2020

Internal Audit of PEIMS and the Student Information System

for the Killeen Independent School District

PREPARED AND SUBMITTED BY:

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Introduction

In October 2019, Gibson Consulting Group, Inc. (Gibson), as part of its continuing contract to provide internal auditing services for the Killeen Independent School District (Killeen ISD/the District) Board of Trustees, began conducting an audit of the Student Information System (SIS) and the function responsible for Public Education Information Management System (PEIMS) submittals. This introductory chapter provides a summary of audit findings and recommendations for improvement, an overview of the audit scope and objectives, and a description of Gibson's approach and methodology.

Gibson wishes to thank the Killeen ISD leadership and staff for their assistance in conducting this audit and the Board Audit Committee (BAC) for overseeing this important work.

Executive Summary

The audit found that the District uses two separate industry-leading applications to monitor the accuracy of data within the SIS to help ensure that data standards and requirements published and enforced by the Texas Education Agency (TEA) are being met during PEIMS submissions. These applications, combined with effective internal procedures, have helped Killeen ISD maintain data integrity for PEIMS reporting in the areas of economically disadvantaged students, special education, and Career and Technical Education (CTE).

This was not the case in other areas. The audit team identified several data integrity issues that need to be addressed in attendance reporting, student leavers, English Language Learners (ELL), and immigrant students, several of which have potential risks of reduced state or federal funding. There appear to be five major contributing factors affecting the consistency of PEIMS data integrity at Killeen ISD:

- PEIMS-related processes are inconsistently applied across campuses, due to a lack of consistent job definitions and insufficiently trained staff.

- Many errors are not detected internally through supervisory reviews or other internal controls. As a result, the collection and reporting of certain PEIMS data is largely in the hands of school clerical staff.

- The Killeen ISD PEIMS group is not organizationally aligned with the District's SIS team, and this appears to be contributing to lapses in control with respect to data validation, as well as hindering collaboration among the two units.

- Training is not sufficiently attended by those who need it, nor is training information tracked to support accountability over training needs.

- The District has not maximized the use of software it owns to ensure efficient PEIMS reporting processes. This has resulted in manual, time-consuming processes that are more susceptible to error.

This audit contains 16 recommendations to improve PEIMS data integrity, reporting, and accountability at Killeen ISD. These recommendations are listed in Table 1, along with the priority assigned by the audit team. The audit team assigned a priority level to each recommendation based on perceived risk and/or impact to the organization. Recommendations are not listed in order of priority but rather the order in which they appear in the report.

Table 1: Summary of Recommendations

No.	Priority	Recommendation
1	High	Align the PEIMS group under Technology.
2	High	Overhaul the District's PEIMS training program.
3	Medium	Use the existing ticketing system for PEIMS support.
4	Medium	Limit the positions with "Maintain" level access to the SIS *Gradebook* module.
5	High	Monitor and enforce attendance reporting requirements.
6	High	Configure *eSchoolPLUS* to limit teachers' ability to enter attendance for the PEIMS period outside of the official time.
7	High	Develop an attendance taking procedure for field trips and extracurricular events that meets TEA requirements.
8	Medium	Maximize the use of *SuccessED* to improve the efficiency and effectiveness of the ELL student identification process.
9	Medium	Complete scanning of historical ELL documentation in all campuses.
10	Medium	Grant ELL teachers access to the SIS reporting tool.
11	Medium	Provide training to campus staff regarding the immigrant student identification requirements.
12	Medium	Use SIS reports to validate immigrant student data.
13	Low	Implement SIS screen edits to support accurate and complete data entry.
14	Medium	Implement a leaver audit control.
15	Low	Implement a six-week reporting audit.
16	Low	Update administrative procedure IV-A to include a requirement to obtain and store written consent for Gifted and Talented (G/T) students.

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Project Objective and Scope

The objective of this internal audit project is to assess the existence and adequacy of controls, processes, and procedures in place within the SIS and selected PEIMS functions to ensure that data generated by both functions are accurate and compliant with State standards set by the Texas Education Agency (TEA).

Unlike other audits that focused on specific departments, functions, or programs, the scope of this audit was dedicated exclusively to student information collected, validated, and reported by Killeen ISD through its SIS and ultimately submitted to TEA through PEIMS. All Killeen ISD organizational units and positions involved in these responsibilities were included in the scope of work, with the exception of student discipline data, which was excluded from this scope of work.

Student Information System

In the SIS audit, the audit team reviewed the computer systems maintained by the District to facilitate the collection and management of student information. Gibson also reviewed computer system controls in place within *eSchoolPLUS*, the District's primary SIS. These controls include system access, backup of data files, updates, and data integration with key third-party systems.

PEIMS

The PEIMS audit evaluated data entry and processing practices and tested the accuracy of reported data through sampling. The audit team audited the following major PEIMS processes: attendance, leavers, special programs, and PEIMS reporting.

- **Attendance** – The audit team reviewed and analyzed regular attendance and modified attendance (field trips, substitutes, extracurricular activities, and first day of school). Audit testing and data analyses were performed to test the accuracy and completeness of attendance data reported by the District to the State.

- **Leavers** – The audit team reviewed the District's processes for capturing and reporting leavers across various campuses. Audit testing and trend analysis were performed on leaver data, providing evidence that proper documentation is maintained and that the correct leaver code is assigned.

- **Special Programs** – The audit team reviewed the student coding processes for each population (special education, gifted and talented, career and technical education, English language learners, at-risk, and economically disadvantaged) across various campuses. Audit testing was performed on each special program population, providing evidence that proper documentation is maintained and that the correct student code is assigned.

- **PEIMS Reporting** – The audit team reviewed the policies and procedures for validating and submitting student data through PEIMS pursuant to TEA regulations. Audit testing was performed at visited campuses, providing evidence that District and TEA procedures are followed.

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In addition to these areas, the audit team reviewed the organizational structure and support and training functions for both the SIS and PEIMS groups.

Project Approach and Methodology

The findings and recommendations included in this report were informed by the following data collection and analytical activities.

Data Collection and Analysis

As part of this audit, Gibson collected and analyzed 2018-19 PEIMS submission data, SIS data, and historical program-specific PEIMS data provided by Killeen ISD, which included attendance taken by teachers and PEIMS student coding data, as well as other program- and function-specific information.

Interviews, Focus Groups, and School Visits

In November and December 2019, the Gibson audit team conducted two site visits. The team interviewed 19 individuals and conducted eight focus group sessions with District leadership, relevant department leadership, SIS leadership and staff, and PEIMS leadership and staff, as well as campus principals, attendance clerks, and registrars. The audit team also conducted seven process mapping sessions with Killeen ISD staff. The primary objective of the interviews and focus group sessions was to gather information about Killeen ISD's SIS and PEIMS roles, responsibilities, and interactions with each other and the rest of the District, and to understand the key processes surrounding these two functions. A complete list of interviewees, focus groups, schools visited, and process mapping sessions can be found in *Appendix A – Site Visit Roster*.

Audit Testing

Gibson performed 35 audit tests across 10 PEIMS domains. The audit tests were performed to validate the compliance of attendance taking and the accuracy of special population coding. These test approaches and the test results are located in the applicable Sections of this report. To perform each of the tests, supporting documentation was reviewed at various campuses and the central office.

The remainder of this report is organized into the following Sections and Appendices:

- Section A – PEIMS Organization and Management
- Section B – Student Information System
- Section C – Attendance
- Section D – English Language Learners
- Section E – Immigrants
- Section F – Leavers

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- Section G – PEIMS Six-Week Reporting

- Section H – Other PEIMS Components

- Appendix A – Site Visit Roster

- Appendix B – Leaver Audit Checklist

A – PEIMS Organization and Management

The PEIMS group reports directly to the Superintendent. The group consists of a PEIMS Coordinator, a PEIMS Specialist, and a PEIMS Clerk. Both the PEIMS Specialist and the PEIMS Clerk positions report to the PEIMS Coordinator. Figure 1 shows the organizational chart for the PEIMS group. This group has had the same number of FTE positions since 2006.

Figure 1: PEIMS Group Organizational Chart
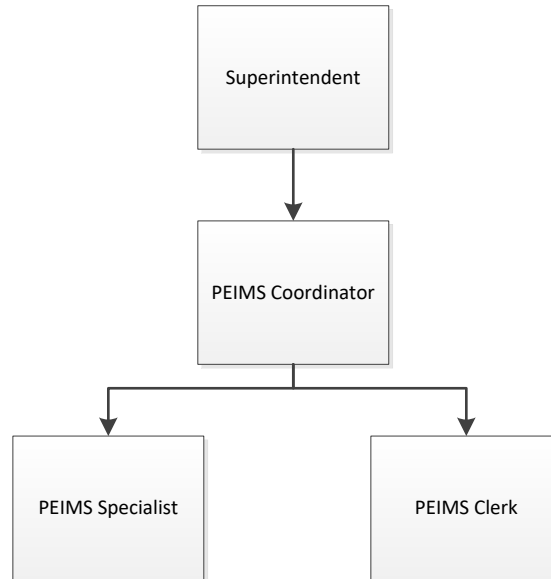
Source: Killeen ISD PEIMS Group, 2019

This group is responsible for the PEIMS and demographics function for the District. Most of the demographer functions are performed by the PEIMS Coordinator.

The following are the main responsibilities of the PEIMS group:

- Provide training to District and campus staff on all activities regarding PEIMS;

- Assist District and campus staff in PEIMS-related issues;

- Provide and update PEIMS-related documentation including guidelines, checklists, and the procedures manual;

- Analyze and review PEIMS-related data throughout the year to detect and correct data issues and anomalies;

- Communicate and coordinate all PEIMS data with the campus leadership, District leadership, department leadership, related staff, the State, and the regional education service center; AND

- Submit District PEIMS data to the State.

The PEIMS group and the SIS team rely on many individuals at campuses and departments to enter, record, and monitor student-level PEIMS data. While the campus attendance clerks are responsible for accurate and complete daily student attendance, the registrars and registration clerks are responsible for accurately capturing student information in the area of enrollment, leavers, and special programs.

Although District departments and campuses are responsible and accountable for the accuracy and completeness of their own data, the PEIMS group and SIS team each play key roles in the successful submission of accurate and complete PEIMS data for Killeen ISD.

The audit team reviewed the job descriptions of all District and campus staff who are involved with PEIMS data to validate the inclusion and accuracy of their PEIMS responsibilities. All reviewed job descriptions appropriately reflected the PEIMS responsibilities of each employee group.

PEIMS Support and Training

Although all three PEIMS staff participate in supporting the PEIMS function throughout the District, the PEIMS Specialist is the primary position responsible for managing the majority of the support-related interactions with the District and campus staff. The PEIMS group does not use the District help desk ticketing system to manage support requests – they receive and respond to support requests via email or phone call.

Similar to PEIMS support, the PEIMS Specialist provides the majority of the PEIMS-related training to District and campus staff. All of the trainings are conducted face-to-face in the District central administration building. The PEIMS group does not use the District's training management software to manage PEIMS training activities.

Findings and Recommendations

Commendation 1: The PEIMS Department uses multiple systems and reports to check PEIMS data integrity.

The District owns two systems called *Certify* and *OnData Suite*. Their primary functions are to validate and check student and related data against PEIMS data standards and rules. *Certify* has hundreds of built-in data integrity rules used to validate the District PEIMS data. *Certify* generates reports of the data integrity issues it encounters. These reports are distributed automatically as a dashboard to the individual schools or departments who are responsible for the data. For example, the ELL Department has access to their *Certify* dashboard, which lists PEIMS data integrity issues related to ELL data. Similarly, an elementary principal can access their *Certify* dashboard and see their campus' PEIMS data issues. Each night, *Certify* checks the student data that was entered into the SIS, allowing the District staff to work on data integrity issues a day after they occur.

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The District also owns a system called *OnData Suite* which has built-in reports for data integrity analysis, but its main function is to allow District staff to analyze all available PEIMS data trends over time. *OnData Suite* holds multiple years of reported PEIMS data for the District. The District staff can access *OnData Suite* and compare PEIMS data points against previous year PEIMS submissions. These two systems provide reporting and data integrity checks against PEIMS data in addition to what is available from the District SIS. These systems and reports allow the District staff to quickly identify PEIMS data integrity issues and give the staff access to reports that are specific to their school or area.

Finding 1: *The current organizational alignment of the Student Information System and PEIMS functions limit their ability to collaborate and work effectively.*

The PEIMS group was part of the District Technology Department until 2002. It later moved under the Superintendent, mostly to elevate its importance to the organization. Although this change gave the PEIMS group well-needed support from the highest position in the District, it created organizational separation from the Technology Department, which houses the SIS function.

The separation of the PEIMS group from the Technology Department has inhibited collaboration and overall effectiveness. For example, SIS vendors are responsible for updating and adding new functionalities to their systems as TEA makes changes to the PEIMS data collection and submission requirements. The District's SIS vendor communicates these changes and related updates to their system, and discusses potential issues with the District SIS function in periodic meetings. The PEIMS staff are not always available in these meetings with the vendor. As a result, the PEIMS group relies on the SIS team to communicate their concerns and issues related to changes to the vendor. This causes decisions to be made without all of the necessary input from the PEIMS group. The PEIMS staff also relies on the SIS team to provide the necessary end user SIS training so the District and campus staff can generate accurate and complete PEIMS data for submission to the State. The PEIMS group doesn't have any formal input to this training, even though the SIS training is key for the employees to fulfill their PEIMS responsibilities. The below table shows some of the key activities that the SIS team is responsible for, that closely affect the PEIMS group.

Table 2: Key activities that the SIS team performs that affect the PEIMS group

Key Activities under SIS that impact PEIMS
Configuring the SIS including the PEIMS module
Updating the SIS PEIMS module
Maintaining the SIS vendor relationship
Supporting the SIS modules, including the PEIMS module for the District
Configuring, maintaining, and supporting the *Certify* program
Configuring, maintaining, and supporting the *OnData Suite* program
Training the District and campus staff on SIS functionality
Generating reports and data analysis for PEIMS group

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Key Activities under SIS that impact PEIMS
Storing and maintaining SIS-related databases
Maintaining periodic integration with the District's other systems for data exchange with SIS
Providing user access and security for SIS and all related systems

Source: Gibson Consulting Group interviews, focus groups, and site observations, 2019

The above functions are closely related but are not organizationally aligned in Killeen ISD. Logical alignment of functions is a key premise of a sound organizational structure.

The leaders of these two functions know and have worked with each other for more than 20 years and have helped the District achieve a certain amount of collaboration and coordination between these functions. However, the existing collaboration and coordination relies heavily on individuals rather than a functional organizational alignment. This puts the organization at risk should there be any turnover in these leadership positions.

Recommendation 1: Align the PEIMS group under Technology.

The PEIMS group should be included in the Data and Information Systems group under the Technology Department. This will allow the SIS team and the PEIMS group to collaborate better and work more effectively. However, it is critical for the District leadership to continue to emphasize to all District stakeholders the importance of accurate and timely PEIMS data submissions, even though the PEIMS group will no longer be reporting directly to the Superintendent.

Finding 2: *Killeen ISD does not have a systematic PEIMS training program.*

The current training process used by the PEIMS group is reliant on the PEIMS Specialist and is not systematic or process-driven. Several observations support this finding.

First, there is no published calendar of upcoming trainings available to campus and District staff. These trainings occur at the Auxiliary Personnel Training Room on dates selected by the PEIMS Specialist. Second, a list of available PEIMS trainings, or a method of those who have electronically registered for a PEIMS training, does not exist. Instead, the PEIMS Specialist will contact individuals via email to attend each training session. The absence of a calendar, a list of available PEIMS trainings, and a lack of online ability for training registration can limit staffs' ability to sufficiently plan for attending critical PEIMS trainings, which may result in low attendance for these courses.

The audit team obtained a list of all PEIMS-related trainings offered by the PEIMS group in 2018-19. This list included the following data points for each training:

- Date
- Subject
- Time

- Location
- Trainer
- Class size

The audit team analyzed the list, calculating the number of times each topic was covered and what percentage of required attendees participated in the training. Table 3 includes the results of the audit team's training analysis. The audit team excluded trainings for specific events, such as Pre-K roundup, which accounted for two courses, as well as trainings requested by individual campuses, which accounted for three courses. The topic most covered by the PEIMS group was Registration, which was offered seven times during 2018-19. The training with the highest percentage of attendance was Staff Responsibility Records (Records), but only 43.5 percent of employees needing[1] the training attended. The poorest attended courses covered Eligibility, where no employees attended, Leavers, and Six-Weeks Reporting.

Table 3: Training Analysis Results

Topic	Attendees	Number of Times Offered	Estimated Number of Employees Needing Training [2]	Percentage Attended
Registration	52	7	144	36.1 percent
Records	22	2	96	22.9 percent
Eligibility	0	1	144	0.0 percent
Attendance	35	3	134	26.1 percent
Discipline	38	3	191	19.9 percent
Leaver	11	1	144	7.6 percent
Six-Weeks	38	2	278	13.7 percent
Staff	27	2	62	43.5 percent
Total	**223**	**21**	**-**	**-**

Source: Created from data included in Request #4 PEIMS Campus Contacts and Request #28 – List of PEIMS Training Offered

Poor training attendance is a contributing factor to process inconsistencies and errors noted during audit testing (discussed later in this report). During site visits and focus groups, the audit team heard conflicting information regarding work processes, such as the requirement to use a checklist for leavers. This information was corroborated by audit testing, where over half of the tested files did not include a Leaver Audit Checklist. (Refer to Section G for the complete leaver audit test results.)

[1] This estimated number of employees was calculated by the audit team based on the data provided in Request #4 PEIMS Campus Contacts. A complete number of employees who require training is not known or tracked by the PEIMS group.

[2] The employee counts included above are not counts of unique employees. One employee may attend and require multiple training courses. As such, the numbers and percentages cannot be totaled.

Other differences were noted among campuses. Depending on the attendance clerk, the Student Detail Reports and Campus Summary Reports could be printed and handed to the signors or emailed. Additionally, several attendance clerks stated that a sample of students were to be tested every six weeks to ensure that the recorded ADA or special program information was correct. Other clerks stated that the entire student population of a special program was to be checked. Other clerks were not aware of any validation requirement. Out of seven campuses tested, no campus fulfilled all six-week reporting requirements. Many campuses did not maintain the original, signed affidavits, the Campus Summary, or the Student Detail Reports.

The inconsistency found is not only restricted to attendance clerks, but also encompasses principals and special program leaders, such as Special Education facilitators or ELL leads. Interviews and focus groups of special program staff indicated that the current target audience for PEIMS training is not inclusive of each staff role that directly impacts PEIMS data, and most notably excludes special program positions (e.g. Special Education, CTE, Gifted and Talented) and campus leaders. Many individuals who sign off on Six-Week Reporting Affidavits were not knowledgeable about their six-week reporting responsibilities. Test G.6 indicated that out of seven principals, five signed off on the reports prior to a review by the special program leader. Principals are expected to be the individual ultimately accountable for data accuracy on their campus. Numerous principals stated that they rely on special program leaders to verify the data for their respective students. However, if the principal's review is occurring prior to the special program review, there is a risk that the principal is signing off on data that has not been thoroughly vetted or reviewed. Refer to Section H for the complete six-weeks test results.

The trainings currently offered by the PEIMS group may be poorly attended for many reasons. The training that is offered and attended is not differentiated by level (e.g. beginner, intermediate, advanced). This may discourage experienced staff from attending trainings due to a perception that the same material is presented year-over-year. Further, existing training is exclusively delivered face-to-face. If staff are unable to attend trainings due to other work commitments, they miss out on valuable information and guidance on important PEIMS matters.

Recommendation 2: Overhaul the District's PEIMS training program.

The implementation of a comprehensive PEIMS training program includes many discrete tasks.

- The PEIMS group should determine what subject matter needs to be taught over the course of a year.

- The subject matter should be differentiated for various levels of experience and knowledge.

- The frequency and timeline for each training should be established.

- The PEIMS group should determine who will be a part of the training program.

- PEIMS training should include, at a minimum, all individuals who are required to sign Six-Weeks Reporting Affidavits.

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- The delivery method should provide online options.

Once the above steps are completed, the PEIMS group should use *Strive*, the *Eduphoria* module used by the SIS team, to facilitate the training program and track credit hours. The Department would then be able to assign trainings to employee groups, employees could register for trainings online, and completion could be monitored.

A comprehensive PEIMS training program could reduce the amount of process inconsistencies between campuses and the likelihood of errors in PEIMS coding. A formal approach to training also equips employees with the knowledge and confidence to perform their PEIMS-related responsibilities.
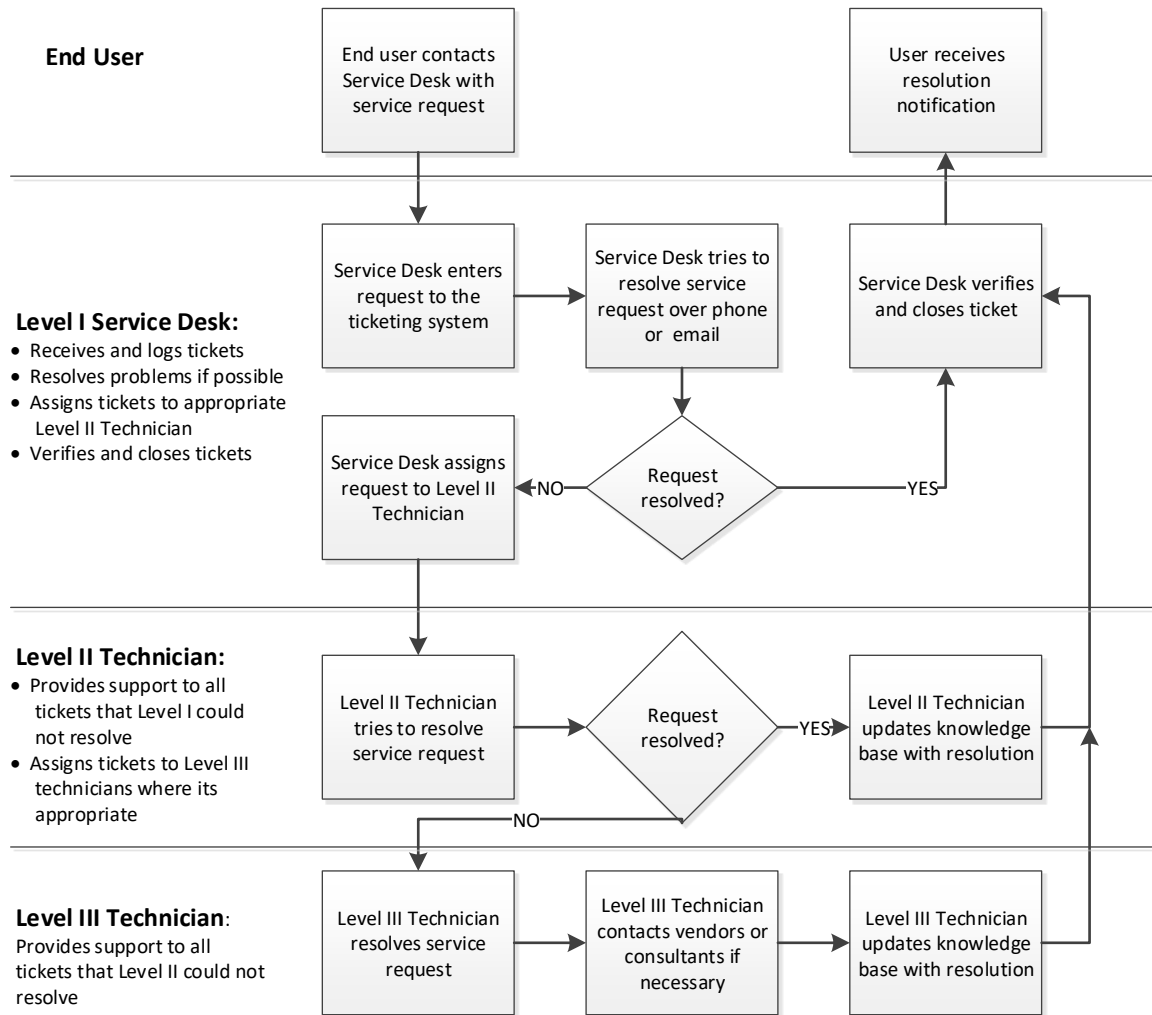
Finding 3: *The current PEIMS support process is overly reliant on individuals instead of established systems and processes.*

The audit team heard many positive comments about the support provided by the PEIMS group. Attendance clerks described the staff in the Department as "helpful," "great," and "kind." However, the support provided is not process-driven and is overly reliant on the experienced personnel within the PEIMS group. The in-depth support knowledge that resides with the existing staff will be lost if personnel changes, such as retirements or promotions, occur in the PEIMS group. As a result, support may be interrupted or negatively impacted.

Two staff members are responsible for supporting 55 campuses and approximately 304 personnel who may have PEIMS-related questions. The PEIMS staff receives emails or phone calls from campus or departmental staff requesting assistance, and will respond via email or phone, or by visiting the requesting department or campus to provide support. The help desk ticketing system used by the Technology Department is not used by the PEIMS group to track support. This results in a lack of aggregated and actionable support data. Support ticket data allows districts to make informed, educated decisions regarding resource needs and training requirements, and it facilitates the creation of a knowledge sharing database, such as searchable Frequently Asked Questions. Additionally, when new employees are on-boarded to support the PEIMS group, support ticket data can serve as a useful training tool, helping new employees understand how to address common problems.

