**Audit of**

**Controls for Updating Student Grades in
Student Information System**

**August 20, 2021**

---

### *MISSION STATEMENT*

The mission of the School District of Palm Beach County is
to educate, affirm, and inspire each student in an equity-embedded school system.

---

Michael J. Burke
Superintendent of Schools

## School Board Members

Frank A. Barbieri, Jr., Esq., Chair
Karen M. Brill, Vice Chair
Marcia Andrews
Alexandria Ayala
Barbara McQuinn
Debra L. Robinson, M.D.
Erica Whitfield

## Audit Committee Members

David H. Talley, Chair
Tammy McDonald, Vice Chair
Mark Bymaster, CPA, CFE
Leondrae D. Camel
Michael Dixon, CPA/PFS
Kathleen Weigel, Ed.D.
(Vacant)

Audit Committee Representatives

Frank A. Barbieri, Jr., Esq., School Board Chair
Michael J. Burke, Superintendent of Schools
Heather Frederick, CPA, Chief Financial Officer
Shawntoyia Bernard, Esq., General Counsel
Maria Lloyd, Principal Representative
Justin Katz, CTA President

# Audit of

# Controls for Updating Student Grades in Student Information System

# Table of Contents

This page intentionally left blank.

# Audit of
# Controls for Updating Student Grades in Student Information System
# EXECUTIVE SUMMARY

Pursuant to the ***Office of Inspector General's (OIG) 2020-21 Work Plan***, we have audited the Controls for Updating Student Grades in the Student Information System (SIS). The primary objectives of the audit were to (1) assess the adequacy of procedures for updating and protecting the integrity of student grades and related information in the SIS, and (2) determine the extent of compliance with applicable ***School Board Policies***.  The audit produced the following major conclusions:

1. **Procedural and Automated System Controls for Updating Student Grades**

    (a) **System Lockout Date Functioning Adequately**

    The SIS allows teachers to edit student's class grades as needed during each marking period until a specified cutoff date.  After the final grade due date, changes to student grades require an online or manual request signed by the originator and approved by the Principal and Regional Superintendent, as appropriate. Our testing determined the SIS Lockout Date control was functioning as designed.

    ***Management's Response****: Management agrees the system lockout date was functioning adequately. (See page 11.)*

    (b) **Employee Access to SIS Granted Prior to Completing Required Training**

    Authorized users of the SIS include school administrators, teachers, other responsible district staff, students, and parents.  The level of access is based on the needs of the user and job responsibilities. All users are required to complete online training before being granted access. We reviewed 75 user accounts and identified five (or 7%) users that were granted access prior to their completion of the required online training, with delays ranging from one to 67 days.

    ***Management's Response****: Current documentation and processes are being reviewed and modified as needed.  Access to the SIS portal tile is activated only after the SIS training is completed. (See page 11.)*

    (c) **Separated Employees' Access to SIS Not Removed Timely**

    We compared the SIS active user list as of April 12, 2021, to the list of separated employees as of April 2, 2021. Our comparison revealed the SIS User IDs for 20 former employees that ended employment between October 2017 and June 2020 had not been disabled and removed from the SIS. We confirmed that no changes to student grades were made by these 20 separated employees during our review period. Separated employees' access to the SIS should be immediately removed to protect the integrity of the SIS, and prevent potential

unauthorized access to the database and improper disclosure of protected information in student education records.

*Management's Response: As per Board Policy 2.501, the user's network ID is immediately disabled in Active Directory upon termination. This in turn restricts access to all district systems including SIS. IT has implemented a process effective May 1, 2021 to end date SIS permissions in a timely manner. (See page 12.)*

### (d) Annual IT Application Security Audit Ineffective

Annually, the Information Technology (IT) Department requests Principals and Department Heads to review a list of active SIS users and confirm the appropriateness of each users' access based on their current job responsibilities and job titles. The Fiscal Year 2020 Security Audit conducted by the IT Department was based on information available as of November 1, 2019; and the confirmation was completed on January 30, 2020. However, we noted five employees who were separated prior to November 1, 2019, still had active SIS user accounts as of April 12, 2021. It appears the FY2020 Security Audit performed by the IT Department was ineffective in identifying and removing access for separated employees.

*Management's Response: The review process is completed by the school or department supervisor, who is responsible for initiating permission changes based on their review. IT is implementing a new process to automatically create an eSupport ticket to request removal or modification of access when a supervisor completes the annual review to ensure any changes identified during the Annual Review are updated in a timely manner. (See page 12.)*

## 2. Twelve (22%) of 54 Sample Grade Changes Were Made Without Principals' Approval
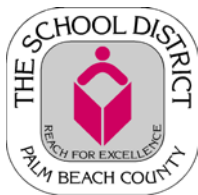
As of February 15, 2021, there were 594 changes to student final grades for the first semester (August 31, 2020, through January 29, 2021) of School Year 2020-2021 at 32 schools. Seven schools each with 10 or more student grade changes accounted for 540 or (91%) of all final grade changes.

