Audit of

Control Procedures in Updating Student Grades in Edgenuity System

May 15, 2020

Report #2020-07

MISSION STATEMENT

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Audit of

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Audit of

Control Procedures in Updating Student Grades in Edgenuity System

EXECUTIVE SUMMARY

Pursuant to the ***Office of Inspector General's (OIG) 2018-19 Work Plan***, we have audited the Control Procedures in Updating Student Grades in the Edgenuity System for July 1, 2017, through February 28, 2019. The primary objectives of the audit were to (1) assess the adequacy of control procedures for updating student grades in the Edgenuity System, and (2) determine whether grade changes were administered in accordance with requirements of ***School Board Policies*** and District guidelines. This audit included the grade changes for the Credit Recovery Program in four schools, and the Virtual School Program administered by the Palm Beach Virtual School. The audit produced the following major conclusions.

1. Access Controls to Edgenuity System Needs Improvement

To determine if confidentiality and integrity of student records in the Edgenuity System is properly safeguarded, the OIG reviewed the Edgenuity System's *User Permission Lists* for the Credit Recovery Program (as of March 20, 2019) and Virtual School Program (as of April 29, 2019); and the *Action Logs* for the Credit Recovery Program and the Virtual School Program for July 1, 2017, through February 28, 2019. The review found that:

- 14 non-District and 144 former District employees had access right to change student grades in the Edgenuity System. Neither group had authority to access student grades.

- An unauthorized user, who retired from the District on September 5, 2018, had accessed the Edgenuity System during a 19-day period (from September 6, through November 29, 2018), and executed 232 record changes. These 232 record changes included: (a) 40 changes in assignment grades, (b) 26 additions of course activities, (c) 3 removals of course activities, (d) 10 resets of assignments, and (e) 153 completion of teacher reviews.

- 25 employees (two of them had two user IDs) transferred to other work locations, but still had access to student records at prior work locations. Consequently, they still had access to change student grades.

(Note: During the audit, on June 24, 2019, the OIG sent a Management Advisory, with details of the exceptions, to the Deputy Superintendent/Chief of Schools for appropriate actions to correct the above deficiencies.)

2. 65% of Sample Edgenuity Assignment Grade Changes Without Valid Justifications

During July 2017 and February 2019, 1,079 assignment grades were changed in the Edgenuity System: 688 for Virtual School Program, and 391 for Credit Recovery Program. The OIG initially reviewed 222 (21%) random samples of changes in grades from "D" or "F" to "A", "B", or "C". The samples included 105 changes for Virtual School and 117 changes for Credit Recovery.

The review found a high percentage of sampled transactions for the Credit Recovery Program at four schools had no documentation for grade changes. Subsequently, the OIG reviewed all grade changes at these four schools. As a result, this audit reviewed 105 samples for Virtual School, and 367 samples for Credit Recovery, for a total of 472 (44%) of the 1,079 grade changes in the Edgenuity System.

The review of documentation for the 472 sample assignment grade changes revealed that 308 (65%) of them did not have documented justifications for the changes. Without the required documentation, there is no assurance that these grade changes were appropriate.

3. Process for Updating SIS Database With Edgenuity Credit Recovery Program Grades Needs Improvement

Our initial review of 222 sample Edgenuity grade changes included 86 courses enrolled by 76 students. As of July 12, 2019, 65 of the 86 courses were completed by 57 students. Our review of the SIS records of the final grades for the 65 courses completed by the 57 students revealed that the final grades for six Credit Recovery Courses completed by students at Riviera Beach Preparatory & Achievement Academy were not accurately recorded in the SIS System: (a) final grades for two courses completed in December 2018 and February 2019 had not been updated into the SIS System as of July 12, 2019; and (b) four Edgenuity final grades were recorded in the SIS System without the approval of the school counselor. Moreover, the final grades for two Credit Recovery Courses completed by students at William T. Dwyer High School were recorded in the SIS System without all the required approvals: the lab manager, school counselor, and teacher of record.

***Management's Responses**: The schools (Riviera Beach Preparatory & Achievement Academy, Turning Points Academy, William T. Dwyer High School, and Palm Beach Virtual School) concur with all the findings, and corrective actions will be implemented accordingly. (Please see pages 20-28.)*

***Comments from the Office of Chief Academic Officer:** The Central Office has reviewed all the information contained in the audit report "Audit of Control Procedures in Updating Student Grades in Edgenuity System" and concurs with the solutions that Palm Beach Virtual has outlined. We will reinforce that all school personnel using Edgenuity receive the proper training before gaining access to the system. The Central Office fully supports the corrective actions described and feels that they will establish an effective system of control. (Please see page 29.)*

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M E M O R A N D U M

TO: Honorable Chair and Members of the School Board
Donald E. Fennoy II, Ed.D., Superintendent of Schools
Chair and Members of the Audit Committee

FROM: Lung Chiu, CPA, Inspector General

DATE: May 15, 2020

SUBJECT: Audit of Control Procedures in Updating Student Grades in Edgenuity System

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PURPOSE AND AUTHORITY

Pursuant to the ***Office of Inspector General's (OIG) 2018-19 Work Plan***, we have audited the Control Procedures in Updating Student Grades in the Edgenuity System for July 1, 2017, through February 28, 2019. The primary objectives of the audit were to (1) assess the adequacy of control procedures for updating student grades in the Edgenuity System, and (2) determine whether grade changes were administered in accordance with requirements of ***School Board Policies*** and District guidelines. This audit included the grade changes for the Credit Recovery Program in four schools, and the Virtual School Program administered by the Palm Beach Virtual School.

SCOPE AND METHODOLOGY

This audit was conducted in accordance with ***Generally Accepted Government Auditing Standards.*** The standards require that we plan and perform the audit to obtain sufficient and appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe the evidence obtained provides a reasonable basis for our findings and conclusions.

The audit covered grade updates in the Edgenuity System for online high school credit courses offered through the District's Credit Recovery Program and Virtual School Program. This audit included interviewing District staff and reviewing:

- Applicable laws, rules, regulations:
  - ***Florida Statutes 1003.4282, Requirements for a standard high school diploma***
  - ***Florida Administrative Rule 6A-1.0955, Education Records***

- ***School Board Policies:***
  - ***2.501 – Information Security – Access Control Policy***
  - ***3.02 – Code of Ethics***
  - ***3.29 – Acceptable Use of Technology by Employees***
  - ***5.50 – Student Education Records***
  - ***8.01 – Promotion, Placement, Graduation – Student Progression Plans***

- District's Bulletins:
  - ***#PD 18-117 CFO – FY 18 Annual IT Application Security Audit***
  - ***#P 19-031 CFO – SY 19 Progress Report/Report Card Timeline***
  - ***#P 17-242 CFO – Student Information System (SIS) Security Profile Review***

- The School District of Palm Beach County ***2018-19 K-12 Student Progression Plan***

- ***Collective Bargaining Agreement Between the School Board of Palm Beach County, Florida and The Palm Beach County Classroom Teachers Association (CTA Agreement)***.