Recommendation 3: Use the existing ticketing system for PEIMS support.

The PEIMS group should implement a structured, leveled process for supporting campus and departmental personnel. The PEIMS group should implement the ticketing software currently used by the SIS team. The PEIMS group could then train help desk employees to respond to basic PEIMS questions. For more complex queries requiring specific PEIMS expertise, the help desk employee could route the ticket to the PEIMS group. Figure 2 presents a typical work flow for a leveled support structure.

Figure 2: Leveled Support Structure Work Flow

End User

End user contacts Service Desk with service request

User receives resolution notification

Level I Service Desk:
- Receives and logs tickets
- Resolves problems if possible
- Assigns tickets to appropriate Level II Technician
- Verifies and closes tickets

Service Desk enters request to the ticketing system

Service Desk tries to resolve service request over phone or email

Service Desk verifies and closes ticket

Service Desk assigns request to Level II Technician

Request resolved? — NO / YES

Level II Technician:
- Provides support to all tickets that Level I could not resolve
- Assigns tickets to Level III technicians where its appropriate

Level II Technician tries to resolve service request

Request resolved? — YES / NO

Level II Technician updates knowledge base with resolution

Level III Technician:
Provides support to all tickets that Level II could not resolve

Level III Technician resolves service request

Level III Technician contacts vendors or consultants if necessary

Level III Technician updates knowledge base with resolution

Source: Gibson Consulting Group, 2019

Using the above approach would create a searchable database of support tickets, allowing the PEIMS group to perform analysis of recurring issues that may need to be addressed through training. The database could also be used as an onboarding tool for new PEIMS employees. Additionally, the number of questions coming to the PEIMS group would decrease. This would reduce the workload on existing PEIMS staff, allowing them to devote more time to training.

B – Student Information System

The Killeen ISD Student Information team resides under the Technology Department. The Student Information System (SIS) team and its supervisor are responsible for the maintenance and support of the SIS. The SIS Team Supervisor reports to the Director of Data and Information Services, who reports to the Executive Director of Technology. The Killeen ISD Deputy Superintendent oversees the Technology Department. Figure 3 presents the organizational chart for the SIS team and its organizational alignment in Killeen ISD.

Figure 3: Data and Information Systems Group Organizational Chart
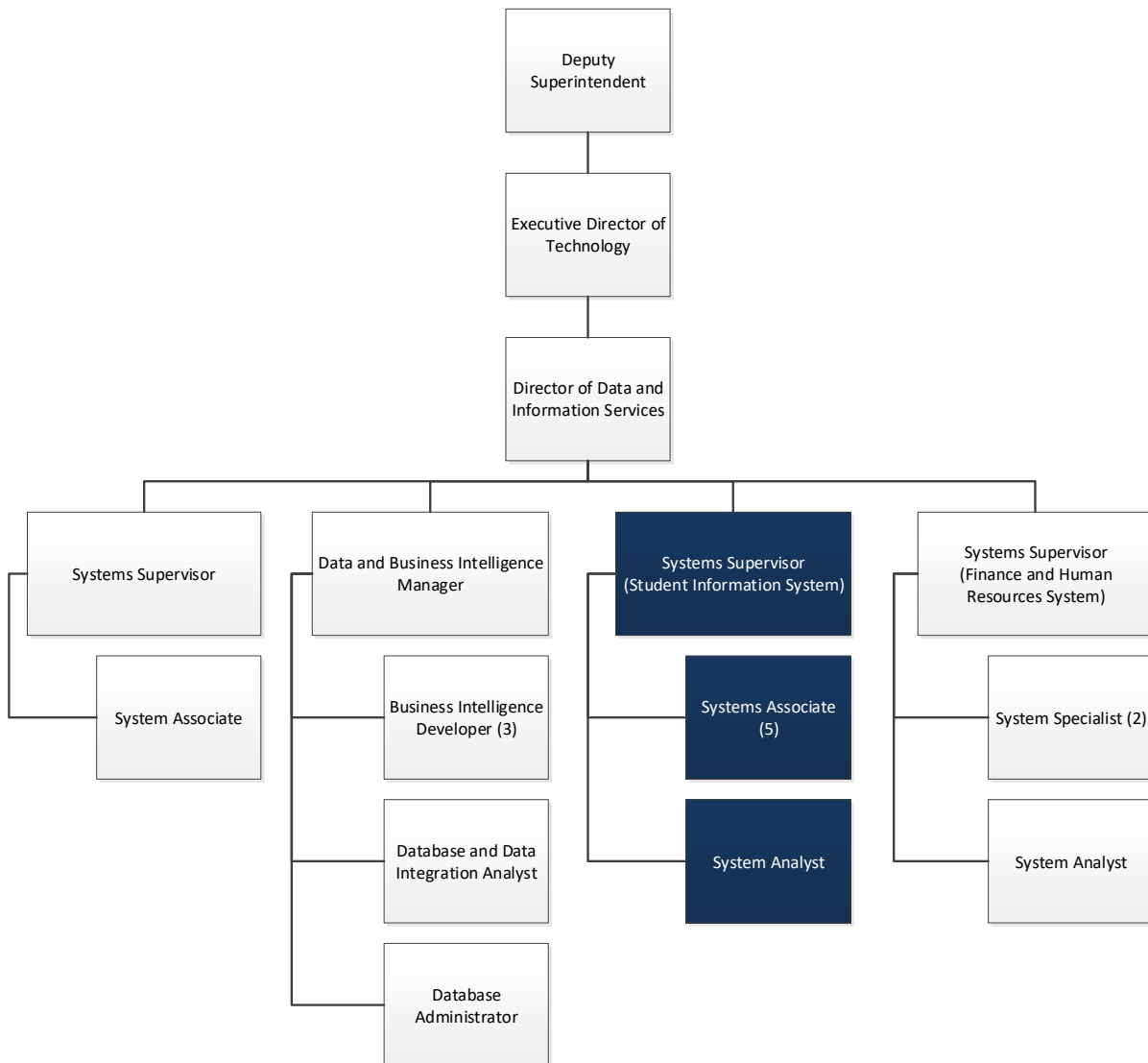
Source: Killeen ISD Technology Department, 2019

The Student Information System team consists of five Systems Associates, one System Analyst, and a Supervisor. Until last year, the team had eight full-time equivalent (FTE) positions since the implementation of the current SIS in 2001. One position moved to the Data and Business Intelligence team in 2018-19, which reduced the team from eight to seven FTE positions. The following are the primary responsibilities of the SIS team:

- Maintain and support the SIS;

- Provide SIS-related training to District and campus staff;

- Generate standard and ad hoc reports from the SIS for District and campus staff;

- Maintain the SIS vendor relationship; and

- Maintain and support security and user access to the SIS.

There are other teams under the Data and Information Systems group that work closely with the SIS team. They provide assistance with advanced and complex report generation, maintain and support all district-wide databases including the SIS, and create and maintain automated integration to district-wide systems (including the SIS) with third-party applications. Some of these responsibilities are discussed later in this Section.

Student Information System Support

The SIS team uses the District help desk ticketing system for SIS support. District staff, including campus staff, who have an issue or question regarding SIS, can contact the Technology Department help desk via email, phone, or online to open a support ticket in this system. The support tickets reside in the main support 'queue' in the District help desk system, and the SIS Team Supervisor monitors the queue for SIS needs. Once identified, they are assigned to the appropriate individual on the SIS team. The SIS team also monitors the help desk system for support tickets that are directly assigned to them by District or campus staff. The SIS Team Supervisor monitors the support ticket volume by SIS team member and assists the support activities as needed.

The SIS support needs of the District can be cyclical. The support ticket volume increases significantly during certain events, including the first day of school, the creation of the master schedule, grades and report card posting, and graduation, among other events.

Student Information System Training

A large percentage of District staff use the SIS, including teachers, campus administrators and support staff, District management and special program staff, and the PEIMS unit. In order to accommodate the training needs of this diverse group of staff, the SIS team offers over 60 *eSchoolPLUS* courses. The courses address how to complete attendance, complete registration, report discipline, and complete master scheduling and grades. There are also courses on SIS navigation, capturing and entering grades and homework in the Teacher Access Center, and specialized courses such as At-Risk Coding. A new employee

who will be using *eSchoolPLUS* must complete SIS training before they receive access to the system. This allows new employees to be trained by qualified employees of the SIS team in order to become familiar with using the systems for their day-to-day tasks.

The SIS team uses an online system called *Strive*, which is a module in *Eduphoria* that manages all aspects of the training activities. The team can create courses with essential information like course date, course location, and maximum number of seats. All District users have access to *Strive*, so they can go online and easily register when they see a course they want to attend. The system electronically manages the registration, cancellations, and the reminders before training dates. It also provides a means of giving course credits when the course is complete, which are posted to each registrant's District Training Transcript. According to the training data provided by the SIS team, 1,058 staff attended SIS training from July 1, 2018 to June 30, 2019. Different types of trainings are available for new versus existing employees, and elementary versus secondary campus staff.

Student Information System Technical Environment

Killeen ISD uses the Student Information System called *eSchoolPLUS* from the vendor PowerSchool. Killeen ISD is using the latest *eSchoolPLUS* software release of 19.4.7.0. Although the name of the software has changed several times, the District has had the software since 2001. The District owns and has implemented all modules except the "Fees" module, where the District Business Office is using a separate program for that function. Below is the list of all modules that are used by Killeen ISD.

- Base System
    - Registration
    - Attendance
    - Mark Reporting
    - Interventions
    - Medical
    - Scheduling
    - Test Scores
- Student Success Plan
- Master Schedule Builder
- Standards Based Gradebook
- Home Access Center
- Mobile Admin Module
- Mobile Family Module
- Standards & Competencies

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Killeen ISD has two data centers in two different locations in order to achieve redundancy and risk mitigation. They are the Killeen Data Center (KDC) and Harker Heights Data Center (HHDC). While the SIS live (production) application servers, task servers, and related databases are located in HHDC, the test and development application servers are located in KDC. Two different internet providers provide connectivity to these data centers. If one vendor experiences down time, the District can create additional servers on the other data center and route all system traffic through the data center that is up. Figure 4 shows where the main components related to *eSchoolPLUS* are located and how they are connected via two separate connectivity vendors.

Figure 4: Killeen ISD *eSchoolPLUS* Main Components and System Configuration
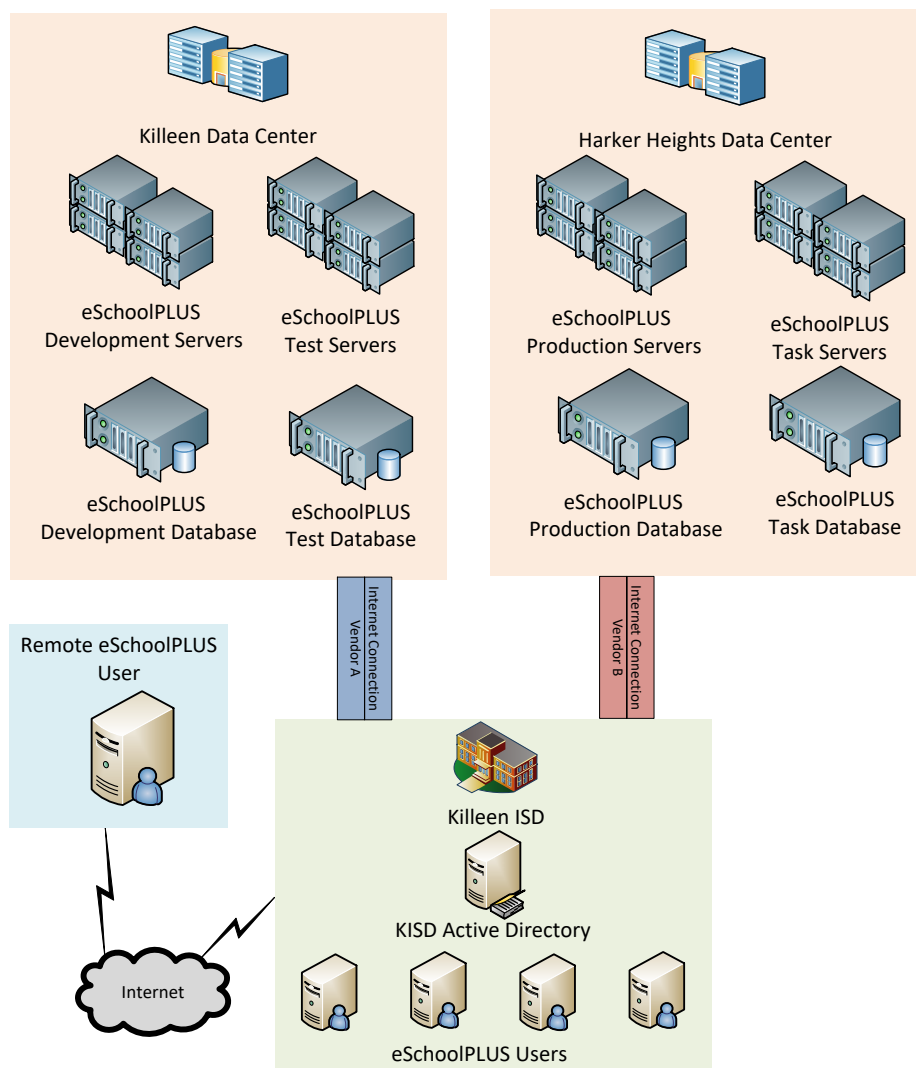
Source: Killeen ISD Technology Department, 2019

While the District is still in the process of finalizing a district-wide disaster recovery plan, as recommended by the Gibson audit team in the 2017 Killeen ISD Technology Audit, the Technology Department reduced

the risk of extended downtime for *eSchoolPLUS* by distributing the *eSchoolPLUS* application and resources into these two data centers. In order to create an additional redundancy, the Department told the audit team that they are in discussions with the *eSchoolPLUS* vendor, PowerSchool, about providing the District a backup of Killeen ISD *eSchoolPLUS* in the secure internet cloud in the event that all Killeen ISD data centers, including the *eSchoolPLUS* servers, are unavailable. This will allow Killeen ISD to have access to *eSchoolPLUS* until the data centers and their services are restored.

Every Monday through Saturday, the Technology Department takes a full daily backup of *eSchoolPLUS*; every Sunday, they take a full weekly backup; and on the first of every month, they take a full monthly backup. They also perform an end-of-year rollover backup. This backup is taken before the end of the year rollover is processed so the District has all the data from the previous year.

Once a week, the *eSchoolPLUS* databases are restored to the *eSchoolPLUS* testing server to verify that the backup of databases is working. In a given time, the Department holds two months of daily and weekly backups. They have a year of monthly backups as well as last year's end-of-year rollover backup. Monthly and yearly backups are stored off-site to a secure location in the cloud.

Data Connections to Student Information System

Since *eSchoolPLUS* maintains all Killeen ISD student information, it is also the data source for other student-related information systems in Killeen ISD, such as those supporting Transportation and Child Nutrition. As Figure 5 displays, there are more than 30 systems and applications on the premises or in the cloud that the Student Information System interacts with. In order to effectively connect and extract data from *eSchoolPLUS* to other Killeen ISD systems, the Data and Information Systems group created nightly, weekly, or ad hoc data exchange scripts that take the data from *eSchoolPLUS* to accommodate the data needs of other Killeen ISD applications. All required PEIMS reports or other state or federal reports are generated directly with live production data using the current version of the *eSchoolPLUS* system.

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Figure 5: Applications that Exchange Data with Killeen ISD's Student Information System
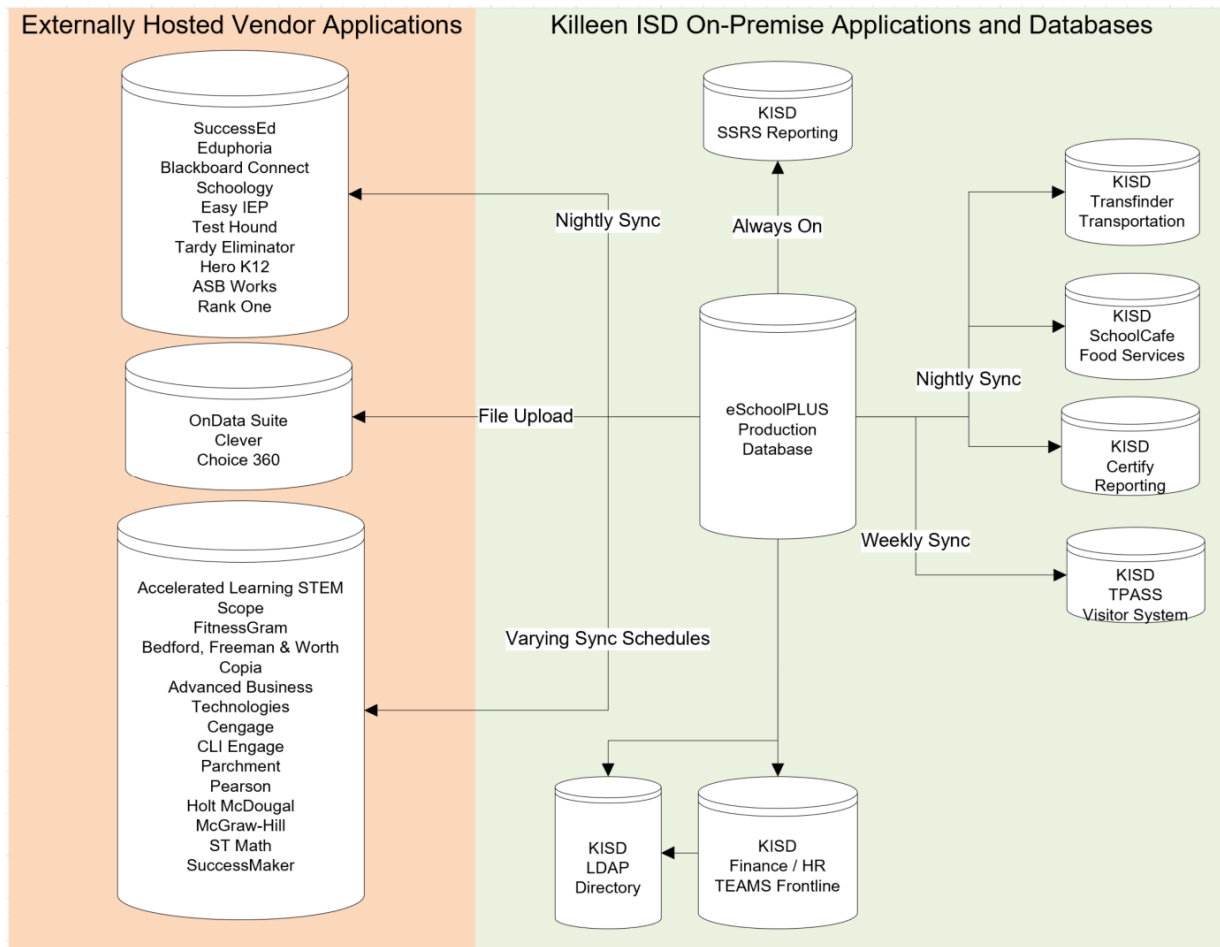
Source: Killeen ISD Technology Department, 2019

The Data and Information Systems group also supports and manages all Killeen ISD software systems and applications. This group has developed a database that contains critical information regarding data exchange types, connectivity frequency, data sharing agreement links, etc. for more than 120 systems. Table 4 below table lists all the information that they store and update for these 120 applications.

Table 4: Information Stored and Updated for Applications

Application /System Attributes
Vendor Name
Import / Export to Killeen ISD Systems
Location of the Application (Cloud or On-site)
Username and Retrieve Password Info
Killeen ISD Contact
Schedule of the Data Import
Yearly Schedules
Sync Pause Necessary
Restart Process for Each School Year
Data Agreement Link
Yearly Schedules Requirement
Connection Authentication Type
Time File gets Created
Vendor Contact Name and Email
Vendor Support Number
Vendor Web Site
Resource Links

Source: Killeen ISD Systems Vendor Master Sheet, 2019

Killeen ISD's approach of having all relevant systems and application information in one place allows the staff to easily use the information and make necessary changes if needed.

Student Information System Access

The Data and Information Systems group is responsible for managing user access to the *eSchoolPLUS* system. Killeen ISD uses Lightweight Directory Access Protocol (LDAP) services across the District to manage access to all of the District's information technology resources. All active employees must have an active account in LDAP so they can take advantage of district systems. Once the employee has an active LDAP account, they can access various systems and applications with varying roles based on their position.

Like most Killeen ISD systems, *eSchoolPLUS* works with the District LDAP system. A new *eSchoolPLUS* user will first need to have an active LDAP account in order to access the *eSchoolPLUS* system. LDAP also plays a critical role in removing the terminated employee's access to district systems and resources. Disabling employee's LDAP account will remove almost all their access to district systems and resources. Although it can be done as needed, creating new LDAP accounts for new employees and disabling LDAP accounts for terminated employees are both automated processes that are triggered by certain Human Resources actions. Figure 6 presents the LDAP account process for new user creation and access removal processes.

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Figure 6: New SIS User Access Creation Process
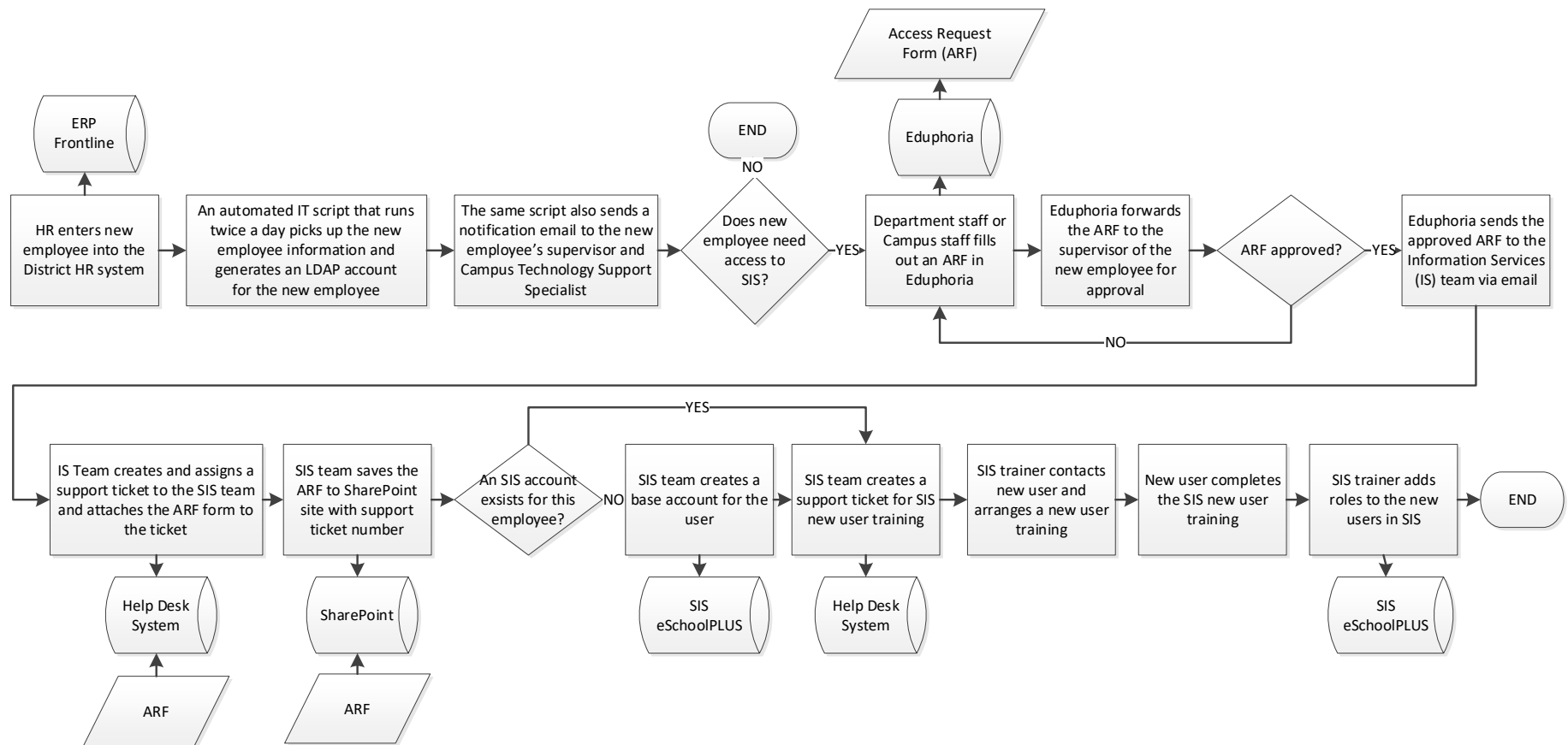
Source: Gibson Consulting Group, created from interviews with the Data and Information Systems Group, 2019

Once a user's LDAP account is created, the Data and Information Systems group uses an online form called the Access Request Form (ARF) to determine what roles and access rights to assign the user. This form is one of the most critical parts of the process because it not only lists all the modules and functionalities the user is requesting access to but also the level of access that they need, such as read-only versus delete or edit (maintain). Figure 7 shows the critical fields on the form that are used to determine the user access areas and levels.

