| Internal Audit Report | *Office of Educational Opportunities*<br><br># Educational Opportunities: Online E-Learning Opportunities Audit<br><br>*May 2024* |



Baltimore County Public Schools
Office of Internal Audit

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## Background

The eLearning program provides Baltimore County Public School (BCPS) students in grades 6-12 access to courses in a virtual environment. Students enrolled in the eLearning program access BCPS curriculum and learning outcomes identical to classes offered in traditional school buildings.

## Objective

To determine e-Learning requirements for attendance, grading, and instructional support for eLearning students.

## Results in Brief

Three results were identified related to the eLearning program:

1. Daily attendance records need manual corrections or reconciliations for 328 of the 800 records, or 41%.

2. eLearning teachers did not consistently take attendance during their assigned periods.

3. eLearning staff inconsistently uses the Lowest Score (LS) grading code, instead of the Missing (M) code for missing assignments.

## Potential Risks

1. Inaccuracies could result in financial penalties or loss of funding.

2. Grading missing assignments at 50% instead of 0% can compromise academic integrity by inflating grades for students who did not complete their work.

## Recommendations

1. eLearning staff should establish a more routine reconciliation process and review the current attendance-taking process to determine if options are available for a more accurate and efficient process.

2. eLearning should reinforce attendance requirements to teachers who frequently fail to take attendance.

3. eLearning staff should consult with the Chief Academic Officer to ensure consistency in the implementation of the grading manual and provide training to eLearning teachers.

## Responses

Responses are provided below in the full report.

# Contents

# BACKGROUND

*Organizational Status and Purpose*

The eLearning program provides Baltimore County Public School (BCPS) students in grades 6-12 access to courses in a virtual environment. Students enrolled in the eLearning program access BCPS curriculum identical to classes offered in traditional school buildings. eLearning students are scheduled for synchronous class meetings taught by BCPS teachers that are held during the day and/or the evening. Students also log into Schoology (footnote: Schoology is BCPS' learning management system. It is a software application for the administration, documentation, tracking, reporting, automation, and delivery of educational courses, training programs, materials or learning and development programs. It is also known as the teachers' electronic gradebook.) to access learning resources, submit assignments, participate in discussion boards, and take exams. eLearning does not offer all courses required for graduation.

eLearning students participate in live, required classes with teachers and other students during scheduled meeting times. These meeting times are similar to a bell schedule in any BCPS middle or high school. Students attend live classes to work with teachers and other students.

The eLearning program is separate from the Virtual Learning Program (VLP). The VLP provides full-time virtual instruction from BCPS staff, including both live (synchronous) instruction and anytime (asynchronous) learning. The VLP is a co-enrollment model, and all students are co-enrolled with their primary school of enrollment.

Starting with the 2024-2025 school year, the eLearning program and the VLP will combine into a single program named "Online Learning". Online Learning will be a combination of synchronous and asynchronous learning. Online Learning students will be enrolled in the program for the entire school year.

*Regulations*

The applicable regulations related to eLearning include:
- COMAR 13A.08.01.01 – Attendance
- COMAR 13A.08.01.05 – Student Attendance Policy
- Maryland Code, Education § 7-301
- Maryland Student Records System Manual 2020
- Board Policy and Superintendent Rule 5120 Enrollment and Attendance
- Board Policy and Superintendent Rule 5210 Grading and Reporting
- Board Policy and Superintendent Rule 6600 Education Options Program
- BCPS Attendance Manual

- BCPS Grading and Reporting Procedures Manual

State regulations provide that a record of the daily attendance of each student shall be kept in accordance with regulations of the State Board of Education and the Maryland Student Records System Manual 2020. The MSDE Records Manual identifies the attendance qualifications for full day, half day, and all-day absences.

Superintendent's Rule 5120 provides guidelines for recording and excusing absences and to outlines procedures for monitoring student attendance. Superintendent's Rule 5210 aligns grading and reporting practices with the curriculum assessments of BCPS and the Maryland State Department of Education (MSDE).

The BCPS Attendance Manual includes procedures, strategies, and resources to assist schools in developing a proactive, school-wide attendance plan. In addition, the manual outlines a multi-tiered system of support structures and interventions to use when assisting families in identifying and addressing barriers to regular school attendance.

*Attendance*

Students have daily attendance taken in homeroom and during each scheduled class period. Students must acknowledge they are present using the audio/video tools in Google meet. An automatic call to an absent student's home will occur daily between 9:30am and 10:00am.