The OIG sampled a total of 54 grade changes from the seven schools and reviewed each for adequate documentation and appropriate approval. The review found that 12 (or 22%) sample grade changes processed manually[1] neither included the authorizing signatures of the teachers or the Principals, nor used the *Grade/Course Change Documentation Form* (*PBSD 0797*) or *Course History Update for Missing End of Course (EOC) Exams Form* (*PBSD 2638*).

*Management's Response: Mr. Tierney, Deputy Superintendent/Chief of Schools reinforced current procedures outlined in the Student Progression Plan regarding grade changes with the Principal Supervisors on July 27, 2021. Principal Supervisors have been directed to continually emphasize the importance of following proper protocol with Principals. (See page 12.)*

---

[1] Manual grade changes are based on specific paper forms input by data processors, as opposed to automated updates to SIS through the *Grade Change Request Screen*.

# M E M O R A N D U M

TO:      Honorable Chair and Members of the School Board
         Michael J. Burke, Superintendent of Schools
         Chair and Members of the Audit Committee

FROM:    Teresa Michael, Inspector General

DATE:    August 20, 2021

SUBJECT: Audit of Controls for Updating Student Grades in Student Information System

## PURPOSE AND AUTHORITY

Pursuant to the *Office of Inspector General's (OIG) 2020-21 Work Plan*, we have audited the Controls for Updating Student Grades in the Student Information System (SIS). The primary objectives of the audit were to (1) assess the adequacy of procedures for updating and protecting the integrity of student grades and related information in the SIS, and (2) determine the extent of compliance with applicable *School Board Policies*.

## SCOPE AND METHODOLOGY

This audit was conducted in accordance with *Generally Accepted Government Auditing Standards.* Those standards require that we plan and perform the audit to obtain sufficient, 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 the period July 1, 2018, through April 12, 2021, and included interviewing staff and reviewing:

- *Family Educational Rights and Privacy Act (FERPA)*
- *Section 1003.4282, Florida Statutes, Requirements for a Standard High School Diploma*
- *State Board of Education Rule 6A-1.0955, Education Records*
- *School Board Policie*s:
  - *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 Bulletins*:
  - *#PD 20-129 CFO, FY 20 Annual IT Application Security Audit*
  - *#P 19-031 CFO, SY 19 Progress Report /Report Card Timeline*
  - *#P 20-039 CFO, SY 20 Progress Report /Report Card Timeline*
  - *#SP 19-162 DSCOS, Grading Procedures for Middle and High School Courses*
  - *#P 17-242 CFO, Student Information System (SIS) Security Profile Review*
- *The School District of Palm Beach County K-12 Student Progression Plan, Entry, Promotion, Retention, and Graduation, 2020-2021*
- Student records maintained in the Student Information System
- Student grade change activities for the periods July 1, 2018, through March 31, 2020, and July 1, 2020, through January 29, 2021.
- Student final grade changes for 1st Semester (August 31, 2020-January 29, 2021), School Year 2021.

Details of the audit conclusions were discussed with and provided to staff during the audit so that appropriate corrective actions could be implemented accordingly. The draft report was provided to management for review and comments. Management responses are included in the Appendix. We appreciate the courtesy and cooperation extended to us by staff during the audit. The final draft report was presented to the Audit Committee at its August 20, 2021, meeting.

## BACKGROUND

**Student Information System**. During School Year 2017-18, the District implemented the Focus Student Information System (SIS) to replace the Total Educational Resource Management System (TERMS) for maintaining student information, such as attendance, courses attended, course grades, report cards, and transcripts, etc.

As of April 12, 2021, the SIS had 35,945 user accounts for 18,580 employees. Employees can be assigned multiple user accounts with different roles to accomplish varying objectives of their job function. For example, an afterschool program director is automatically assigned the "afterschool" role based on job title. However, the director may also be given the "billing" role in order to access the billing tab in SIS to update student financial obligations.

**Procedures for Updating Student Grades**. Student grades maintained in the SIS are the official academic records for students. Teachers can update the students' class grades during each marking period as needed until the final grade due date. After the final grade due date, student grades may be updated through the following methods:

(A) Automatic Updates of Student Final Grades Through the *SIS Grade Change Request Screen*. After the final grade verification window is closed and Report Cards are printed, all final grade updates require the teachers to submit requests electronically through the *SIS Grade Change Request Screen* for the Principal's review and approval. The SIS will automatically update the student grades after the Principal approved the grade change request.

