check all the users with multiple roles and locations to ensure their access levels are commensurate with their current job responsibilities. The district should also examine the level of documentation and approvals needed to authorize *Skyward* access rights beyond those typically assigned to other employees with similar positions.

Recommendation 5: *The EASTR group should continue to evaluate the access roles and security settings of all users to determine that multiple roles and rights to data of multiple locations are still appropriate.*

Management Response 5: *The District supports the recommendation that the EASTR group should continue to evaluate the access roles and security settings of all Skyward users to determine that multiple roles and rights to data of multiple locations are still appropriate. These security roles will be reviewed annually to align with District staff responsibility. In addition, the EASTR group will work closely with the Human Resources group to assure that processes are put in place to assign multiple locations to staff as appropriate in the PeopleSoft HCM system, so that manual maintenance is reduced.*

Attendance and Eligibility

Texas school districts are required to submit student attendance data through PEIMS. TEA published the Student Attendance Accounting Handbook (SAAH, or the “*Handbook*”) to guide school districts in complying with regulations for periodically reporting attendance data, as well as other student information.

Our review of the attendance recording and reporting function was developed using standards contained in the TEA *Handbook*. The review addressed the following requirements specified therein:

- Foundation School Program (FSP) eligibility requirements of all students
- Minimum standards for all attendance accounting systems
- Documentation requirements for attendance audit purposes
- Responsibilities of all district personnel involved in student attendance accounting

In order to address these areas, we documented the policies and procedures in place at Fort Bend ISD for taking attendance and documenting the eligibility status of each student. We reviewed procedures to validate student data at the end of each six-week period (i.e., each regular school year is comprised of six six-week periods), as well as for each PEIMS submission (i.e., generally, there are three PEIMS submissions of student-related data, along with re-submissions annually).

We analyzed all Fort Bend ISD student data for certain errors or irregularities, such as:

- Students outside normal age ranges for each grade
- Students in Pre-Kindergarten met eligibility requirements
- Days without any absences
- Absences on the first day of class
- PK students with full-day eligibility
- Absences that are not ultimately coded
- Teachers who did not take attendance or recorded attendance after the required time (generally 10 a.m.)
- Although not related to attendance, we also analyzed student data for:
 - Teacher Referral records (TR) not recorded to valid action codes
 - Access issues: terminated employees with access, non-employee access and super-user status

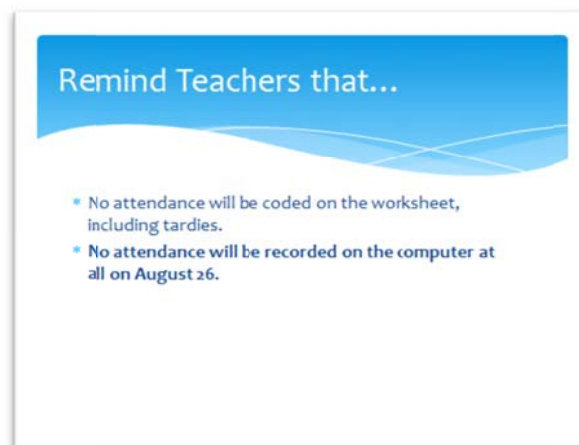
First Class Day Procedures

According to state law, attendance is required to be taken every class day, and for secondary schools every class period. However on the first day of school, teachers are required to determine which students on their roster are present. Those students on the class roster, who are not present, are considered “No Show” and are dropped from enrollment. The district must follow-up on these “No Show” students to determine the reason for leaving the district and to code the reason accordingly.

Students who return to school after the first class day are re-enrolled. However, no student is shown as absent on the first class day.

In our testing, we noted that 31 students were reported “Absent” on August 26, 2013, the first day of the 2014 school year. These errors occurred despite the efforts of the EASTR group to train school-based staff regarding the first class day procedures. The slide in the Figure 2 below is included in the training provided to each attendance clerk.

Figure 2. First Day of Class Training Program



Source: Enterprise Application Support, Training and Reporting

We determined that this error does not have any impact on funding, as the first class day is not counted for purposes of FSP calculations. This error type does suggest the need for continued training of school staff and/or communication with teachers at the beginning of each school year.

We selected six schools for detailed testing of First Class Day procedures (i.e., two each for elementary, middle, and high school levels). The first day of school for Fort Bend ISD was August 26, 2013. We reviewed each school’s documentation including:

- original roster with notations; signed and dated by the teacher;
- the “No Show” report for the first class day that agrees with the totals from the rosters;
- re-run roster – Enrollment Report; and

- In/Out reconciliation spreadsheet.

The above documentation for four of the schools was reviewed without exceptions. For the other two schools, we noted exceptions in the documentation.

Schiff Elementary:

- The teachers for two classrooms did not sign and date the First Day Enrollment worksheets to indicate that the students present were accounted for.
- The reconciliation (i.e., In/Out Reconciliation Spreadsheet) was not prepared. Worksheets were retained for the first day; however, the reconciliation in the format specified by the district was not available.
- The number of students reported as “Present” on the first class day differed from the worksheets prepared and signed by the teachers.
- We noted that teachers completed enrollment worksheets for the other days of the first week of school, which is not required because attendance is taken in *Skyward*. In our review of these documents, we noted that reported attendance in *Skyward* for the second class day (i.e., August 27, 2013) also did not agree with the written attendance worksheets. For Grade 1, attendance was reported for 146 students and the written worksheets totaled 144.

Crockett Middle:

- The teachers for two classrooms did not sign and date the First Day Enrollment worksheets to indicate that the students present were accounted for.
- The reconciliation (i.e., In/Out Reconciliation Spreadsheet) was not prepared. Worksheets were retained for the first day; however, the reconciliation in the format specified by the district was not available.

The EASTR department has developed a thorough training program, including detailed instructions for staff at each school level to follow in taking attendance on the first class day. The training includes detailed explanations of the forms to be used, enrollment procedures, reports to be reviewed, and the documentation to be retained. The training includes emphasis that no attendance (absences) is to be taken on the first class day.

The errors noted at Schiff Elementary were due in large part to the inexperience of the attendance clerk who began her employment at Fort Bend ISD approximately two weeks prior to the start of school. Management of EASTR were aware of the issues arising at Schiff Elementary, and during the first week, representatives of the group went to the school to assist the clerk in completing enrollment-related documentation and in validating *Skyward* data for the school’s student body.

For these reasons, the exceptions noted for the First Class Day documentation do not indicate weaknesses in the procedures or specific gaps in training.