Figure 7: Sample Page from Access Request Form (ARF)

	View Only / Query Access	Maintain Access **(TRAINING REQUIRED)**
Activities		
AVID		
At-Risk **		
Attendance Package		
Career Planner (High School Only)		
Demographics Package		
Home Access Center (HAC) Parent Account Access		
Enrollment Online Account Access		
PEIMS Staff Responsibility Records		
Discipline Package		
Drug Testing **		
Grades, IPR, UIL, Transcript Package		
Locker Package		
LPAC *Maintain Only Available to Bilingual/ ESL Dept*		
Master Schedule Package		
Medical Package *Form should be submitted by District Medical Coordinator*		
News Items in HAC and TAC for Campus		
Special Education in eSchoolPLUS *Contact SPED Dept for EasyIEP Access*		
Student Scheduling Package		
Student Success Plan (SSP, RTI, PGP)		
Teacher Access Center - Admin Access to Teacher Gradebooks		
504 Checkbox and Dyslexia Indicator in eSchoolPLUS *Contact your district 504 coordinator for SuccessEd access*		
GT Student Log *Campus GT coordinators and above. Requires approval.*		

Source: Killeen ISD Access Request Form, 2019

The ARF can be submitted by the requesting individual or by anyone at the campus or department level. The system that the form is created in forwards the form to the principal or the department head so they can review and approve it. Approved forms move to the queue of the Data and Information Systems group to be processed. After saving the form for verification and documentation purposes, the Data and Information Systems group reviews the access request to make sure the request is in line with the position and with access levels of those with a similar position. For standard campus positions such as principal, assistant principal, or counselor, the group maintains a template of user access roles that those positions should have in *eSchoolPLUS*. The campus can either fill out the form shown in Figure 7, or request the standard user access roles that the position should have in those templates. The group also determines if the access requested is dependent on SIS training or requires approval by another department such as Gifted and Talented, Special Education, or 504. If the access requires additional approval, they contact the other departments for approval and contact the user for training. All new users have read-only access to SIS until they complete their SIS training.

The terminated user access removal process is explained in Figure 8. The process starts with disabling the LDAP account of the terminated user, which is automatically triggered by HR terminating an employee in the District HR system. This automated process runs twice a day to disable LDAP accounts of the employees that are no longer with the District. Once the employee LDAP account is disabled, they can't access any district systems or staff resources. The Technology Department can also run this automated process any time if requested by the HR Department or District leadership. In addition to disabling the users LDAP account, the SIS team runs SIS reports daily to identify and remove any disabled LDAP account users with SIS access, as well as any employees that have access to locations that are no longer their own.

Figure 8: Terminated User Access Removal Process
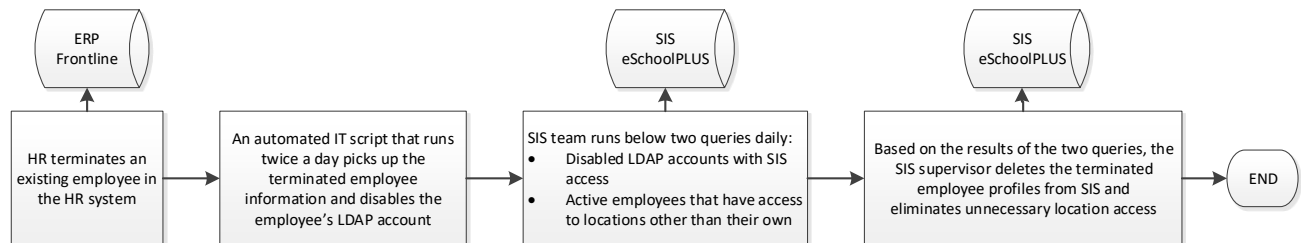
Source: Gibson Consulting Group, created from interviews with the Data and Information Systems Group, 2019

Findings and Recommendations

Finding 4: *The District has too many campus positions with "Maintain" level access to the SIS Gradebook module.*

As it is shown in Figure 7, users can have either "View Only/Query Access" or "Maintain" access to SIS modules. "View Only/Query Access" allows the user to access the modules, but only to view data – the user is not able to enter and edit data. "Maintain" access on the other hand allows users to not only view the data but also enter or edit it.

When the District has too many staff that have "Maintain" level access to the SIS *Gradebook* module, it increases the risk of incorrect or unwanted data changes in one of the most sensitive data points in the SIS – student grades. It can also increase the management, control, and auditing workload for campuses.

According to the Data and Information Systems group, campus-wide "Maintain" level access to the SIS *Gradebook* modules is one of the critical user access combinations that should be given to one or two staff, including those who are either assistant principal (AP) or campus instructional specialists (CIS) positions on each campus, since this type of user access combination allows users to enter and edit student grades for an entire campus.

The Campus Technology Support Specialist (CTSS), which is usually the position responsible for troubleshooting *Gradebook* issues, should be the only other position besides the AP or CIS to have access to the SIS *Gradebook* module. However, unlike the other positions, the CTSS does not need the "Maintain" level access – the CTSS should have "View Only" level access.

Table 5 shows the number of staff who have access to the SIS Gradebook module with "Maintain" level access.

Table 5: The number of staff who have "Maintain" level access to the SIS *Gradebook*

School Name	School Type	# of Staff
Robert M Shoemaker High School	High	9
C E Ellison High School	High	7
Killeen High School	High	6
Skipcha Elementary	Elementary	5
Ira Cross Jr Elementary	Elementary	5
Eastern Hills Middle	Middle	5
Bellaire Elementary	Elementary	5
Harker Heights High School	High	4
Palo Alto Middle	Middle	4
Dr Joseph A Fowler Elementary	Elementary	4
Brookhaven Elementary	Elementary	3
Nolan Middle	Middle	3
Haynes Elementary	Elementary	3
Maude Moore Woo Elementary	Elementary	3
Peebles Elementary	Elementary	3
Hay Branch Elementary	Elementary	3
Killeen ISD Early College High School	High	2
Iduma Elementary	Elementary	2
Manor Middle	Middle	2
Sugar Loaf Elementary	Elementary	2
Timber Ridge Elementary	Elementary	2

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School Name	School Type	# of Staff
West Ward Elementary	Elementary	2
Meadows Elementary	Elementary	2
Nolanville Elementary	Elementary	2
Gateway Middle	Specialized	2
Liberty Hill Middle	Middle	2
Oveta Culp Hobby Elementary	Elementary	2
Live Oak Ridge Middle	Middle	2
Saegert Elementary	Elementary	2
Union Grove Middle	Middle	2
Audie Murphy Middle	Middle	2
Venable Village Elementary	Elementary	2
Alice W Douse Elementary	Elementary	2
Trimmier Elementary	Elementary	2
Montague Village Elementary	Elementary	2
Willow Springs Elementary	Elementary	2
Richard E Cavazos Elementary	Elementary	1
Clarke Elementary	Elementary	1
Carrer Center	Specialized	1
Pershing Park Elementary	Elementary	1
Cedar Valley Elementary	Elementary	1
Clifton Park Elementary	Elementary	1
Charles E Patterson Middle	Middle	1
Mountain View Elementary	Elementary	1
Roy J Smith Middle	Middle	1
Reeces Creek Elementary	Elementary	1
Maxdale Elementary	Elementary	1
Clear Creek Elementary	Elementary	1
Harker Heights Elementary	Elementary	0
Rancier Middle	Middle	0
Gateway High School	Specialized	0
Pathways Academic Campus	Specialized	0
Metroplex School	Specialized	0
El Alter Learning Center	Specialized	0
Total		**124**

Source: Killeen ISD SIS *Gradebook* User Access Report, 2019

The number of staff who have "Maintain" level access to the SIS *Gradebook* among campuses vary from zero (0) to nine (9).

There are ten different positions, other than AP or CIS positions, that have this type of access to the SIS *Gradebook*. The responsibilities and duties of these positions should not require them to have "Maintain" level access to the SIS *Gradebook*.

Table 6 shows all the positions that have "Maintain" level access to the SIS *Gradebook*.

Table 6: Positions that have "Maintain" level access to the SIS *Gradebook*

Position	# of Staff
CIS	45
AP	38
CTSS	15
Principal	10
Specialist	5
Counselor	4
Attendance Officer	2
Secretary	1
AVID Coordinator	1
Campus Facilitator	1
Special Education Facilitator	1
Curriculum Director	1
Total	**124**

Source: Killeen ISD SIS Gradebook User Access Report, 2019

Recommendation 4: Limit the positions with "Maintain" level access to the SIS *Gradebook* module.

The District should develop written guidelines for campuses about which positions are suitable to have this type of access. Once the guidelines are developed, the Technology Department can consult these guidelines when issuing user access to staff. The Data and Information Systems group should work with the District leadership on reducing the number of existing positions that have "Maintain" level access to the SIS *Gradebook*. The group can generate a report periodically to be reviewed by a designated person in District leadership. Based on the result of this report, the District leadership and campuses should work together to reduce the staff numbers with "Maintain" level access to the SIS *Gradebook*.

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C – Attendance

Texas school districts are required to take and submit student attendance data through PEIMS. Accurate and timely attendance taking is one of the most important components of the PEIMS data collection activities because it directly affects state funding.

The Texas Education Agency (TEA) *Student Attendance Accounting Handbook* (SAAH) guides school districts in taking and reporting attendance data. SAAH Sections 2 and 3 provide detailed information on automated attendance accounting system requirements and general attendance taking rules, which are relevant to this Section of the audit report.

According to Section 3.6.2, which is the *Time of Day for Attendance Taking*, "each campus must determine attendance for all grades by the absences recorded at the one particular point in time the campus has chosen for roll to be taken (a snapshot, for example, 9:45 a.m.). The selected time may vary from campus to campus within your district. Once a time has been selected, a campus must not change it during the school year."

In addition to establishing a time of the day for attendance taking, SAAH Section 2.2.3 describes the impact of electronic systems, i.e. paperless Student Information System requirements. Most electronic Student Information Systems count all students as 'Present' unless marked by the teacher. However, one of the key features required for this system is that the system must provide "positive confirmation for 100 percent of attendance." In the event that all students are in attendance on a given day, the teacher must click 'All Present' to properly report attendance.

Attendance Process

Killeen ISD uses *eSchoolPLUS*, the Student Information System (SIS), to capture and report attendance. The system counts students as 'Present' unless marked by the teacher. The system also has the capability to allow teachers to click a *Save* button for 'All Present' to confirm 100 percent attendance.

The established attendance time at Killeen ISD is the second hour of school daily across the District. This means second period for high schools, third period for middle schools, and attendance (ATT) period for elementary schools. The attendance periods at alternative schools vary by building.

Elementary school teachers are required to take attendance daily in the ATT period. This period is also called the PEIMS 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 third or second period is considered the PEIMS period for middle and high schools, respectively.

All teachers and long-term substitutes have a unique user name and password to log into *eSchoolPLUS* to take attendance. It is important that teachers log into *eSchoolPLUS* and click the *Submit* button 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. Killeen ISD teachers are instructed to take class roll each day at the established time and are given a window of 15 minutes to complete the task online. The *eSchoolPLUS* system maintains logs of all teachers logging in and taking attendance. These records make it possible to determine whether teachers are, in fact, taking attendance daily.

Killeen ISD teachers use the Teacher Access Center (TAC) in *eSchoolPLUS* to take attendance. *eSchoolPLUS* provides three options to lock attendance so teachers cannot update attendance or take attendance outside the period. The first option is to lock all attendance in general. In this option, teachers cannot edit or take attendance once the period time is over. The second option is to lock only the official PEIMS period. The last option is no lock out. Killeen ISD *eSchoolPLUS* is currently configured with the last option. As a result, teachers can take attendance anytime and make edits anytime.

In addition to the teachers, campus attendance clerks play a key role in attendance-related activities. Campus attendance clerks run a report called "missing submissions" 15 minutes after the attendance time to identify the teachers that did not take attendance. They call or send messages to remind teachers to take attendance. Attendance clerks also notify campus leadership on attendance-related issues if they are unable to resolve them. Campus attendance clerks collect documents and information such as doctor notes, parent notes, campus sign-in sheets, discipline status including out-of-school suspension, and any other documentation that may affect student attendance, and the clerks enter them into the system. Attendance clerks are also responsible for entering any paper attendance rosters for that day, which are primarily used by short-term substitute teachers.

Figure 9 provides a schematic overview of the attendance process.

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Figure 9: Regular Attendance Process
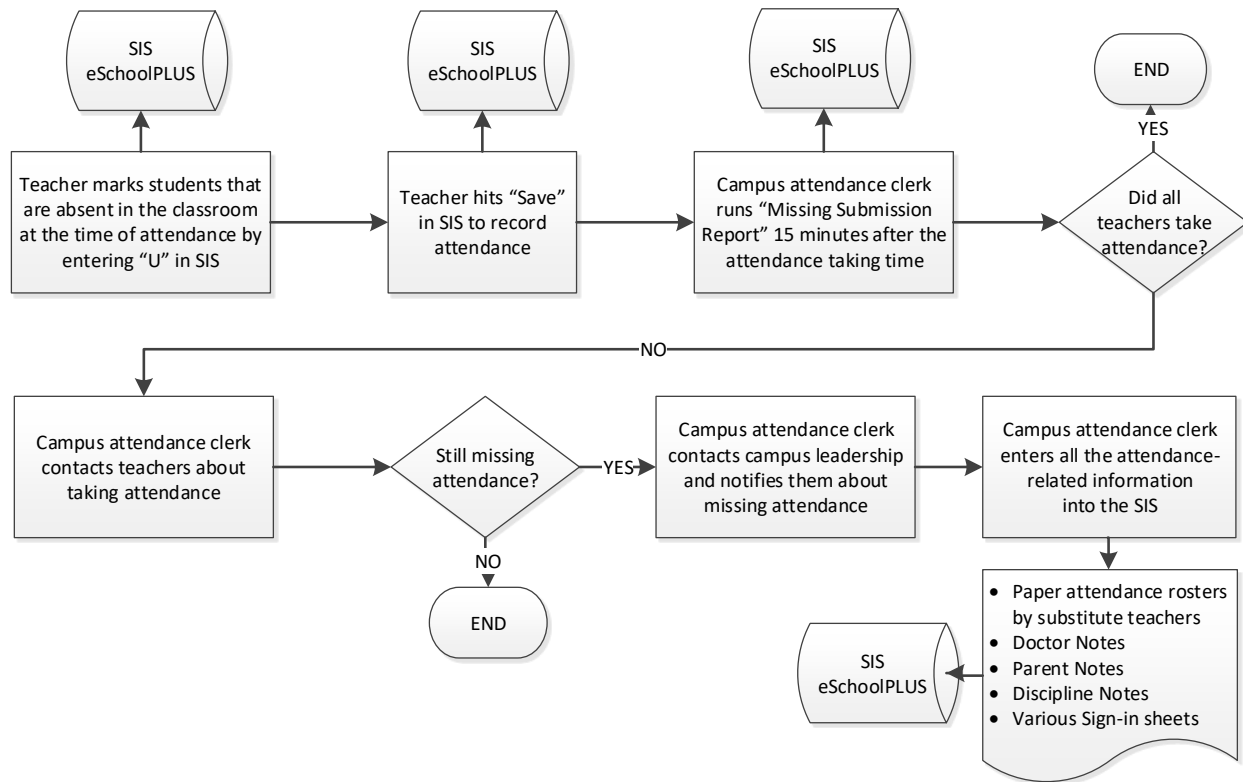
Source: Gibson Consulting Group, created from interviews with PEIMS Group, 2019

Analysis and Testing

In order to test if Killeen ISD 2018-19 attendance records comply with the TEA regulations specific to attendance taking, the audit team conducted two separate data analyses. The first analysis was to determine what percentage of attendance was taken on-time, and the second analysis was to quantify the occurrence of teachers not taking attendance.

On-Time Attendance

The audit team, with the assistance of the District SIS team, performed an on-time attendance data analysis for all Killeen ISD campuses in the 2018-19 school year. Although data was provided to analyze every school day in the 2018-19 school year, based on the District calendar, the attendance data for the following days was removed from the analysis:

- First and last day of school
- Early release days
- Testing days

This allowed the analysis not to be influenced by days with special circumstances. The audit team also excluded special schools and Early College High School from this analysis due to the special attendance times and unique attendance circumstances of these campuses.

The District SIS team provided the beginning time of the PEIMS period for every campus for each day based on the school start times, as well as the actual time that assigned teachers took attendance. The audit team used this information to calculate the time difference between the start of the PEIMS period and the actual time that attendance was taken. As discussed in the Regulatory Framework and Process Framework Sections, attendance must be taken within 15 minutes of the PEIMS period snapshot time; otherwise, TEA may not accept attendance records. For purposes of audit testing, the audit team applied a 120-minute window after the PEIMS period snapshot time to be considered late. A two-hour window is used to minimize the impact of system and personnel-related delays to attendance taking. Finally, the audit team included attendance occurrences that were taken before the PEIMS period snapshot time as part of the group of attendance that was not taken on-time. In those cases, the teachers recorded attendance for the PEIMS period before the PEIMS period had started. In order to calculate the on-time attendance percentage for each campus, the audit team divided early and 120 minutes late attendance occurrences by total attendance occurrences.

Table 7 shows an analysis of on-time attendance within Killeen ISD schools, the percentage of attendance taken on-time in green, and the percentage of early and 120 minutes late attendance in red.

The results of the on-time attendance data analysis showed that overall, based on the parameters defined above, Killeen ISD took attendance on-time 82.1 percent of the time. Attendance was taken either early or later than 2 hours from the official PEIMS attendance time 17.9 percent of the time. The on-time attendance percentage of secondary schools is lower than elementary schools. All high schools, five middle schools, and four elementary schools have on-time attendance lower than 80 percent. The on-time attendance percentage went down even further to 49 percent when the audit team changed the time difference between the PEIMS period attendance snapshot time to attendance taken from 2 hours to 30 minutes later than the official PEIMS attendance time.

Table 7: On-Time Attendance Data Analysis of Killeen ISD Schools in 2018-19

High Schools	Percent Taken On-Time	Percent Taken Early and 2 hrs or more Late
007 Harker Heights High	67.0%	33.0%
008 Robert M Shoemaker High	69.7%	30.3%
002 C E Ellison High	72.2%	27.8%
001 Killeen High	74.0%	26.0%
Middle Schools	**Percent Taken On-Time**	**Percent Taken Early and 2 hrs or more Late**
053 Roy J Smith Middle	62.9%	37.1%
048 Palo Alto Middle	71.5%	28.5%
051 Union Grove Middle	75.2%	24.8%
054 Charles E Patterson Middle	76.6%	23.4%
042 Nolan Middle	76.7%	23.3%
052 Audie Murphy Middle	76.7%	23.3%
044 Manor Middle	81.3%	18.7%
050 Live Oak Ridge Middle	85.4%	14.6%
046 Eastern Hills Middle	85.9%	14.1%
049 Liberty Hill Middle	87.0%	13.0%
043 Rancier Middle	91.8%	8.2%
Elementary Schools	**Percent Taken On-Time**	**Percent Taken Early and 2 hrs or more Late**
127 Trimmier Elementary	68.3%	31.8%
128 Montague Village Elementary	75.9%	24.1%
109 Peebles Elementary	78.8%	21.2%
116 Clarke Elementary	79.8%	20.2%
125 Brookhaven Elementary	82.7%	17.3%
126 Venable Village Elementary	83.8%	16.2%
135 Saegert Elementary	84.3%	15.7%
131 Iduma Elementary	87.3%	12.7%
132 Oveta Culp Hobby Elementary	88.6%	11.4%
112 West Ward Elementary	89.2%	10.8%
113 Bellaire Elementary	89.2%	10.8%
122 Reeces Creek Elementary	89.5%	10.5%
120 Willow Springs Elementary	89.8%	10.2%
129 Maxdale Elementary	90.3%	9.7%
121 Mountain View Elementary	90.5%	9.5%
108 Meadows Elementary	90.9%	9.1%
137 Richard E Cavazos Elementary	90.9%	9.1%
139 Dr Joseph A Fowler Elementary	92.1%	7.9%
102 Clifton Park Elementary	92.3%	7.7%
133 Timber Ridge Elementary	93.2%	6.8%
119 Hay Branch Elementary	93.6%	6.4%
138 Haynes Elementary	93.7%	6.3%
140 Alice W Douse Elementary	93.7%	6.3%
115 Nolanville Elementary	94.3%	5.7%
105 Harker Heights Elementary	95.0%	5.0%
111 Sugar Loaf Elementary	95.6%	4.4%
130 Ira Cross Jr Elementary	95.7%	4.3%
136 Skipcha Elementary	96.3%	3.7%
124 Cedar Valley Elementary	97.5%	2.5%
110 Pershing Park Elementary	98.0%	2.0%
123 Clear Creek Elementary	99.1%	0.9%
103 East Ward Elementary	99.3%	0.7%
Total	**82.1%**	**17.9%**

Source: Killeen ISD PEIMS period attendance time report aggregated and analyzed by Gibson Consulting Group, 2019

Not-Recorded Attendance

As described in the Regulatory Framework Section, many electronic Student Information Systems automatically count all students 'Present' for each attendance period unless the teacher or authorized person marks a student absent. This creates a risk of falsely counting all students for that particular period 'All Present' if there is no action by the teacher. The audit team, along with the assistance of the District SIS team, analyzed the 2018-19 attendance data to identify the number of occurrences where the teacher assigned to the PEIMS period did not take attendance. The audit team also had to account for the times a substitute teacher took paper attendance on behalf of an assigned teacher, so the District SIS team provided us with this data from the District Substitute System for the assigned teachers for the 2018-19 school year. In order to find out how many occurrences the teacher did not take attendance for each campus, the audit team added the occurrences that the teachers took attendance plus the occurrences of attendance taken by substitute teachers, then subtracted these from the total instances where attendance was taken during the PEIMS period for each campus. Similar to the "On-Time Attendance Data Analysis," attendance data was removed for the following days:

- ▪ First and last day of school
- ▪ Early release days
- ▪ Testing days

The audit team also excluded special schools and Early College High School in this analysis due to the special attendance times and unique attendance circumstances of these campuses.

The below Table 8 shows the results of the "Not-Recorded Attendance Data Analysis" by campus. In 2018-19, the District data shows that teachers did not record attendance 3.3 percent of the time. This 3.3 percent corresponds to a total of 13,294 occurrences of teachers not taking attendance in the PEIMS period.

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Table 8: Not-Recorded Attendance Data Analysis of Killeen ISD Schools in 2018-19

High Schools	Percent attendance recorded	Percent not recorded attendance
001 Killeen High	94.8%	5.2%
002 C E Ellison High	95.5%	4.5%
008 Robert M Shoemaker High	97.8%	2.2%
007 Harker Heights High	98.7%	1.3%
Middle Schools	**Percent attendance recorded**	**Percent not recorded attendance**
051 Union Grove Middle	92.4%	7.6%
050 Live Oak Ridge Middle	93.9%	6.1%
046 Eastern Hills Middle	94.3%	5.7%
054 Charles E Patterson Middle	95.0%	5.0%
048 Palo Alto Middle	95.3%	4.7%
042 Nolan Middle	95.9%	4.1%
052 Audie Murphy Middle	96.6%	3.4%
049 Liberty Hill Middle	97.8%	2.2%
053 Roy J Smith Middle	99.8%	0.2%
043 Rancier Middle	100.0%	0.0%
044 Manor Middle	100.0%	0.0%
Elementary Schools	**Percent attendance recorded**	**Percent not recorded attendance**
110 Pershing Park Elementary	87.1%	12.9%
103 East Ward Elementary	87.3%	12.7%
116 Clarke Elementary	92.4%	7.6%
127 Trimmier Elementary	92.8%	7.2%
108 Meadows Elementary	92.8%	7.2%
129 Maxdale Elementary	93.7%	6.3%
122 Reeces Creek Elementary	94.1%	5.9%
120 Willow Springs Elementary	94.8%	5.2%
125 Brookhaven Elementary	95.1%	4.9%
112 West Ward Elementary	96.1%	3.9%
135 Saegert Elementary	96.5%	3.5%
126 Venable Village Elementary	96.5%	3.5%
123 Clear Creek Elementary	96.6%	3.4%
128 Montague Village Elementary	96.6%	3.4%
119 Hay Branch Elementary	97.1%	2.9%
105 Harker Heights Elementary	97.5%	2.5%
124 Cedar Valley Elementary	97.7%	2.3%
102 Clifton Park Elementary	97.7%	2.3%
130 Ira Cross Jr Elementary	98.2%	1.8%
140 Alice W Douse Elementary	98.2%	1.8%
131 Iduma Elementary	98.5%	1.5%
111 Sugar Loaf Elementary	98.5%	1.5%
113 Bellaire Elementary	98.7%	1.3%
121 Mountain View Elementary	98.9%	1.1%
139 Dr Joseph A Fowler Elementary	99.1%	0.9%
132 Oveta Culp Hobby Elementary	99.4%	0.6%
133 Timber Ridge Elementary	99.6%	0.4%
109 Peebles Elementary	99.6%	0.4%
138 Haynes Elementary	99.6%	0.4%
137 Richard E Cavazos Elementary	99.7%	0.3%
115 Nolanville Elementary	99.9%	0.1%
136 Skipcha Elementary	100.0%	0.0%
Total	**96.7%**	**3.3%**

Source: Killeen ISD PEIMS period attendance time report aggregated and analyzed by Gibson Consulting Group 2019

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Findings and Recommendations

Finding 5: *Killeen ISD is not consistently enforcing requirements for taking attendance.*

The results of Gibson's data analysis are consistent with the interviews, focus groups, and campus site visit observations. At some schools, campus leadership positions rely on campus attendance clerks to monitor and enforce accurate and on-time attendance taking. However, these clerical positions do not have the authority to hold teachers accountable. The lack of information reported at the District-level (similar to the graphical information above) limits the ability of District leadership to hold school principals accountable for accurate and on-time attendance taking. This, in turn, can expose the District to financial risks.