Daily and quarterly reconciliations of attendance are recorded in FOCUS for all eLearning students. The student's daily attendance is based on the student's schedule (footnote: Not every student attends the eLearning program for the entire day.) and the amount of time that the student should be in attendance. Each period is 80 minutes long and home room is 15 minutes:
- If the student is present 50% of the day, they are considered present for the full day.
- If a student is present 10% to 49% of the day, they are considered in attendance for ½ day.
- A student is considered absent if they are there for 10% or less of the day.

If there's an appearance that a student was marked present but has a "majority of absences in each individual course," staff will recalculate the number of minutes the student was absent overall and make any applicable changes in accordance with the MSDE records manual.

*Grading*

BCPS' eLearning program uses the 50-point grading scale to evaluate student performance and report progress. In the 50-point scale, all scores will range between 50 and 100. Students scoring less than 50% on any

given assignment will receive an LS code, indicating the score is outside of the point range. This includes any non-submitted assignments.

Final marking period grades are calculated using the following formula:
- Major assessments will count towards 30% of the marking period grade.
- Minor assessments will be counted for 70% of the marking period grade.
- Questions about grades on an assignment should first be communicated to the students' teacher of record.
- Any appeals should be directed to the program administrator.

The following grading procedures are outlined in the BCPS grading manual for students with a special Education IEPs for high school and middle school students (eLearning students are grades 6-12).
- All students with disabilities who are non-diploma bound will be graded as pass or fail.
- All diploma-bound students will be graded on the standards aligned to the course or grade level.

Grading Codes
The BCPS grading manual provides the following guidance for the assignment of codes in Schoology:

- Lowest Score (LS) Code
  This code calculates 50% of the total possible points. This code may be used when a student attempts a task and earns below 50% of the total points possible. An attempted assignment should show a reasonable effort on the part of the student. Assignments that do not show a reasonable effort can be marked as Incomplete(I). If no attempt is made on an assignment or an assignment is not submitted, the Missing (M) code can be used.

- Missing (M) Code
  The BCPS Grading and Reporting manual indicates that the "M" code calculates as a 0 (zero) for the assignment and that the "M" code may be used when a student is absent or if a student has not completed an assignment. The Missing (M) code should only be entered after the due date of the assignment has passed.

*IEP and 504 Plan Support*

For eLearning students with an IEP and/or a 504 plan:
- Home school building staff are relied upon to deliver IEP and 504 plan support for students.
- Home school building Special educators will work with eLearning personnel to support students with an IEP or a 504 plan.

- It is mandatory to document the accommodation(s) for students with an IEP or 504 plan.
- The accommodation does not alter a student's grade.
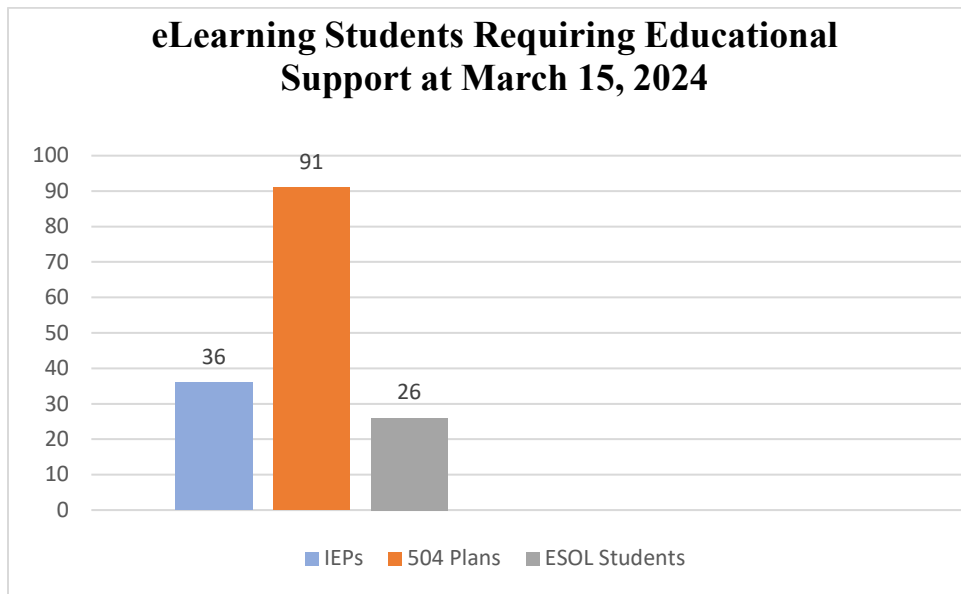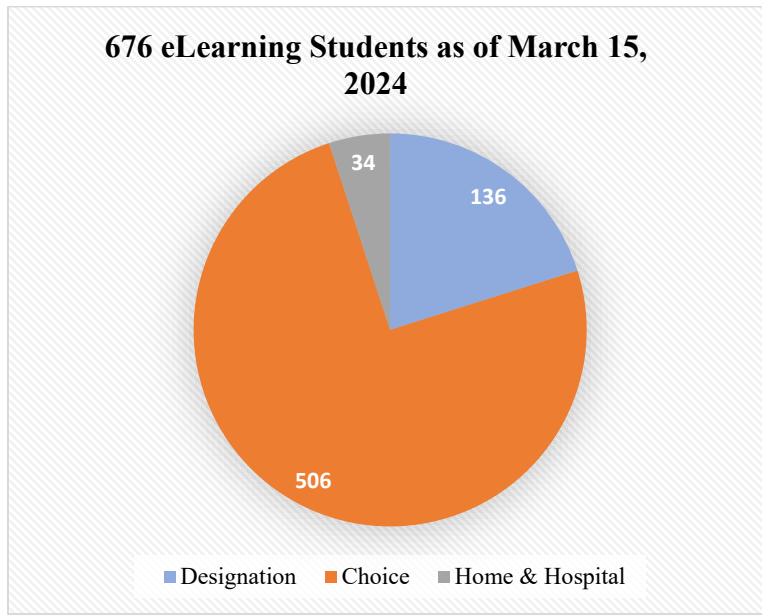- Students with IEPs enter the eLearning program by choice and cannot be designated.