Recommendation 6: *As training for this area is updated for presentation in the future, these issues arising at Schiff Elementary and Crockett Middle should be considered to ensure that the school-based staff district-wide is fully informed of the responsibilities for documenting first day “No Shows” and taking attendance.*

Management Response 6: *The District supports the recommendation to ensure that the school-based staff district-wide is fully informed of the responsibilities for documenting first day “No Shows” and taking attendance. The Department of School Leadership will ensure that campus administrators designate appropriate campus staff as “back-up” for key campus positions for beginning of the year processes in the case of vacancies, leaves of absence, or last minute hires. Additionally, the Department of School Leadership will ensure campus administrators oversee the timely completion of those tasks that directly impact the ability to accurately complete first day counts including completion of the master schedule, new student enrollment, and fully scheduling students into classes. The EASTR group will continue to provide training to new staff as well as “back-up” designees.*

Six-Week Reporting

TEA guidelines incorporated in the *Handbook* require that at the end of each six-week reporting period, campus-level and district-level reports should be generated and reviewed by the principal and superintendent, respectively, to ensure accuracy of the underlying data. The *Handbook* indicates that the principal at a minimum should:

- scrutinize regular attendance totals and special program attendance totals based on approximate membership;
- investigate all data totals that have an exceptionally high value or a value of zero; and
- compare current-year totals to prior-year totals to detect unreasonable fluctuations.

The district has developed procedures to support this review requirement known as the “Oaths & Affidavits” (O&A) system. In addition to facilitating the review by the superintendent and school principals, the O&A system also supported the documentation of review and approval by other district employees, including school-based staff (i.e., data entry clerks, attendance clerks, registrars, and counselors) and central office staff (i.e., special program coordinators, athletic managers, and financial supervisors).

This system was in effect through the date of our review; however, it is being updated and re-branded as Data Integrity Affirmation. The new system will be implemented during PEIMS Summer Submission 3.

The O&A process has some weaknesses, which we have discussed in further detail below. Because the O&A system has been updated, no recommendations are proposed for the weaknesses in the system. These issues should be considered as the updated data validation process is implemented.

Report Inconsistencies

Reports for each six-week period are run at different times by each campus and for the district as a whole. Because changes are made in the underlying data between the data of the various reports, we noted numerous differences in total attendance between and among the reports.

For testing of the six-week reporting and PEIMS submission reporting procedures, we reviewed the reports for seven schools – three elementary and two each for middle and high schools. Our reviews were also spread throughout the 2013 school year. The results of the testing are detailed below:

Table 2. Review of Six-Week Reports

School	Type	Period	Issues noted
Burton	Elementary	1 st	<ul style="list-style-type: none"> ▪ <i>Daily Register, Principal's Summary and District Summary</i> totals do not agree ¹ ▪ No principal O&A ▪ Three early childhood education students (EE) had eligibility code of "1" indicating full-time student
Colony Bend	Elementary	2 nd	<ul style="list-style-type: none"> ▪ Principal initially signed O&A on 11/20/2012 as PEIMS Administrator; later (1/18/2013) signed as Principal ▪ District-level report differs from campus reports by one student (3rd Grade) ¹
Blue Ridge	Elementary	3 rd	<ul style="list-style-type: none"> ▪ Principal signed O&A twice (1/16/2013 and 2/4/2013) ▪ <i>Daily Register, Principal's Summary and District Summary</i> totals do not agree ¹
Sugar Land	Middle	4 th	<ul style="list-style-type: none"> ▪ <i>Daily Register, Principal's Summary and District Summary</i> totals do not agree ¹
Bowie	Middle	5 th	<ul style="list-style-type: none"> ▪ Principal's Report at the time of the close of the six-week period was not in Audit File. A <i>Principal's Report</i> run on 6/12/13 was included; however Principal's O&A was dated 4/30/13 ▪ <i>Daily Register and District Summary</i> totals do not agree ¹
Clements	High	6 th	<ul style="list-style-type: none"> ▪ Two versions of <i>Daily Register and Principal's Report</i> were filed in Audit Box and it is unclear which report was approved by the Principal
Marshall	High	3 rd	<ul style="list-style-type: none"> ▪ <i>Daily Register, Principal's Summary and District Summary</i> totals do not agree ¹

¹ See Appendix 1 for the summary of totals from each report.

In addition to approvals by school-based staff on six-week reports and PEIMS submissions, Fort Bend ISD policy also requires that other district officials review *Skyward* reports to validate the underlying student information, specifically attendance, leaver, discipline, At-risk, Title I, and Special Program area data. These requirements are formally documented in the *PEIMS Data Review – Staff Responsibility Grid* as

part of the district’s policies and procedures. We reviewed the sign-offs recorded for the 2013 school year and noted that certain officials had not signed his/her O&A as required.

The following positions are required to sign an O&A for each six-week period and for each PEIMS submission (i.e., generally the fall, summer submissions, and re-submissions):

- Bilingual Coordinator
- ESL Coordinator
- Title I Coordinator
- Student Support Services Coordinator
- Chief of Police
- Gifted and Talented Director
- Career and Technical Education Coordinators
- Career and Technical Education Administrator

We noted that not all positions had signed the O&A for each six-week period and PEIMS submission, or re-submission, as indicated in the matrix. Missing O&A included:

Table 3. Positions’ Missing O&A

Title/Position	Explanation
Title I Coordinator	Second, fourth, and sixth six-weeks; the Title I coordinator signed-off twice for the fifth six-week period, the date of one which indicates that it should have been for the fourth six-week period.
Gifted and Talented Coordinator	No sign-offs for any six-week reporting periods; however, O&A noted for the fall and summer PEIMS submissions.
Police	No reviews indicated for police department contacts or Chief of Police for six-week reports of Student Restraint
Career and Technical Administrator	No O&A for the second six-week period
ESL/Bilingual Coordinator	No O&A for the Summer Submission (i.e., 2013)
Superintendent (or designee)	No sign-off for the Summer Submission; no indication of the review of six-week reports by the superintendent or designee of district-level reports per the Handbook.

Source: Oaths & Affidavits report from EASTR Department.

Student Absence Pending Resolution

When a teacher records a student as absent, the *Skyward* system assigns a temporary code (“W” or Web Absent) for that day or period. When the student provides documentation as evidence of the reason for the absence, the “W” code will be changed to an “E” indicating an excused absence. Other codes (M, R,

O, etc.) are used for excused absences that are counted as present for funding purposes. Appropriate supporting documentation is also required for these types of excused absences.

If a valid excuse is not received, the absence code will be changed to a “U” indicating unexcused absence. The frequency of unexcused absences within a given period is the basis for truancy actions. All absences should ultimately be re-coded when resolved.

We reviewed the student attendance data to determine that absences have not been resolved. The following table indicates the current number of “W” codes for the period.

Recommendation 7: *The district should run reports periodically for all schools with “W” coded absences that have not be resolved. The staff at each school should review these lists and clear all instances.*

Management Response 7: *The District supports this recommendation and already has documented procedures in place for campuses to review daily the “Principal’s Dashboard” which displays this data. At the beginning of each school year, the Department of School Leadership will communicate to campus administrators the importance of accurate attendance recording and reporting. The monitoring of this data will continue to be a part of the rebranded O&A system.*

Table 4. Students with “W” Attendance Records, By School Level

School Type	Number
High Schools	12
Middle Schools	105
Elementary Schools	305
Summer Schools	1,097
Total	1,519

Source: Skyward Information System, EASTR

Other Attendance Issues

Attendance at Fort Bend ISD schools is taken around 10 a.m. daily across the district. Elementary school teachers are required to take attendance daily in the first period. This period is called the significant period for purposes of determining average daily attendance which is used for Foundation School Program (FSP) funding. Secondary teachers are generally required to take attendance at the beginning of each period, and the second or third period (i.e., the period in which 10 a.m. falls) is considered the significant period for middle and high schools, respectively.