- Student Records in Student Information System (SIS) Database

- Student Records in Edgenuity System for Credit Recovery and Virtual School Programs

- District's eLearning training module: ***Changing Grades within Edgenuity***

We discussed the conclusions with staff during the audit so that corrective actions could be implemented as soon as possible. Draft audit findings were sent to management for review and comments. Management responses are included in the Appendix. We appreciate the courtesy and cooperation extended to us by District staff during the audit. The final draft report was presented to the Audit Committee at its May 15, 2020, Meeting.

BACKGROUND

Student Information System. Beginning in School Year 2017, the District replaced the Total Educational Resource Management System (TERMS) Student Information System with the Focus Student Information System (SIS) to maintain student information, including student attendance, grades, report cards, and transcripts, etc.

Edgenuity System. The District has contracted with Edgenuity Inc. to provide online part-time and full-time courses for its Credit Recovery and Virtual School Programs.

- Credit Recovery Program. The Virtual School Department manages the High School Credit Recovery Program. Edgenuity online instruction is one of the options the District provides for high school students who did not meet the 2.0 minimum Grade Point Average (GPA) graduation requirement and for students who need grade forgiveness. Grade forgiveness allows for a grade "C" or higher earned in the same or comparable course in the Credit Recovery Program to replace the student's prior failing ("D" or "F") grade.

The program allows students to work independently towards the completion for their designated course(s). Coursework requirements may include a combination of academic activities such as quizzes, pre-tests, lectures, essays, topic tests, homework, and cumulative exams. The program is available in all District high schools and alternative schools. Grades earned by the students for those courses through completion of the Edgenuity courses will replace their prior failing grades.

- Virtual School Program. In addition to the Credit Recovery Program, the Edgenuity Program is also used by the District's Virtual School Program for online high school courses.

Edgenuity Assignment Grade and Final Grade. Edgenuity courses are organized by units and lessons. Units are made up of several lessons, with reviews and tests. Each quiz is preceded by lesson notes and instructional videos. Students turn in the notes they took while viewing the instructional videos. The notes can be counted for 10% of the overall grade. Assignment Grade is given to the student after completion of the required activities and quizzes at the end of each lesson.

Edgenuity System tracks student progress and computes the final/overall grade (from 0% to 100%) based on the points received for each unit/lesson.

Grade Conversion. Edgenuity System generates a *Progress Report* for each course completed by a student showing the student's grade percentage. The grade percentage is converted to a letter grade for updating the student records in the SIS Database. (Please see Table 1.)

Table 1
Middle and High School Grading Scale

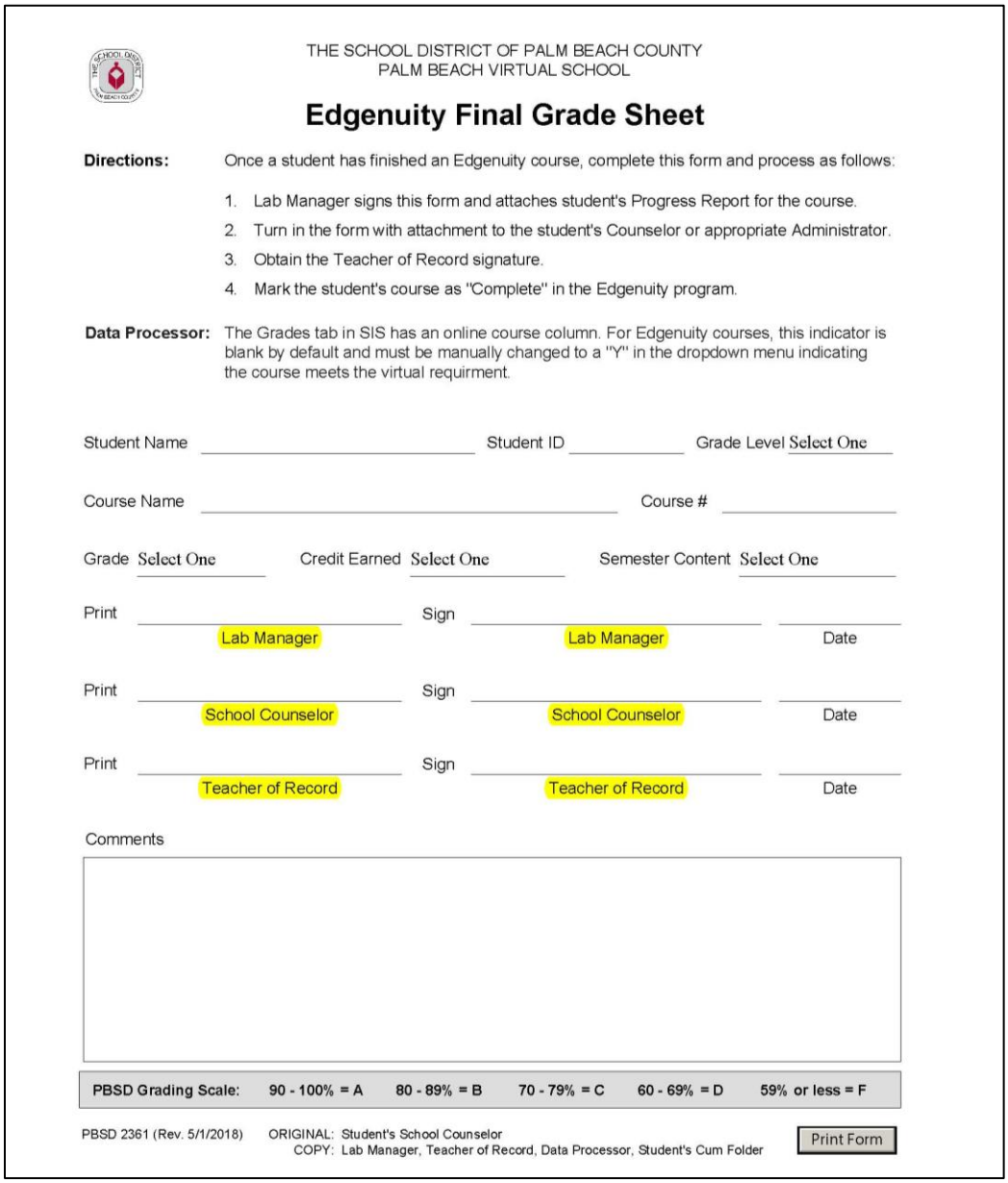
Letter Grade	Score
A	90-100%
B	80-89%
C	70-79%
D	60-69%
F	59% or less

Source: District's ***2018-19 K-12 Student Progression Plan***

Updating Edgenuity Final Grade into SIS.

