Student Discipline

Internal Audit Report

May 25, 2022

Orange County Public Schools

Internal Audit

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EXECUTIVE SUMMARY

Why We Did This Audit

Our objectives were to determine whether student discipline activities follow OCPS procedures, School Board Policies, and related Federal/State statutes and evaluate the consistency of practice and equitable application of discipline. This audit was included in the 2020-2021 Annual Audit Plan.

Observations and Conclusion

Audit Results at a Glance			
	Risk/Impact Rating		
Results and Observations	**Significant**	**Moderate**	**Minor**
IA - Internal Audit **M - Management**	IA - 4 M - 1	–	–
D - Deficiency **O - Opportunity**	D – 5 O - 0	–	–

Our overall conclusion is that student discipline activities are following OCPS procedures and School Board Policies. We noted consistency of practice and treatment in the statistical sample of 106 student discipline cases we tested where documentation was available. However, we noted several areas of significant risk and opportunities for Student Discipline management to improve oversight and monitoring as noted below.

Results and Recommendations

- District staff are not monitoring student discipline data and do not have effective controls in place to ensure reliability of data;
- More than 21,000 incident numbers are missing from the records and management is not managing or monitoring changes/deletions of discipline records creating a risk of unauthorized changes/deletions;
- Too many persons have access to add/change/delete discipline records;

- 340 Unsubstantiated and five Hope scholarship student discipline records in Skyward are referenced with the student name and number instead of being shown in the Unknown Perpetrator category; and,
- A significant amount of student discipline documentation could not be located.

Recommendations:
- Develop or redevelop organized and effective reports of student discipline activities.
- Develop and implement policies and procedures over changes and deletions of student discipline records. Develop procedures to track and monitor change/deletion activities. Pursue revisions to the report that will track deleted incident numbers.
- Thoroughly review all positions and persons with access and revise to assign access and access levels strictly according to job requirements. Review and update access privileges as positions and personnel change. Monitor the Skyward *Transaction Tracking Report* for unauthorized changes/deletion of offense records.
- Unsubstantiated incidents and Hope Scholarships should be recorded under the *Unknown Perpetrator* category in Skyward.
- Student discipline documentation should be retained. Records for Level 4 offenses should be kept in one place at the district office.

This report has been discussed with management and they have prepared their response which follows.

DEFINITIONS:

Risk / Impact Ratings

Minor	Low risk with a financial impact of less than one percent and/or an isolated occurrence limited to local processes (low impact and low likelihood)
Moderate	Slight to moderate risk with a financial impact between one and five percent and/or a noticeable issue that may extend beyond local processes (low impact and high likelihood or high impact and low likelihood)
Significant	High risk with a financial impact greater than five percent and/or a significant issue that occurs in multiple processes and/ or noncompliance with Florida Statutes or School Board Policies (high impact and high likelihood)

We categorize risk/ impact as:
- *Minor*
- *Moderate*
- *Significant*

Observations Categories

Opportunity	A process that falls short of best practices or does not result in optimal productivity or efficient use of resources
Deficiency	A shortcoming in controls or processes that reduces the likelihood of achieving goals related to operations, reporting and compliance

We categorize our observations as opportunities or deficiencies.

Criteria for Observations Sourced to Management

- Internal audit was informed of the issue prior to starting detailed testing
- Management identified, evaluated, and communicated the issue to appropriate levels of the district
- Management has begun corrective action with clear, actionable plans and targeted completion dates

Audit Result #1 in this audit is sourced to management.

BACKGROUND:

School Board policy JIC – *Code of Student Conduct* and Florida Statutes Section 1006.07 - *District School Board Duties Relating to Student Discipline and School Safety* require the adoption of a Code of Student Conduct which helps students, parents or guardians, and school personnel understand the guidelines for maintaining a safe and orderly learning environment. The *Code of Student Conduct* is discussed with students, school advisory committees, and parent and teacher associations at the beginning of each school year and quarterly thereafter, and with transferring students upon their enrollment. The *Code of Student Conduct* applies to all OCPS students in Kindergarten through Grade 12. The district has established the *Discipline Procedures Guide* which identifies offenses for which a student may be disciplined and the disciplinary consequences appropriate for each offense.