Attendance is taken by recording absences online in *Skyward*; teachers do not record anything for students who are present except for on the first class day. All teachers and long-term substitutes have a unique user name and password to log into the *Skyward* system for this purpose. It is important that teachers log into *Skyward* daily even if all students are present in order to provide evidence that attendance was taken. In accordance with TEA rules, attendance should represent a “snapshot” of the students present at a given time each day. Fort Bend ISD teachers are instructed to take class roll each

day at the established time (generally 10 a.m. or at the beginning of the class period in which 10 a.m. falls) and given a window of 15 minutes to complete the task online. The *Skyward* system maintains logs of all teachers logging in and taking attendance. These records make it possible to determine whether teachers are, in fact, taking the roll daily.

According to the *Handbook*, district personnel must create the original documentation of attendance at the time of attendance. Each district must establish a point in time that its campuses will take roll (i.e., a snapshot, e.g., 10:00 a.m.). The selected time may vary by campus, but cannot be changed during the school year. Documentation for attendance cannot be created after the fact, and any documentation not created at the time of attendance is not acceptable for TEA to support average daily attendance calculations.

The *Handbook* further specifies that electronic systems, i.e., paperless, such as *Skyward* must provide “positive confirmation for 100% of attendance.” In the event that all students are in attendance on a given day, the teacher must “submit ‘All Present’ rather than showing no one absent.”

If a teacher does not log onto *Skyward* to positively confirm the attendance in his/her class, or does not log in within a reasonable period after the official “time of attendance,” then the district does not have original documentation to support the attendance data submitted through PEIMS. TEA can retain 100% of the district’s FSP allotment for the inappropriately documented attendance for the school year for which records have not been maintained.

We queried the *Skyward* system to determine whether teachers were complying with the requirement for taking attendance. Due to the structure of the data files and time constraints, we were not able to perform this analysis for all schools; however, we selected two schools at each level (elementary and secondary) in order to determine whether a pervasive problem exists.

Table 5. Teachers Not Taking Attendance, Selected Schools, 2013-2014 School Year

School	Total Teachers	Teachers with at least 1 Day of Missing Attendance	Number of Days 20% or More of Teachers Did Not Take Attendance	Number of Teachers Who Did Not Take Attendance 20 or More Days	Average Daily Percentage Missing Attendance
Blue Ridge	35	34	6	7	9.4%
Arizona Fleming	39	39	12	7	10.4%
Quail Valley	50	49	15	31	26.9%
Lake Olympia	45	34	6	9	10.6%
Willowridge	106	62	5	32	13.7%
Bush	129	97	5	23	9.5%

Source: Enterprise Application Support, Training and Reporting Group

The following table provides information regarding the frequency of late entry by all teachers at every school at Fort Bend ISD. The table indicates the number of teachers that have recorded attendance late at least 10 percent of the days in the current school year, and the number that have been late over 25 percent of the days.

Table 6. Teachers Taking Attendance after 12:00 Noon Daily, 2013-2014 School Year

School Level	Number of Teachers with Late Attendance Entry		Total Number of Teachers
	Over 10% of days	Over 25% of days	
Elementary	113	34	1,644
Middle	104	34	1,044
High	260	128	747
Totals	477	196	3,435

Source: Enterprise Application Support, Training and Reporting Group

Recommendation 8: The district should take the following steps to address the issues arising with respect to attendance taking:

- Complete the analysis of teachers who did not take attendance (see Table 5) for the remaining schools, as well as the actual attendance (i.e., number of students per class) of each class where attendance was not taken.
- Determine the attendance (number of students) in those classes where attendance was after the time allotted for attendance (i.e., 12:00 Noon).
- Calculate the overall impact on Average Daily Attendance (ADA) and the total potential effect on funding.
- Consult legal advisors regarding the appropriate approach in submitting future PEIMS attendance reports, for example PEIMS Submission 3 this summer. Also, consider the approach to working with TEA to resolve potential errors in prior period submissions.

Management Response 8: The District supports the recommendation that an analysis be completed district-wide to determine the extent and potential impact of teachers not taking attendance and taking attendance late. Once the analysis is complete, the District will determine an appropriate course of action.

Leavers

Texas school districts must account for all students that have enrolled in that district. Any student, who leaves a particular school, must be tracked to determine where the student went and why. Typically, students leave a particular school as promotion to a higher-level school (i.e., go from elementary to middle school within the same district) or move among schools of the same level (i.e., move from one district high school to another). Students may also leave a school to enroll at another Texas public school.

These types of transfers are known generally as moves. A student is considered to “leave” the district when he/she discontinues attendance at a Fort Bend ISD school for any reason other than those described above. For these students, Fort Bend ISD must record a reason (i.e., “leaver” code) for the student leaving the district. The codes used correspond to the reasons why a student may leave. For example, a student who leaves the district to be home schooled will be coded as “60.”

TEA provides detailed guidance regarding the documentation required when documenting leavers. The agency also performs analyses of enrollment data for all Texas school systems to track the status of all students who have attended any public or charter school.

The *Skyward* system maintains accountability for all Fort Bend ISD students and alerts school-based staff to follow-up on any students who discontinue attendance in Fort Bend ISD schools – either by being classified as “No Show” on the first day of class each year or when attendance records indicate persistent absence. Most students who leave notify the school and provide exit documentation for the reason for leaving.

We performed tests of the documentation supporting the leavers reported in *Skyward* for the 2013 school year. We selected a non-statistical sample of leavers across the district and reviewed documentation for all leaver codes used in 2013. The results are summarized below.

Table 7. Summary of Leaver Code Review

Description	Number
Documentation is complete and fully supports the reported leaver code.	29
Documentation is incomplete or the leaver is coded incorrectly, but the error does not lower the campus dropout rate.	5
Documentation does not support the reported code and the error does lower the campus dropout rate.	1
Withdrawal information does not include leaver code documentation for the student (i.e., incomplete, invalid, or not found).	0
Total	35

Source: Leaver code documentation maintained at each campus.

For the majority of items reviewed, the documentation maintained on campus was outstanding.

We noted that certain forms used to document the reason for leavers were insufficiently completed or signed. School staff should review each leaver folder at the end of the process to ensure that all forms are completed, all appropriate school staff have reviewed and initialed the forms, and the parent or guardian has signed.

Some campuses included the license or identification card of the parent who signed the leaver form. This practice helps to ensure that a valid parent or guardian has provided the documentation of the reason for the student leaving the district.

Recommendation 9: *The district should review the documentation required for each leaver code and provide a checklist to campus staff to ensure that the correct forms are used, that the forms filled out completely and that all school officials have signed the forms as required.*

Management Response 9: *The District supports this recommendation, and the EASTR group will continue to provide the required documentation for leaver codes from Appendix D of the PEIMS Data Standards. The EASTR group will also create a checklist for campus staff to ensure that the correct forms are used. The Department of School Leadership will work closely with campus administrators to ensure compliance and oversight.*

Discipline

A school district may take a variety of actions in the event that a student fails to comply with district policies. Various codes are used to denote the type of incident and its disposition. These are determined by the appropriate Fort Bend ISD official and recorded in *Skyward*.