If a teacher does not click the *Save* button in *eSchoolPLUS* to positively confirm the attendance in his/her class, or does not take attendance within the prescribed time after the PEIMS period snapshot, the District will not have original documentation to support the attendance data submitted through PEIMS. TEA can retain 100 percent of the District's FSP allotment for inappropriately documented attendance for the school year for which records have not been maintained.[3]

Recommendation 5: Monitor and enforce attendance reporting requirements.

The audit team identified a best practice in this area during one of the campus site visits, whereby the campus leadership included on-time and accurate attendance taking as part of the overall evaluation of their staff. This approach contributed to designated, uninterrupted time for the campus attendance clerk during the PEIMS period so that attendance-related tasks could be completed timely and accurately. These accountability mechanisms led to significantly higher compliance with attendance reporting requirements.

Killeen ISD needs to adopt the approach that is taken at this school district-wide. To support accountability, the SIS team should create reports similar to the data analysis reports above for on-time and not-recorded attendance for campus and District leadership to review, and act on exceptions.

Finding 6: *The current configuration of eSchoolPLUS does not limit the teacher's ability to submit attendance outside of the official attendance times.*

As described in the Procedural Framework Section, Killeen ISD's *eSchoolPLUS* is currently configured with the "no-lock option," which means teachers can take attendance at any time, and make edits to attendance at any time. While this option gives the ultimate flexibility to teachers, it represents a major control weakness by allowing attendance taking outside the TEA window. This is especially significant if attendance that is not taken on-time during the PEIMS period, which directly affects state funding.

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[3] 2018-19 Student Attendance Accounting Handbook (SAAH) Section 2.1.

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Recommendation 6: Configure *eSchoolPLUS* to limit teacher's ability to enter attendance for the PEIMS period outside the official time.

The SIS team can work with the *eSchoolPLUS* vendor to configure the system so that the PEIMS period will be locked. This configuration will prevent teachers from taking, editing, or submitting attendance outside of the PEIMS period.

Finding 7: *Attendance taking procedures for field trips and extracurricular activities vary across campus and pose compliance risks.*

The District PEIMS group has several written procedures in the area of attendance including regular attendance, attendance during testing, and attendance for students participating in the dual credit program. However, there is not a written procedure for taking attendance during field trips or extracurricular activities. The audit team found varying processes among campuses regarding attendance taken during field trips or extracurricular activities. These varying processes include the following:

- Some campus attendance clerks print paper class rosters and ask teachers to take attendance for the upcoming periods that the students will be gone as the students are getting on the buses to leave the campus.

- Some campus attendance clerks ask teachers to take attendance at the attendance time during the field trip or extracurricular activity, and call in the absent students via phone or two-way radio.

- Some campus attendance clerks allow teachers to take attendance in advance of the periods that the students will be gone and ask the teachers to report any absentees or changes after the trip or activity.

- Other teachers took attendance after the trip or activity.

Field trips and extracurricular activities follow the same attendance taking requirements described previously in this Section. Inconsistencies in attendance taking procedures for field trips and extracurricular activities can cause compliance issues for the District and confuse campus staff.

Recommendation 7: Develop an attendance taking procedure for field trips and extracurricular events that meets TEA requirements.

Teachers should take attendance at the designated attendance time during field trips or extracurricular activities. The District PEIMS group should develop a procedure reflecting this requirement. Once the procedure is created, the Department should train the campus attendance clerks so that campuses apply the same procedure throughout the District.

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D – English Language Learners

The District receives an additional 10 percent of the normal per student state allotment for all students receiving Bilingual or ESL services. In addition, the District receives federal funding for each ELL student through Title III Part A of the Every Student Succeeds Act (ESSA). Accordingly, PEIMS reporting of ELL students has a direct impact on funding.

Killeen ISD has experienced growth in the number of English Language Learners (ELL) over the past five years, until 2019-20 when it experienced its first decline. Between 2015-16 and 2018-19, the number of ELL students increased from 4,000 to 4,716, an increase of 17.9 percent. In 2019-20, however, the District saw a 2.2 percent decline in ELL students. Figure 10 presents the number of ELL students by ELL program categories in Killeen ISD since 2015-16.

Figure 10: Killeen ISD ELL Student Count, 2015-16 to 2019-20 (Fall Submission 2019-20)
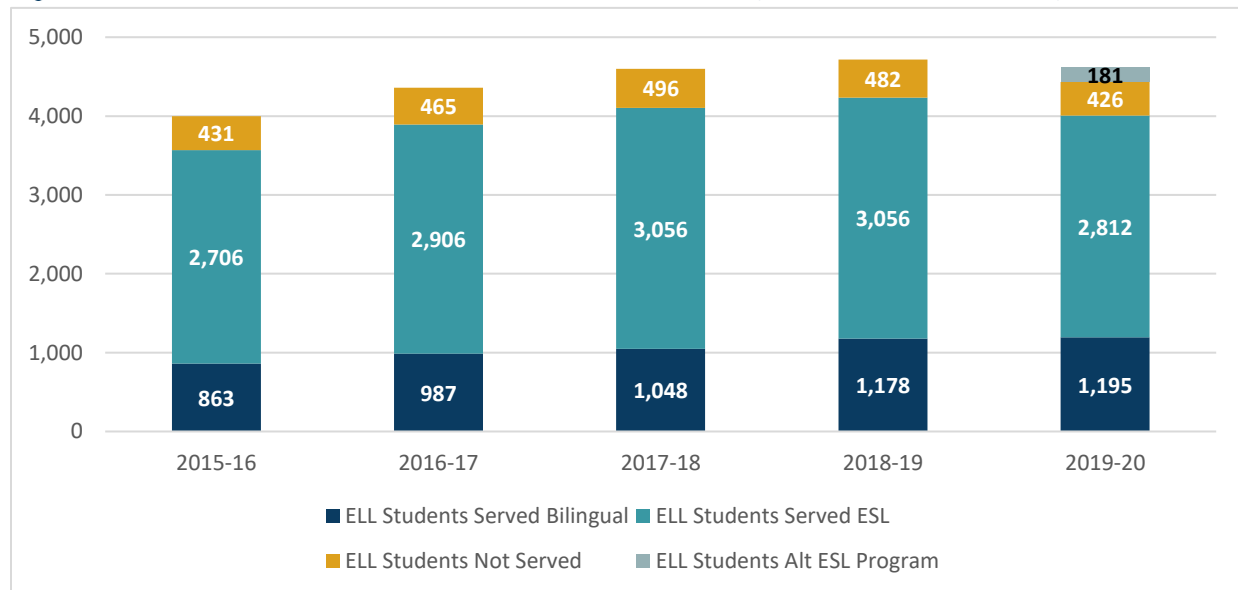
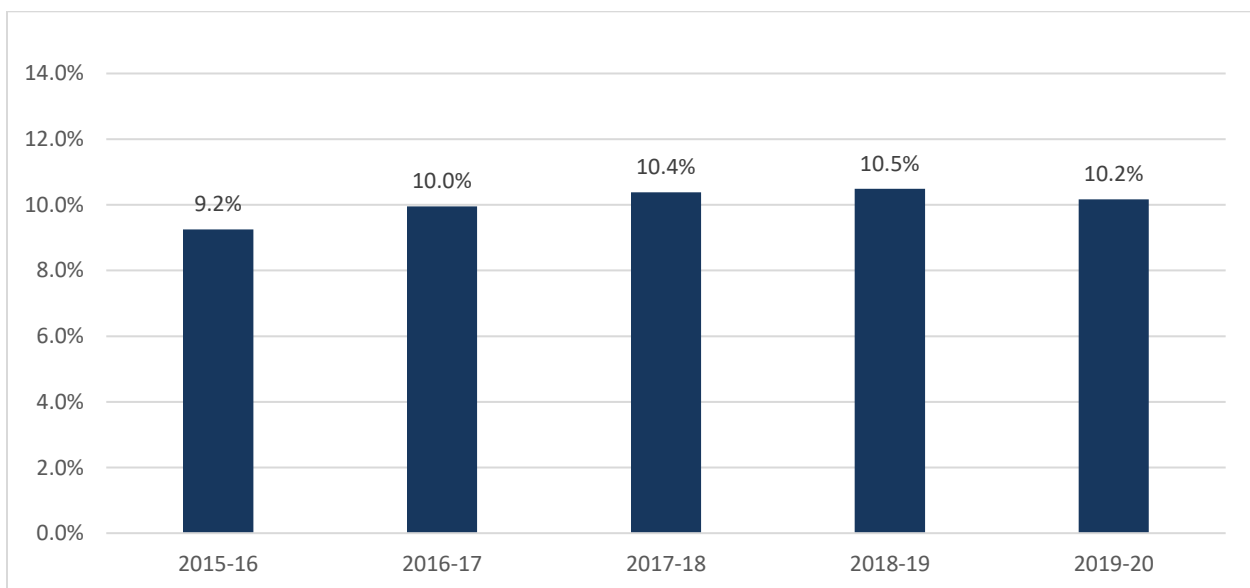Source: *OnData Suite* Report, *Data Validation Monitoring - Performance Monitoring Analysis System: ELL Students All Campuses*

The year-to-year percentage change in ELL students has steadily declined over the past five years, while total enrollment growth has remained fairly constant. Figure 11 shows the year-over-year percent change in ELL students and total enrollment in Killeen ISD from 2016-17 to 2019-20.

Figure 11: Annual Percent Change in ELL Students and Total Enrollment, 2016-17 to 2019-20
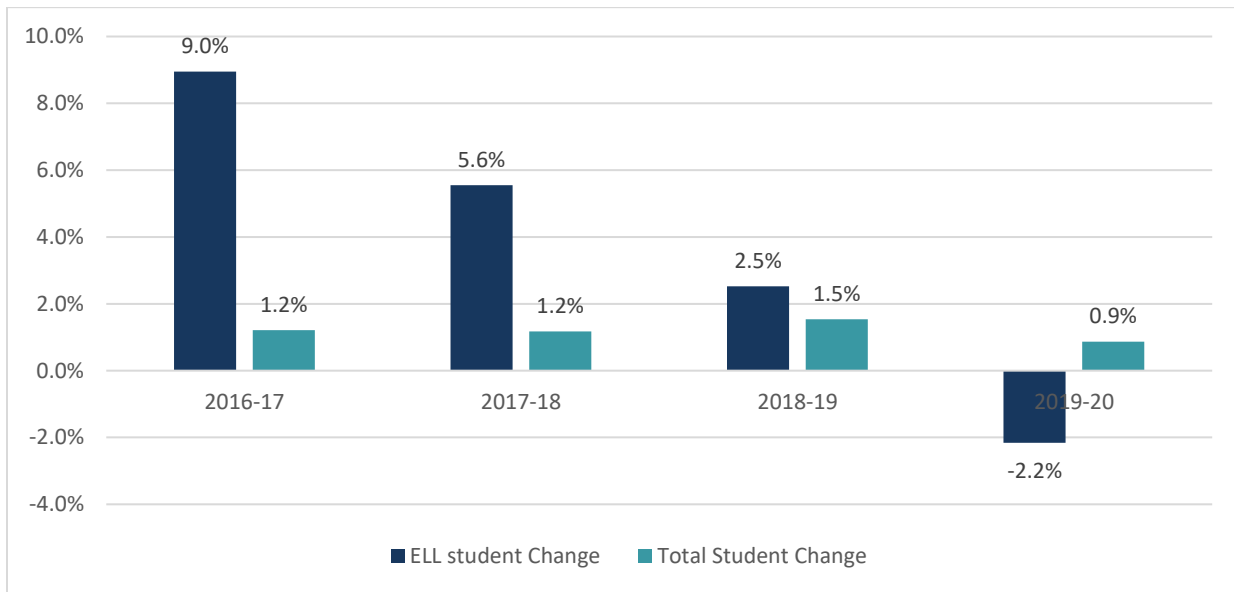
Source: *OnData Suite* Report, *Data Validation Monitoring - Performance Monitoring Analysis System: ELL students All Campuses*

Although the pace of ELL student growth slowed over the past five years, the percentage of ELL students to total enrollment in Killeen ISD has remained between 10 percent and 10.5 percent for the most recent four years. Figure 12 shows the percent of Killeen ISD ELL students to total enrollment from 2015-16 to 2019-20.

Figure 12: Percentage of ELL Students to Total Enrollment, 2015-16 to 2019-20

Source: *OnData Suite* Report, *Data Validation Monitoring - Performance Monitoring Analysis System: ELL students All Campuses*

Regulatory Guidance

Section 6 of the Texas Education Agency *Student Attendance Accounting Handbook* describes the Bilingual/English as a Second Language (ESL) program as it relates to the processes and reporting requirements of the students who are served by those programs. TEA uses the term "English Language Learners (ELL)" for those students who are participating in these programs. Sub-Section 6.2 of the handbook explains the procedures for identifying a student as ELL and enrolling the ELL student in the Bilingual or ESL program. It is important to note that this procedure must be completed within the first four weeks of the student's initial enrollment. Below is the list of steps that the District must follow in the ELL student identification process:

- **Obtain the Home Language Survey (HLS):** Upon enrollment, the student's parent(s) or legal guardian(s) complete an HLS to indicate the language spoken in the home most of the time. If the language on the survey is anything other than English, the District must proceed with the ELL student identification process.

- **Assess the students' English learning proficiency with a test:** Qualified District personnel provide the student with an English language proficiency test to measure the English proficiency of the student.

- **Review the proficiency test results:** The Language Proficiency Assessment Committee (LPAC) convenes to identify the student as an ELL or as English-proficient based on the results of the English language proficiency test. The LPAC may recommend placing the students who do not test as proficient in English in a Bilingual or ESL program.

- **Obtain parental or guardian approval:** The LPAC gives written notice to the students' parents or guardian informing them that the student has been classified as ELL, and requests approval in order to place the student in a Bilingual or ESL program. The District must obtain a completed parental/guardian approval form with the parent's/guardian's signature in order to enroll the student in a Bilingual or ESL program.

Once identified, students are able to attend the Bilingual or ESL program in the district. Each district is required to offer a Bilingual and/or ESL program for ELL students. In the elementary grades, a Bilingual program must be provided when there are 20 or more identified ELL students in the same grade level with the same primary language classification across the district. A district is not required to provide a Bilingual program beyond the elementary grades. Regardless of the number of ELL students, the district must provide an ESL program from Pre-K through twelfth grade.

Killeen ISD has two local policies – the EHBE Legal and EHBE Local – that directly and exclusively address ELL students and related programs. The District has other policies where ELL students and related services are addressed, along with other special program students.

The EHBE Legal Special Programs covers Bilingual Education/ESL in detail. Below lists some of the key areas from this policy.

Regarding District Responsibility:

- Identify English learners based on criteria established by the State;

- Provide Bilingual Education and ESL programs as integral parts of the general program;

- Seek appropriately certified teaching personnel to ensure that English learners are afforded full opportunity to master the essential knowledge and skills; and

- Assess achievement for essential knowledge and skills in accordance with Education Code Chapter 29 to ensure accountability for English learners and the schools that serve them.

Regarding Identification of ELL Students:

Within the first four weeks of the first day of school, the LPAC shall determine and report to the Board the number of ELL students on each campus and shall classify each student according to the language in which the student possesses primary proficiency.

The District shall administer only one Home Language Survey to each new student enrolling for the first time in a Texas public school in any grade from Pre-Kindergarten through Grade 12. The District shall require that the survey be signed by the student's parents if the student is in Pre-Kindergarten through Grade 8, or by the student if the student is in Grades 9 through 12. The original copy of the survey shall be kept in the student's permanent record.

If the response on the HLS indicates that a language other than English is used, the student shall be tested. Based on the test results the LPAC may classify a student as ELL. Within ten days of the LPAC's classification of a student as ELL, the LPAC shall give written notice to the student's parent.

The District shall notify the parent or legal guardian in English and in the parent or legal guardian's primary language that their child has been classified as an English learner and recommended for placement in the required Bilingual Education or ESL program. The entry or placement of a student in the Bilingual Education or ESL program must be approved in writing by the student's parent or legal guardian.

Regarding Bilingual and ESL Programs:

The District is required to offer a Bilingual Education or ESL program that provides each English learner the opportunity to be enrolled in the required program at his or her grade level. The District's Bilingual Education program shall comply with the program content and design requirements of Administrative Code 19.89.1210. The District shall provide for ongoing coordination between the ESL program and the regular educational program.

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A Bilingual Education program shall be a full-time program of dual-language instruction. An ESL program shall be an intensive program of instruction in English. English learners shall participate with their English-speaking peers in general education classes provided in subjects such as art, music, and physical education. The District must ensure students enrolled in the Bilingual or ESL program have a meaningful opportunity to participate with other students in all extracurricular activities.

Regarding Personnel:

Teachers assigned to a Bilingual Education program using one of the following program models must be appropriately certified in bilingual education:

- Transitional bilingual/early exit program model; or
- Transitional bilingual/late exit program model.

Teachers assigned to ESL programs must be appropriately certified for ESL.

Regarding Program Exit:

The District may transfer an ELL student out of a Bilingual Education or special language program for the first time or a subsequent time if the student is able to participate equally in a regular all-English instructional program. The District shall give written notification to the student's parent or legal guardian of a student's reclassification as English proficient and his or her exit from the Bilingual or ESL program, and acquire written approval from the parent or legal guardian.

ELL Reporting Process

The Killeen ISD ELL Department and campus staff work together in identifying, enrolling, and monitoring students who are ELL. The Department and campus staff use a software program called *SuccessED*, in addition to the District SIS *eSchoolPLUS*, to track ELL student activities. The District implemented *SuccessED* in 2017-18. While the campus registration clerks play a key role in ELL student activities by collecting and entering all HLS documentation into *eSchoolPLUS* and notifying the ELL teachers, the ELL teachers on campus are responsible for the majority of the administrative and instructional activities for ELL students. Among other things, ELL teachers assess the English language proficiency of the students whose HLS is not English; they coordinate and schedule the LPAC meeting; they communicate with the students' parents throughout the identification and enrollment process; they collect and store all required documentation; and, they provide instruction to ELL students.

The District ELL Department has one director, two specialists, and a secretary. These roles are not only responsible for Bilingual and ESL programs, but also for Immigrant programs (addressed in Section F of this report). While the ELL Department's main responsibility is to provide the instructional support and training to all ELL teachers and related staff, they are also involved in ELL-related data entry, data verification, and PEIMS reporting.

Analysis and Testing

The audit team conducted a series of analyses and audit tests to assess the procedures for PEIMS reporting of ELL students. These analyses, tests, and results are described below.

Analysis 1. Bilingual Students Enrolled in Non-Bilingual Campuses – The District offers bilingual services at four campuses: Harker Heights Elementary, Peebles Elementary, Pershing Park Elementary, and Trimmier Elementary. The previously listed campuses are the only campuses where a student should be coded as receiving bilingual services, as these are the only locations where bilingual programs exist in Killeen ISD. The audit team analyzed the entire population of students receiving bilingual services to determine if any campuses that do not have a bilingual program were recorded as providing bilingual services.

- **Analysis Approach**

  - Obtained a list of all students coded as receiving bilingual services as of October 26, 2018.

  - Sorted the list of students by campus.

  - Analyzed the data to validate that only the four campuses included above had bilingual students on the respective campus.

- **Analysis Results** – Three additional campuses reported students serviced by the Bilingual program. Figure 13 presents the results of the analysis.

Figure 13: Students Receiving Bilingual Services by Campus
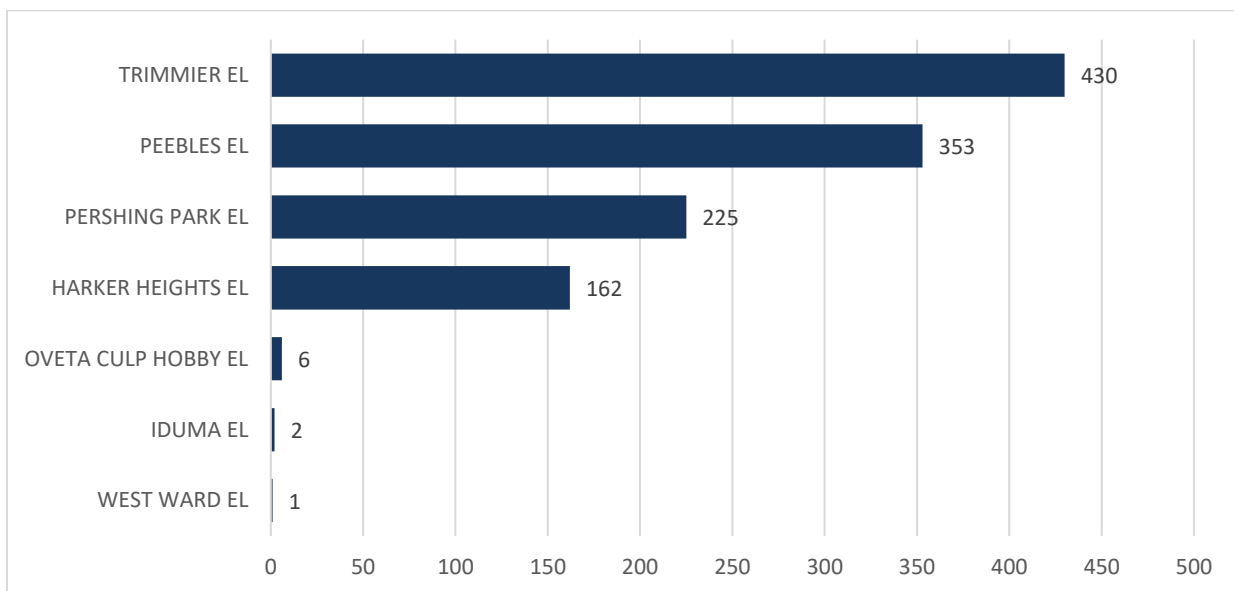
Source: Killeen ISD Fall PEIMS Submission Data

- As of October 26, 2018, 1,179 students were coded as receiving bilingual services.

- Out of the 1,179 students receiving bilingual services, nine students were coded as attending non-bilingual campuses (Iduma Elementary, Oveta Culp Hobby Elementary, and West Ward Elementary).

Test D.1. LPAC vs. Enrollment Lag Testing – The LPAC must convene within four school weeks from the date a Home Language Survey is received, as discussed in the Regulatory Framework Section earlier. The audit team designed a test to validate that the District performed an LPAC meeting within the legally obligated timeframe.

- **Test Approach**

  - Obtained a list of all students coded as receiving bilingual services as of October 26, 2018.

  - Extracted all students grade one or younger. The audit team wanted to focus this testing on the largest population of incoming students.

  - Randomly selected 15 students.

  - Obtained LPAC meeting rosters for each student.

  - Obtained Home Language Surveys for each student.

  - Calculated the lag between the Home Language Survey date to the LPAC meeting date per the roster.

  - Removed any weekends or school holidays from the lag to calculate, and adjusted the lag.

  - Compared the adjusted lag to the 20-school day requirement to validate that the LPAC meeting was held within 20 school days of receiving the Home Language Survey form **(Test 1)**.

- **Test Results –** Refer to Table 9 for the test results. "P" indicates that the sample passed the test; "F" indicates that the sample failed the test.

Table 9: Test D.1 Results

Sample	Grade Level	Home Language Survey Date	LPAC Date	Adjusted Lag	Test 1
1	KG	8/27/2018	9/17/2018	15	P
2	KG	8/28/2017	9/14/2017	14	P
3	PK	8/27/2018	9/21/2018	19	P
4	1	8/22/2016	9/12/2016	16	P
5	KG	8/28/2017	4/28/2017	-87	P

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Sample	Grade Level	Home Language Survey Date	LPAC Date	Adjusted Lag	Test 1
6	1	8/27/2018	9/21/2018	19	P
7	1	8/27/2018	9/21/2018	19	P
8	KG	8/28/2017	9/25/2017	21	F
9	KG	8/28/2017	4/28/2017	-87	P
10	KG	9/28/2017	9/18/2018	253	F
11	KG	8/28/2017	9/25/2017	21	F
12	PK	8/27/2018	9/21/2018	19	P
13	KG	8/27/2018	9/17/2018	15	P
14	PK	8/27/2018	9/17/2018	15	P
15	1	8/25/2016	9/12/2016	13	P

- Out of 15 samples, 12 LPAC meetings occurred within the 20 school-day requirement.

- Two LPAC meetings occurred prior to the Home Language Survey date. This resulted from a "Pre-Kindergarten Round-Up" event prior to the start of the 2017-18 school year. The dates are reasonable.

- Two samples had LPAC meetings occur one day after the 20 school-day window.

- One sample had an LPAC meeting occur in a subsequent school year. This student transferred campuses within Killeen ISD. The receiving campus incorrectly assumed that an LPAC meeting was held for the student at the sending campus in the prior year. The receiving campus performed an LPAC meeting in the subsequent year due to a change in programming.

Test D.2. Accuracy of PEIMS ELL Coding – There are many data elements for each ELL student, as discussed in the Regulatory Framework Section above. The audit team developed an audit test to validate the accuracy of the student language codes and the student's eligibility to receive bilingual or ESL services.

- **Test Approach**

  - Obtained a list of all students coded as receiving bilingual services as of October 26, 2018.

  - Randomly selected 20 students.

  - Obtained Home Language Surveys for each student.

  - Obtained assessment results for each student.