School staff refers students for discipline. The school contacts parents when a discipline referral is issued. Schools maintain discipline referral information in the *Skyward Student Information System* (Skyward).

Schools also have the authority to discipline students for acts near or related to the school or when a student's conduct may harm the health, safety, or welfare of the student, of other students, of the school or of school personnel. Law enforcement could also be involved for acts that violate the law.

Disciplinary offenses are divided into four levels. Each level represents progressively more serious offenses culminating in Level 4 offenses. Disciplinary consequences (actions) become progressively more severe as one moves upward in the levels of misconduct. Actions are selected according to the level of the offense. Level 4 offenses require up to 10 school days suspension and a recommendation for expulsion/removal. The School Board may expel a student for up to 180 days.

Level 5 offenses are associated with felonies. There are three sub levels of Level 5 offenses.

The Code of Student Conduct is discussed with students, school advisory committees, and parent and teacher associations at the beginning of each school year and quarterly thereafter, and with transferring students upon their enrollment.

Disciplinary offenses are divided into four levels. Each level represents progressively more serious offenses culminating in Level 4 offenses.

Level 5 offenses are associated with felonies.

- Level 5A – Transfer from another school district after expulsion
- Level 5B – OCPS student and Felony Suspension
- Level 5C – OCPS student and Felony Expulsion

For certain Level 4 and Level 5A offenses, the district sends parents a notification letter informing them of the Superintendent's recommendation to the School Board regarding student placement to Back on Track Counseling Program (for Level 4) and to an Alternative Center (for Level 5A) only after the completion of a District Behavior Contract. These students, as well as those recommended for expulsion, are placed on the School Board Discipline Matrix (SBM).

School-based staff manage Levels 1, 2, and 3 offenses and district staff manage Levels 4 and 5 offenses. The Legal Services Department and District Police also cooperate with student discipline activities for levels 4 and 5, if necessary.

Below table shows <u>examples</u> of offenses and actions by level of offense.

Table – 1 Examples of Offenses and Actions by Level of Offense

Offense	Level	Action(s)
Disrespect	1D	Referral, Parent Contact, Verbal Reprimand
Intimidation/Threat	2G	Referral, Parent Contact, Behavior Contract, Counseling & Directions
Fighting	3F	Referral, Parent Contact, Counseling & Directions, Assign to the Positive Alternative to Student Suspension (P.A.S.S) Program
Threat to a School	4E	Referral, Parent Contact, Discipline Team Meeting, Suspension from School up to 10 days, Expulsion/Removal from School
• Expelled Student transferred from another district • Felony Suspension • Felony Expulsion	5A 5B 5C	Notify parents regarding district decision to transfer student to Positive Pathway Transition Center (PPTC) or Suspension/Expulsion from school

Source: Discipline Procedures Guide and Code of Student Conduct

Students with an Individual Education Plan (IEP)/504 plan may be subject to a removal depending on the disciplinary offense. A student

with an IEP/504 plan may be removed from a school up to 10 school days within a school year without providing services identified in the IEP/504 Plan. A manifestation determination is not needed for the first 6 to 8 school days of removal, however, a manifestation determination meeting is required for Level 4 offenses.

Incidents related to school safety and discipline are reported to the Florida Department of Education (FLDOE) through the *School Environmental Safety Incident Reporting* (SESIR) structure. Offenses such as alcohol, arson, battery, drugs, physical attacks, robbery, sexual assault, sexual harassment, hazing, gambling, threat intimidation, weapons, and bullying must be reported to SESIR regardless of the level of offense. All Level 4 offenses must also be reported to the FLDOE.

OBJECTIVES, SCOPE AND METHODOLOGY:

Objectives
Our objectives were to:
- Determine whether student discipline activities followed OCPS procedures, School Board Policies, and related Federal/State statutes; and,
- Evaluate consistency of practice and equitable application of discipline.

Scope
The scope of the audit included student discipline incidents that occurred from July 1, 2018 through June 30, 2021.