Disciplinary actions may include: in-school suspensions (ISS), out-of-school suspensions (OSS), referral to district alternative education programs (DAEP), and county-administered juvenile justice alternative education programs (JJAEP).

We selected a non-statistical sample of incidents documented in *Skyward* for disciplinary action and reviewed documentation supporting the coding. Of the sample of 20 incidents, five were insufficiently documented for the coding entered. Documentation largely consisted of print-outs from the *Skyward* system.

Recommendation 10: *School-based staff should be trained further to ensure that all documentation for disciplinary action is maintained and available for review.*

Management Response 10: *The District supports this recommendation. The Department of Student Affairs in conjunction with the Legal Department will continue to provide annual training regarding discipline decision making and documentation. The EASTR group will continue to provide annual discipline data entry training emphasizing proper electronic documentation. The Department of School Leadership will work closely with campus administrators to ensure compliance and oversight.*

Fort Bend ISD utilizes a database separate from *Skyward* to track absences that result in truancy actions. Attendance information is downloaded from *Skyward* to the truancy database weekly. Algorithms have been developed to identify students with absence patterns that require truancy action – typically three or more unexcused absences within a four week period or 10 or more unexcused absences within a six month period. The database tracks warning letters, referrals to the truancy diversion program, and formal citations or complaints.

Fort Bend ISD also follows formal procedures for absences that result in response by the district’s truancy officers. The district generally follows an escalation process for truancy that includes warning letters, the truancy diversion program, and formal citations or complaints for truancy.

The Attendance Officer in the Department of Student Affairs sends reports to the school-based staff for entry of truancy actions in *Skyward*. There are significant differences between the data maintained in the truancy database, which is the true record of truancy actions, and *Skyward*.

The table below presents these differences in the truancy-related records, only regarding “truancy letter” codes from *Skyward* and the truancy database. Two schools from each level (elementary and secondary) were compiled in order to show the extent of the differences in data sources. Similar differences exist for each school.

Table 8. Truancy Database and Skyward Discipline Record Differences, 2012–13 School Year

School	Number of Incidents from Truancy Database Regarding Truancy Letter	Number of Incidents from Skyward Discipline Module Regarding Truancy Letter
Barrington Place	50	None
Rosa Parks	101	4
Quail Valley	86	33
Macario Garcia	134	34
Willowridge	1,261	92
Stephen F Austin	549	750

Source: Truancy Database and Skyward

District attendance officials indicated that when a citation is issued for truancy, the case goes to the Fort Bend County Truancy Court. Many cases filed in the last 18 months have been dismissed by the court due to issues arising at Fort Bend ISD. These issues include failure to file the complaint within 10 days of the truancy, data changes made in *Skyward* that invalidate the truancy, and withdrawal of the student prior to the case being adjudicated. In the 2013 and 2014, the Attendance Officer reported to us the following dismissals of cases.

Table 9. Dismissal of Truancy Cases, 2013 and 2014

Period	Failure to File within 10 days	Data Change in <i>Skyward</i>	Student Withdrawal
2013 School Year	182	202	10
2014 School Year, to date	114	170	104

Source: Attendance Office, Department of Student Affairs

In order to avoid clogging the court with cases that will be dismissed, the Attendance Officers communicate with the school-based staff prior to issuing a truancy citation; however, the number of cases dismissed in 2014 indicates that the coordination between the Attendance Office and the schools needs improvement.

Recommendation 11: *The coordination between the Truancy Office and campus staff should be improved to ensure that truancy incidents are appropriately documented in Skyward. The district should explore ways in which actions in the Truancy database can be uploaded to Skyward directly to improve the reconciliation of the two systems.*

Management Response 11: *The District supports the recommendation that the coordination between the Truancy Office and campus staff be improved to ensure that truancy incidents are appropriately documented in Skyward. The Department of Student Affairs will address the expectations of consistent data entry for truancy incidents as part of their annual discipline training. The District will explore ways*

in which actions in the Truancy database can be uploaded to Skyward directly to improve the reconciliation of the two systems. The Department of Student Affairs will develop a method to monitor the consistency between the Truancy system and Skyward.

Special Program Areas

In addition to data related to attendance and eligibility for FSP funding, the *Skyward* system maintains information for each student with regard to special services and participation in certain education programs. We reviewed the codes assigned to students that relate to the following areas:

- Limited English Proficiency (LEP)
 - Bilingual (BIL) program participation
 - English as a Second Language (ESL) program participation
- At-Risk Students
- Title I Eligibility
- Immigrant status
- Migrant status
- Career and Technical Education program (CTE)
- Gifted and Talented education program (GT)
- Pregnancy-related services

For each of these program areas, we discussed with the program coordinators for each area, the processes for identifying students that qualify for services under these programs. The *Handbook* provides guidance for the procedures for enrollment and withdrawal of students in these programs, as well as the documentation required for determining eligibility.

For each area, we selected students from the *Skyward* system to review supporting documentation for the coding of students during the 2013 and 2014 school years. Except as otherwise noted below, the information maintained in campus files was sufficient to support the coding in *Skyward* and the information submitted through PEIMS.

Limited English Proficiency

Students with limited proficiency in English are classified as Limited English Proficient or LEP. Before each student is classified as LEP, certain forms (e.g., the home language survey) are completed and signed by the school administrators and parents; assessments of English reading, writing, and speaking ability are administered; and the school Limited Proficiency Advisory Committee (LPAC) must complete its assessment and recommendation.

If the student's functional language is Spanish, he/she may receive bilingual instruction in the elementary grades. For students with proficiency in languages other than English or Spanish, *English as a Second Language* (ESL) instruction is provided. Parents may also opt to have their child receive no LEP-

related language education support. All students classified as LEP will also have some code associated with bilingual or ESL services.

We selected a non-statistical sample of students in 2013 and 2014 classified as LEP and reviewed supporting documentation for LEP status and educational services (i.e., ESL or BIL). Seven exceptions (out of 60 students) were noted.

For three students, the school files were missing documentation such as the home language survey and/or the parent authorization form. Four students were listed as receiving ESL Pull-out instruction (i.e., Code “3”), but according to Fort Bend ISD staff, only ESL Content services are provided to those students.

In addition to documentation or coding exceptions, we also noted that the total count of LEP students district-wide as reported in *Skyward* is in error. Each six-week period, central office staff performs a reconciliation of LEP/ESL/BIL students in all schools with the records maintained in *Skyward*. This reconciliation is prepared by taking rolls of all LEP students in each class at every school district-wide and by comparing the totals to the *Skyward Oaths & Affidavits Summary Report*.

At the time of the most recent reconciliation (i.e., on April 4, 2014), the Oaths & Affidavits Summary Report showed 11,004 LEP students district-wide, while the compilation of rolls at each school totaled only 10,953. According to the Lead Coordinator for the Program for English Language Learners, the difference of 51 students – which is less than one student per campus – has been significantly reduced from differences of several hundred students in prior years.