- Compared the language listed on the Home Language Survey to the language reported to PEIMS to validate that both agreed **(Test 1)**.

- Compared the assessment results to the Killeen ISD rubric to validate that the student qualified for Bilingual or ESL services **(Test 2)**.

▪ **Test Results –** Refer to Table 10 for the test results. "P" indicates that the sample passed the test.

Table 10: Test D.2 Results

Sample	Grade Level	Student Language	Placement	Test 1	Test 2
1	9	Spanish	English As A Second Language/Pull-Out	P	P
2	7	Spanish	English As A Second Language/Pull-Out	P	P
3	3	Spanish	Transitional Bilingual/Late Exit	P	P
4	1	Spanish	English As A Second Language/Pull-Out	P	P
5	8	Spanish	English As A Second Language/Pull-Out	P	P
6	5	Spanish	English As A Second Language/Pull-Out	P	P
7	3	Spanish	Transitional Bilingual/Late Exit	P	P
8	8	Spanish	English As A Second Language/Pull-Out	P	P
9	6	Spanish	English As A Second Language/Pull-Out	P	P
10	2	Vietnamese	English As A Second Language/Pull-Out	P	P
11	10	Spanish	English As A Second Language/Pull-Out	P	P
12	6	Spanish	English As A Second Language/Pull-Out	P	P
13	10	Spanish	English As A Second Language/Pull-Out	P	P
14	5	Spanish	Transitional Bilingual/Late Exit	P	P
15	11	Spanish	English As A Second Language/Pull-Out	P	P
16	12	Spanish	English As A Second Language/Pull-Out	P	P
17	5	Spanish	Transitional Bilingual/Late Exit	P	P
18	4	Spanish	Transitional Bilingual/Late Exit	P	P
19	7	Spanish	English As A Second Language/Pull-Out	P	P
20	PK	Urdu	English As A Second Language/Pull-Out	P	P

- All samples had student languages listed on the Home Language Survey that agreed to the language reported to TEA.

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- All samples had assessment results that qualified the student for either Bilingual or ESL services.

Test D.3. Accuracy of PEIMS Program Coding – Each student who is coded as being of limited English proficiency receives bilingual services, ESL services, or no services due to parent denial. The audit team developed an audit test to validate that the services the student is required to receive, based on PEIMS coding, are being provided to the student.

- **Test Approach**

  - Obtained a list of all students coded as receiving bilingual services as of October 26, 2018.

  - Randomly selected 10 students.

  - Obtained transcripts for each student.

  - For Bilingual students, inspected transcript to validate that the student was enrolled in a bilingual class.

  - For ESL students, inspected the student's teacher to validate that the teacher was ESL certified.

- **Test Results** – Refer to Table 11 for test results. "P" indicates that the sample passed the test; "F" indicates that the sample failed the test.

Table 11: Test D.3 Results

Sample	Grade Level	Student Language	Placement	Test
1	10	Spanish	English As A Second Language/Pull-Out	P
2	6	Spanish	English As A Second Language/Pull-Out	P
3	10	Spanish	English As A Second Language/Pull-Out	P
4	5	Spanish	Transitional Bilingual/Late Exit	P
5	11	Spanish	English As A Second Language/Pull-Out	P
6	12	Spanish	English As A Second Language/Pull-Out	P
7	5	Spanish	Transitional Bilingual/Late Exit	P
8	4	Spanish	Transitional Bilingual/Late Exit	P
9	7	Spanish	English As A Second Language/Pull-Out	P
10	PK	Urdu	English As A Second Language/Pull-Out	F

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- – Out of 10 samples, nine students had sufficient evidence proving the service provided to them.

- – One student, who was receiving ESL services, did not have a teacher that was ESL certified, thereby not qualifying for the service.

Findings and Recommendations

Finding 8: *The District's ELL student identification and coding process is inefficient.*

Figure 14 provides a schematic overview of the current ELL student identification and coding process. Since there are multiple processes covered in this schematic, the audit team divided it into three Sections. The process steps in Section A include identifying and testing the student that may qualify for ELL services. The campus registration clerk uses the HLS results to notify the campus ELL teacher of students who may qualify for ELL services. The campus ELL teacher tests these students for English proficiency. Students who are not proficient based on this test are contacted for ELL-related services.

Section B describes the process steps involving convening the LPAC committee and finalizing the ELL services that the student will potentially receive. The campus ELL teacher schedules the LPAC committee meeting, where the members of the committee determine the appropriate ELL services for the student. The campus ELL teacher also notifies and asks for written approval from students' parents for the proposed ELL services.

Section C describes the process for documenting and coding the identified students in the District SIS, *eSchoolPLUS* and *SuccessED*, with their appropriate ELL service. The campus ELL teacher not only creates a paper folder called the LPAC folder for each identified student with all their required documentation, but also scans these documents to *SuccessED*. The District ELL Department uses the scanned documents in *SuccessED* to determine and enter the appropriate PEIMS codes into *eSchoolPLUS*. Orange boxes in Figure 14 represent the process steps that the audit team believes can be eliminated, automated, or improved using existing systems and staff in the ELL student identification and coding process.

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Figure 14: ELL Student Identification and Coding Process Map (As-Is)
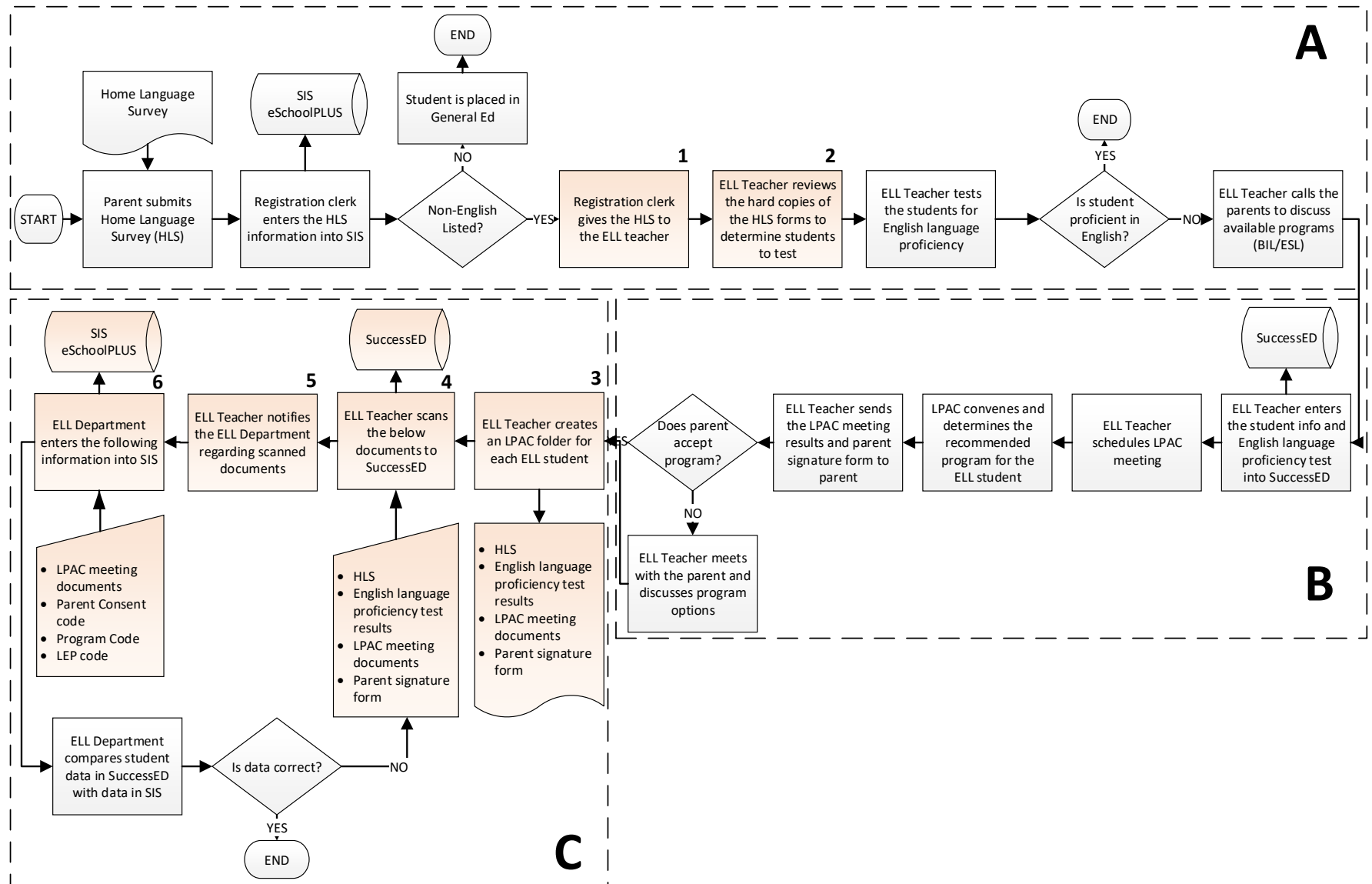
Source: Gibson Consulting Group, created from interviews with the ELL Department Coordinators, 2019

Campus registration clerks not only enter the HLS information into *eSchoolPLUS* during the registration process, but they also make copies of the HLS if the language is anything other than English, and send this information to the ELL teacher. Based on the information collected during interviews, focus groups, and campus site visits, the majority of the ELL teachers rely on the registration clerks to either notify them via email or provide them with the HLS to start the ELL student identification process – even though the HLS information is available electronically in *eSchoolPLUS* after the registration clerk enters it (orange boxes 1 and 2 in Figure 14). Most ELL teachers do not have *eSchoolPLUS* access, or have access to the *eSchoolPLUS* reporting tool – *SQL Server Reporting Services* (SSRS) – to be able to run a report periodically to identify students that register on the HLS with a language other than English. If the registration clerk fails to notify the ELL teacher about a non-English HLS, there is a possibility that the ELL teacher will not know about the student and subsequently does not start the ELL student identification process.

When the ELL Department acquired the software *SuccessED* for ELL-related services in 2017-18, they initially used the system mostly as a document storage system. The Department requested campus ELL teachers and other personnel that are involved with the ELL students to scan into the *SuccessED* system all ELL program documents that are essential or required. ELL teachers were asked to scan not only all the documents belonging to the newly identified ELL students that year, but also scan all of the historical documents of existing ELL students. The documents that they are asked to scan include the following:

- HLS
- English language proficiency test results
- Initial and ongoing LPAC meeting roster and documents
- Parent signature form
- All ELL student testing documents

The audit team found that not all campuses completed the scanning process. While some campuses have scanned all required documents, others campuses scan current documents but have not completed the scan of historical documents. Since not all historical ELL documents are scanned into *SuccessED*, and not all ELL teachers have access to *eSchoolPLUS* and its reporting tools, the ELL teachers have to rely heavily on the paper documents which are located in hard copy "LPAC folders" for compliance, student identification, and ELL-related program and service delivery (orange boxes 3 and 4 in Figure 14).

The paper LPAC folder, which includes all of the documents listed above, are generally kept separate from the student's permanent folder, in locked cabinets that are with ELL teachers. However, this practice of keeping LPAC folders separate from the student permanent folders is not consistent among all campuses.

During campus site visits and focus groups, many middle and high school ELL teachers indicated that they are not receiving the physical LPAC folders timely from previous schools for the upcoming ELL students so they can identify their ELL student population and have access to their program level information. Some told the audit team that they have to create new folders for the students because they never receive their

existing LPAC folders. The delay of not receiving LPAC folders may cause interruption and delays on campuses to provide ELL services to students that need these services.

Although *SuccessED* is an ELL student management system, the ELL Department and campuses continue to use the software primarily for ELL-related document storage purposes. As a result, the ELL Department spends a considerable amount of time extracting information from scanned documents that are stored in *SuccessED* and entering them into the District SIS, *eSchoolPLUS*.

Recommendation 8: Maximize the use of *SuccessED* to improve the efficiency and effectiveness of the ELL student identification process.

The ELL Department and ELL teachers on campuses should use *SuccessED* not only for storing ELL-related documents, but also for capturing the necessary information in those documents in *SuccessED*. The Technology Department should create an automated integration between *SuccessED* and *eSchoolPLUS*, allowing the data in *SuccessED* to populate applicable data fields in *eSchoolPLUS* without any manual data entry. The ELL Department will then have more time to examine the data that is already in *eSchoolPLUS* for quality control purposes.

The audit team created a proposed or "to-be" process map for the identification and coding of ELL students in Killeen ISD, presented in Figure 15. The boxes shaded in blue are the revised process steps from the original process map shown above. In this proposed process map, ELL teachers who currently perform all of the ELL-related administrative tasks, including scanning the ELL documents to *SuccessED*, will also enter the information captured from these documents in *SuccessED*. For example, the ELL teacher will enter who attended the LPAC meeting, the program recommendation of the LPAC meeting, and the results of the parent signature form in *SuccessED*. *SuccessED* will be the main source of information for all ELL student-related data. Under the proposed process, ELL teachers in campuses will enter the ELL information in the system for their ELL students.

There is always a risk of incorrect data entry by campus-based staff, so the ELL Department should periodically select a sample set of ELL students and verify that the information in *SuccessED* reflects what is on the related scanned documents in the system. In addition to this control, the Technology Department should generate exceptions and errors reports from the automated data integration task between *eSchoolPLUS* and *SuccessED*. This will notify both the ELL Department and the Technology Department if there were any errors or issues during the integration process between systems.

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Figure 15: Proposed ELL Student Identification and Coding Process Map (To-Be)
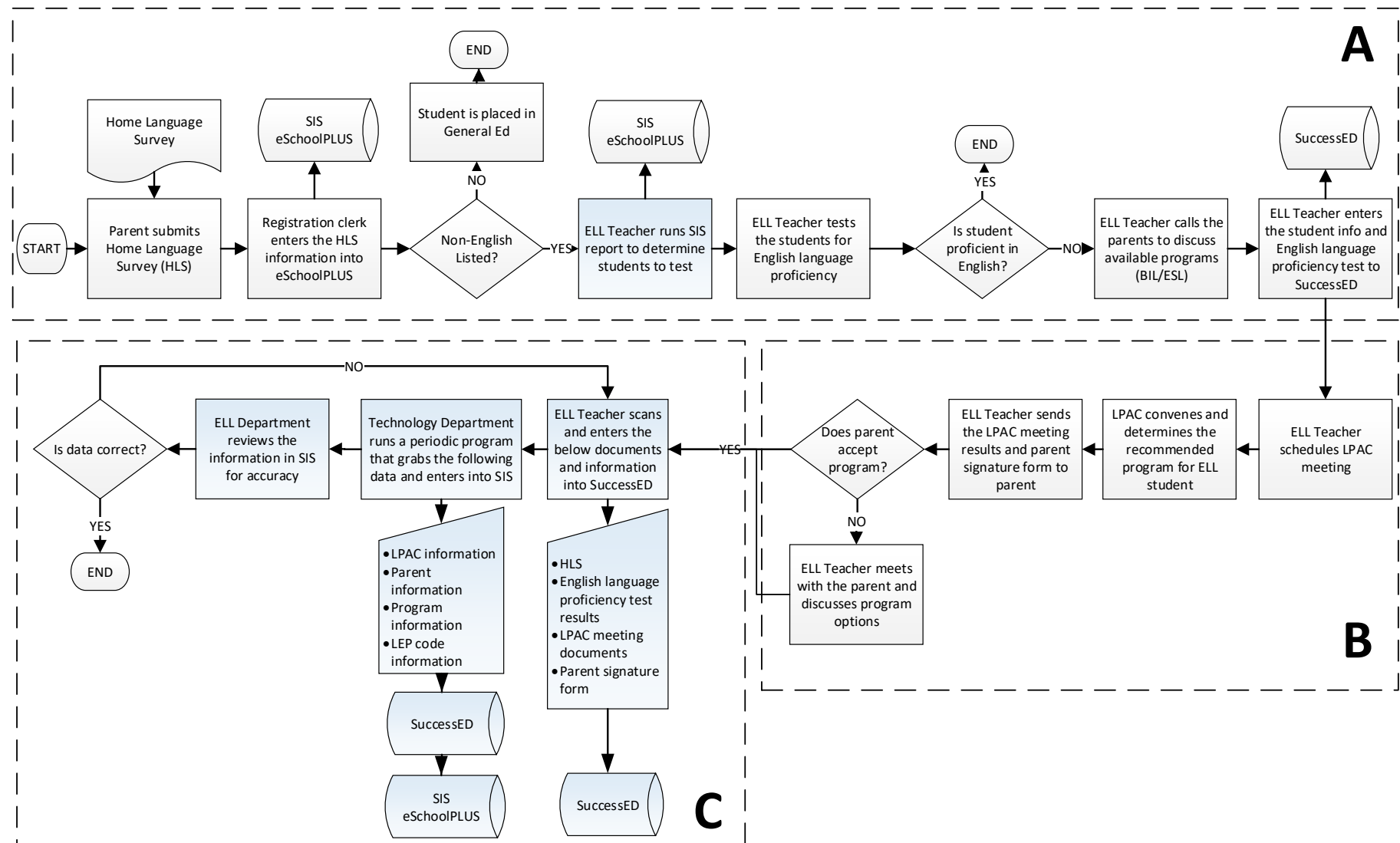
Source: Gibson Consulting Group, created based on the interviews with District and campus ELL staff, 2019

Recommendation 9: Complete scanning of historical ELL documentation in all campuses.

As described in detail in the above finding, although several campuses have completed scanning of all historical ELL documents and continue to scan all new ELL student documents to the *SuccessED* system, many campuses have not completed the scanning of their ELL documents. As a result, the District heavily relies on the paper LPAC folders, which house all documentation about the ELL students. The District is experiencing delays and issues with LPAC folders when a student moves campuses or advances from elementary to secondary school. The District should complete the scanning of all historical ELL documents and scan all new ELL documents, so the need for the LPAC folders can be eliminated. All ELL information that are in LPAC folders should be available on *SuccessED*. The original paper documents can be stored with the student's permanent folder based on the required document retention guidelines.

Recommendation 10: Grant ELL teachers access to the SIS reporting tool.

As described in the above finding, while all ELL teachers have access to the *SuccessED* system, not all ELL teachers have access to the SIS (*eSchoolPLUS*) and its reporting tool. If ELL teachers have access to the reporting capabilities, they can run reports to identify if there are any students with an HLS that are non-English. This will eliminate the need for registration clerks to manually notify ELL teachers. In addition, having access to the SIS reporting tool will allow the ELL teachers to quickly discover new ELL students that have transferred to or arrived at their campus, even if the LPAC folder does not arrive on time.
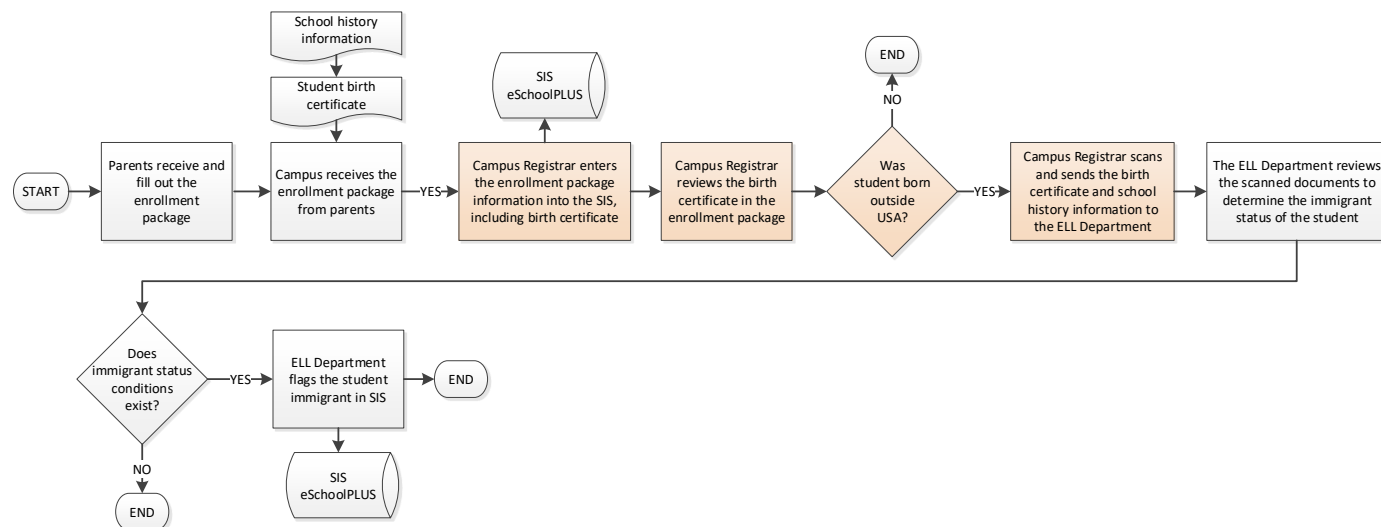
E – Immigrant

According to the Texas Education Data Standard's (TEDS) PEIMS student category data submission requirements, the immigrant indicator code indicates whether the student is an identified immigrant under the definition found under Title III of the Every Student Succeeds Act of 2015 (ESSA), where the term "immigrant children and youth" is defined as, "individuals who are aged 3 through 21; were not born in any State; and have not been attending one or more schools in any one or more States for more than three full academic years." TEA uses the federal definition of "immigrant student" under Title III of ESSA in order to determine immigrant student counts for funding, as determined by Title III, Part A, and for coding in PEIMS. Districts identify and report students that meet the immigrant student definition during the fall PEIMS submission.

Immigrant Reporting Process

The Killeen ISD ELL Department and campus staff work together to identify students that are immigrants. Figure 16 provides a schematic overview of the immigrant identification and reporting process. Parents initiate the process by completing an enrollment package that includes the student's birth certificate and school history. This package is submitted to the school where the parent is seeking student enrollment, and the campus registrar or other identified support position reviews the material and validates that the student was born outside the U.S. If so, the information is scanned and sent to the ELL Department to determine if other immigration status requirements are met.

Figure 16: Immigrant Student Identification and Reporting Process

Source: Gibson Consulting Group, created from interviews with ELL Department Coordinators, 2019

The orange boxes in Figure 16 represent the steps that campus-based staff perform during the immigrant student identification and reporting process. As Figure 16 shows, the ELL Department relies on campus staff for the enrollment data entry and the initial identification of immigrant students.

Analysis and Testing

Below is a description of the immigrant audit test performed by the audit team to validate PEIMS coding of immigrant students, along with the related results.

Test E.1. Accuracy of PEIMS Immigrant Coding – Three criteria must be met before a student can be classified as an immigrant:

- The student must be between the ages of 3 and 21;

- The student was not born in the United States; and

- The student has not attended a U.S. school for three full academic years.

Districts must keep documentation, such as a birth certificate and student academic records, that supports the immigrant coding. The audit team developed a test to validate the accuracy of the immigrant coding and the existence of supporting documentation.

- **Test Approach**

  – Obtained a list of all students coded as immigrants as of October 26, 2018.

  – Randomly selected 10 students.

  – Obtained a birth certificate for each student to validate that the District maintained supporting documentation of the student's birth place **(Test 1)**.

  – Inspected the birth certificate of each student to validate that the student was born outside of the United States **(Test 2)**.

  – Inspected the birth certificate of each student to validate that the student is between 3 years and 21 years old **(Test 3)**.

  – Obtained enrollment verification forms or records requests for each student to validate that the student has been in U.S. schools for fewer than three years **(Test 4)**.

  – Obtained screenshots of *eSchoolPLUS* to validate that the "School History" field for each student was filled **(Test 5)**.

- **Test Results** – Refer to Table 12 for the test results. "P" indicates that a sample passed the test; "F" indicates that a sample failed a test; "N/A" indicates that a test could not be performed due to a lack of data.

Table 12: Test E.1 Results

Sample	Grade Level	Test 1	Test 2	Test 3	Test 4	Test 5
1	KG	P	P	P	N/A	F
2	4	P	P	P	N/A	F
3	1	P	P	P	N/A	F
4	KG	P	P	P	N/A	F
5	8	P	P	P	P	P
6	2	P	P	P	P	P
7	PK	P	P	P	P	P
8	8	P	P	P	P	P
9	PK	P	P	P	P	P
10	2	P	P	P	P	P

- All tested students had a birth certificate that proved their birth outside of the United States and that their ages were between 3 and 21.

- Out of 10 students tested, four students did not have a record request or enrollment verification form. The audit team could not conclude that the student was enrolled in U.S. schools for fewer than three years.

- The same four students that failed Test 4 did not have the "School History" field in *eSchoolPLUS* completed.

Findings and Recommendations

Finding 9: *The District does not have adequate system controls and processes to accurately identify immigrant students.*

The ELL Department exclusively relies on campus staff to scan and send the birth certificates and prior school history information of potential immigrant students to them so they can make a determination on immigrant student status. As part of their regular registration process, campus staff also enter the country of birth and the previous school history information into the District SIS, so the District SIS Department has the necessary information to identify potential immigrant students, even if campus staff do not scan the documentation.

When the audit team asked campus staff during focus groups and school visits about the immigration student identification process, many campus staff were not aware of the conditions that may qualify students to be coded immigrant. Several thought they were scanning and sending the information if the

student's Home Language Survey (HLS) reflected another language other than English. Up until 2018-19, the District's Home Language Survey form asked for the student's country of birth, prior school history, and home language information. Campus staff were required to scan and send the HLS information to the ELL Department for identification of ELL students. The information was used by the ELL Department not only for ELL student identification, but also for immigrant student identification. If the student's HLS was English but the student was born outside the Unites States, in many incidents the campus staff did not scan and send the information to ELL Department. This could potentially cause the District to under-report immigrant students, and as a result not collect additional funding that is available with additional immigrant students.