Methodology
We conducted this audit in accordance with the *International Standards for the Professional Practice of Internal Auditing* of the Institute of Internal Auditors and included such procedures as deemed necessary to provide reasonable assurance regarding the audit objectives. Internal Auditing is an independent, objective assurance and consulting activity designed to add value and improve an organization's operations. It helps an organization accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control, and governance processes.

A manifestation determination is a meeting where parents of a student with an IEP or 504 and school staff review relevant information about the student and determine whether child's misbehavior was caused by their disability.

Certain incidents must be reported to the FLDOE.

We conducted this audit in accordance with the International Standards for the Professional Practice of Internal Auditing.

We are required to note any material deficiencies in accordance with Florida Statutes, School Board Policy and sound business practices. No material deficiencies were noted in this audit. We also offer suggestions to improve controls or operational efficiency and effectiveness.

For analysis purposes, we extracted student discipline data directly from the following tables in the OCPS_SHED (Student Hub of Educational Data) using Structured Query Language (SQL) queries:

- *DisciplineOffenses*
- *DisciplineActions*
- *DisciplineActionDetails*
- *DisciplineUnknownPerpetrator*
- *DisciplineVictims*
- *StudentDemographics*

We did not use Skyward reports for analysis purpose because they are not organized effectively to analyze student demographic data along with offenses and actions.

We used the Skyward *Entry by Incident* report provided by Student Discipline management to select a statistical sample of incidents. We used statistical sampling so the sample's results could be used to make inferences about the entire population under review. We selected 106 incidents from the total of 126,014 incidents for the three fiscal years ending June 30, 2019, 2020, and 2021. The data analytical tool used for the statistical sample size requires three inputs: a confidence rate, a tolerance rate, and an expected deviation (exception) rate. We assessed risk by level of offense (lower level offenses are lower risk) and segmented the population accordingly. We then randomly selected samples from each sub-group of the population of incidents.

The actual deviation rate in the sample was much higher than the expected deviation rate. The following table summarizes our results.

Table 2 – Detail Statistical Sampling Method

Level	Popu-lation Size	% of Con-fidence Level	% of Tolerable Deviation Rate	% of Expected Deviation Rate	Sample Size	% of Actual Deviation Rate
Level 1,2,3	121,527	85	10	0	19	32
Level 4	4,180	90	5	0	45	84
Level 5	59	90	5	0	32	91
Unsubstan-tiated	248	10	15	0	10	60
Totals	126,014				106	

Source: Internal Audit

Other tests and procedures are described in detail in Appendix A to this report.

ANALYSIS, RESULTS & RECOMMENDATIONS:

Overall Conclusion:

Our overall conclusion is that student discipline activities are following OCPS procedures and School Board Policies. We noted consistency of practice and treatment of students in the statistical sample of 106 student discipline cases we tested where documentation was available. However, we noted several areas of risk and opportunities for improvement, most notably the following:

- District staff are not monitoring student discipline data and do not have effective controls in place to ensure reliability of data;
- More than 21,000 incident numbers are missing from the records and management is not managing or monitoring changes/ deletions of discipline records creating a risk of unauthorized changes / deletions;
- Too many persons have access to add/ change/ delete discipline records;
- 340 Unsubstantiated and five Hope scholarship student discipline records in Skyward are referenced with the student name and number instead of being shown in the *Unknown Perpetrator* category; and,
- A significant amount of student discipline documentation could not be located.

Actual deviation (error) rates were much higher than expected.

We noted consistency of practice and treatment of students according to district procedures and School Board Policies.

However, there are deficiencies in processes which create significant risks as well as opportunities to improve oversight and monitoring.

Analysis:

These terms and explanations will help in understanding our analysis.