(B) <u>Manual Procedures for Updating Student Final Grades</u>. Any changes to student grades other than through the *SIS Grade Change Request Screen* are manually updated by the schools' data processors, supported with justifications documented on one of the following forms. The forms are signed by the teacher of record and approved by the Principal and the Regional Superintendent, as needed:

   (1) *Course History Update for Missing End of Course (EOC) Exams (PBSD 2638)*. This form is used to recalculate a final grade for an EOC exam.

   (2) *Edgenuity Final Grade Sheet (PBSD 2361)*. This form is used to document the final grade when the student has completed an Edgenuity[2] course.

   (3) *Grade and/or Course Change Documentation (PBSD 0797)*. This form is used to update a final grade after a student has completed the Edgenuity's Credit Recovery Course, and all other types of grade changes arising from unusual or extenuating circumstances such as student withdrawal during the last two weeks of a semester.

## CONCLUSIONS

The audit produced the following major conclusions:

1. **Procedural and Automated System Controls for Updating Student Grades**

   To safeguard the integrity and confidentiality of student information, the District implemented both automated controls built in to the SIS and procedural controls for updating student records. The controls specifically designed to protect the integrity of student grades include: (a) a system lockout date for each semester, (b) access controls to the SIS, and (c) an Annual IT Application Security Audit. Our review of the controls revealed the following:

   **(a) System Lockout Date Functioning Adequately**

   The SIS allows teachers to update the students' class grades during each marking period as needed until the final grade due date. After the final grade due date, changes to student grades require (1) the Principal's online approval if the requests were submitted by the teacher through the SIS, or (2) a designated staff, such as the school's data processor, to manually update the grades based on a request form signed by the teacher, and approved by the Principal and Regional Superintendent, as appropriate.

   Our testing of the controls revealed that the SIS Lockout Date feature was functioning as designed for three sample grading-quarters ending on October 17, 2019, December 20, 2019, and November 2, 2020.

   ***Management's Response***: *Management agrees the system lockout date was functioning adequately. (See page 11.)*

---

[2] The Edgenuity System provides online part-time and full-time courses for the Credit Recovery and Virtual School Programs.

### (b) Employee Access to SIS Granted Prior to Completing Required Training

Persons authorized to access the SIS include school administrators, teachers, other responsible district staff (such as school counselors), students, and parents. Students and parents are provided with view only access to their own records. Employees receive access on an as-needed basis compatible with their job function.

As a prerequisite to access the SIS, all users are required to complete the online *SIS Basic Navigation Course* or *SIS Basic Navigation for Teachers Course* before they are granted access to the system. Access requests are submitted electronically and must be approved by the supervising principal or department head.

We selected 75 sample user accounts for detailed examination. The review found that access for all 75 accounts was approved by the related Principals and the assigned roles were compatible with the employees' job duties. However, we also noted the following instances of procedural noncompliances:

- Five users (or 7%) were granted SIS access from one to 67 days prior to the users' completion of the required SIS online training courses.

- One user was granted access two days before the request was approved by the Principal.

### Recommendation

To ensure users are properly authorized to access the SIS, user profiles and access authority for users should be activated only after (1) the requests have been approved by the supervising Principals or Department Heads, and (2) the requestors have completed the required SIS training.

*Management's Response: Current documentation and processes are being reviewed and modified as needed. Access to the SIS portal tile is activated only after the SIS training is completed. (See page 11.)*

### (c) Separated Employees' Access to SIS Not Removed Timely

*Family Educational Rights and Privacy Act (FERPA)* protects, in part, students' personally identifiable information contained in education records from public disclosure. Under the law, "[d]isclosure" means "*to permit access to* or the release, transfer, or other communication of personally identifiable information contained in education records."[3] Accordingly, FERPA limits access to the information in education records only to school officials and identified categories of people with a "legitimate educational interest" in the information. Improper disclosure of students' protected education records carries the potential penalty of withdrawal of U.S. Department of Education funds from violating school districts.

---

[3] *See* 20 U.S.C. 1232g(b)(1) and (b)(2) (emphasis added).

The *State Board of Education Rule 6A-1.0955(6)(h) - Education Records,* requires that the School Board policy for educational records 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...*"

*School Board Policy 2.501, Information Security - Access Control Policy, Section 2(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.*"

We compared the SIS active user list as of April 12, 2021, to the list of separated employees as of April 2, 2021. Our comparison revealed the SIS User IDs for 20 former employees that ended employment between October 2017 and June 2020 had not been disabled and removed from the SIS. (See Table 1.)