In order to verify and measure the impact of the process issues, the audit team asked the SIS team to identify all students that were not born in United States and also not coded as immigrant. The SIS team generated a report identifying 450 students that met this criterion. This report shows that controls at the campus level are inadequate to ensure the accurate processing of enrollment forms to determine immigrant status. The students may or may not qualify as immigrant students – the District ELL Department still needs to verify that students' prior U.S. school history is less than three years before coding them as immigrant. During the writing of this report the District ELL Department was still working on verifying the status of the 450 students.

Figure 17 shows the number of immigrant students and total students reported by Killeen ISD in the last five years. From 2015-16 to 2017-18, the number of immigrant students remained fairly steady at approximately 300-plus students. In 2018-19, however, the number of immigrant students increased 44 percent to 503 students. 2019-20 year-to-date shows a decline back to pre-2018-19 levels. These trends indicate a possible data integrity issue, which is likely caused by an underlying process/control deficiency.

Figure 17: Killeen ISD Total and Immigrant Student Numbers
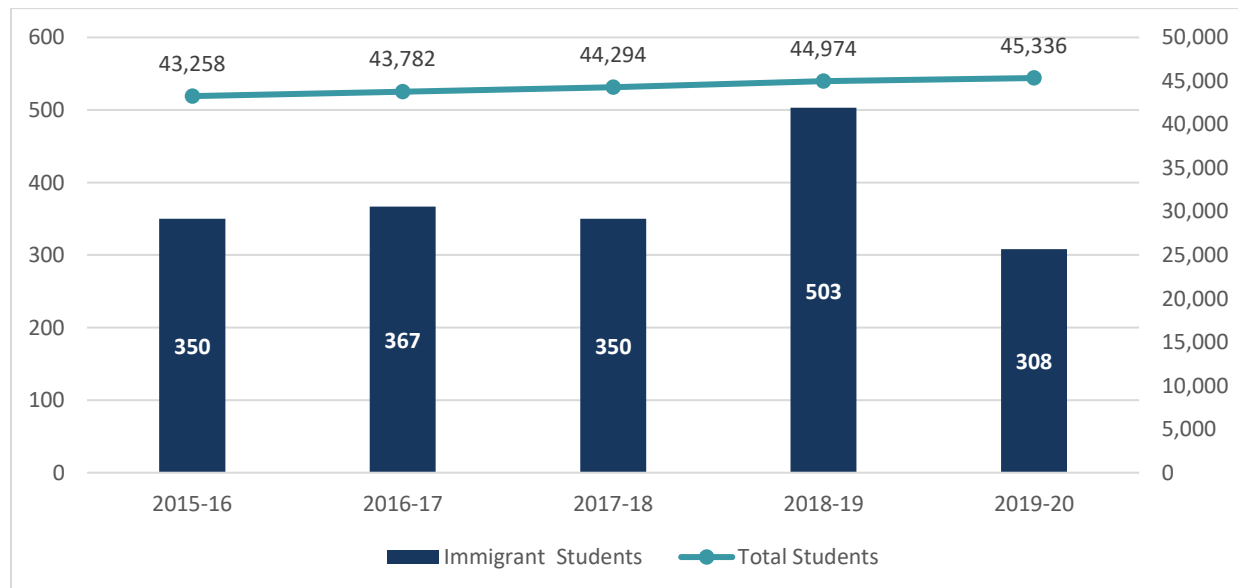
Source: Killeen ISD Fall PEIMS submission data

Other observations were made during the audit testing of immigrant student reporting. The data field "Country of Birth" is not a required field on the District SIS screen where campus staff enter student information. If left blank, campus staff will not be alerted by the system that there is a potential immigrant student. In addition, the data field on the District SIS screen where the campus staff captures the prior U.S. school information can be left blank. If no information is entered, the District assumes the student did not have prior United States school history, which may or may not be the case. The audit team immigration test found four instances where a student's previous U.S. school history was blank. These two system-related issues represent inadequate screen edit controls that can lead to misreporting of immigrant students.

Recommendation 11: Provide training to campus staff regarding the immigrant student identification requirements.

The ELL Department should provide training to campus staff regarding the requirements for identifying immigrant students. The training should be recorded so the new campus staff or those who need a refresher can take the training as needed based on their own time without leaving their campuses. The ELL Department should update the training if the requirements change.

Recommendation 12: Use SIS reports to validate immigrant student data.

The ELL Department should request a custom report from the SIS that lists students who were born outside of the United States with their previous U.S. school history. The ELL Department should run the report periodically to make sure all new potential immigrant students are accounted for.

Recommendation 13: Implement SIS screen edits to support accurate and complete data entry.

The SIS team should work with the SIS vendor to reconfigure the student "Country of Birth" field as a mandatory field so that if the campus staff does not enter the information, it displays a warning message and will not allow them to continue the student registration. The SIS team should also request for the SIS vendor to add a new field to verify when the "Previous U.S. School History Information" field is left blank, or convert the existing field to a dropdown that includes a "no history" option. The staff member who is entering the data will need to confirm that the field is left blank because there is no previous school history, so that the staff cannot forget to enter this data.

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F – 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 within the district (i.e., from elementary to middle school within the same district) or move among schools of the same level (i.e., from one district high school to another). Students may also leave a school to enroll at another Texas public or charter 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 Killeen ISD school for any reason other than those described above. For these students, Killeen 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. A description of each leaver code and required documentation is provided below.[4]

- Code 03 – Student died while enrolled in school or during the summer break after completing the prior school year.

    – A death certificate, obituary, funeral program, or statement by parent or guardian.

- Code 16 – Student returned to family's home country.

    – Copy of the Transfer Document for Binational Migrant Student, withdrawal form signed and dated by parent/guardian and administrator, a signed letter from parent/guardian, or statement by an adult neighbor or other adult with knowledge of the family's whereabouts.

- Code 24 – Student entered college and is working towards an Associate's or Bachelor's degree.

    – Transcript request, verification by an authorized college representative, or verification by the parent/guardian.

- Code 60 – Student is homeschooled.

    – Signed and dated verification by the parent/guardian. The verification must include the date homeschooling began.

- Code 66 – Student was removed by Child Protective Services (CPS) and the District has not been informed of the student's current status or enrollment.

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[4] Obtained from *2018-19 Texas Education Data Standards, Appendix D – PEIMS Leaver Reason Codes and Documentation Requirements*.

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- Due process documentation, a written Statement signed and dated by a CPS officer, or documentation of a conversation with a CPS officer signed and dated by a school official.

▪ Code 78 – Student was expelled under the provisions of TEC §37.007 and cannot return to school.

- Due process documentation.

▪ Code 81 – Student enrolled in a private school in Texas.

- Transcript request, verification by the superintendent or authorized campus, district administrator of the receiving district, or verification by the parent/guardian.

▪ Code 82 – Student enrolled in a public or private school outside of Texas.

- Transcript request, verification by the superintendent or authorized campus, district administrator of the receiving district, or verification by the parent/guardian.

▪ Code 83 – Student was attending and was withdrawn from school by the District when the District discovered that the student was not entitled to enrollment in the District because a) the student was not a resident of the District, b) was not entitled under other provisions of TEC §25.001 or as a transfer student, or c) was not entitled to public school enrollment under TEC §38.001 or a corresponding rule of the Texas Department of State Health Services because the student was not immunized.

- Due process documentation supporting withdrawal.

▪ Code 85 – Student graduated outside Texas before entering a Texas public school, entered a Texas public school, and left again.

- Transcript showing sufficient credits, date, and school official signature, and a diploma with a graduation seal.

▪ Code 86 – Student completed the GED outside of Texas.

- Copy of GED certificate or written document provided by the testing company showing GED completion.

▪ Code 87 – Student withdrew from/left school to enroll in the Texas Tech University ISD High School Diploma Program or the University of Texas at Austin High School Diploma Program.

- Records or transcript request from the high school diploma program or a letter from the high school diploma program showing student enrollment.

▪ Code 88 – Student was ordered by a court to attend a GED program and has not earned a GED certificate.

- – Copy of the court order requiring the student to attend a GED program.

  - ▪ Code 89 – Student is incarcerated in a State jail or federal penitentiary as an adult or as a person certified to stand trial as an adult.

    - – Written Statement of oral notification, or a written Statement by law enforcement agency, jail, or prosecuting attorney to an authorized District representative.

  - ▪ Code 90 – Student graduated from another State under provisions of the Interstate Compact on Educational Opportunity for Military Children.

    - – Transcript showing sufficient credits, date, and school official signature, or a diploma with a graduation seal.

 - ▪ Code 98 – Other (reason unknown or not listed above).

The accurate coding of leaver students is important for districts as accountability ratings are impacted by the number of students who are determined to be dropouts, identified as Code 98 in the list above. If a non-98 leaver code cannot be assigned to a student, the student is considered to be a dropout. Similarly, if documentation is not maintained for any leaver with a code other than 98, TEA could require the district to change the leaver code to a 98, negatively impacting accountability ratings.

Local Board policies are used by Killeen ISD to ensure compliance with the TEA regulations for leavers.

  - ▪ *Board Policy FD (Local)* – This policy states that a parent or guardian who wishes to withdraw a minor student shall provide a signed statement including the reason for withdrawal.

  - ▪ *Board Policy FEA (Local)* – This policy states that the District may withdraw a student, triggering the coding process discussed above, after the student has been absent for ten consecutive school days. Documentation requirements for students withdrawing to be homeschooled are also discussed in this policy. The District requires that a parent or guardian provide a written, signed statement indicating when the homeschooling began.

Leaver Trends

The number of students classified as leavers since 2015-16 are presented in Figure 18 below. The students who graduated, assigned leaver code '01', are excluded from the graph below. The number of leavers, excluding graduates, has decreased slightly from 1,779 in 2015-16 to 1,747 in 2019-20. The numbers for each year are presented on a one-year lag, meaning that the students recorded as leavers in the October Snapshot of 2015-16 actually withdrew from the District in 2014-15.

Figure 18: Killeen ISD Leaver Count, 2015-16 to 2019-20 (as of February 7, 2020)
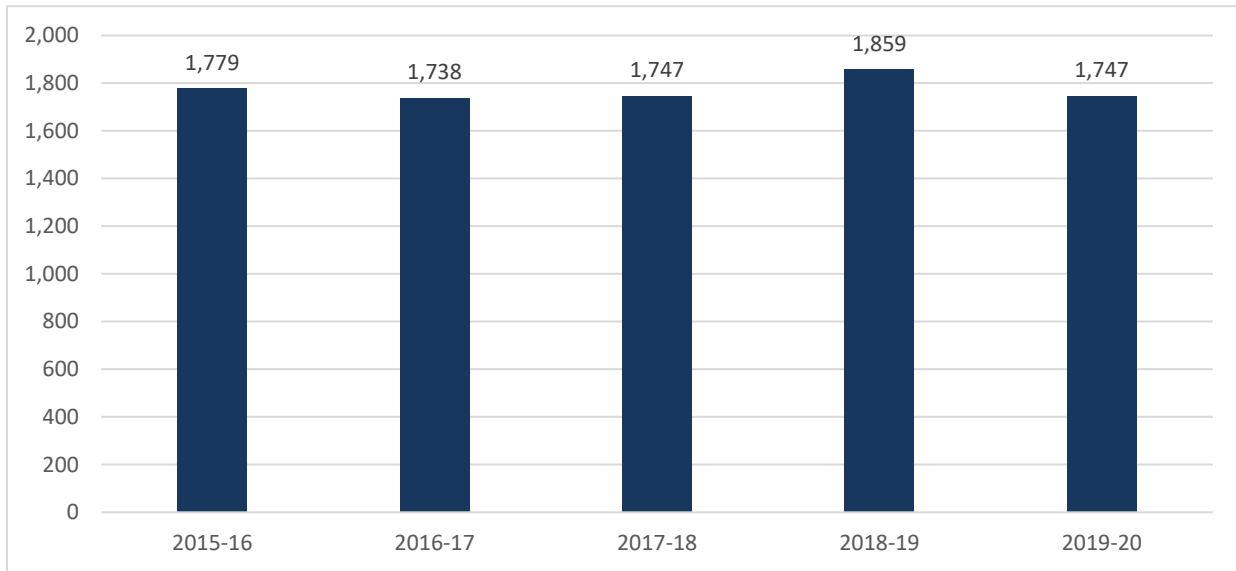
Source: *OnData Suite* Report, *Leaver by Leaver Reason*

Figure 19 presents the number of leavers as a percentage of total enrollment for Killeen ISD. The leaver value presented in Figure 18 above was divided by the total enrollment of the preceding year. The percentage of student leavers at Killeen ISD has decreased over the past five years.

Figure 19: Leavers as a Percentage of Total Enrollment
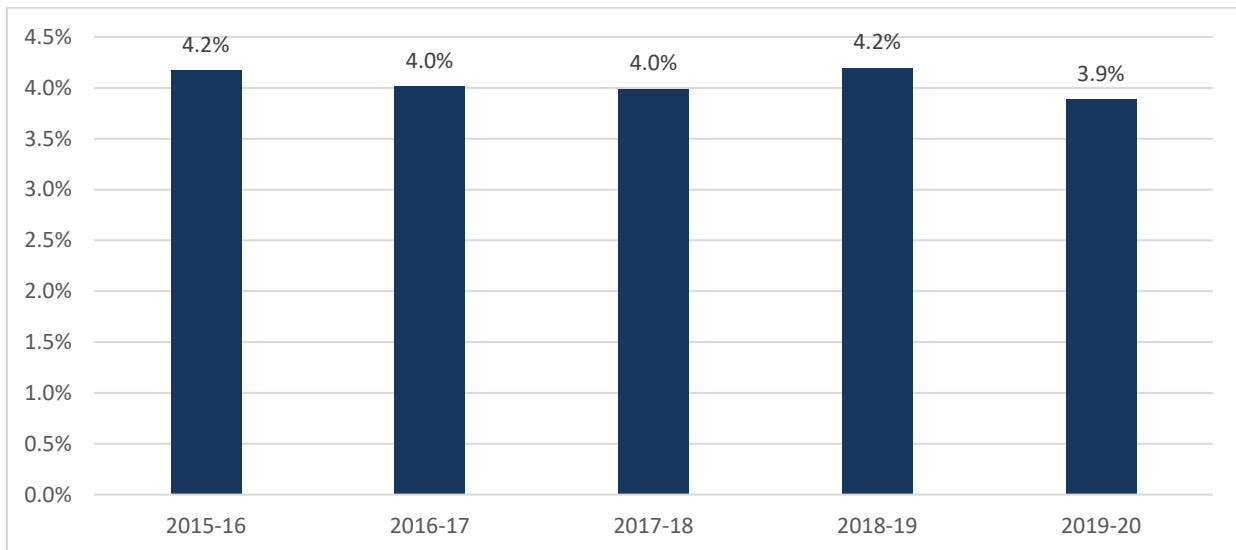
Source: *OnData Suite* Report, *Leaver by Leaver Reason*, TEA Enrollment Data

The leaver code with the largest numerical decline since 2015-16 is code 82, students enrolled in a public or private school outside of Texas. From 2015-16 to 2019-20, the number of leavers assigned to this code decreased by 166 students, from 1,293 to 1,127.

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Figure 20: Count of Students Leaving to Public or Private Schools Outside Texas, 2015-16 to 2019-20
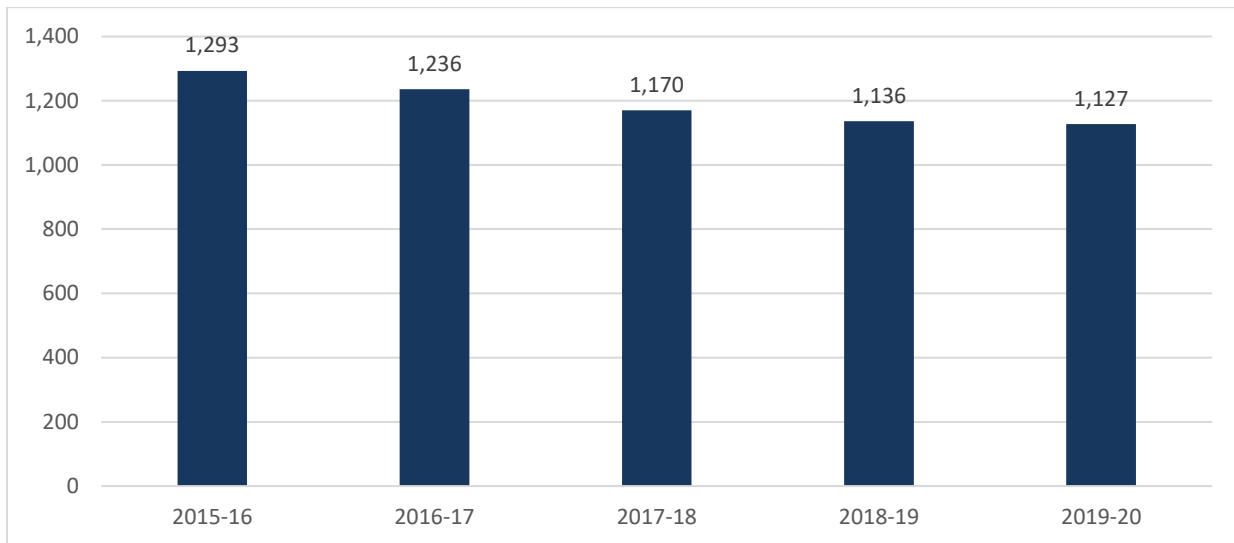
Source: *OnData Suite* Report, *Leaver by Leaver Reason*

Though the number of total leavers has decreased since 2015-16, the number of students leaving to be homeschooled has increased. Figure 21 provides the number of leavers coded as a "60" or homeschooled. This code was applied to 152 students in 2015-16 and to 240 students in 2019-20.

Figure 21: Count of Home-school Leavers, 2015-16 to 2019-20
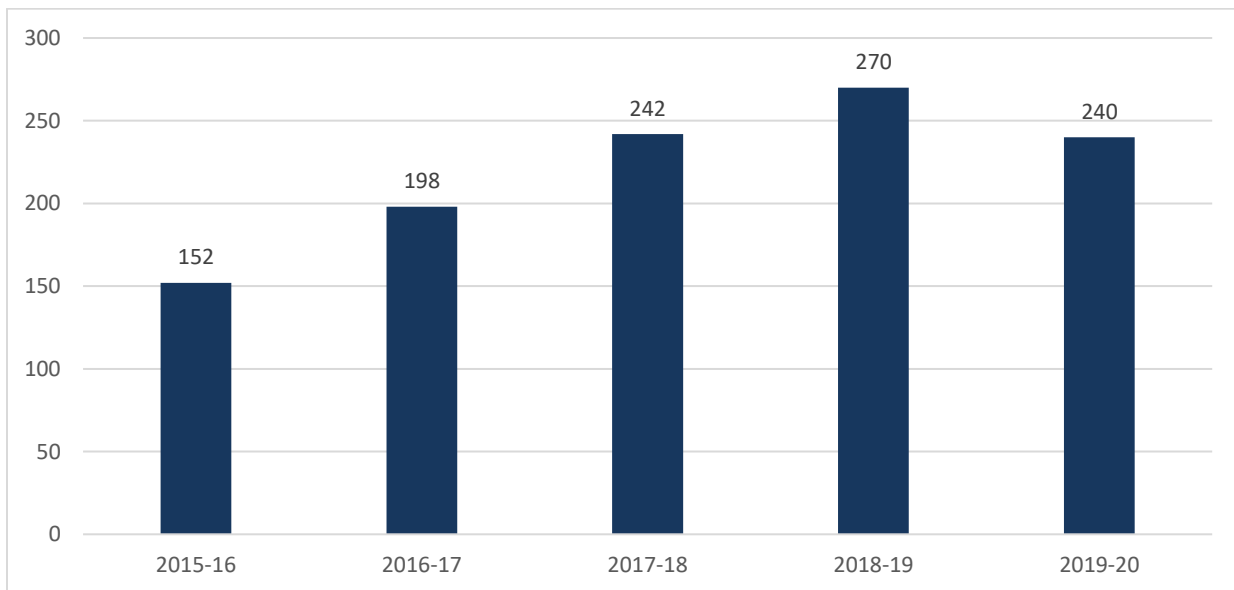
Source: *OnData Suite* Report, *Leaver by Leaver Reason*

Students coded as dropouts, known as leaver code 98, increased from 217 in 2015-16 to 239 in 2019-20, as displayed in Figure 22. The number of dropouts peaked in 2018-19 at 284 students but decreased to 239 in 2019-20.

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Figure 22: Count of Students Coded as Dropouts, 2015-16 to 2019-20
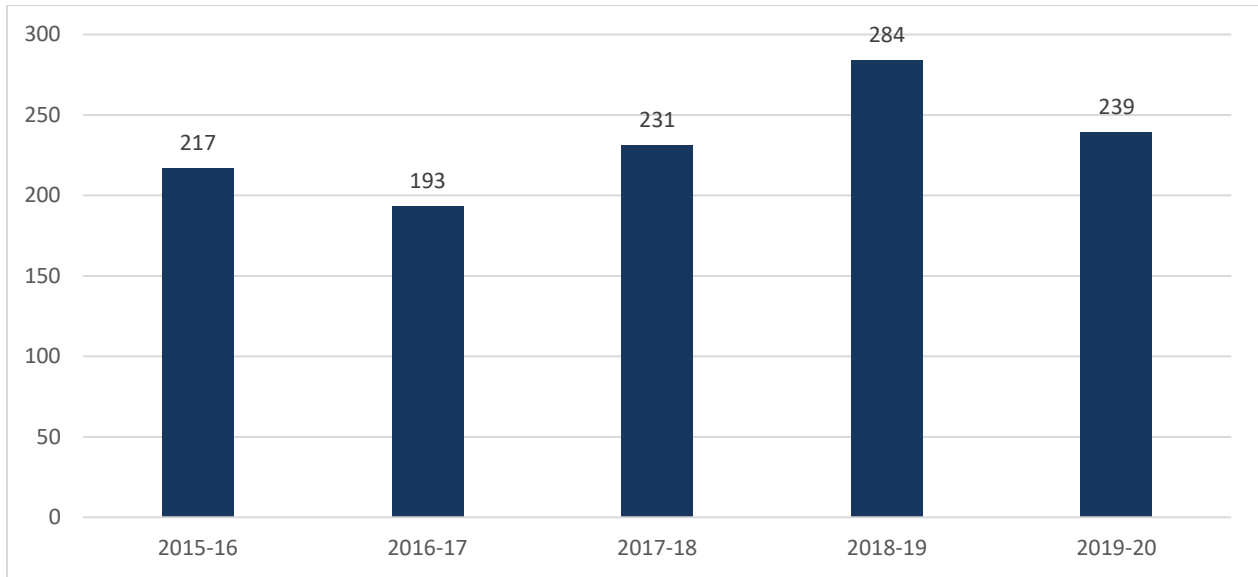
Source: *OnData Suite* Report, *Leaver by Leaver Reason*

The number of students leaving Killeen ISD to return to their home countries, coded as "16", also increased since 2015-16. This count, as shown in Figure 23, has fluctuated year-over-year, but increasing overall from 33 students in 2015-16 to 52 students in 2019-20.

Figure 23: Count of Students Returning to Their Home Country, 2015-16 to 2019-20
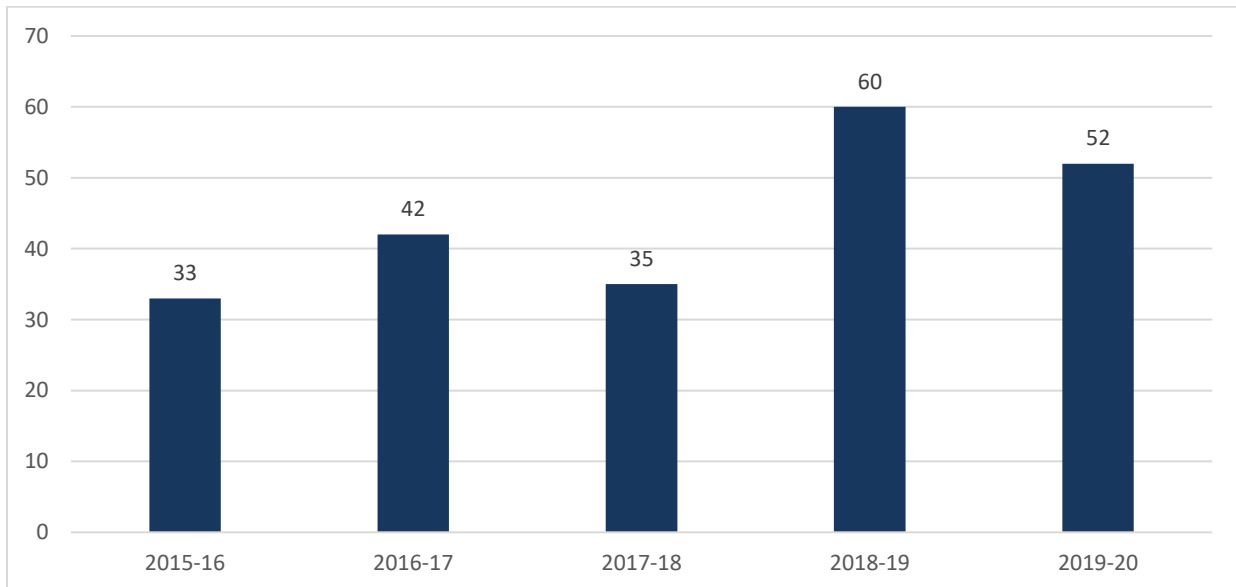
Source: *OnData Suite* Report, *Leaver by Leaver Reason*

Students leaving Killeen ISD to enroll in Texas private schools, known as leaver code 81, increased from 34 in 2015-16 to 50 in 2019-20, as displayed in Figure 24.