Recommendation 12: *The LEP Coordinator should continue to reconcile the students classified as LEP/ESL/BIL in Skyward with those identified by individual teachers at each school. The goal of this effort should be to identify all differences and the related source.*

Management Response 12: *The District supports this recommendation. By working with an identified contact at each campus, the ELL Coordinator will continue to reconcile the students classified as LEP/ESL/BIL in Skyward with those identified by individual teachers at each school. The ELL Coordinator will provide training at appropriate monthly Learning Communities facilitated by the EASTR group. This data will be monitored by the ELL Coordinator and campus staff every six weeks through the rebranded O&A process.*

Gifted and Talented Education

Students that qualify for GT educational services take advanced courses taught by teachers certified to teach GT courses. We selected a non-statistical sample of students coded for GT in 2013 and 2014 and reviewed their course schedules for GT courses and documentation of approval for eligibility. Of the 20 students tested, two students were in courses taught by teachers for which no documentation of GT certification was available. For one of these courses, the primary teacher was on extended leave and the

school's Associate Principal was listed as the teacher of record. The class was actually being taught by substitutes for whom the GT certification status was unknown.

Career and Technical Education

For students that elect to take CTE courses, the state provides additional funding for the contact hours and an additional amount for each student taking a coherent sequence of CTE courses (i.e., two or more related CTE courses). The codes assigned for CTE participation in Fort Bend ISD are:

- 0 – No CTE course-work
- 1 – One CTE course or no coherent sequence of CTE course-work
- 2 – Coherent sequence of CTE courses and 2 or more CTE courses completed or in progress
- 3 – Fire Fighter Academy participation

We selected 35 students coded as CTE in 2013 and 2014 and reviewed the supporting documentation. Of the students tested, five students were miscoded.

Migrant/Immigrant

Additional funding is available to provide services for migrant and immigrant students. Migrant and immigrant students are two separate classifications of students based on the students' country of origin and status.

Fort Bend ISD has one family with four children classified as migrant students. We noted that one additional student in our sample was coded as migrant incorrectly.

We noted a total of 685 students that are coded with immigrant status that according to other *Skyward* records were born in the United States (i.e., 82) or have been educated in the United States for over three years (i.e., 603). Conversely, we noted students that were born outside the United States and educated for fewer than three years here that are not coded as immigrants. We did not perform this search for all such students, however, due to the size and structure of the data files.

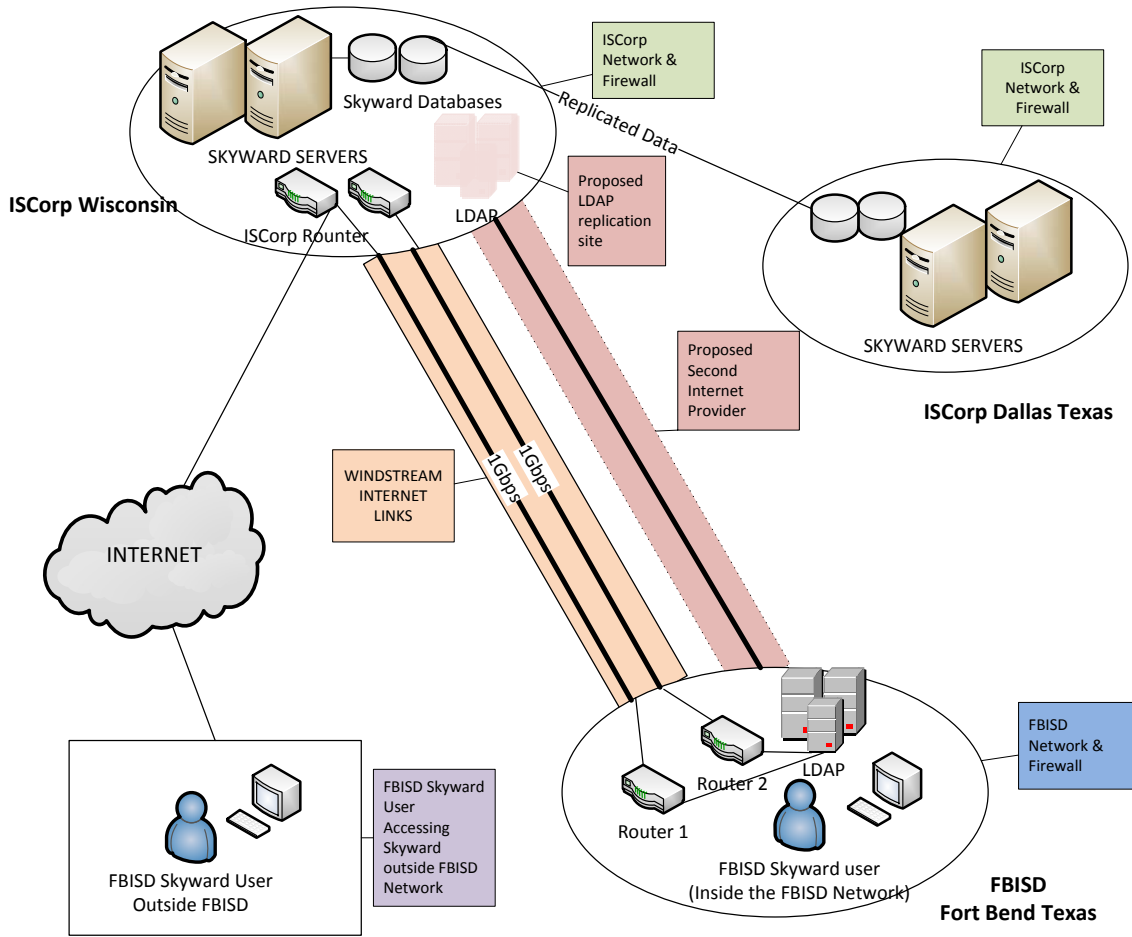
Recommendation 13: *The district should review the files for students eligible for special services (GT, CTE, Immigrant, Migrant, etc.) to determine that adequate documentation for coding in Skyward is available. The district should also consider running periodic reports to screen students whose demographic data is inconsistent with coding.*

Management Response 13: *The District supports this recommendation. By working with an identified contact at each campus, the Special Program Administrators will continue to reconcile the students enrolled in special programs with those coded as such in Skyward. Special Program Administrators will provide training to appropriate campus staff. This data will be monitored by the Special Program Administrators and campus staff every six weeks through the rebranded O&A process.*