Our review of the *Grade Change Reports* for two sample periods during July 1, 2018, through March 31, 2020, and July 1, 2020, through January 29, 2021, concluded that no changes to student grades were made by these 20 separated employees.

**Table 1**
**Separated Employees with Active SIS User Accounts**
**As of April 12, 2021**

| Employee | School/Department | User Profile | Employment End Date |
|---|---|---|---|
| Employee #1 | Boca Raton High | School Wide Personnel | October 8, 2017 |
| Employee #2 | Panther Run Elementary | Teacher | June 4, 2018 |
| Employee #3 | Westward Elementary | District Admin | August 28, 2019 |
| Employee #4 | D.D. Eisenhower Elementary | Food Services | June 30, 2019 |
| Employee #5 | Lantana Middle | Food Services | October 18, 2019 |
| Employee #6 | Boynton Beach High | Teacher | December 20, 2019 |
| Employee #7 | School Psychological Services | 1. District Admin 2. RTI/SBT * | January 8, 2020 |
| Employee #8 | Spanish River High | Teacher | February 20, 2020 |
| Employee #9 | Forest Hill High | School Wide Personnel | February 28, 2020 |
| Employee #10 | Teaching and Learning | District Admin | March 2, 2020 |
| Employee #11 | School Psychological Services | 1. District Admin 2. RTI/SBT | June 29, 2020 |
| Employee #12 | Transportation Services | District Admin | June 30, 2020 |

| Employee | School/Department | User Profile | Employment End Date |
|---|---|---|---|
| Employee #13 | Multicultural Education | 1. ESOL<br>2. Region ESOL | July 31, 2020 |
| Employee #14 | IT Enterprise Applications | 1. District Admin<br>2. Records District Wide | November 10, 2020 |
| Employee #15 | School Trans-Fed/State Program | District Admin | December 3, 2020 |
| Employee #16 | School Psychological Services | RTI/SBT | February 26, 2021 |
| Employee #17 | Glades Academy, Inc. | Teacher | March 9, 2021 |
| Employee #18 | Indian Pines Elementary | District Admin | August 31,2020 |
| Employee #19 | Bear Lakes Middle | SDPBC View | January 29,2020 |
| Employee #20 | Technical Operations | 1. District Admin<br>2. Data Center | June 24,2020 |

*RTI/SBT: Response to Intervention/School Based Team*

**Recommendation**

To protect the integrity of the SIS, and prevent potential unauthorized access to the database and improper disclosure of protected information in student education records, the District should comply with *School Board Policy 2.501* and immediately remove SIS access for all separated employees.

*Management's Response: As per Board Policy 2.501, the user's network ID is immediately disabled in Active Directory upon termination. This in turn restricts access to all district systems including SIS. IT has implemented a process effective May 1, 2021 to end date SIS permissions in a timely manner. (See page 12.)*

**(d) Annual IT Application Security Audit Ineffective**

Annually, the Information Technology (IT) Department conducts an IT Application Security Audit. IT sends a list of active SIS users to each School Principal and Department Head to confirm the appropriateness of each of their employees' access authority, based on current job responsibilities and job titles.

The Security Audits for Fiscal Years 2020 and 2021 were based on information available as of November 1, 2019, and February 1, 2021, respectively. The confirmation processes were completed on January 30, 2020, and May 14, 2021. However, we noted five employees who were separated prior to November 1, 2019, still had active SIS user accounts as of April 12, 2021. (See Table 2.) It appears the FY 2020 Annual IT Application Security Audit performed by IT was ineffective in identifying and removing access for separated employees. Staff did not diligently review the lists and complete the Annual IT Application Security Audits.

**Table 2**
**Employees Separated Prior to FY20 Annual IT Application Security Audit**
**That Still Had Access to SIS as of April 12, 2021**

| Employee | School/Department | User Profile | Employment End Date |
|---|---|---|---|
| Employee #1 | Boca Raton High | School Wide Personnel | October 8, 2017 |
| Employee #2 | Panther Run Elementary | Teacher | June 4, 2018 |
| Employee #3 | Westward Elementary | District Admin | August 28, 2019 |
| Employee #4 | D.D. Eisenhower Elementary | Food Services | June 30, 2019 |
| Employee #5 | Lantana Middle | Food Services | October 18, 2019 |

**Recommendation**

Responsible staff should carefully review and confirm the appropriateness of access provided to their staff during the Annual IT Application Security Audit conducted by IT. All terminated employees and incompatible access for active employees should be timely removed from the District's computer systems.