- Credit Recovery Program. As required by the *Edgenuity Final Grade Sheet (PBSD 2361)*, the Lab Manager at each school center is responsible for initiating the grade change process after the student has completed a Credit Recovery/Remedial Course through the Edgenuity System. The Lab Manager (1) uses the District's grading scale to convert the Edgenuity point grade listed on the student's *Progress Report* to a "letter grade", (2) prepares and signs the *Edgenuity Final Grade Sheet (PBSD 2361)* (Exhibit 1 on page 4), (3) forwards the *Edgenuity Final Grade Sheet (PBSD 2361)* and the student's *Progress Report* to the School Counselor and Teacher of Record for signatures, and (4) submits the completed *Edgenuity Final Grade Sheet (PBSD 2361)* to the data processor for updating the final grade into the SIS System.

Exhibit 1
Edgenuity Final Grade Sheet (PBSD 2361)



THE SCHOOL DISTRICT OF PALM BEACH COUNTY
PALM BEACH VIRTUAL SCHOOL

Edgenuity Final Grade Sheet

Directions: Once a student has finished an Edgenuity course, complete this form and process as follows:

1. Lab Manager signs this form and attaches student's Progress Report for the course.
2. Turn in the form with attachment to the student's Counselor or appropriate Administrator.
3. Obtain the Teacher of Record signature.
4. Mark the student's course as "Complete" in the Edgenuity program.

Data Processor: The Grades tab in SIS has an online course column. For Edgenuity courses, this indicator is blank by default and must be manually changed to a "Y" in the dropdown menu indicating the course meets the virtual requirment.

Student Name _____ Student ID _____ Grade Level Select One

Course Name _____ Course # _____

Grade Select One Credit Earned Select One Semester Content Select One

Print _____ Sign _____ _____
Lab Manager Lab Manager Date

Print _____ Sign _____ _____
School Counselor School Counselor Date

Print _____ Sign _____ _____
Teacher of Record Teacher of Record Date

Comments

PBSD Grading Scale:	90 - 100% = A	80 - 89% = B	70 - 79% = C	60 - 69% = D	59% or less = F

PBSD 2361 (Rev. 5/1/2018) ORIGINAL: Student's School Counselor
COPY: Lab Manager, Teacher of Record, Data Processor, Student's Cum Folder

Print Form

- Virtual School. When a student at any of the Palm Beach County schools completes a Virtual School Course through the Edgenuity Virtual Academy System, the Palm Beach Virtual School's Data Processor converts the Edgenuity grade percentage into a letter grade, and records the letter grade into the SIS System.

Edgenuity Assignment Grade Changes During July 2017 through February 2019. During this period, the Edgenuity System had 1,079 assignment grade changes, which included 688 for the Virtual School Program and 391 for the Credit Recovery Program. (Please see Table 2.)

Table 2
Assignment Grade Changes in Edgenuity System
During July 2017 through February 2019

School / Institution	# of Grade Changes
Credit Recovery Program	
Boynton Beach High	1
Pace Center For Girls	1
Pahokee High	1
Crossroads Academy	2
Seminole Ridge High	2
Wellington High	2
Palm Beach County Jail	4
South Intensive Transition	5
Palm Beach Lakes High	6
Palm Beach Gardens High	8
William T. Dwyer High	8
Turning Points Academy	21
Riviera Beach Prep. & Achievement Academy	330
Credit Recovery Program Total	**391**
Virtual School Program	
Jupiter High	1
Park Vista High	1
Don Estridge Tech Middle	2
Wellington High	2
Omni Middle	4
West Boca High	4
Seminole Ridge High	5
Lake Worth High	6
Suncoast High	6
Loggers Run Middle	7
Santaluces High	8
Olympic Heights High	10
Palm Beach Central High	11
Florida Virtual School Franchise	16
A.W. Dreyfoos S.O.A	20
Spanish River High	68
Atlantic High	74
Boca Raton High	92
Home Education	172
Palm Beach Virtual	179
Virtual School Program Total	**688**

Source: Edgenuity System

Based on the District's Middle and High School Grading Scale, the OIG converted the 1,079 assignment grade changes into letter-grades. (Please see Tables 3 and 4.)

Table 3
Number of Grade Changes – Virtual School Program

Original Grade	New Grade					
	A	**B**	**C**	**D**	**F**	***Total***
A	177	8	3	-	35	***223***
B	25	7	-	-	1	***33***
C	16	18	9	3	2	***48***
D	9	1	2	6	-	***18***
F	237	24	24	10	7	***366***
Total	***464***	***58***	***38***	***19***	***109***	***688***

Table 4
Number of Grade Changes – Credit Recovery Program

Original Grade	New Grade					
	A	**B**	**C**	**D**	**F**	***Total***
A	10	2	2	2	3	***19***
B	55	8	1	4	1	***69***
C	61	9	3	1	-	***74***
D	15	9	18	28	-	***70***
F	41	15	23	48	32	***210***
Total	***182***	***43***	***47***	***83***	***36***	***391***

METHODOLOY FOR SAMPLING OF GRADE CHANGES

Audit Focus. The sampling focused on those assignment grade changes from letter-grades "D" or "F" (below 2.0 grade point) to "A", "B", or "C" (2.0 grade point or above.).

Initial Sample Size: 222. The OIG randomly selected 222 assignment grade changes for detailed analysis. (Please see Table 5.)

Table 5
Initial Sample Size

	Virtual School Program	**Credit Recovery Program**	***Total***
Total # of Grade Changes from "D" or "F" to "A", "B", or "C"	297	121	***418***
# of audit samples	***105***	***117*** [(Note)]	***222***

Note: The other 4 (121-117) grade changes were not included in the audit samples because they were from schools with fewer than five grade changes at each of the schools.

Final Sample Size: 472. The review of the initial 117 samples for Credit Recovery Courses revealed significant noncompliance: insufficient or lack of documentation for changing grades at the four sample schools (Riviera Beach Preparatory & Achievement Academy, Turning Points Academy, William T. Dwyer High, and Palm Beach Gardens High). The remaining 250 grade changes for Credit Recovery Courses at these four schools were included in our samples. As a result, the sample size was increased to 472 grade changes, which included 367 for Credit Recovery Program and 105 for Virtual School Program.