*English for Speakers of Other Languages (ESOL)*

The BCPS grading and procedures manual indicate that "teachers of all content areas must provide assessment and instructional accommodations for English Learners. Accommodations are determined and recorded within the first 45 days of each school year or 30 days of student enrollment if the student enters after October. Accommodations do not change the learning goals/grade-level standards for the student but allow the student to participate in and demonstrate mastery of the standards."

Guiding Practice 6 of the BCPS grading and reporting manual states Accommodations and modifications will be provided for English learners.

# eLEARNING DATA

As of March 15, 2024, there were 413 full time and 263 part time eLearning students. The charts below indicate how the students entered the program and how many students require educational support:

**676 eLearning Students as of March 15, 2024**

- Designation: 136
- Choice: 506
- Home & Hospital: 34

**eLearning Students Requiring Educational Support at March 15, 2024**

- IEPs: 36
- 504 Plans: 91
- ESOL Students: 26

## COMMENDATIONS

*Cooperation*      The Executive Director for the Department of Academic Programs and Options, and the Director and Supervisor of the Virtual Learning Program cooperated fully with the audit team.

*Communication*      The Director and the Supervisor of the Virtual Learning Program were prompt in their responses and provided detailed explanations.

*eLearning Staff*      Members of eLearning staff are extremely knowledgeable and very aware of regulations and guidelines applicable to the eLearning program.

# RESULTS

## 1. BCPS has an attendance process that requires staff to manually review and correct daily attendance.

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|---|---|
| Criteria | The Maryland Student Records System Manual states the following:<br><br>• A student is reported for a full day of attendance if the student is attending an instructional program approved by the State, local school system, and/or school for greater than half of the school day.<br>• A student is "present" or "attending" for a partial day of attendance if the student is attending an instructional program approved by the State, local school system, and/or school for 10% to 50% of the school day.<br>• A student is "absent" or "not attending" if the student is not physically present on school grounds and not participating in instruction or instruction-related activities at an approved off-grounds location for less than 10% of the school day. |
| Finding | Internal Audit reviewed 800 recorded daily attendance records for 40 eLearning students for the month of April 2024, which was 20 school days. Internal Audit determined that daily attendance records need manual corrections or reconciliations for 328 of the 800 records, or 41%. |
| Cause | The BCPS attendance system defaults to present and does not automatically update when eLearning staff make a correction. Additionally, eLearning staff do not have the opportunity to correct attendance in real time and they lost access to Focus for two days in April 2024. |
| Effect | Inaccuracies could result in financial penalties or loss of funding when the attendance process relies on a manual correction and reconciliation process. |
| Recommendation | eLearning staff should establish a more routine reconciliation process to ensure attendance is accurate. Additionally, eLearning staff should review the current attendance-taking process to determine if options are available for a more accurate and efficient process. |
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## Management's Corrective Action

The eLearning program and the Virtual Learning Program are sunsetting at the end of the 2023-2024 school year. Beginning in 2024-2025, the BCPS Online Learning Program will provide an online education option for students. The BCPS Online Learning Program will review the current attendance-taking processes for both programs and develop a more routine reconciliation process. A more efficient and accurate process will be developed. All program staff will be receiving training on the new process. The new process will be monitored, on a routine schedule, by clerical and administrative staff.