*Management's Response: The review process is completed by the school or department supervisor, who is responsible for initiating permission changes based on their review. IT is implementing a new process to automatically create an eSupport ticket to request removal or modification of access when a supervisor completes the annual review to ensure any changes identified during the Annual Review are updated in a timely manner. (See page 12.)*

2. **Twelve (22%) of 54 Sample Grade Changes Were Made Without Principals' Approval**

The *SDPBC Student Progression Plan 2020-2021, page 144,* states that,

*"A recorded grade may **not** be changed after report cards are finalized, except for one of the following situations:*

- *The change is initiated by the teacher of record and approved by the principal. **Signature of both the teacher of record and the principal are required**; or*

- *The change is initiated by the principal and approved by the Regional/Instructional superintendent. **Signatures of both the principal and the Regional/Instructional superintendent are required**.*

- *The grade change is a result of the student successfully completing the school's MSCR [Middle School Course Recovery] Program. Signatures by the MSCR instructor or MSCR Program Coordinator, and the principal are required."*

As of February 15, 2021, there were 594 changes to students' final grades for the first semester of School Year 2020-2021 at 32 schools. (See Table 3.) Seven schools accounted for 540 (or 91%) of all final grade changes.

**Table 3**
**Schedule of Grade Changes SY 20-21, 1st Semester**

| School | # of Grade Changes |
|---|---|
| (1) Royal Palm School | 282[a] |
| (2) Jupiter High | 70 |
| (3) Royal Palm Beach High | 60 |
| (4) Forest Hill High | 51 |
| (5) West Boca Raton High | 44 |
| (6) Atlantic High | 23 |
| (7) Seminole Ridge High | 10 |
| (8) 25 Schools with less than 10 grade changes each | 54 |
| *Total # of Grade Changes* | *594* |

[a] Note:425 of the 594 grade changes, including all 282 changes at Royal Palm School, were from a letter grade (A thru F) to a pass/fail grade.

We sampled a total of 54 grade changes from the seven schools with 10 or more changes. We reviewed each for adequate documentation and appropriate approval. The review found that 12 (or 22%) sample grade changes were processed manually (i.e., not using the automated *SIS Grade Change Request Screen*). None of the 12 manually processed grade changes included the authorizing signatures of the teacher or Principal, nor were they documented on the *Grade/Course Change Documentation Form (PBSD 0797)* or *Course History Update for Missing End of Course (EOC) Exams Form* (*PBSD 2638).* (See Table 4.)

**Table 4**
**Grade Changes Without Principal's Approval**

| School | # of Audit Samples | Unapproved Grade Changes |
|---|---|---|
| (1) West Boca Raton High | 7 | 6 |
| (2) Seminole Ridge High | 3 | 3 |
| (3) Jupiter High | 14 | 1 |
| (4) Royal Palm Beach High | 10 | 1 |
| (5) Forest Hill High | 9 | 1 |
| (6) Atlantic High | 5 | - |
| (7) Royal Palm School | 6 | - |
| **Total** | **54** | **12** |

**Recommendation**

To protect the integrity of student grades, grade changes should be made in compliance with the *Student Progression Plan 2020-2021*. All grade changes after report cards are finalized should include the required two signatures and be documented through the *SIS Grade Change Request Screen* or the *Grade/Course Change Documentation Form (PBSD 0797)*.

***Management's Responses***: *Mr. Tierney, Deputy Superintendent/Chief of Schools reinforced current procedures outlined in the Student Progression Plan regarding grade changes with the Principal Supervisors on July 27, 2021. Principal Supervisors have been directed to continually emphasize the importance of following proper protocol with Principals. (See page 12.)*

### *Principal of West Boca Raton High School:*

*<u>Incident 1</u>: Teacher A did not turn her second quarter grades in on time. The student's 1st quarter grade was a C so the computer calculated his grade to a C with only 1 quarter available. The student did earn an A for quarter 2 so the C for quarter 1 and an A for quarter 2 should average to a B. The data processor just changed the grade as she was entering the missing quarter 2 grades from the teacher and there was no grade change through SIS as there were no quarter 2 grades*

*<u>Incident 3-5</u>: When Palm Beach State turned in their grades into West Boca on 12/18/20 they were grades of L. Which meant late. Palm Beach State turned in an updated grade sheet on 1/14/21 so the grades were changed from an L to their respective grades. The data processor changed the grades as there was no teacher from palm beach state that could submit a grade change*

*<u>Incident 6</u>: The student was in edgenuity for the 1st Quarter and did not do any work required. He was then transferred out of the class into a regular classroom setting. Edgenuity does not have grades attached to the class. The student did receive a C for the 2nd quarter. The computer computed his grade using only the 2nd quarter. There should have been an F for the 1st quarter as he did not do any work. The average of an F for the 1st quarter and a C for 2nd quarter should be a D. The graduation coach changed the grade as there was no grade entered through SIS for quarter 1*