REFERRAL TO THE DEPARTMENT OF EMPLOYEE & LABOR RELATIONS

The audit revealed significant noncompliance with student grade changes at sample schools, i.e. 65% of the sample changes were without valid justifications. On November 20, 2019, we referred our conclusions to the Department of Employee & Labor Relations (ELR) for appropriate actions. On May 6, 2020, ELR indicated that:

> *"The Employee and Labor Relations Department discussed these issues with the principals of the respective sample schools to ensure that they have addressed these concerns administratively as indicated in their management responses and concurrence with the audit findings. It was acknowledged by the principals that there was a lack of training, human error in processing, and poor judgment in following the proper procedures. It was also clarified that the issues identified at Palm Beach Virtual were not those attributed to District staff. Principals of the schools addressed these concerns administratively with pertinent staff and ensured that corrective measures were put in place per their management response to the audit."*

CONCLUSIONS

The audit produced the following major conclusions:

1. Access Controls to Edgenuity System Needs Improvement

School Board Policy 2.501, Information Security - Access Control Policy, Section (2)(a)(ix) states,

> *"The user's User ID shall be immediately disabled when a resignation or termination change in his /her status occurs in PeopleSoft the District's Human Resource system."*

Florida State Board of Education Rule 6A-1.0955 Education Records, Section 6(h) requires that,

> *"Each school board shall adopt a policy for educational records which shall include provisions for the maintenance and security of student records, including procedures to ensure the confidentiality of student records and safeguard records from unauthorized or unintentional access,"*

To determine if confidentiality and integrity of student records in the Edgenuity System is properly safeguarded, the OIG obtained from the vendor (Edgenuity Inc.):

(a) The *User Permission Lists* for accessing the District's Edgenuity Credit Recovery Program (as of March 20, 2019) and Virtual School Program (as of April 29, 2019); and

(b) The *Action Logs* for the Credit Recovery Program and the Virtual School Program for July 1, 2017, through February 28, 2019.

Results of the Review.

(A) 14 Non-District and 144 Former District Employees Had Access Right to Change Student Records in the Edgenuity System

As of April 29, 2019, a total of 1,023 users were assigned 1,061 user IDs with access right to the Edgenuity System; i.e. 686 users with 703 user IDs for the Credit Recovery Program; and 337 users with 358 user IDs for the Virtual School Program. Of these 1,023 users, 144 were former employees with 155 user IDs, and 14 were non-District employees with 16 user IDs. (Please see Table 6).

Table 6
Non-District and Former District Employees
With Access Right to Change Student Records in Edgenuity System

Users	Credit Recovery Program		Virtual School Program		Total	
	# Users	# of User IDs	# of Users	# of User IDs	# of Users	# of User IDs
Former Employees	32	34	112	121	144	155
Non-District Employees	-	-	14	16	14	16
Total	**32**	**34**	**126**	**137**	**158**	**171**

(B) Student Records Changed By One Former District Employee

An unauthorized user (employee ID #1032309), who retired on September 5, 2018, from Riviera Beach Preparatory & Achievement Academy, had accessed the Edgenuity System during a 19-day period (from September 6, through November 29, 2018), and executed 232 transactions after the retirement. These 232 record changes included: (a) 40[Note (1)] changes in assignment grades, (b) 26 additions of course activities, (c) 3 removals of course activities, (d) 10 resets of assignments, and (e) 153 completion of teacher reviews.

Moreover, 16 of the 232 transactions had impact on four students in four schools: (a) 12 teacher reviews for one student each at South Intensive Transition, Inlet Grove High School, Palm Beach Lakes High, and Palm Beach Gardens High, (b) one reset of assignment for one student at Palm Beach Lakes High, and (c) three additions of course activities for one student at Palm Beach Lakes High. *[Note: Riviera Beach Preparation & Achievement Academy concurs with the finding, and indicated that all 16 transactions were done while each of the students was enrolled at Riviera Beach Preparation & Achievement Academy.]*

(C) 25 Employees (two of them had two user IDs) Transferred to Other Work Locations, But Still Had Access to Student Records at Prior Work Locations

25 employees who transferred from Virtual School to other work locations still had access to approve courses in former schools. However, these employees did not have access to the student course requests at their new work locations.

Immediate Action Request. During the audit, on June 24, 2019, the OIG sent a Management Advisory, with details of the exceptions, to the Deputy Superintendent/Chief of Schools for appropriate actions to correct the above deficiencies.

Note (1) These 40 grade changes included: 38 changes to a better grade, and 17 of them were changes from D or F to A, B or C.

On June 27, 2019, the Department of Educational Technology indicated that the following corrective actions will be taken:

- *The Department of Educational Technology and the Virtual School program will collaborate to ensure all accounts listed in Exhibits A, B and E [of OIG's June 24, 2019, Management Advisory] are archived. Estimated completion date is July 15, 2019.*

- *The Department of Educational Technology and the Virtual School program will collaborate to ensure non-District employee have access to Edgenuity on an as-needed basis following board policy with Third-Party Vendor Access.*

- *Collaborating with Virtual School on ensuring all accounts are provisioned through Clever which will immediately prevent former employees from logging in to the system once their PeopleSoft records are updated. We plan for full implementation by August 5, 2019.*

- *Setup quarterly reviews of User Permission Lists of Edgenuity system by both Educational Technology and Virtual School to ensure authorized access by all user.*

On August 27, 2019, the Department of Educational Technology informed the OIG that,

> *Upon further research, we found that the teacher accounts listed in Exhibit B [of OIG's June 24, 2019, Management Advisory] were Edgenuity IS accounts. Edgenuity IS (Edgenuity Virtual Academy) is an online implementation in place to meet State Statute requiring three Virtual Instruction Providers (VIP) available at every level. Edgenuity IS serves grades 6 through 12. This program is delivered through a different mechanism than the rest of the Edgenuity products and uses a different software platform as well. The Edgenuity IS platform does not currently support single sign-on and therefore Edgenuity IS will need to continue to be rostered manually by Palm Beach Virtual School via the Edgenuity company. A query has been created by HR that allows the Virtual Education staff to pull information regarding the counselors that have terminated their employment with the District. This report will be pulled weekly and access will be removed as needed.*

Recommendations

To ensure student performance is accurately assessed, recorded, and protected, the District should take proper remedial actions, including:

a) Immediately removing the Edgenuity User IDs for all former District employees.

b) Disallowing non-District employees' access to student records, and the ability to change grades. Access to student records should be restricted to authorized users on an as-need basis.

c) Implementation of procedures for periodical review of the *User Permissions Lists* to ensure that access to the Edgenuity System be provided only to authorized users on an as-needed basis.

Management's Responses:

Principal of Riviera Beach Preparation & Achievement Academy*: Concurs with the findings.*

The following corrective measures have been implemented for all the staff members that have access to Edgenuity:

- *All staff with access to Edgenuity have been directed to change their password.*
- *Any former district employee or current district employee no longer based at the school site will be reported to the Edgenuity Department within one business day for access removal.*
- *Target Completion Date: 12/06/2019.*

(Please see pages 20-21.)

Department of Palm Beach Virtual School*: Concurs.*

With regard to the Edgenuity high school credit recovery program, the District will be moving to Single Sign-On (SSO). Passwords of all users will be scrambled thereby preventing access directly through the website. As part of this SSO, access is updated/removed as personnel (counselors, teachers, and administrators) transfer or leave the District. Currently, any personnel that have not accessed the program in the past month have had their account archived. Active accounts are also reviewed at every semester site visit.