## Responsible Person(s)

Director, Online and Extended Learning Programs, Coordinator, BCPS Online Learning Program, and Supervisor(s), BCPS Online Learning Program

## Anticipated Completion Date

October 2024

## 2. eLearning teachers did not consistently take attendance.

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|---|---|
| Criteria | eLearning training guidance indicate the follow for taking attendance: |

- Teaching staff takes homeroom / period attendance. HR- By 8:00 in FOCUS; Period by end of period in Focus
- Teaching staff codes 'Present' or 'Absent' for each student listed on the roster.
- Teaching staff enters absence codes (if proper documentation is provided)
- Verify each student is present.
- Attendance taken and coded in FOCUS.
- Codes updated for previous absences (if documentation is provided to HR teacher)
- Send email with absent students to Admin. Sec. (HR Coverage only)

| | |
|---|---|
| Finding | Internal Audit reviewed 800 recorded daily attendance records for 40 eLearning students for the month of April 2024 and determined that eLearning teachers did not consistently take attendance during their assigned periods. |
| Cause | eLearning teachers failed to follow attendance-taking guidance. |
| Effect | Inaccuracies could result in financial penalties or loss of funding when the attendance process relies on a manual correction and reconciliation process. |
| Recommendation | eLearning staff must provide attendance training to ensure teachers are adhering to policies and procedures for attendance monitoring. Additionally, eLearning should reinforce attendance requirements for teachers who frequently fail to take attendance. |

### Management's Corrective Action

The eLearning program and the Virtual Learning Program are sunsetting at the end of the 2023-2024 school year. Beginning in 2024-2025, the BCPS Online Learning Program will provide an online education option for students. The BCPS Online Learning Program will provide training to all staff on attendance-taking processes. Teacher attendance-taking will be monitored regularly by clerical and administrative staff. Processes will be identified to reinforce attendance requirements for teachers who fail to take attendance.

Responsible Person(s)

BCPS Online Learning Program Coordinator, and BCPS Online Learning Program Supervisor(s)

Anticipated Completion Date

October 2024

3.  Inconsistent use of grade code for missing assignments.

Criteria

The 2023-2024 BCPS Grading and Reporting Procedures indicates that the LS "may" be used when a student when a student attempts a task. If no attempt is made on an assignment or an assignment is not submitted, the M code can be used.

Finding

When a student has not completed an assignment, staff inconsistently uses the Lowest Score (LS) grading code, instead of the Missing (M) code. The LS score calculates as 50% while the M code calculates as 0 for the missed assignment.

Cause

The BCPS Grading and Reporting Procedures Manual contains language that allows for the interpretation and use of grading codes.

Effect

Grading missing assignments at 50% instead of 0% can compromise academic integrity by inflating grades for students who did not complete their work. This practice could undermine the value of assessments and can lead to concerns about fairness and equity among students. Additionally, grading missing assignments at 50% artificially inflates students' grades. Inaccurate grading practices can erode the quality of education by failing to hold students accountable for completing assigned work.

Recommendation

eLearning staff should consult with the Chief Academic Officer to ensure consistency in the implementation of the grading manual. Training and support should be provided to eLearning teachers to ensure they understand and adhere to the established guidelines for grading missed assignments.

Management's Corrective Action

The Chief Academic Officer, in collaboration with content offices, the Division of Schools and in alignment with Board Policy 5210 and Superintendent's Rule 5210 will review and revise the BCPS Grading and Reporting Procedures Manual prior to the start of the 2024-2025 school year. Professional development will be provided to teachers, staff, and administrators on the revised grading and reporting procedures.

Responsible Person(s)

Chief Academic Officer

Anticipated Completion Date

October 2024

# OBJECTIVE, SCOPE & METHODOLGY

Objective To determine if requirements for attendance, grading, and instructional support are adhered to for eLearning students.

Scope The audit period is 2023-2024 School Year.

Methodology To achieve the audit objectives, we performed the following:
- Reviewed applicable regulation and BCPS procedures to identify eLearning attendance, grading, and instructional support requirements.
- Verified that established procedures and protocols for eLearning complied with applicable regulation.
- Evaluated risk and controls over the eLearning process.
- Discussed the attendance, grading, and instructional support processes for eLearning students with staff.
- Determined the number and categories of eLearning students as of March 15, 2024.
- Reviewed student attendance records to understand the attendance reconciliation process.
- Determined if there any eLearning grade appeals.
- Compared daily attendance to attendance recorded for homeroom and courses for consistency.
- Reviewed attendance recorded by eLearning teacher to identify times teachers did not take attendance.
- Benchmarked use of M code vs LS code.