*Management Concurs - I have added a discussion of grade changes to my next meeting with the school administration, who will continually maintain documentation of all external District grade changes. (See page 13.)*

### *Principal of Seminole Ridge High School:*

*All 3 grade changes were for college courses taken through Palm Beach State College. Our school counselors received an email notification of the grade change from PB State. The counselors forwarded the email to the data processors to initiate the change without approval from the school principal. All school counselors have been notified that the correct process is to initiate the grade change using PBSD 0797. School counselors will route the form to the principal. The principal will request the approval signature of the instructional superintendent before signing and forwarding the form to data processing for final action. (See page 14.)*

*Principal of Jupiter High School:*

*Guidance counselor Meghan Thornton received an official transcript from Palm Beach State College requesting a grade change be made for a student with a 504 plan. In response to this response, Mrs. Thornton changed the grade. This request was not made through SIS (Student Information System) because the change was requested through the student's college professor.*

*I have informed all guidance counselors & staff that in the future, all grade changes must be requested through SIS and approved by the principal. (See page 15.)*

*Central Region Secondary Schools Instructional Superintendent:*

**Royal Palm Beach High School***: I spoke with the Principal, Jesus Armas. There is actually no real grade change that took place. The counselor, Kathryn Murphy, was on the phone with Eric Stern [Department of Teaching & Learning] discussing athletic eligibility. She selected a student at random and changed a grade from a C to a D to see if that changed the overall GPA. She then changed it back from a D to a C, which was the grade noted here. (See page 16.)*

**Forest Hill High School***: The Data Processor, Heidi Watkoski, did process a grade change for the student listed on the spreadsheet, along with a handful of others. This came as the result of a Data Processor meeting where it shared that schools should run a report and check that grades D/F or F/D rounded to a D. I also spoke with Jason Smith [Department of FTE & Student Reporting] to clarify this since the slide spoke to Middle Schools with High School credit classes. Jason said that it applied to all high school classes. The Data Processor garnered signatures from the Lead Counselor, Samanth [Tammatha] Proby, who checked to be sure the grades were calculated properly and the Assistant Principal, Antonio Loyd. I did ask Jason to include the grade change process in the presentations given to the Data Processors to ensure that proper procedure and documentation is followed. I have also asked the Principal to review the proper process for grade changes with her Assistant Principals, Guidance Counselors, and the Data Processors. (See page 16.)*

– End of Report –

## Management's Response
*Joint Response from the Chief Financial Officer, Chief Information Officer, and Deputy Superintendent/Chief of Schools*

THE SCHOOL DISTRICT OF
PALM BEACH COUNTY, FL

HEATHER FREDERICK, CPA
CHIEF FINANCIAL OFFICER

MICHAEL J. BURKE
SUPERINTENDENT

CHIEF FINANCIAL OFFICE
3300 FOREST HILL BOULEVARD, SUITE A-306
WEST PALM BEACH, FL 33406

PHONE: 561-434-8584 / FAX: 561-357-7585
WWW.PALMBEACHSCHOOLS.ORG/CFO

**RECEIVED**

AUG 1 2 2021

**INSPECTOR GENERAL**

MEMORANDUM

TO: Teresa Michael, Inspector General

FROM: Heather Frederick, Chief Financial Officer
Deepak Agarwal, Chief Information Officer
Edward Tierney, Deputy Superintendent/Chief of Schools

DATE: August 12, 2021

SUBJECT: Response to Audit of Controls for Updating Student Grades in Student Information System

Management has reviewed the Audit of Controls for Updating Student Grades in Student Information System and offers the following responses:

1. Procedural and Automated System Controls for Updating Student Grades

   (a) System Lockout Date Functioning Adequately

**Management's Response:**

Management agrees the system lockout date was functioning adequately.

   (b) Employee Access to SIS Granted Prior to Completing Required Training

**Recommendation:**

To ensure users are properly authorized to access the SIS, user profiles and access authority for users should be activated only after (1) the requests have been approved by the supervising Principals or Department Heads, and (2) the requesters have completed the required SIS training

**Management's Response:**

Current documentation and processes are being reviewed and modified as needed. Access to the SIS portal tile is activated only after the SIS training is completed.