Targeted Completion Date: Immediately upon resolution of current Edgenuity portal issue being resolved by the Educational Technology department and vendor.

Palm Beach Virtual School now receives weekly updates from Penny Lombard, HR Process Specialist regarding counselor transfers, retirements, resignations, terminations. Upon receipt, Palm Beach Virtual School contacts Edgenuity to disable the account(s) from the Edgenuity Virtual Academy program. Edgenuity Virtual Academy is not able to utilize SSO at this time.

(Please see page 27.)

2. 65% of Sample Edgenuity Assignment Grade Changes Without Valid Justifications

The review of the 472 sample assignment grade changes noted that 308 (65%) of them did not have documented justifications for the changes. (Please see Table 7.) Changes of grades in Edgenuity without justifications included (a) 287 (87%) changes in Riviera Beach Preparatory & Achievement Academy, (b) 10 (48%) changes in Turning Points Academy, (c) two (25%) changes in William T. Dwyer High, and (d) nine (9% of 105 samples) changes in Virtual School.

Table 7
Number of Assignment Grade Changes Without Valid Justifications

Programs / Schools	# of Grade Changes		
	Total	**# of Samples**	**# of Changes Without Valid Justifications**
Credit Recovery			
Riviera Beach Preparatory & Achievement Academy	330	330 (100%)	287 (87%)
Turning Points Academy	21	21 (100%)	10 (48%)
William T. Dwyer High	8	8 (100%)	2 (25%)
Palm Beach Gardens High	8	8 (100%)	–
Total for another 9 Schools	24	–	–
Credit Recovery Total	***391***	***367 (100%)***	***299 (81%)***
Virtual School	688	105 (100%)	9 (9%)
Total Virtual School	***688***	***105 (100%)***	***9 (9%)***
Grand Total	**1,079**	**472 (100%)**	**308 (65%)**

CTA Agreement, Article II, Section A, (7), states,

> *"The employee shall have the right and responsibility to determine grades within the grading policy of the Palm Beach County School District based upon his/her professional judgment of available criteria pertinent to any given subject area or activity to which he/she is responsible."*

The District's eLearning's ***Changing Grades within Edgenuity*** training program provides guidelines for teachers to initiate assignment grade changes. Specifically, Slide #3 of the training material states,

- *Grade changes should only be done for specific reasons*
- *Student was able to provide a correct answer verbally or on paper*

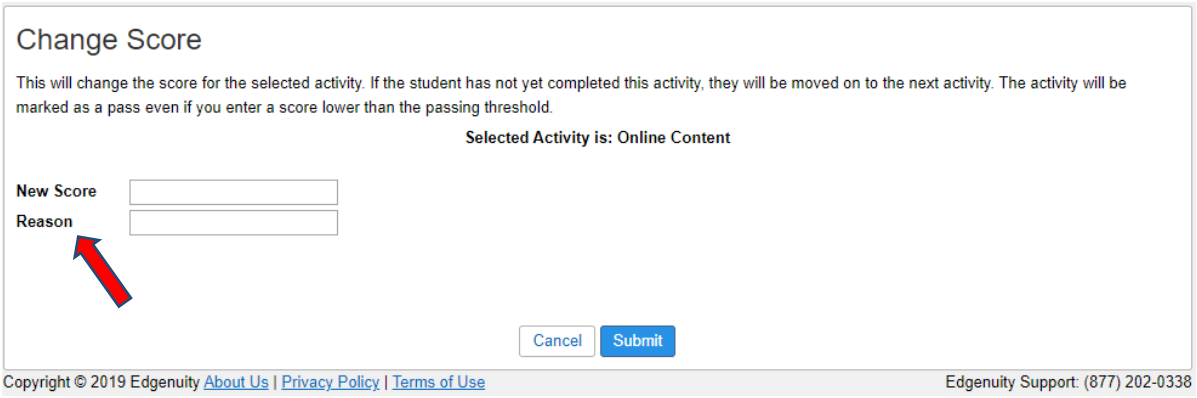
- *Student provided a correct answer in Edgenuity but misspelled or used incorrect terminology*

- *Student completed an alternative assignment that covered the same standards*

- *In all cases, documentation should be kept regarding any work done outside of the program.*

Moreover, the *"Change Score"* screen (Exhibit 2) in the Edgenuity System has a box for the teacher to enter the reasons for changing the student grade/score.

Exhibit 2
Edgenuity System's Change Score Screen



Without the required justifications for changing student grades, there is no assurance that the changes were appropriate. Moreover, improperly changing student grades violates ***School Board Policy 3.02, Code of Ethics***:

> ***Section (5)(c)(iii)****, "Falsifying or misrepresenting information reported regarding the evaluation of student…" , and*
>
> ***Section (5)(g)(iii)****, "Threatening the integrity of student testing security,…; causing achievement of schools to be inaccurately measured or reported;…"*

Recommendation

To maintain the integrity of student grades and to ensure compliance with Edgenuity grading procedures by all program sites, the Virtual School Department should (1) provide specific documentation required for work done outside of the program, (2) require the reason box to be completed on the "*Change Score"* screen, and (3) include the examples in a procedures manual/handbook.

Management's Responses:

Principal of Riviera Beach Preparation & Achievement Academy*: Concurs with the findings.*

During the audit period there were four (4) teachers assigned to the Edgenuity lab. Two (2) of those teachers are currently assigned to these duties. Course assignments and final grade entries are conducted by the guidance counselor and data processor only, and the lab instructors are restricted to monitoring the students' progress. The lab instructors' monitoring duties include checking the students' formative assessments and assigning the students' final chapter and unit grades. It appears that the transactions, reported in the audit report, were a direct result of lab instructor entries. Two (2) of the 4 previously assigned instructors retired during the audit period. Riviera Beach Prep. & Achievement Academy completed 65 courses. 330 grade changes were done within the course work. This is an average of 5 changes per course. Being that Riviera Beach Prep. & Achievement Academy is an Academic Alternative it is more likely that students will need alternative assignments to aid their growth in the Edgenuity coursework. Given the audit findings and facts gleaned from my preliminary review, the following corrective measures have been implemented:

- *Lab instructors have been instructed to maintain a portfolio on all students taking Edgenuity courses.*
- *The student portfolio will be maintained in a secure file cabinet in the Edgenuity lab.*
- *All staff with access to Edgenuity have completed the Changing Grades Edgenuity Course available through the PeopleSoft – My Learning link.*
- *Grade Changes will only be done for the following specific reasons: the student was provide a correct answer verbally, or on paper, the student provides a correct answer in Edgenuity, but it was misspelled, or incorrect terminology was used, the student completed an alternative assignment that covered the same standards. Documentation will be kept in each student's portfolio and stored on Google Drive which would be shared with administration.*
- *Target Completion Date: 12/06/2019.*

(Please see pages 20-21.)