Appendix 1. Fort Bend ISD Six-week Report Review

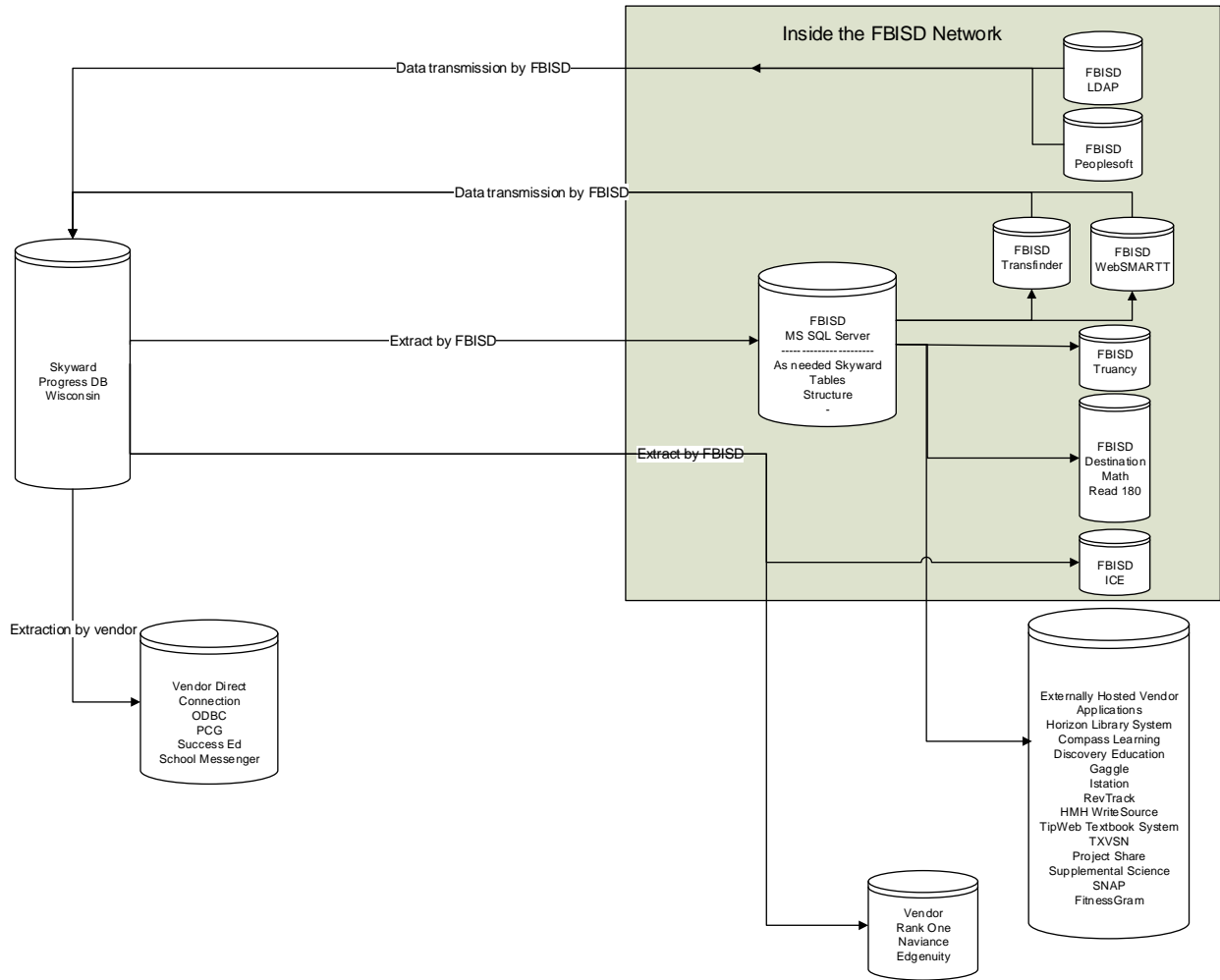
Fort Bend Independent School District												
Student Information System Audit												
Six-week Report Review												
Appendix 1												
Six-Week Period	School No.	School	Report and Run Date	Grade Levels								
				EE	PK	KG	1	2	3	4	5	
First	134	Burton	Per Daily Register -- 10/17/2012	87	0	3372	3351	3361	3292	3988	4263	
			Per Principal's Six-week Report -- 10/9/2012	87	0	3373	3353	3363	3292	3988	4263	
			Per District Summary (Principal's six-week report) -- 10/12/2012	87	0	3372	3351	3663	3292	3988	4263	
				EE	PK	KG	1	2	3	4	5	
Second	117	Colony Bend	Per Daily Register -- 11/20/2012	0	0	1641	2537	2607	1970	2462	2369	
			Per Principal's Six-week Report -- 11/20/2012	0	0	1641	2537	2607	1970	2462	2369	
			Per District Summary (Principal's six-week report) -- 1/18/2013	0	0	1641	2537	2607	1969	2462	2369	
				EE	PK	KG	1	2	3	4	5	6
Third	108	Blue Ridge	Per Daily Register -- 1/11/2013	0	193.5	1904	2028	2164	1793	1871	2017	1685
			Per Principal's Six-week Report -- 1/11/2013		193.5	1925	2028	2165	1793	1871	2014	1685
			Per District Summary (Principal's six-week report) -- 1/08/2013	0	193.5	1925	2028	2164	1793	1871	2014	1685
				6	7	8						
Fourth	43	Sugar Land M.S.	Per Daily Register (3-8-13)	12953	13398	13351						
			Per Principal's Six-week Report (2-25-13)	12955	13400	13349						
			Per District Summary (from Principal's Six-week Report tied to District summary) (3/3/13)	12953	13398	13351						
				6	7	8						
Fifth	54	James Bowie M.S.	Daily Register -- run 4/22/13	10526	8594	9065						
			Daily Register -- re-run 6/12/13	10521	8594	9064						
			Principal's Report -- run 6/12/13	10521	8594	9064						
			District Summary (Principal's Report of Six-weeks) 5/1/13	10525	8594	9065						
				9	10	11	12					
Sixth	4	Clements H.S.	Daily Register 6/7/13	22552	19412	19370	22005					
			Principal's Report 6/7/13	22552	19412	19370	22005					
			District Summary 6/12/13	22552	19412	19370	22005					
				9	10	11	12					
Third	12	Marshall	Daily Register (1/9/13)	7226	6736	6885	6008					
			Principal's Report (1/9/13)	7226	6736	6885	6008					
			District Summary (1/22/13)	7225	6735	6886	6005					

Appendix 2. Fort Bend ISD Skyward System Main Components Configuration



Source: Fort Bend ISD Technology Department

Appendix 3. Applications that Exchange Data with Fort Bend ISD’s Student Information System



Source: Fort Bend ISD Technology Department

Appendix D – Fiscal Impact Detail

Estimated Financial Impact from Attendance Recorded on or after Noon

Data for current year is as of 8/26/2014 - 1/30/2014 and data from 2013-14 is as of 8/27/2013 - 2/5/2014. Both school years span 95 instructional days.