Figure 24: Count of Students Enrolling in Texas Private Schools, 2015-16 to 2019-20
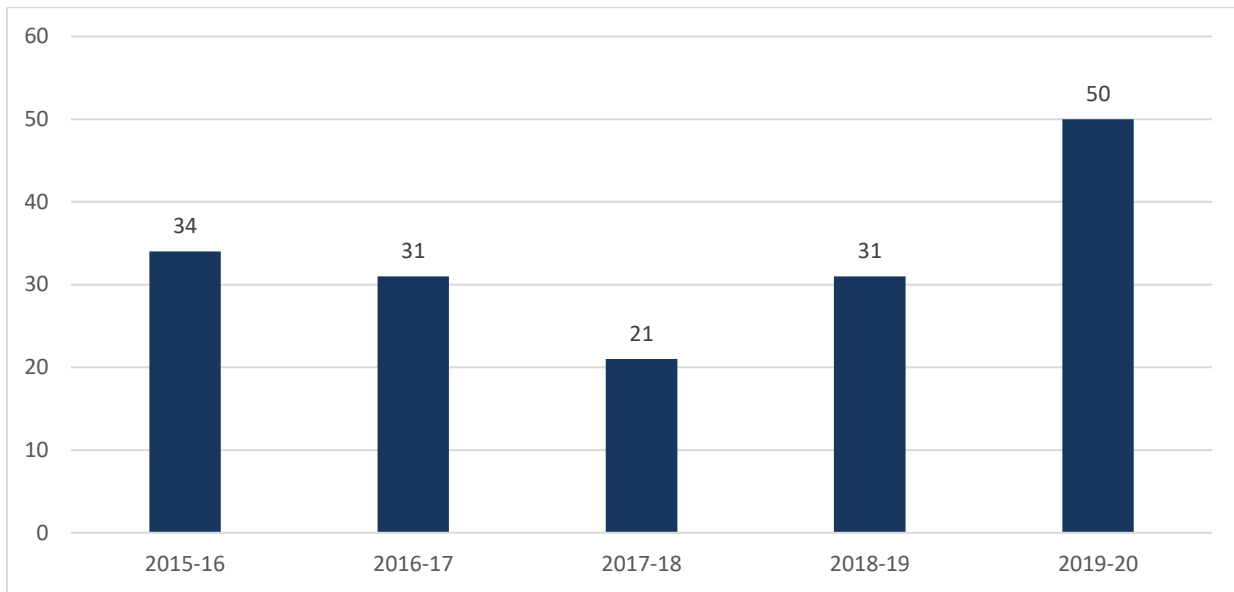
Source: *OnData Suite* Report, *Leaver by Leaver Reason*

Leaver Reporting Process

The Killeen ISD PEIMS office created a process map to guide attendance clerks, registration clerks, and registrars through the leaver process, which is presented in Figure 25. These positions are referred to as Campus PEIMS Designees (CPD) on the process map. The manner in which a student leaves the District drives what process the CPD is to follow.

If a student formally withdraws from Killeen ISD by submitting a notification from the parent or guardian and completing a withdrawal form, the CPD will review the withdrawal documentation to ensure proper completion and sign-offs. The CPD will then notify the student's teacher(s) and any other departments, such as Special Education or Career and Technical Education, of the student's withdrawal. The CPD will review the withdrawal form and associated documents, and sign the withdrawal form. The CPD will then withdraw the student and assign one of the leaver codes discussed earlier to the student within *eSchoolPLUS*.

The documents gathered during the withdrawal are placed into the student file. If the CPD cannot determine which code should be assigned to the student, the PEIMS Coordinator is contacted. The Coordinator will either advise the CPD on which code should be applied, or instruct the CPD to gather more information. If sufficient documentation and evidence can be gathered, a non-dropout code will be applied. If the dropout code (code 98) is the only code that can be applied, the CPD will continue to monitor the student file, the Person Identification Database (PID), and Person Enrollment Tracker (PET) for updated information that allows a non-dropout code to be applied. For example, a student who was originally coded as a dropout may later appear as enrolled in another Texas school district in the PET. This would then allow the student to be coded as a "mover" and not as a "dropout."

Figure 25: Leaver Process, Students Withdrawing from School
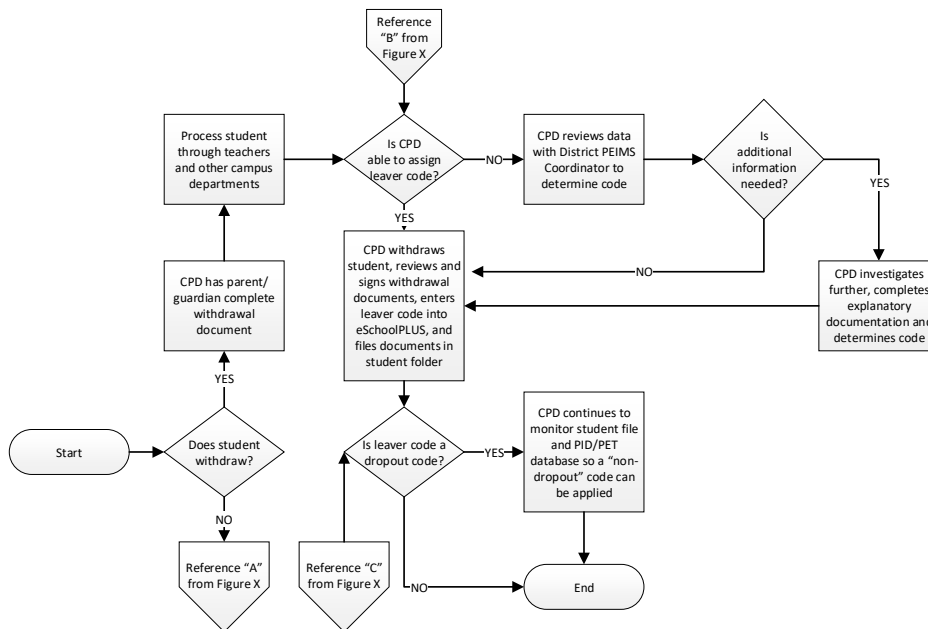
Source: Killeen ISD Leaver Identification and Reporting, 2019

Many students do not withdraw from school and simply stop attending class. In these instances, additional procedures must be completed by the CPD. As seen in Figure 26 below, the CPD should determine if any records requests from another school district were received for the student. The CPD can also check for other documents, such as an emailed homeschool form, to provide evidence regarding the student's whereabouts. If no documentation can be immediately found, the CPD or assignee will check the PID and PET, contact the family or student, or reach out to other entities, such as Child Protective Services, to locate the student. If contact cannot be made with the student, the CPD will work with the PEIMS Coordinator to determine what code should be applied.

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Figure 26: Leaver Process, Students Not Withdrawing from School
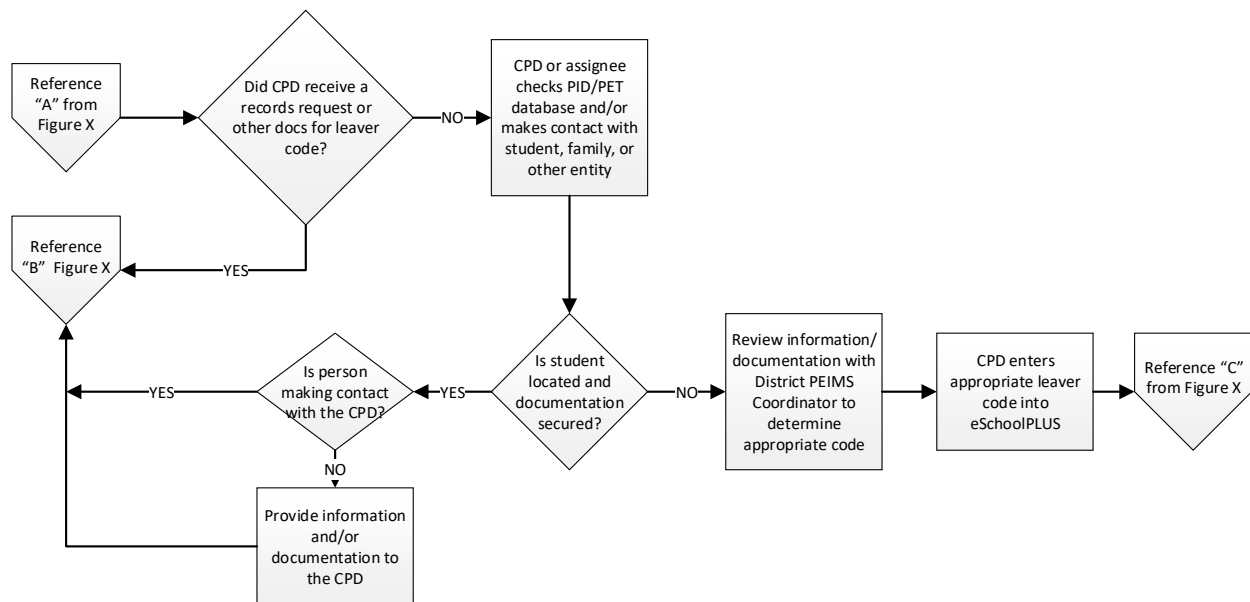
Source: Killeen ISD Leaver Identification and Reporting, 2019

Though it is not included in the District's process map, interviewees discussed the use of a Leaver Audit Checklist form. This form is required to be completed by an attendance or registration clerk whenever a student leaves Killeen ISD. A blank copy of the checklist is available on the District's *SharePoint* site and has been included as Appendix B.

Leaver Audit Testing

TEA requires documentation to support each leaver code that is applied to a student, as described in the Regulatory Framework Section above. Killeen ISD requires additional documentation, as described in the Procedural Framework Section, to demonstrate compliance with TEA regulations. The audit team designed a test to validate that leaver documentation required by Killeen ISD and TEA are obtained and support the applied leaver code for a student.

- **Test Approach**

  – Obtained a report of all students classified as leavers, which was submitted to TEA on the October 2019 PEIMS Snapshot.

  – Stratified the population by leaver code.

  – Judgmentally selected 35 leavers across the various codes, ensuring that sample representation is consistent on the count of students assigned with a specific code.

  – Obtained the student withdrawal form for each sample to validate its existence and completion **(Test 1)**.

- Obtained the Leaver Audit Checklist for each sample to validate its existence and completion **(Test 2)**.

- Inspected documentation maintained by Killeen ISD to validate that the TEA required documentation was obtained for the assigned leaver code **(Test 3)**.

- Compared the documentation to the leaver code to validate that the correct leaver code was assigned **(Test 4)**.

- **Test Results –** Please refer to Table 13 below. "P" indicates that the sample passed the test; "F" indicates that the sample failed the test; "N/A" indicates that the test could not be performed due to a lack of data.

Table 13: Test F.1 Results

Sample	Leaver Code	Test 1	Test 2	Test 3	Test 4
1	Homeschooling	P	P	F	F
2	Enroll in School Outside Texas	P	F	P	P
3	Enroll in School Outside Texas	P	F	P	P
4	Enroll in School Outside Texas	P	F	P	P
5	Enroll in School Outside Texas	P	P	P	P
6	Enroll in School Outside Texas	P	P	P	P
7	Homeschooling	P	F	P	P
8	Enroll in School Outside Texas	P	P	P	P
9	Enroll in School Outside Texas	P	F	P	P
10	Enroll in School Outside Texas	P	F	F	N/A
11	Enroll in School Outside Texas	P	F	F	N/A
12	Enroll in School Outside Texas	P	P	P	P
13	Enroll in School Outside Texas	P	P	P	P
14	Enroll in School Outside Texas	P	F	P	P
15	Enroll in School Outside Texas	P	F	P	P
16	Enroll in School Outside Texas	P	F	P	P
17	Homeschooling	P	P	P	P
18	Enroll in School Outside Texas	P	F	P	P
19	Homeschooling	P	F	P	P

Sample	Leaver Code	Test 1	Test 2	Test 3	Test 4
20	Enroll in School Outside Texas	P	P	P	P
21	Homeschooling	P	P	N/A	N/A
22	Enroll in School Outside Texas	P	F	P	P
23	Enroll in School Outside Texas	P	P	P	P
24	Enroll in School Outside Texas	P	F	P	P
25	Enroll in School Outside Texas	P	F	P	P
26	Enroll in School Outside Texas	P	P	P	P
27	Other	P	P	P	P
28	Other	P	F	P	P
29	Other	P	F	P	P
30	Court-ordered to a GED program, has not earned a GED	P	F	P	P
31	Other	P	P	P	P
32	Administrative Withdrawal	P	P	F	N/A
33	Removed by CPS	P	P	F	F
34	Other	P	F	P	P
35	Other	P	P	P	P

– All 35 leaver students had completed withdrawal forms.

– 19 out of 35 leavers did not have a Leaver Audit Checklist.

– Five out of 35 leaver files did not have sufficient evidence to support the applied leaver code.

  o Sample 1 is discussed later in this Section.

  o Samples 10 and 11 did not have a records request or enrollment verification from the out-of-state district, or a confirmation from the parent or guardian that the student began attending classes in the new district.

  o Sample 32 did not include any due process hearing minutes or signatures supporting the administrative withdrawal.

  o Sample 33 is discussed later in this Section.

- The sufficiency of evidence for Sample 21 could not be assessed. Sample 21 included a homeschool affidavit that was signed by a student who was over the age of 18. The TEA requirements do not mention a student signature as serving as evidence of homeschooling. No other information was provided for this student.

- Two out of 35 leaver codes were incorrect.

   o One student was classified as homeschooled, but a records request from a public charter school in Killeen was obtained. The student should have been coded as a "mover" and not a "leaver."

   o One student was classified as being removed by CPS, however a records request from Amarillo ISD was obtained. The student should have been coded as a "mover" and not a "leaver."

- Four out of 35 leaver codes could not be assessed for accuracy due to a lack of information.

Findings and Recommendations

The leaver test results and information discovered during interviews support the recommendations made in Sections A and B of this report to provide additional training and improve data integrity. Below are additional findings and recommendations related specifically to leaver reporting.

Finding 10: *The District does not have adequate monitoring to ensure that sufficient evidence for leaver coding is obtained by campus staff.*

The results from Test F.1 indicate that many campuses are not following District or TEA documentation requirements for leaver codes. The Leaver Audit Checklists reviewed by the audit team included a line for a reviewer's signature, but this was occasionally left blank. Without a review, the registration clerk or attendance clerk are the only individuals ensuring that adequate documentation is kept for each leaver. This increases the likelihood that errors in coding can occur, increasing the risk to the District that leaver codes may be changed to a "98" if a TEA audit were to occur.

Also, during interviews and site visits, the audit team learned that the audit checklist is not consistently required. These process differences were proven in Test F.1 above, where over 50 percent of all sampled leavers did not have a Leaver Audit Checklist. Checklists were not completed for two of the five samples that did not have sufficient evidence.

Recommendation 14: Implement a leaver audit control.

Killeen ISD should require that all leaver records must be accompanied by a Leaver Audit Checklist and signed by the individual completing the checklist. The PEIMS group should accordingly modify its process map to include steps for completing and reviewing the Leaver Audit Checklist. The PEIMS group should also audit leaver files to ensure that documentation required by TEA is maintained by campuses. An audit

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schedule should be created, ensuring that a sample from every campus is tested at least every two years. Applying these controls should result in a higher percentage of accurately coded and fully documented leavers.

G – PEIMS Six-Week Reporting

The TEA guidelines incorporated in the *Student Attendance Accounting Handbook* require that at the end of each six-week reporting period, or semester, depending on local preference, a Student Detail Report and Campus Summary Report be generated and reviewed by the campus principal and persons who record data and approve data. The District Summary Report encompasses all information from the individual campus reports and must be reviewed by the superintendent. The requirement for school and district officials to review the reports is to ensure accuracy of the underlying data. The *Handbook* indicates that the principal and superintendent 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.

Every first and fourth six-weeks reporting period has an additional required certification. Attendance during each official attendance period must be reconciled to a teacher's class roster. The purpose of this reconciliation is to verify that all students are accurately reported in attendance records and that "no-show" students have been correctly removed from attendance. This reconciliation should be completed no later than the final week of the six-week reporting period. The PEIMS coordinator and superintendent must sign the district-level reconciliation.

PEIMS Six-Week Reporting Process

Procedures for the Student Detail Report, Campus Summary Report, and Class Roster Reconciliation are located on Killeen ISD's intranet *SharePoint* site and are updated annually. Each guide includes a step-by-step description of how the reports should be generated and includes screenshots of relevant *eSchoolPLUS* screens.

Attendance clerks at each campus are responsible for generating the Student Detail, Campus Summary, and Roster Reconciliation Reports. The Student Detail and Campus Summary Reports are submitted to the special population leads (special education, ELL, gifted and talented, CTE, etc.) and principal for review and validation. The Roster Reconciliation Report is provided to each teacher who has a class during the official attendance period, and to the principal for review and validation. If an error or omission is noted during the review, the attendance clerk is instructed to call the PEIMS group or program-level contact listed in the guides. Once all relevant parties have signed the signature pages for the reports, the attendance clerks are to either scan and email the signature page or mail a copy of the signature page to the PEIMS group. The original reports and signatures should be maintained by the attendance clerks according to the procedures referenced above.

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After the campus-level reports are submitted to the PEIMS group, the PEIMS group will create the District-level reports. The District-level reports are reviewed and reconciled to the underlying campus reports by the PEIMS group. If discrepancies are noted, the PEIMS group will contact the relevant personnel to obtain information about the student. The PEIMS coordinator will make necessary corrections to the data in *eSchoolPLUS*. Figure 27 provides a schematic overview of the six-week reporting process.

Figure 27: Six-Week Reporting Process
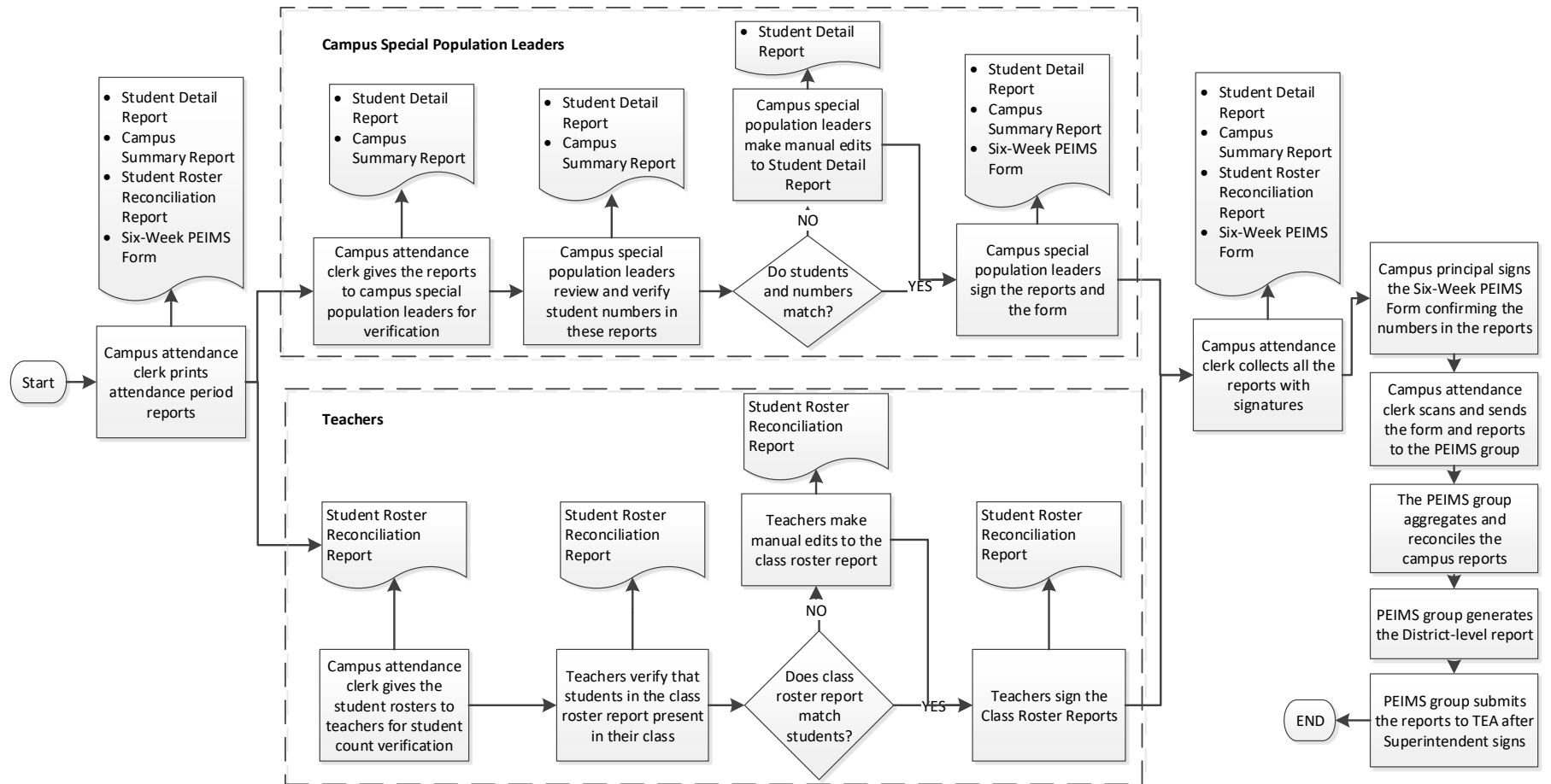
Source: Created from interviews with *the PEIMS group*, 2019

Six-Week Audit Testing

As discussed in the Regulatory and Procedural Framework above, campuses are required to generate, review, and sign the Student Detail, Campus Summary, and Roster Reconciliation Reports each six-weeks. The audit team developed testing procedures to assess if campuses are performing the six-week reporting duties as required by TEA.

- **Test Approach**

  - Judgmentally selected seven schools to visit based on school type and geographic location.

  - Obtained Campus Summary Reports **(Test 1)**, Student Detail Reports **(Test 2)**, and Roster Reconciliation Reports **(Test 3)** for each six-weeks during the 2018-19 school year.

  - Inspected affidavits to validate that all necessary signatures were obtained **(Test 4)**.

  - Obtained original affidavits from the campuses **(Test 5)**.

  - Compared principal signature date to all other signature dates to validate that the principal was the last party to review **(Test 6)**.

- **Test Results** – Please refer to Table 14 for test results. "P" indicates that the six weeks passed the test; "F" indicates that the six weeks failed the test; "N/A" indicates that the test was not applicable for that six-weeks period.

Table 14: PEIMS Six-Weeks Reporting Test Results (Test G.1)

School Number	Six-Weeks Period	Test 1	Test 2	Test 3	Test 4	Test 5	Test 6
1	1	F	F	P	P	F	P
	2	F	F	N/A	P	P	P
	3	F	F	N/A	P	P	P
	4	P	P	P	P	F	F
	5	F	F	N/A	P	F	P
	6	F	F	N/A	P	P	P
2	1	P	P	P	P	P	F
	2	P	P	N/A	P	P	F
	3	P	P	N/A	P	P	F
	4	P	P	P	P	P	F
	5	P	P	N/A	P	P	P
	6	P	P	N/A	P	P	P

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School Number	Six-Weeks Period	Test 1	Test 2	Test 3	Test 4	Test 5	Test 6
3	1	F	F	P	P	F	P
	2	F	F	N/A	P	F	P
	3	F	F	N/A	P	F	P
	4	F	F	P	P	F	P
	5	F	F	N/A	P	F	P
	6	F	F	N/A	P	F	F
4	1	P	P	P	P	P	P
	2	P	P	N/A	P	P	P
	3	F	F	N/A	P	F	P
	4	P	P	P	P	P	P
	5	F	F	N/A	P	F	P
	6	F	F	N/A	P	F	P
5	1	P	P	P	P	P	F
	2	P	P	N/A	P	P	P
	3	P	P	N/A	P	P	P
	4	P	P	P	P	P	P
	5	P	P	N/A	P	P	P
	6	P	P	N/A	P	P	P
6	1	P	P	P	P	P	P
	2	P	P	N/A	P	P	F
	3	P	P	N/A	P	P	P
	4	P	P	P	P	P	P
	5	P	P	N/A	P	P	F
	6	F	F	N/A	P	F	F
7	1	F	P	P	P	P	P
	2	P	P	N/A	P	P	P
	3	P	P	N/A	P	P	P
	4	P	P	P	P	P	P
	5	P	P	N/A	P	F	P
	6	P	P	N/A	P	P	P

- No tested schools fulfilled all requirements for the 2018-19 school year.

- Two schools maintained all Campus Summary Reports and Student Detail Reports on-site.

- Two schools maintained all but one Campus Summary Report or Student Detail Report.

- Three schools were missing at least three Campus Summary Reports or Student Detail Reports.

- All schools provided evidence that the first and fourth six-weeks roster reconciliation was performed.

- All affidavits were signed by all necessary personnel.

- Two schools maintained original, signed affidavits on-site.