***Principal of Turning Points Academy**: Concurs.*

To maintain the integrity of student grades and to ensure compliance with Edgenuity grading procedures TPA will (1) provide specific documentation required for work done outside of the program, (2) require the reason box to be completed on the "Change Score" screen, and (3) include the examples in a procedure manual/handbook.

Corrective actions to be taken:

1. *All Edgenuity staff on site will take the Changing Grades in Edgenuity course in E-Learning*
2. *Administration and the school counselor will take the Monitoring for Administrators course in E-Learning*
3. *Have a designee to print the Grade Change Monitoring Document and review monthly*
4. *Have a designee to address any Edgenuity grade changes monthly with the lab managers*
5. *Require lab managers to follow the District Grade Change Procedures / Guidelines*
6. *Require lab managers to keep documentation of all grade change requests / completions*
7. *Require lab managers to turn in all grade change documentation to the school counselor during the end of year checkout to be stored.*

(Please see pages 22-23.)

***Principal of William T. Dwyer High School**: The school concurs with the findings.*

Corrective Actions Taken – The school will make sure that all active Edgenuity account holders have completed the E-Learning course titled "changing grades within Edgenuity." The administrator that oversees the program will pull biweekly reports regarding any grade changes that have been submitted in the system to ensure that they were completed for appropriate reasons. The AP that oversees the program will maintain a portfolio for each student that has grade changes within the program. All teachers of record will be trained no later than February 7th 2020. Principal will meet with the stakeholders to privy them to these actions on December 9th 2019.

Target Completion Date: 2/7/2020.

(Please see page 26.)

***Department of Palm Beach Virtual School**: Concurs.*

The ability to Change a Grade within the Edgenuity credit recovery program will be removed from all users. Any grades needing to be updated for a valid reason (the student was able to provide a correct answer verbally or on paper, the student provided a correct answer in Edgenuity, but it was misspelled or used incorrect terminology, the student completed an alternative assignment that covered the same standards) will be done through the Palm Beach Virtual School office. Documentation will need to be sent electronically by the Edgenuity Assistant Principal at the requesting school and will be kept on file by Palm Beach Virtual School for audit purposes. Moving forward, ALL accounts will be disabled at the start of every school year. Personnel will need to attend an Edgenuity Refresher training before being able to regain access.

Targeted Completion Date: Monday, March 30

Edgenuity Virtual Academy teachers (employed by Edgenuity) will continue to be able to change grades. Valid academic reasons will be entered and documentation kept within the platform.

Targeted Completion Date: completed

(Please see pages 27-28.)

3. Process for Updating SIS Database With Edgenuity Credit Recovery Program Grades Needs Improvement

Florida State Board Of Education Rule 6A-1.0955 Education Records, states that,

Section (3)(g): *"Content of Category A records … courses taken and record of achievement, such as grades, units, or certification of competence",* and

Section (2)(a): "*Category A information for each student shall be kept current while the student is enrolled…."*

In addition, the District's ***Student Progression Plan 2018-2019*** requires that "*All courses and grades must be included on the student's transcript*".

Currently, the official academic records, including course grades and transcripts for students are maintained in the District's Student Information System (SIS).

The initial 222 sample Edgenuity grade changes included 86 courses enrolled by 76 students. As of July 12, 2019, 65 of the 86 courses were completed by 57 students.

Our of review of the SIS records of the final grades for the 65 courses completed by the 57 students revealed that the final grades for two Credit Recovery Courses completed by the students at Riviera Beach Preparatory & Achievement Academy were not recorded in the SIS system, and four were recorded without the approval of the school counselor. Moreover, the final grades for two Credit Recovery Courses completed by students at William T. Dwyer High School were recorded in the SIS System without all the required approvals: the lab manager, school counselor, and teacher of record.

Table 8
Edgenuity Final Grades Not Recorded in SIS

Program	# of Sample Grade Changes	Courses With Grade Changes		Courses Completed by Students			
		# of Students	# of Courses	# of Students	# of Courses	Final Grades Recorded in SIS System	
						No	Without Approval/Signatures
Virtual School	105	31	36	24	28	–	–
Credit Recovery	117	45	50	33	37	2	6
Total	**222**	**76**	**86**	**57**	**65**	**2**	**6**

(A) Two Edgenuity Final Grades Not Recorded in the SIS

Final grades for two Credit Recovery Program Courses completed by the students at Riviera Beach Preparatory & Achievement Academy on December 18, 2018, and February 12, 2019 respectively had not been updated into the SIS System as of July 12, 2019. The OIG informed the school of the omissions during the audit, and subsequently, the school updated the SIS student records with the final grades for the completed courses.

(B) Six Edgenuity Final Grades Recorded in the SIS Without Proper Approval

The District's Credit Recovery Program Procedures requires that the Lab Manager, School Counselor and Teacher of Record verify the final grade by signing the *Edgenuity Final Grade Sheet (PBSD 2361).* The review of the *Edgenuity Final Grade Sheets* for the 37 Credit Recovery Courses completed by the 33 students found that:

- Four were not signed off by the School Counselor at Riviera Beach Preparatory & Achievement Academy
- One was not signed off by the School Counselor and the Teacher of Record, and another one was not signed off by the Lab Manager at William T. Dwyer High School

Related approvals are required to validate the accuracy and integrity of the information recorded on the ***PBSD 2361,*** and to authorize the grade changes in the Student Information System.

Recommendation

To protect the integrity of student records, and to help ensure compliance with the ***State Board of Education Rule 6A-1.0955***, the schools (Riviera Beach Preparatory & Achievement Academy and William T. Dwyer High School) should ensure that:

- Student records, including final grades of completed courses, be timely updated into the SIS.

- *Edgenuity Final Grade Sheet* (*PBSD 2361)* should be reviewed and approved by the Lab Manager, School Counselor and Teacher of Record prior to updating the final grades into the SIS System. Periodic summary report should be generated for the principal's monitoring to ensure that all required parties have signed off for the grade changes.

Management's Responses:

Principal of Riviera Beach Preparation & Achievement Academy*: Concurs with the findings. The following corrective measures have been implemented:*

- *Starting immediately, the students are restricted to enrollment in one Edgenuity course at a time. Additional courses will be assigned only when the original course has been completed, and the final grade has been entered in the Student Information System (SIS)*

- *To track the input of Edgenuity Final Grades into the SIS, one staff (Guidance), will be responsible for obtaining all of the required signatures, and one staff (Data Processor), will input the grades in SIS.*

- *Target Completion Date: 12/06/2019.*

(Please see pages 20-21.)