School	Average time attendance taken per class in 2014-15	Average time attendance taken per class in 2013-14	Average students per class	Number of classes with recorded attendance on or after noon in 2014-15	Number of classes with recorded attendance on or after noon in 2013-14	Refined daily ADA per student as of FY 2013-14	Estimated number of students with attendance recorded late in 2014-15	Estimated number of students with attendance recorded late in 2013-14	Potential financial impact from attendance recorded late in 2014-15	Potential financial impact from attendance recorded late in 2013-14
Dulles H S	10:05:08 AM	10:07:18 AM	25	856	782	\$31	21,400	19,550	\$663,400	\$606,050
Clements H S	10:01:07 AM	9:51:49 AM	25	838	458	\$31	20,950	11,450	\$649,450	\$354,950
George Bush H S	10:00:46 AM	10:15:43 AM	25	547	844	\$31	13,675	21,100	\$423,925	\$654,100
Willowridge H S	10:01:37 AM	10:09:44 AM	25	491	459	\$31	12,275	11,475	\$380,525	\$355,725
Stephen F Austin H S	9:43:18 AM	10:45:21 AM	25	370	1,588	\$31	9,250	39,700	\$286,750	\$1,230,700
Hightower H S	9:34:48 AM	9:50:57 AM	25	327	631	\$31	8,175	15,775	\$253,425	\$489,025
Ridge Point H S	9:45:55 AM	9:38:19 AM	25	222	155	\$31	5,550	3,875	\$172,050	\$120,125
Lawrence E Elkins H S	9:33:51 AM	10:14:17 AM	25	164	740	\$31	4,100	18,500	\$127,100	\$573,500
William B Travis H S	9:35:08 AM	9:38:05 AM	25	160	150	\$31	4,000	3,750	\$124,000	\$116,250
Thurgood Marshall H S	9:39:14 AM	10:04:21 AM	25	125	273	\$31	3,125	6,825	\$96,875	\$211,575
Kempner H S	9:37:33 AM	9:55:25 AM	25	95	363	\$31	2,375	9,075	\$73,625	\$281,325
High School Totals	9:47:08 AM	10:02:51 AM	25	4,195	6,443	\$31	104,875	161,075	\$3,251,125	\$4,993,325
Progressive H S	10:39:58 AM	2013-14 Data Not Available	12	368	2013-14 Data Not Available	\$31	4,416	4,416*	\$136,896	\$136,896*
Tech Center	10:02:01 AM	11:28:54 AM	27	42	479	\$31	1,134	12,933	\$35,154	\$400,923
Mr Wood Ctr For Learning	10:06:55 AM	10:17:44 AM	3	47	48	\$31	141	144	\$4,371	\$4,464
Fort Bend Co Alter	10:05:47 AM	10:09:11 AM	3	29	13	\$31	87	39	\$2,697	\$1,209
Ferndell Henry Ctr For Learn	9:58:49 AM	10:03:47 AM	3	8	9	\$31	24	27	\$744	\$837
Specialized School Totals	10:10:42 AM	10:29:54 AM	<i>not applicable</i>	494	549	\$31	5,802	17,559*	\$179,862	\$544,329*
Macario Garcia M S	10:34:52 AM	10:36:49 AM	25	507	359	\$31	12,675	8,975	\$392,925	\$278,225
Lake Olympia M S	10:29:52 AM	10:41:11 AM	25	482	460	\$31	12,050	11,500	\$373,550	\$356,500
Missouri City M S	10:28:37 AM	10:24:55 AM	25	319	162	\$31	7,975	4,050	\$247,225	\$125,550
Quail Valley M S	10:34:15 AM	11:05:20 AM	25	308	566	\$31	7,700	14,150	\$238,700	\$438,650
Fort Settlement M S	10:27:16 AM	10:40:02 AM	25	254	362	\$31	6,350	9,050	\$196,850	\$280,550
Hodges Bend M S	10:23:51 AM	10:07:15 AM	25	212	61	\$31	5,300	1,525	\$164,300	\$47,275
First Colony M S	10:22:49 AM	10:33:42 AM	25	160	249	\$31	4,000	6,225	\$124,000	\$192,975
Billy Baines M S	10:15:40 AM	10:20:08 AM	25	157	194	\$31	3,925	4,850	\$121,675	\$150,350
Sartartia M S	10:05:16 AM	10:32:05 AM	25	154	282	\$31	3,850	7,050	\$119,350	\$218,550
Christa McAuliffe M S	10:10:39 AM	10:24:14 AM	25	152	159	\$31	3,800	3,975	\$117,800	\$123,225
Sugar Land M S	10:10:46 AM	10:10:04 AM	25	123	73	\$31	3,075	1,825	\$95,325	\$56,575
David Crockett M S	10:09:38 AM	10:17:13 AM	25	62	70	\$31	1,550	1,750	\$48,050	\$54,250
Dulles M S	10:06:43 AM	10:08:51 AM	25	55	32	\$31	1,375	800	\$42,625	\$24,800
James Bowie M S	10:03:43 AM	10:14:33 AM	25	50	64	\$31	1,250	1,600	\$38,750	\$49,600
Middle School Totals	10:18:51 AM	10:26:53 AM	25	2,995	3,093	\$31	74,875	77,325	\$2,321,125	\$2,397,075

Estimated Financial Impact from Attendance Recorded on or after Noon

Data for current year is as of 8/26/2014 - 1/30/2014 and data from 2013-14 is as of 8/27/2013 - 2/5/2014. Both school years span 95 instructional days.