   (c) Separated Employees' Accesses to SIS Not Removed Timely

The School District of Palm Beach County, Florida
**A Top High-Performing A-Rated School District**
*An Equal Opportunity Education Provider and Employer*

11

**Management's Response**
*Joint Response from the Chief Financial Officer, Chief Information Officer, and Deputy Superintendent/Chief of Schools*

Page 2 of 2
Date: August 10, 2021
Subject: Response to Audit of Controls for Updating Student Grades in Student Information System

Recommendation:

To protect the integrity of the SIS, and prevent potential unauthorized access to the database and improper disclosure of protected information in student education records, the District should comply with School Board Policy 2.501 and immediately remove SIS access for all separated employees.

Management's Response:

As per the Board Policy 2.501, the user's network ID is immediately disabled in Active Directory upon termination. This in turn restricts access to all district systems including SIS. IT has implemented a process effective May 1, 2021 to end date SIS permissions in a timely manner.

    (d) Annual IT Application Security Audit Ineffective

Recommendation:

Responsible staff should carefully review and confirm the appropriateness of access provided to their staff during the Annual IT Application Security Audit. All terminated employees and incompatible access for active employees should be timely removed from the District's computer systems.

Management's Response:

The review process is completed by the school or department supervisor, who is responsible for initiating permission changes based on their review. IT is implementing a new process to automatically create an eSupport ticket to request removal or modification of access when a supervisor completes the annual review to ensure any changes identified during the Annual Review are updated in a timely manner.

2. Twelve (22%) of 54 Sample Grade Changes Were Made Without Principals' Approval

Recommendation:

To protect the integrity of student grades, grade changes should be made in compliance with the Student Progression Plan 2020-2021. All grade changes after report cards are finalized should include the required two signatures and be documented through the SIS Grade Change Request Screen or the Grade/Course Change Documentation Form (PBSD 0797).

Management Response:

Mr. Tierney, Deputy Superintendent/Chief of Schools reinforced current procedures outlined in the Student Progression Plan regarding grade changes with the Principal Supervisors on July 27, 2021. Principal Supervisors have been directed to continually emphasize the importance of following proper protocol with Principals.

HF/DA/ET:mw

---

**The School District of Palm Beach County, Florida**
**A Top High-Performing A-Rated School District**
*An Equal Opportunity Education Provider and Employer*

**Management's Response**
*Principal of West Boca Raton High School*

Randy Law <randy.law@palmbeachschools.org>

## IG Investigation- Grades
1 message

Edmund Capitano <edmund.capitano@palmbeachschools.org>      Mon, Aug 9, 2021 at 3:37 PM
To: Randy Law <randy.law@palmbeachschools.org>
Cc: Peter Licata <peter.licata@palmbeachschools.org>, Valerie Wise
<valerie.mcwhite@palmbeachschools.org>

Dear Mr. law,

Incident 1 Teacher A did not turn her second quarter grades in on time. The student's 1st
quarter grade was a C so the computer calculated his grade to a C with only 1 quarter available. The
student did earn an A for quarter 2 so the C for quarter 1 and an A for quarter 2 should average to a B.
The data processor just changed the grade as she was entering the missing quarter 2 grades from the
teacher and there was no grade change through SIS as there were no quarter 2 grades

Incident 3-5: When Palm Beach State turned in their grades into West Boca on 12/18/20 they were
grades of L. Which meant late. Palm Beach State turned in an updated grade sheet on 1/14/21 so the
grades were changed from an L to their respective grades. The data processor changed the grades as
there was no teacher from palm beach state that could submit a grade change

Incident 6: The student was in edgenuity for the 1st Quarter and did not do any work required. He was
then transferred out of the class into a regular classroom setting. Edgenuity does not have grades
attached to the class. The student did receive a C for the 2nd quarter. The computer computed his
grade using only the 2nd quarter. There should have been an F for the 1st quarter as he did not do any
work. The average of an F for the 1st quarter and a C for 2nd quarter should be a D. The graduation
coach changed the grade as there was no grade entered through SIS for quarter 1

That is the explanation for the grade changes.

Recommendation:
Management Concurs - I have added a discussion of grade changes to my next meeting with the school
administration, who will continually maintain documentation of all external District grade changes.

Thank you,
Ed

Edmund Capitano
Principal
West Boca Raton Community High School
PBSAA Principal's High School Co-Chair
edmund.capitano@palmbeachschools.org

**RECEIVED**

AUG - 9 2021

**INSPECTOR GENERAL**

**Management's Response**
*Principal of Seminole Ridge High School*

Randy Law <randy.law@palmbeachschools.org>

## Re: SIS Grade Changes without Supporting Documents

1 message

**James Campbell**          Thu, Aug 5, 2021 at 10:25 AM
<james.campbell.1@palmbeachschools.org>
To: Randy Law <randy.law@palmbeachschools.org>

Sorry. I submitted this Dr. Long as requested last week.