Principal of William T. Dwyer High School*: The school concurs with the findings.*

Corrective Actions Taken – A system will be created where by no grades will be submitted until the Principal, AP, and Data Processor gather during weekly scheduled meetings to review each #2361 prior to SIS input.

Target Completion Date: 2/7/2020.

(Please see page 26.)

***Department of Palm Beach Virtual School**: Concurs.*

A Google Site will be created for Edgenuity Credit Recovery containing an Edgenuity manual, contact information, form 2361, and other documents pertaining to this implementation. Site visits will continue to be conducted every semester during which the grading process will be reviewed with each Edgenuity administrator. Palm Beach Virtual School will also conduct site visits to spot check that form 2361 has been accurately completed.

Targeted Completion Date: start of FY21 school year

(Please see page 28.)

Comments from the Office of Chief Academic Officer:

The Central Office has reviewed all the information contained in the audit report "Audit of Control Procedures in Updating Student Grades in Edgenuity System" and concurs with the solutions that Palm Beach Virtual has outlined. We will reinforce that all school personnel using Edgenuity receive the proper training before gaining access to the system. The Central Office fully supports the corrective actions described and feels that they will establish an effective system of control.

(Please see page 29.)

– End of Report –

Management's Response
Principal of Riviera Beach Preparatory & Achievement Academy

THE SCHOOL DISTRICT
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Riviera Beach Preparatory and Achievement Academy
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(561) 881-4740 PX: 24740 FAX: (561) 881-4731 PX: 24731

Mark Simmonds
PRINCIPAL
Venelse Harrell
ASSISTANT PRINCIPAL
Donald Edwards
ASSISTANT PRINCIPAL

Donald E. Fennoy II, Ed.D.
SUPERINTENDENT

Title I School

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INSPECTOR GENERAL

December 6, 2019

MEMORADUM: Edgenuity Audit

Management responses for Edgenuity Audit from the office of Mark Simmonds, Principal of Riviera Beach Preparatory & Achievement Academy.

(1) Upon my review of the draft report I concur with all findings except the following; **Moreover, 16 of 232 transactions had impact of four students in four schools** (Results of the Review Section B). Upon my investigation I have found that all transactions were done while each student was enrolled at Riviera Beach Prep. & Achievement Academy.

Regarding grade changes, during the audit period there were four (4) teachers assigned to the Edgenuity lab. Two (2) of those teachers are currently assigned to these duties. Course assignments and final grade entries are conducted by the guidance counselor and data processor only, and the lab instructors are restricted to monitoring the students' progress. The lab instructors' monitoring duties include checking the students' formative assessments and assigning the students' final chapter and unit grades. It appears that the transactions, reported in the audit report, were a direct result of lab instructor entries. Two (2) of the 4 previously assigned instructors retired during the audit period. Riviera Beach Prep. & Achievement Academy completed 65 courses. 330 grade changes were done within the course work. This is an average of 5 changes per course. Being that Riviera Beach Prep. & Achievement Academy is an Academic Alternative it is more likely that students will need alternative assignments to aid their growth in the Edgenuity coursework. Given the audit findings and facts gleaned from my preliminary review, the following corrective measures have been implemented.

(2) The following corrective measures have been implemented for all the staff members that have access to Edgenuity:

- All staff with access to Edgenuity have been directed to change their password.
- Lab instructors have been instructed to maintain a portfolio on all students taking Edgenuity courses.
- The student portfolio will be maintained in a secure file cabinet in the Edgenuity lab.
- Starting immediately, the students are restricted to enrollment in one Edgenuity course at a time. Additional courses will be assigned only when the original course has been completed, and the final grade has been entered in the Student Information System (SIS).

Management's Response
Principal of Riviera Beach Preparatory & Achievement Academy

- All staff with access to Edgenuity have completed the Changing Grades Edgenuity Course available through the PeopleSoft - My Learning link.

- To track the input of Edgenuity Final Grades into the SIS, one staff (Guidance), will be responsible for obtaining all of the required signatures, and one staff (Data Processor), will input the grades in SIS.

- Grade Changes will only be done for the following specific reasons: the student was provide a correct answer verbally, or on paper, the student provides a correct answer in Edgenuity, but it was misspelled, or used incorrect terminology was used, the student completed an alternative assignment that covered the same standards. Documentation will be kept in each student's portfolio and stored on Google Drive which would be shared with administration.

- Any former district employee or current district employee no longer based at the school site will be reported to the Edgenuity Department within one business day for access removal.

(3) Targeted Completion Date; **12/06/2019**

Mark Simmonds, Principal

Management's Response
Principal of Turning Points Academy

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Turning Points Academy Response to Edgenuity Audit findings

1. **Concur** with Findings: High percentage of Credit Recovery Program grade changes had no documentation.

Recommendation: To maintain the integrity of student grades and to ensure compliance with Edgenuity grading procedures TPA will (1) provide specific documentation required for work done outside of the program, (2) require the reason box to be completed on the "Change Score" screen, and (3) include the examples in a procedure manual/handbook.

2. Corrective actions to be taken

Mr. T. Hart (AP) and Ms. J. Jones (Guidance) discussed the following with Ms. Putre and Ms. Terribile during the meeting on 12/9:

1. All Edgenuity Staff on Site will take the Changing Grades in Edgenuity course in E-Learning
2. Administration and Ms. Jones will take the Monitoring for Administrators course in E-Learning
3. Have a Designee to Print the Grade Change Monitoring Document and Review monthly
4. Have a Designee to Address any Edgenuity Grade Changes Monthly with the Lab Managers

Management's Response
Principal of Turning Points Academy

5. Require Lab Managers to follow the District Grade Change Procedures/Guidelines
6. Require Lab Managers to keep Documentation of all Grade Change Requests/Completions
7. Require Lab Managers to turn in all Grade Change documentation to the School Counselor during the End of the Year Checkout to be stored.

SEE Next Page for TPA procedures to be added to school handbook. Immediately.

Management's Response
Principal of Turning Points Academy

PROCEDURES FOR EDGENUITY GRADE CHANGES 2019/2020

Step 1: Lab Manager contacts School Counselor/Administration with documentation and reason for the proposed Grade Change within the Edgenuity Program.

Step 2: School Counselor/Administration will verify if the proposed Grade Change meets the District's guidelines which are as follow:

- Student was able to provide a correct answer verbally or on paper
- Student provided a correct answer in Edgenuity but misspelled or used incorrect terminology
- Student completed an alternative assignment that covered the same standards
- In all cases, documentation should be kept regarding any work done outside of the program

Step 3: School Counselor/Administration will notify the Lab Manager that His/Her proposed grade change meets the District's guidelines or will notify the Lab Manager that the grade change does not meet the District's guidelines.