- Two schools maintained all but one original, signed affidavit on-site.

- Three schools were missing at least three original, signed affidavits.

- The principals at two campuses performed an appropriate review for each six-week reporting period.

- The principals at three campuses performed an appropriate review for all but one six-week reporting period.

- The principals at two campuses performed an appropriate review for three or fewer six-week reporting periods.

Findings and Recommendations

The PEIMS six-week test results and information discovered during interviews support the recommendations made in Sections A and B of this report to provide additional training and improve data integrity. Below is an additional finding and recommendation related specifically to the PEIMS six-week reporting.

Finding 11: *The District does not have adequate monitoring to ensure that a consistent six-weeks reporting process is followed.*

The interviews performed by the audit team and results from Test G.1 identified process inconsistencies across campuses. Some principals interviewed stated they would act as the final reviewer and perform a thorough review of the data previously certified by their campus' attendance clerks, registrars, and special program leaders. Other principals mentioned they would not perform a review and would simply sign when the document came to them. Additionally, some attendance clerks maintained original documentation, while others did not.

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The current monitoring process in place requires that campuses scan and send the signature sheets for the six-week reports. This does not provide the PEIMS Department with sufficient evidence that a thorough review was performed or that District procedures were followed.

Recommendation 15: Implement a six-week reporting audit.

The District should review six-week reporting documentation to ensure that campuses are following District guidelines and six-week reports are being appropriately reviewed by campus administration.

H – Other PEIMS Components

This Section presents the audit test results for five additional areas of PEIMS reporting. Each of these areas demonstrated more favorable results based on audit testing and corroborating information obtained from interviews and focus groups:

- Economically Disadvantaged
- Special Education
- At-Risk
- Career and Technical Education
- Gifted and Talented

The audit test approach and results for each of these PEIMS components are presented below.

Economically Disadvantaged

A student that is classified as "economically disadvantaged" is entitled to free or reduced lunch and is automatically eligible for Pre-Kindergarten. CEP or income verification forms must be obtained, with a few exceptions, for a student to be coded as economically disadvantaged, unless the student's family receives SNAP or TANF. The form must include the number of family members and gross income for each member. A student will be classified as economically disadvantaged if the family's income is within a threshold for their respective size. These thresholds are updated annually by the USDA, therefore a form must be completed each year by the student's family. The audit team developed a test to determine if the students who were classified as economically disadvantaged through the use of CEP or income verification forms qualified for the designation based on the USDA thresholds.

- **Test Approach**

  – Obtained a list of all students coded as economically disadvantaged.

  – Isolated the students coded as a "99," or other economically disadvantaged.

  – Randomly selected ten students for testing.

  – Obtained the CEP form or income verification form for each student to validate its existence **(Test 1)**.

  – Inspected the date of the CEP to validate that a form was completed for the 2018-19 school year **(Test 2)**.

  – Compared the income amount and family size to the USDA thresholds to validate that the student qualified for free or reduced lunch **(Test 3)**.

- **Test Results** – Refer to Table 15 for the test results. "P" indicates that a sample passed the test; "N/A" indicates that the test could not be performed due to a lack of data.

Table 15: Test H.1 Results

Sample	Test 1	Test 2	Test 3
1	P	P	P
2	N/A	N/A	N/A
3	P	P	P
4	P	P	P
5	P	P	P
6	P	P	P
7	P	P	P
8	P	P	P
9	P	P	P
10	P	P	P

– The CEP form for one sample was not dated, therefore the test could not be performed.

– The remaining nine samples passed all three tests.

Special Education

Students who receive special education services have extensive documentation including Full and Individual Evaluation (FIE) disability reports, Admission, Review, and Dismissal (ARD) Committee Meeting forms, and IEPs in their special education folders and in *EasyIEP*. This key information is captured and loaded into *EasyIEP* by District and campus staff. The Killeen ISD Technology Department implemented a nightly process in 2019 where *EasyIEP* information is uploaded to *eSchoolPLUS*. As a result of this process, the information that is needed for PEIMS submission and reporting for students receiving special education services is copied into the District's SIS. Prior to the implementation of the automated process, the Special Education data team would apply input data from *EasyIEP* into *eSchoolPLUS*. The audit team developed an audit test to validate the accuracy of primary disability and instructional settings codes within the special education services PEIMS coding.

- **Test Approach**

  – Obtained a list of all students coded as special education as of October 26, 2018.

  – Isolated all students in second grade or below, as process changes were made during the 2017-18 school year based on information included in the *Special Education Follow-Up Audit*.

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- – Randomly selected 15 students.

- – Reviewed the FIE for each student to validate that it exists **(Test 1)** and that the primary disability agrees to the PEIMS coding **(Test 2)**.

- – Reviewed the IEP that was active as of October 26, 2018 to validate that it exists **(Test 3)** and that the instructional setting included on the IEP agrees to the PEIMS coding **(Test 4).**

- ▪ **Test Results** – Refer to Table 16 for the Test H.2 results. "P" indicates that a sample passed the test.

Table 16: Test H.2 Results

Sample	Grade	PD	PD Description	IS	IS Description	Test 1	Test 2	Test 3	Test 4
1	2	2	Other Health Impairment	41	Resource Room/Services Less than 21 percentage	P	P	P	P
2	2	10	Autism	44	Self-Con, M/M/S, Reg Campus More than 60 percentage	P	P	P	P
3	1	10	Autism	40	Mainstream	P	P	P	P
4	EE	14	Noncategorical Early Childhood	44	Self-Con, M/M/S, Reg Campus More than 60 percentage	P	P	P	P
5	2	8	Learning Disability	42	Resource Room/Services At Least 21 percentage and Less than 50 percentage	P	P	P	P
6	KG	14	Noncategorical Early Childhood	40	Mainstream	P	P	P	P
7	2	10	Autism	40	Mainstream	P	P	P	P
8	1	10	Autism	44	Self-Con, M/M/S, Reg Campus More than 60 percentage	P	P	P	P
9	1	2	Other Health Impairment	40	Mainstream	P	P	P	P

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Sample	Grade	PD	PD Description	IS	IS Description	Test 1	Test 2	Test 3	Test 4
10	EE	2	Other Health Impairment	44	Self-Con, M/M/S, Reg Campus More than 60 percentage	P	P	P	P
11	KG	7	Emotional Disturbance	44	Self-Con, M/M/S, Reg Campus More than 60 percentage	P	P	P	P
12	1	3	Auditory Impairment	44	Self-Con, M/M/S, Reg Campus More than 60 percentage	P	P	P	P
13	2	8	Learning Disability	40	Mainstream	P	P	P	P
14	1	10	Autism	44	Self-Con, M/M/S, Reg Campus More than 60 percentage	P	P	P	P
15	2	2	Other Health Impairment	41	Resource Room/Services Less than 21 percentage	P	P	P	P

- All tested students had sufficient documentation supporting the applied PEIMS codes for primary disability and instructional setting.

At-Risk

Students who are classified as "at-risk" have been determined to be at-risk of dropping out of school. These students are expected to receive accelerated instruction to reduce the risk of dropping out of school. The State of Texas uses 14 indicators to qualify students as "at-risk", stating that a student is at-risk if they are under 26 years of age and meet one or more of the following criteria:

1) Was not advanced from one grade level to the next for one or more school years;

2) If the student is in grade 7, 8, 9, 10, 11, or 12, did not maintain an average equivalent to 70 on a scale of 100 in two or more subjects in the foundation curriculum during a semester in the preceding or current school year, or is not maintaining such an average in two or more subjects in the foundation curriculum in the current semester;

3) Did not perform satisfactorily on an assessment instrument administered to the student under Subchapter B, Chapter 39, and who has not in the previous or current school year subsequently performed on that instrument or another appropriate instrument at a level equal to at least 110 percent of the level of satisfactory performance on that instrument;

4) If the student is in prekindergarten, kindergarten, or grade 1, 2, or 3 and did not perform satisfactorily on a readiness test or assessment instrument administered during the current school year;

5) Is pregnant or is a parent;

6) Has been placed in an alternative education program in accordance with Section 37.006 during the preceding or current school year;

7) Has been expelled in accordance with Section 37.007 during the preceding or current school year;

8) Is currently on parole, probation, deferred prosecution, or other conditional release;

9) Was previously reported through the Public Education Information Management System (PEIMS) to have dropped out of school;

10) Is a student of limited English proficiency, as defined by Section 29.052;

11) Is in the custody or care of the Department of Family and Protective Services or has, during the current school year, been referred to the Department by a school official, officer of the juvenile court, or law enforcement official;

12) Is homeless, as defined by 42 U.S.C. Section 11302, and its subsequent amendments;

13) Resided in the preceding school year or resides in the current school year in a residential placement facility in the district, including a detention facility, substance abuse treatment facility, emergency shelter, psychiatric hospital, halfway house, cottage home operation, specialized child care home, or general residential operation;

14) Has been incarcerated or has a parent or guardian who has been incarcerated, within the lifetime of the student, in a penal institution as defined by Section 1.07, Penal Code.[5]

The majority of codes are applied automatically in *eSchoolPLUS* based on the assessment results, retention data, discipline data, or grades for the student. Codes 5, 8, 10, 11, 12, and 14 require manual intervention. Code 10, limited English proficiency, is tested separately and was excluded from this test. Students coded as homeless represented the largest manually coded population of at-risk students, excluding LEP students, and were tested separately.

The audit team designed a test to validate the accuracy of at-risk codes.

▪ **Test Approach**

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[5] Texas Education Code Sec. 29.081.

–   Obtained a list of all students coded as at-risk as of October 26, 2018.

–   Randomly selected 10 students.

–   Obtained evidence to validate that the at-risk code was accurate **(Test 1)**.

▪   **Test Results –** Refer to Table 17 for the test results. "P" indicates that a sample passed the test.

Table 17: Test H.3 Results

Sample	At-Risk Code	Test 1
1	4	P
2	4	P
3	4	P
4	1	P
5	2	P
6	2, 4	P
7	4	P
8	2, 4	P
9	2, 4	P
10	3	P

–   All samples were accurately coded.

Accuracy of PEIMS Homeless Coding – The McKinney-Vento Homeless Education Assistance Improvements Act of 2001 requires school districts to provide free breakfast and lunch to homeless students and transportation to the student's school of origin, defined as the school the student attended when permanently housed or the school in which the student was last enrolled. The Homeless Awareness Response Program (HARP) in Killeen ISD is responsible for identifying and serving homeless students. Killeen ISD identifies homeless students during the registration process. Each student must complete a Student Residency Questionnaire (SRQ). The SRQ includes the following questions:

1)   Is the student's current address a temporary living arrangement?

2)   Is this temporary address due to a military/PCS move?

3)   Is this temporary living arrangement due to loss of housing, economic hardship, domestic violence, or divorce?

4)   Is the student an unaccompanied youth (not in the physical custody of a parent or legal guardian)?

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5) Is the student in Foster Care?

If any of the above questions are answered "yes," the parent, legal guardian, or student must check if the student is in one of the following:

- A hotel or motel (name of hotel or motel must be provided);

- A shelter (name of shelter and case manager must be provided);

- With more than one family in a house or apartment (the number of bedrooms, people, name of house owner, and relationship of the owner to the student must be provided);

- A tent, car, van, abandoned building, on the street, at a campground, in a park, or other unsheltered location.

The physical address of the student must be listed and the names, grades, and ages of any temporarily housed siblings must be included, if applicable.

Once the SRQ is completed, the HARP campus counselor, which is typically a counselor or administrator, will review the SRQ for answers indicating that the student is homeless. If the student was documented as homeless on the SRQ, the HARP campus counselor will interview the parent or guardian and student to determine the veracity of responses. The counselor will include interview notes in *eSchoolPLUS*. If the HARP campus counselor determines that the student is homeless, the HARP campus counselor will scan and email the SRQ to the HARP office. The HARP secretary will monitor the email and create a HARP folder for all students whose SRQs are received. The Killeen ISD Homeless Liaison will review the SRQ and the interview notes to determine if the student is eligible. The Liaison will electronically sign the SRQ and indicate which of the following PEIMS codes should be applied:

- Code 0 – The student is not homeless.

- Code 2 – The student lives temporarily doubled-up.

- Code 3 – The student is unsheltered.

- Code 4 – The student lives in a motel or hotel.

- Code 5 – The student lives in a shelter or transitional housing.

The SRQ is then placed into the HARP campus counselor's *SharePoint* folder. The HARP campus counselor will then access *eSchoolPLUS* and input the homeless coding information for the student.

The audit team developed an audit test to validate the accuracy of PEIMS coding for homeless students.

- **Test Approach**

- Obtained a list of all students coded as at-risk as of October 26, 2018.

- Isolated all students with a homeless status that did not equal 0.

- Randomly selected 10 students.

- Obtained the SRQ for each student to validate that it was completed and signed **(Test 1)**.

- Inspected the SRQ for answers supporting the applied homeless code **(Test 2)**.

- Obtained interview notes to validate that an interview with the HARP campus counselor occurred **(Test 3)**.

- Inspected the SRQ for Homeless Liaison approval and PEIMS coding to validate that the applied homeless code matched the approved homeless code **(Test 4)**.

- **Test Results** – Refer to Table 18 for the test results. "P" indicates that a sample passed the test.

Table 18: Test H.4 Results

Sample	Grade	Homeless Code	Homeless Code Description	Test 1	Test 2	Test 3	Test 4
1	12	2	Student lives temporarily doubled-up at any time during current school year	P	P	P	P
2	PK	2	Student lives temporarily doubled-up at any time during current school year	P	P	P	P
3	7	2	Student lives temporarily doubled-up at any time during current school year	P	P	P	P
4	1	2	Student lives temporarily doubled-up at any time during current school year	P	P	P	P
5	10	4	Student lives in motel or hotel at any time during current school year	P	P	P	P
6	6	2	Student lives temporarily doubled-up at any time during current school year	P	P	P	P
7	4	2	Student lives temporarily doubled-up at any time during current school year	P	P	P	P
8	8	2	Student lives temporarily doubled-up at any time during current school year	P	P	P	P

Sample	Grade	Homeless Code	Homeless Code Description	Test 1	Test 2	Test 3	Test 4
9	2	2	Student lives temporarily doubled-up at any time during current school year	P	P	P	P
10	12	2	Student lives temporarily doubled-up at any time during current school year	P	P	P	P

– All samples passed each test.

Career and Technical Education

For students that elect to take Career and Technical Education (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 Killeen ISD are:

- 0 – No CTE coursework

- 1 – One CTE course or no coherent sequence of CTE coursework

- 2 – Coherent sequence of CTE courses and 2 or more CTE courses completed or in progress

Section 8.2.4 – PEIMS Student Category Data Submission Requirements of the *2018-19 Texas Education Data Standards* states that in order for a student to be coded as a "2," the student must have a four-year graduation plan to take a coherent sequence of CTE courses. If the student was enrolled in a CTE course, but does not have a four-year graduation plan to take a coherent sequence of courses, a "1" must be applied. The audit team developed a test to validate the accuracy of codes applied to CTE students and to verify the existence of required supporting documentation.

- **Test Approach**

  - Obtained a list of all students with a CTE code of 1 or 2 as of October 26, 2018.

  - Randomly selected 10 students.

  - Obtained each student's graduation plan to validate that it exists **(Test 1)**.

  - Analyzed the graduation plan to validate that a coherent sequence of CTE courses exist **(Test 2)**.

  - Obtained each student's transcript.

  - Analyzed the transcript to validate that a CTE course was taken by the student **(Test 3)**.

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- Compared the CTE courses listed on the transcript to the CTE courses included on the graduation plan to validate that courses satisfying plan requirements have been previously taken **(Test 4)**.

▪ **Test Results** – Refer to Table 19 for the test results. "P" indicates that a sample passed the test.

Table 19: Test H.5 Results

Sample	Grade	CTE Indicator	Test 1	Test 2	Test 3	Test 4
1	8	1	P	P	P	P
2	8	1	P	P	P	P
3	10	1	P	P	P	P
4	10	1	P	P	P	P
5	9	1	P	P	P	P
6	11	1	P	P	P	P
7	9	2	P	P	P	P
8	12	2	P	P	P	P
9	9	2	P	P	P	P
10	10	2	P	P	P	P

- All samples had the correct CTE code applied.

Analysis 2. Accuracy of the CTE Course List – The audit team tested the accuracy of all courses coded as CTE in Killeen ISD by comparing these courses to the TEA CTE course list found in Code Table C022 of the TSDS PEIMS Data Standards.

▪ **Analysis Approach**

- Obtained a report of all CTE courses with recorded attendance during 2018-19 from *OnData Suite*.

- Compared the service IDs for each course to the service IDs included in the TSDS PEIMS Data Standards.

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- **Analysis Results**

  – All CTE courses with recorded attendance reported by the District had a valid CTE service ID included in the TSDS PEIMS Data Standards.

Gifted and Talented

TEA requires each district to maintain documentation supporting the identification of a student as gifted and talented. Board Policy EHBB (Local) governs how the Gifted and Talented (G/T) program at Killeen ISD operates.

- *Parental Consent* – This portion of the policy states that written parental consent must be obtained before conducting an individual assessment that is part of a screening or identification process.

- *Selection* – A committee of three parties, all of whom are trained in the nature and needs of gifted students, shall evaluate each nominee according to established criteria. The committee will determine if the gifted program is the most appropriate instructional setting for each nominated student.

- *Assessments* – All data that is collected during the assessment and identification process must be measured against Board-approved criteria.

- *Notification* – Parents and students shall be notified in writing upon selection to the program. Written parent permission must be obtained before placing a student in a program.

The audit team developed a test to validate the existence of the parent permission letters with parent signatures and dates, student assessment results, and signed committee evaluation forms.

- **Test Approach**

  – Obtained a list of all students coded as gifted and talented as of October 26, 2018.

  – Isolated all students in second grade or below, as the primary test objectives focused on documentation needs triggered by identification.

  – Randomly selected 15 students.

  – Obtained written documentation provided by a parent consenting to their child being assessed to validate that the documentation exists **(Test 1)**.

  – Obtained gifted and talented assessments each student performed.

  – Compared the parental consent date to the assessment date to validate that consent was received prior to the assessment being conducted **(Test 2)**.

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- Obtained evidence to validate that a three-person committee approved the student's entrance to the G/T program **(Test 3)**.

- Obtained written documentation provided by the parent consenting to their child being placed in the G/T program to validate that it exists **(Test 4)**.

- Obtained documentation proving a student's placement date within G/T.

- Compared the parental consent date to the placement date to validate that consent was received prior to the student's placement into the G/T program **(Test 5)**.

- **Test Results** – Refer to Table 20 for the test results. "P" indicates that a sample passed the test; "F" indicates that a sample failed the test; "N/A" indicates that the test could not be performed due to a lack of data.

Table 20: Test H.6 Results

Sample	Grade	Parent Consent Date	Student Assessment Date	Student Placement Date	Test 1	Test 2	Test 3	Test 4	Test 5
1	1	2/21/2018	3/6/2018	3/26/2018	P	P	P	P	P
2	1	2/12/2018	3/6/2018	3/26/2018	F	P	P	F	P
3	2	12/15/2016	1/23/2017	1/31/2017	P	P	P	P	P
4	1	10/18/2017	11/6/2017	11/29/2017	F	P	P	F	P
5	2	3/5/2018	4/9/2018	8/27/2018	P	P	P	P	P
6	2	9/26/2017	9/28/2017	10/30/2017	P	P	P	P	P
7	1	2/20/2018	3/6/2018	3/26/2018	F	P	P	F	P
8	2	10/20/2017	11/6/2017	11/29/2017	F	P	P	F	P
9	2	10/18/2017	11/6/2017	11/29/2017	P	P	P	P	P
10	1	2/2/2018	2/16/2018	2/26/2018	P	P	P	P	P
11	2	8/26/2016	9/27/2016	10/21/2016	P	P	P	P	P
12	2	N/A	N/A	10/18/2018	N/A	N/A	N/A	N/A	N/A
13	2	3/7/2018	3/21/2018	4/30/2018	F	P	P	F	P

Sample	Grade	Parent Consent Date	Student Assessment Date	Student Placement Date	Test 1	Test 2	Test 3	Test 4	Test 5
14	1	2/12/2018	3/6/2018	3/26/2018	F	P	P	F	P
15	1	2/6/2018	2/15/2018	2/26/2018	P	P	P	P	P

- – Samples 2, 4, 7, 8, 13, and 14 did not maintain evidence that written parent consent was obtained prior to assessment or student entrance.

  - o The audit team inspected the "G/T Students Entry" for each of these students on *eSchoolPLUS* to obtain the consent date.

- – Sample 12 was a military transfer student who was enrolled in a G/T program in their previous state. Texas Senate Bill 90 includes an Interstate Compact on Educational Opportunity for Military Children. This document states that if a military student was enrolled in a gifted program in their sending state, the receiving district will initially include the student in a gifted program. As such, no documentation was generated for this student, preventing the audit team from performing tests.

- – All tested samples had a consent date prior to assessment and program entry.

- – All tested samples had a three-person evaluation committee determine their placement into the G/T program.

Findings and Recommendations

Finding 12: *The District's administrative procedures for gifted and talented students do not align with Board Policy and TEA regulations.*

Administrative Procedure IV-A "Placement/Exit Criteria for Talented and Gifted" addresses many of the requirements discussed in Board Policy EHBB (Local). However, the administrative procedure does not include any discussion on the requirement to obtain written parent consent, which is specifically required by TEA, as documented in Section 8 of the *Student Attendance Accounting Handbook*. This could result in the District not following TEA documentation requirements for G/T students. Written consent documentation was not available for 6 out of 15 students tested in Test X. The District could face a compliance finding if TEA were to perform an audit of the Gifted and Talented program.

Recommendation 16: Update Administrative Procedure IV-A to include a requirement to obtain and store written consent for G/T students.

Inconsistencies across campuses, as seen in Test X, could be reduced by formally requiring the storing of written consent documentation. The District should modify the administrative procedure so that

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campuses are aware of the requirement to have written consent for a student to be assessed for G/T and to enter the G/T program. This updated administrative procedure should be distributed to the campuses, specifically to G/T personnel.

Appendix A – Site Visit Roster

Interviews

The audit team conducted interviews with the following Killeen ISD staff:

- Dr. John Craft, Superintendent
- Dr. Eric Penrod, Deputy Superintendent
- Nancy Duran, Executive Director for Career and Technical Education
- Janice Peronto, Executive Director of Special Education
- Cindy Oppermann, Director of Data and Information Services
- Liodolee Garcia, Director of Bilingual Services
- Jeffrey Heckathorn, Coordinator PEIMS and Demographer
- John Parker, Supervisor of Student Information System
- Debbie Shiller, Manager Data and Business Intelligence
- Phyllis Rosen, Foster Care/Homeless Liaison/Principal
- Michelle Taylor, Data Manager, Guidance and Counseling
- Anna Sampson, PEIMS Specialist
- Eileen Lebron Ocasio, Bilingual, ELL, Migrant & Immigrant Specialist
- Hilda Vasquez, Bilingual, ELL, Migrant & Immigrant Specialist
- Michelle Oswalt, At-Risk, Dyslexia, Section 504 and Homebound Specialist
- Christina Walker, At-Risk, Dyslexia, Section 504 and Homebound Specialist
- Kathy Gaughan, Systems Analyst SIS Team
- Susan Chaudhry, System Associate SIS Team
- Shelia Cook, PEIMS Secretary

Focus Groups

The audit team conducted the following group interviews; participants were randomly selected by the Gibson audit team.

- Elementary Attendance /Registration Clerks
- Secondary Registration Clerks
- Secondary Attendance Clerks

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- ELL Teachers

- Elementary Principals

- Secondary Principals

- CEP Economic Disadvantage

- Special Education Facilitators

Process Mapping Sessions

The audit team conducted process mapping sessions with various District staff. List of processes that are mapped in these sessions are below:

- Regular attendance taking process

- English Language Learner identification and coding process

- Immigrant student identification and coding process

- Leaver student identification and reporting processes

- Six- week PEIMS reporting process

- New user creation in SIS process

- Removal of terminated user from SIS process

School Visits

The audit team visited seven schools to interview ELL teachers, registration clerks, and attendance clerks and perform six-weeks reporting tests at each campus. The schools visited were selected based on school level and geographic location.

- Maxdale Elementary School

- Iduma Elementary School

- Ira Cross Elementary School

- Belleaire Elementary School

- Eastern Hills Middle School

- Early College High School

- Shoemaker High School

Appendix B – Leaver Audit Checklist

Please see the attached file 'Appendix B. Leaver Audit Checklist.pdf'.

Campus: _____   School Year: _____

Leaver Audit Checklist

Student ID#: _____

Student Name: _____

Grade: _____

Entry Date: _____   Withdrawal Date: _____   Leaver Code: _____

Do student records contain Registration Card(s)?   **Yes**   **No**

Do student records contain KISD Withdrawal Form(s)?   **Yes**   **No**

Did the parent/guardian sign the withdrawal form?   **Yes**   **No**

    If not, please explain: _____

_____

Is there appropriate documentation in the student
folder to justify the chosen leaver code?   **Yes**   **No**

Does the chosen leaver code accurately
appear in District computer system?   **Yes**   **No**

If additional documentation received after initial coding,
was leaver code re-evaluated and updated, if necessary?   **Yes**   **No**

Completed by: _____   Date: _____
                   (*Signature, Printed Name*)

Reviewed by: _____   Date: _____
                  (*Signature, Printed Name*)

Comments: _____

_____

_____