**Seminole Ridge response:** All 3 grade changes were for college courses taken through Palm Beach State College. Our school counselors received an email notification of the grade change from PB State. The counselors forwarded the email to the data processors to initiate the change without approval from the school principal. All school counselors have been notified that the correct process is to initiate the grade change using PBSD 0797. School counselors will route the form to the principal. The principal will request the approval signature of the instructional superintendent before signing and forwarding the form to data processing for final action.

*James C. Campbell, Ph.D.*

Principal
**Seminole Ridge Community High School**
4601 Seminole Pratt Whitney Rd.
Westlake, FL 33470
(561) 422-2600
james.campbell.1@palmbeachschools.org
www.seminoleridge.org
Follow us on Twitter & Instagram @SRHSHawks
Like us on Facebook www.facebook.com/SRHSHawks

*"Students may not always remember what you taught them, but they will always remember how you made them feel."*

**RECEIVED**

AUG – 5 2021

**INSPECTOR GENERAL**

**Management's Response**
*Principal of Jupiter High School*

---

*Jupiter Community High School*
500 N. Military Trail
Jupiter, FL 33458
Phone: 561-744-7900
Fax: 561-744-7978

Dr. Colleen Iannitti
Principal

August 5, 2021

**RECEIVED**

AUG − 5 2021

To:    Randy Law, Director of Audit

From:  Colleen Iannitti, Principal

Re:    Audit Finding, February 2021 for student #26771691

**INSPECTOR GENERAL**

In response to the audit finding on February 9, 2021, guidance counselor Meghan Thornton received an official transcript from Palm Beach State College requesting a grade change be made for a student with a 504 plan. In response to this request, Mrs. Thornton changed the grade. This request was not made through SIS (Student Information System) because the change was requested through the student's college professor.

I have informed all guidance counselors & staff that in the future, all grade changes must be requested through SIS and approved by the principal.

If you have any questions, please do not hesitate to contact me at 561-743-6024.

Sincerely,

Colleen Iannitti, Principal

*Partnered with*   JUPITER MEDICAL CENTER   VELOCITY community credit union

## Management's Response
*Central Region Secondary Schools Instructional Superintendent*

Randy Law <randy.law@palmbeachschools.org>

### Fwd: Audit of Controls for Updating Student Grades in SIS
1 message

Edward Tierney <edward.tierney@palmbeachschools.org>      Wed, Aug 4, 2021 at 5:44 PM
To: Randy Law <randy.law@palmbeachschools.org>

Good evening,

    Attached please find some additional information related to the grade change audit.

Thank you,

Ed

---------- Forwarded message ----------
From: **Karen Whetsell** <karen.whetsell@palmbeachschools.org>
Date: Thu, Jul 29, 2021 at 4:35 PM
Subject: Re: Audit of Controls for Updating Student Grades in SIS
To: Edward Tierney <edward.tierney@palmbeachschools.org>
Cc: Valerie Zuloaga-Haines <valerie.zuloaga-haines@palmbeachschools.org>

**RECEIVED**

AUG – 4 2021

**INSPECTOR GENERAL**

Dear Mr. Tierney,

Please find the information regarding the June 28, 2021 Memorandum:

Forest Hill High School
The Data Processor, Heidi Watkoski, did process a grade change for the student listed on the spreadsheet, along with a handful of others (attached). This came as the result of a Data Processor meeting (see slide 5) where it shared that schools should run a report and check that grades D/F or F/D rounded to a D. I also spoke with Jason Smith to clarify this since the slide spoke to Middle Schools with High School credit classes. Jason said that it applied to all high school classes. The Data Processor garnered signatures from the Lead Counselor, Samanth Proby, who checked to be sure the grades were calculated properly and the Assistant Principal, Antonio Loyd. (attached). I did ask Jason to include the grade change process in the presentations given to the Data Processors to ensure that proper procedure and documentation is followed. I have also asked the Principal to review the proper process for grade changes with her Assistant Principals, Guidance Counselors, and the Data Processors.

Royal Palm Beach High School
I spoke with the Principal, Jesus Armas. There is actually no real grade change that took place. The counselor, Kathryn Murphy, was on the phone with Eric Stern discussing athletic eligibility. She selected a student at random and changed a grade from a C to a D to see if that changed the overall GPA. She then changed it back from a D to a C, which was the grade noted here. Please let me know if you need anything further from either Dr. Armas or Ms. Murphy.

Sincerely,
Karen

--
**Karen Whetsell, Instructional Superintendent**
Central Region Secondary Schools
karen.whetsell@palmbeachschools.org