Step 4a: Lab Manager will proceed with the Grade Change if the School Counselor/Administration notified Him/Her that the grade change meets the District's guidelines. The Lab Manager will (1) have specific documentation required for work done outside of the program, (2) complete the reason why on the "Change Score" screen, and (3) include the examples in a procedures manual/handbook.

Step 4b: Lab Manager will not implement the Grade Change if the School Counselor/Administration notified Him/Her that the grade change does not meet the District's guidelines.

Step 5: Lab Manager will keep all Grade Change requests in a file created by the Lab Manager.

Step 6: School Counselor will print the Grade Change report monthly on the 1st day of the month to monitor for Grade Changes and check for documentation.

Management's Response
Principal of Turning Points Academy

Step 7: School Counselor will meet with the Lab Manager and Administration monthly to discuss Edgenuity which will include any Grade Changes on the Grade Change Report.

Step 8: Lab Manager will keep a Grade Change Request/Completion file.

Step 9: Lab Manager will turn in all documentation for Requested/Completed Grade Changes at the end of the year to the School Counselor during end of the year Checkout.

Step 10: School Counselor will house the Edgenuity Grade Change Documents in a designated file room on site.

3. Targeted completion date for Recommendations.

Recommendation 1. (12/16/19)
Recommendation 2. (12/16/19)
Recommendation 3. (12/16/19)

Management's Response
Principal of William T. Dwyer High School

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Finding #1
Final grades were recorded in SIS without proper approval of the district's credit recovery program. The required signatures were not visible on form 2361.

Conclusion - The school concurs with the findings

Corrective Actions Taken - A system will be created where by no grades will be submitted until the Principal, AP, and Data Processor gather during weekly scheduled meetings to review each #2361 prior to SIS input.

Targeted Completion Date: 2/7/2020

Finding #2
The review found transactions for the credit recovery program had no documentation to justify grade changes.

Conclusion - The school concurs with the findings

Corrective Actions Taken - The school will make sure that all active edgenuity account holders have completed the E-Learning course titled "changing grades within Edgenuity." The administrator that oversees the program will pull biweekly reports regarding any grade changes that have been submitted in the system to ensure that they were completed for appropriate reasons. The AP that oversees the program will maintain a portfolio for each student that has grade changes within the program. All teachers of record will be trained no later than February 7th 2020. Principal will meet with the stakeholders to privy them to these actions on December 9th 2019.

Targeted Completion Date: 2/7/2020

Sincerely,

Mr. Corey Brooks, Principal
William T. Dwyer High School
13601 N. Military Trail
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Tel: (561) 625-7800 | Fax: (561) 625-7870
wtdh.palmbeachschools.org
@DwyerPrincipal

Management's Response
Department of Palm Beach Virtual School

THE SCHOOL DISTRICT OF
PALM BEACH COUNTY, FL

PALM BEACH VIRTUAL SCHOOL
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PALM BEACH GARDENS, FL 33403
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BRADLEY S. L. HENRY
DIRECTOR

KEITH OSWALD.
DEPUTY SUPERINTENDENT/CHIEF OF SCHOOLS

GLENDA SHEFFIELD, PH.D.
CHIEF ACADEMIC OFFICER

JOHN-ANTHONY BOGGESS
ASSISTANT SUPERINTENDENT
CHOICE AND INNOVATION

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JAN 29 2020
INSPECTOR GENERAL

January 29, 2020

Memorandum: Edgenuity Audit

Palm Beach Virtual School is in receipt of the Audit report "Audit of Control Procedures in Updating Student Grades in Edgenuity System" and concurs with the overall findings. The following corrective actions will/have been instituted based on Audit recommendations:

1. Access Controls to Edgenuity System Need Improvement

With regard to the Edgenuity high school credit recovery program, the District will be moving to Single Sign-On (SSO). Passwords of all users will be scrambled thereby preventing access directly through the website. As part of this SSO, access is updated/removed as personnel (counselors, teachers, and administrators) transfer or leave the District. Currently, any personnel that have not accessed the program in the past month have had their account archived. Active accounts are also reviewed at every semester site visit.
Targeted Completion Date: Immediately upon resolution of current Edgenuity portal issue being resolved by the Educational Technology department and vendor

Palm Beach Virtual School now receives weekly updates from Penny Lombard, HR Process Specialist regarding counselor transfers, retirements, resignations, terminations. Upon receipt, Palm Beach Virtual School contacts Edgenuity to disable the account(s) from the Edgenuity Virtual Academy program. Edgenuity Virtual Academy is not able to utilize SSO at this time.
Targeted Completion Date: completed

2. 65% of Sample Edgenuity Assignment Grade Changes Without Justification

The ability to Change a Grade within the Edgenuity credit recovery program will be removed from all users. Any grades needing to be updated for a valid reason (the student was able to provide a correct answer verbally or on paper, the student provided a correct answer in Edgenuity, but it was misspelled or used incorrect terminology, the student completed an alternative assignment that covered the same standards) will be done through the Palm Beach Virtual School office. Documentation will need to be sent electronically by the Edgenuity Assistant Principal at the requesting school and will be kept on file by Palm Beach Virtual School for audit purposes. Moving forward, ALL accounts will be disabled at the start of every school year. Personnel will need to attend an Edgenuity Refresher training before being able to regain access.

Management's Response
Department of Palm Beach Virtual School

Targeted Completion Date: Monday, March 30

Edgenuity Virtual Academy teachers (employed by Edgenuity) will continue to be able to change grades. Valid academic reasons will be entered and documentation kept within the platform.
Targeted Completion Date: completed

3. Process for Updating SIS Database With Edgenuity Credit Recovery Program Grades Needs Improvement

A Google Site will be created for Edgenuity Credit Recovery containing an Edgenuity manual, contact information, form 2361, and other documents pertaining to this implementation. Site visits will continue to be conducted every semester during which the grading process will be reviewed with each Edgenuity administrator. Palm Beach Virtual School will also conduct site visits to spot check that form 2361 has been accurately completed.
Targeted Completion Date: start of FY21 school year

Management's Response
Comments from the Office of Chief Academic Officer

THE SCHOOL DISTRICT OF PALM BEACH COUNTY, FL

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FEB - 5 2020
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MEMORANDUM

February 3, 2020

TO: Lung Chiu

FROM: Glenda Sheffield, Ed.D.

SUBJECT: **CONTROL PROCEDURES FOR UPDATING STUDENT GRADES IN EDGENUITY**

The Central Office has reviewed all of the information contained in the audit report "Audit of Control Procedures in Updating Student Grades in Edgenuity System" and concurs with the solutions that Palm Beach Virtual has outlined. We will reinforce that all school personnel using Edgenuity receive the proper training before gaining access to the system. The Central Office fully supports the corrective actions described and feels that they will establish an effective system of control.

Cc: Jay Boggess, Assistant Superintendent, Choice and Innovation
Randy Law, Director of Audit, Inspector General Office