School	Average time attendance taken per class in 2014-15	Average time attendance taken per class in 2013-14	Average students per class	Number of classes with recorded attendance on or after noon in 2014-15	Number of classes with recorded attendance on or after noon in 2013-14	Refined daily ADA per student as of FY 2013-14	Estimated number of students with attendance recorded late in 2014-15	Estimated number of students with attendance recorded late in 2013-14	Potential financial impact from attendance recorded late in 2014-15	Potential financial impact from attendance recorded late in 2013-14
Dulles H S	10:05:08 AM	10:07:18 AM	25	856	782	\$31	21,400	19,550	\$663,400	\$606,050
Clements H S	10:01:07 AM	9:51:49 AM	25	838	458	\$31	20,950	11,450	\$649,450	\$354,950
George Bush H S	10:00:46 AM	10:15:43 AM	25	547	844	\$31	13,675	21,100	\$423,925	\$654,100
Willowridge H S	10:01:37 AM	10:09:44 AM	25	491	459	\$31	12,275	11,475	\$380,525	\$355,725
Stephen F Austin H S	9:43:18 AM	10:45:21 AM	25	370	1,588	\$31	9,250	39,700	\$286,750	\$1,230,700
Hightower H S	9:34:48 AM	9:50:57 AM	25	327	631	\$31	8,175	15,775	\$253,425	\$489,025
Ridge Point H S	9:45:55 AM	9:38:19 AM	25	222	155	\$31	5,550	3,875	\$172,050	\$120,125
Lawrence E Elkins H S	9:33:51 AM	10:14:17 AM	25	164	740	\$31	4,100	18,500	\$127,100	\$573,500
William B Travis H S	9:35:08 AM	9:38:05 AM	25	160	150	\$31	4,000	3,750	\$124,000	\$116,250
Thurgood Marshall H S	9:39:14 AM	10:04:21 AM	25	125	273	\$31	3,125	6,825	\$96,875	\$211,575
Kempner H S	9:37:33 AM	9:55:25 AM	25	95	363	\$31	2,375	9,075	\$73,625	\$281,325
High School Totals	9:47:08 AM	10:02:51 AM	25	4,195	6,443	\$31	104,875	161,075	\$3,251,125	\$4,993,325
Colony Meadows E S	10:21:10 AM	10:15:28 AM	22	297	162	\$31	6,534	3,564	\$202,554	\$110,484
Dr Lynn Armstrong E S	10:23:29 AM	10:21:18 AM	22	285	140	\$31	6,270	3,080	\$194,370	\$95,480
Ridgemont E S	10:20:21 AM	10:13:17 AM	22	280	90	\$31	6,160	1,980	\$190,960	\$61,380
Mission West E S	10:20:19 AM	10:21:01 AM	22	252	177	\$31	5,544	3,894	\$171,864	\$120,714
Rita Drabek E S	10:13:16 AM	10:10:59 AM	22	223	61	\$31	4,906	1,342	\$152,086	\$41,602
Mission Bend E S	10:15:15 AM	10:13:59 AM	22	208	92	\$31	4,576	2,024	\$141,856	\$62,744
Barrington Place E S	10:12:47 AM	10:11:18 AM	22	206	42	\$31	4,532	924	\$140,492	\$28,644
Highlands E S	10:22:34 AM	10:16:20 AM	22	195	40	\$31	4,290	880	\$132,990	\$27,280
Ridgegate E S	10:12:20 AM	10:06:40 AM	22	193	15	\$31	4,246	330	\$131,626	\$10,230
Mission Glen E S	10:17:10 AM	10:04:55 AM	22	192	12	\$31	4,224	264	\$130,944	\$8,184
Pecan Grove E S	10:01:45 AM	9:58:43 AM	22	183	31	\$31	4,026	682	\$124,806	\$21,142
Quail Valley E S	10:20:12 AM	10:22:46 AM	22	170	152	\$31	3,740	3,344	\$115,940	\$103,664
Rosa Parks E S	10:15:15 AM	10:20:47 AM	22	168	121	\$31	3,696	2,662	\$114,576	\$82,522
Heritage Rose E S	10:15:43 AM	10:07:46 AM	22	164	30	\$31	3,608	660	\$111,848	\$20,460
Edgar Glover Jr E S	10:23:57 AM	10:17:59 AM	22	161	70	\$31	3,542	1,540	\$109,802	\$47,740
Blue Ridge E S	10:15:26 AM	10:03:42 AM	22	156	27	\$31	3,432	594	\$106,392	\$18,414
Hunters Glen E S	10:20:48 AM	10:40:58 AM	22	157	229	\$31	3,454	5,038	\$107,074	\$156,178
Arizona Fleming E S	10:11:41 AM	10:03:18 AM	22	156	24	\$31	3,432	528	\$106,392	\$16,368
Palmer E S	10:15:42 AM	10:05:47 AM	22	126	9	\$31	2,772	198	\$85,932	\$6,138
Briargate E S	10:20:11 AM	10:20:52 AM	22	110	75	\$31	2,420	1,650	\$75,020	\$51,150
E A Jones E S	10:10:40 AM	10:12:45 AM	22	106	79	\$31	2,332	1,738	\$72,292	\$53,878
Juan Seguin E S	10:10:35 AM	10:07:07 AM	22	103	8	\$31	2,266	176	\$70,246	\$5,456
Settlers Way E S	10:06:52 AM	10:07:48 AM	22	95	29	\$31	2,090	638	\$64,790	\$19,778
Townwest E S	10:08:42 AM	10:10:06 AM	22	93	11	\$31	2,046	242	\$63,426	\$7,502
Lantern Lane E S	10:09:56 AM	10:06:52 AM	22	89	20	\$31	1,958	440	\$60,698	\$13,640
Lula Belle Goodman E S	10:12:44 AM	10:21:22 AM	22	85	107	\$31	1,870	2,354	\$57,970	\$72,974
Jan Schiff E S	10:11:01 AM	10:15:24 AM	22	83	133	\$31	1,826	2,926	\$56,606	\$90,706
Sugar Mill E S	10:13:14 AM	10:10:10 AM	22	72	29	\$31	1,584	638	\$49,104	\$19,778
Walker Station E S	10:08:17 AM	10:07:33 AM	22	64	27	\$31	1,408	594	\$43,648	\$18,414
Austin Parkway E S	10:06:35 AM	10:16:30 AM	22	48	99	\$31	1,056	2,178	\$32,736	\$67,518
Oakland E S	10:08:32 AM	10:06:12 AM	22	45	76	\$31	990	1,672	\$30,690	\$51,832
Mary Austin Holley E S	10:04:49 AM	10:16:39 AM	22	43	158	\$31	946	3,476	\$29,326	\$107,756
Lexington Creek E S	10:06:03 AM	10:11:58 AM	22	30	62	\$31	660	1,364	\$20,460	\$42,284
Barbara Jordan E S	10:04:57 AM	10:03:40 AM	22	25	28	\$31	550	616	\$17,050	\$19,096
Oyster Creek E S	10:06:14 AM	10:07:11 AM	22	23	22	\$31	506	484	\$15,686	\$15,004
Cornerstone E S	10:08:17 AM	10:15:23 AM	22	21	70	\$31	462	1,540	\$14,322	\$47,740
Brazos Bend E S	10:08:50 AM	10:07:55 AM	22	17	28	\$31	374	616	\$11,594	\$19,096
Meadows E S	10:08:02 AM	10:27:49 AM	22	16	99	\$31	352	2,178	\$10,912	\$67,518
Sienna Crossing E S	10:07:15 AM	10:12:45 AM	22	16	103	\$31	352	2,266	\$10,912	\$70,246
Dulles E S	10:04:28 AM	10:08:01 AM	22	12	32	\$31	264	704	\$8,184	\$21,824
Scanlan Oaks E S	10:03:12 AM	10:09:32 AM	22	11	55	\$31	242	1,210	\$7,502	\$37,510

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Kempner H S	9:37:33 AM	9:55:25 AM	25	95	363	\$31	2,375	9,075	\$73,625	\$281,325
High School Totals	9:47:08 AM	10:02:51 AM	25	4,195	6,443	\$31	104,875	161,075	\$3,251,125	\$4,993,325
Commonwealth E S	10:03:04 AM	10:05:34 AM	22	8	27	\$31	176	594	\$5,456	\$18,414
Lakeview E S	10:08:41 AM	10:19:46 AM	22	7	36	\$31	154	792	\$4,774	\$24,552
Colony Bend E S	10:04:44 AM	10:08:02 AM	22	0	2	\$31	0	44	\$0	\$1,364
Walter Moses Burton E S	10:01:00 AM	10:13:56 AM	22	0	113	\$31	0	2,486	\$0	\$77,066
Elementary School Totals	10:11:41 AM	10:12:37 AM	22	4,994	3,052	\$31	109,868	67,144	\$3,405,908	\$2,081,464
District Totals	10:09:22 AM	10:14:48 AM	22	12,678	13,137	\$31	295,420	323,103*	\$9,158,641	\$10,016,193*

* Because 2013-14 Progressive High School data was not available, we used the PHS 2014-15 data in calculating the total financial impact for 2013-14.