Incident: an incident is the record created for each discipline referral. Each incident is assigned a number by the Skyward system. A single incident may involve one or more students. For example, a fight may involve two students. One incident – two students.
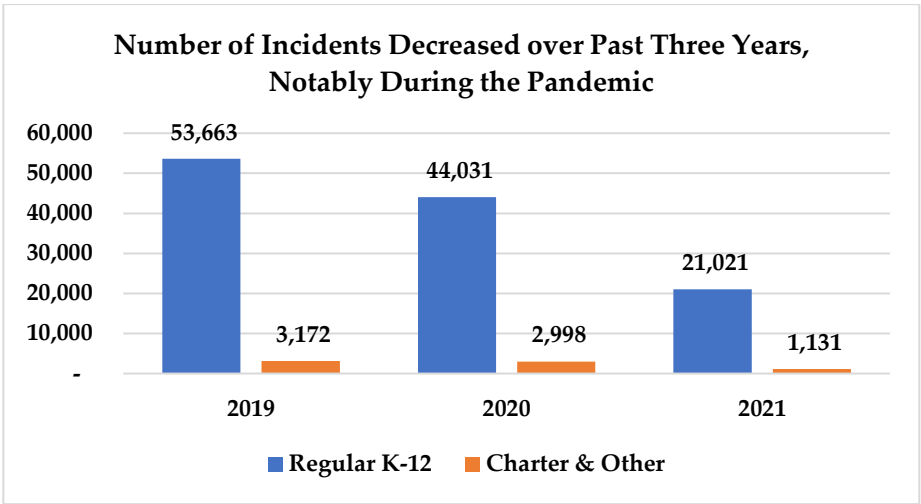
Students – unduplicated: individual students, each with a unique student number involved in at least one incident. The number of unduplicated students does not reflect how many incidents in which each student may have been involved.

Students – duplicated: individual students times the number of incidents in which they were involved. For example, one student involved in three incidents would be counted three times.

Discipline Overview – District as a Whole

The following charts show the number of incidents, number of students (unduplicated) and number of students (duplicated) for the 2019, 2020, and 2021 fiscal years, separated between regular K-12 students and those in charter and special schools. This data is for the district as a whole and helps to understand the volume of activity and how it changed over the period covered by this audit.

Chart 1 – Number of Incidents

Number of Incidents Decreased over Past Three Years, Notably During the Pandemic

Source: Skyward – SQL SHED Database

Chart 2 – Number of Students (Unduplicated) Involved in Discipline

Number of Students Involved in Discipline Decreased over Past Three Years, Notably During the Pandemic

	2019	2020	2021
Regular K-12	25,048	21,881	12,136
Charter & Other	1,378	1,251	601
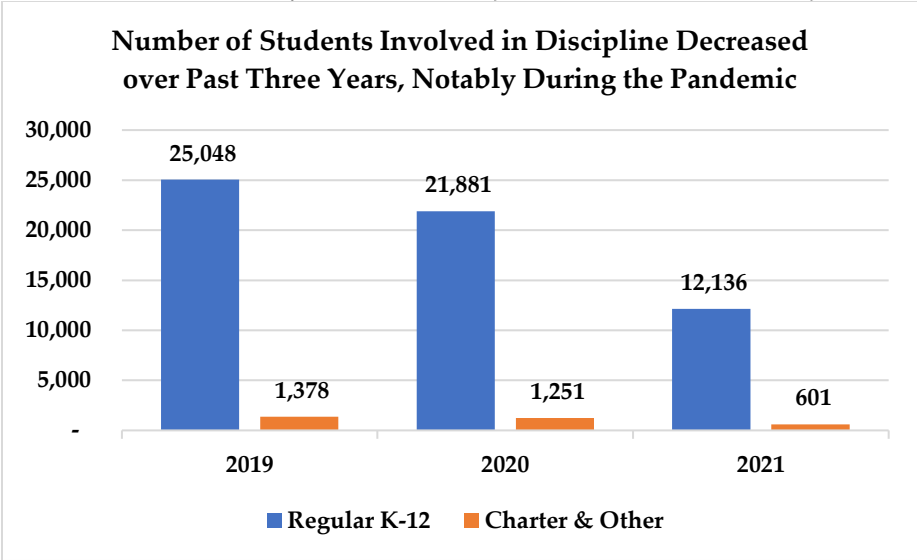
Source: Skyward - SQL SHED Database

Likewise, the number of individual students involved in at least one incident has decreased from 25,048 to 12,136 over the past three years.

Chart 3 – Total Students (Duplicated) Involved in Discipline

Total Number of Students (Duplicated) Involved in Discipline

	2019	2020	2021
Regular K-12	62,028	49,537	24,260
Charter & Other	3,351	3,347	1,303
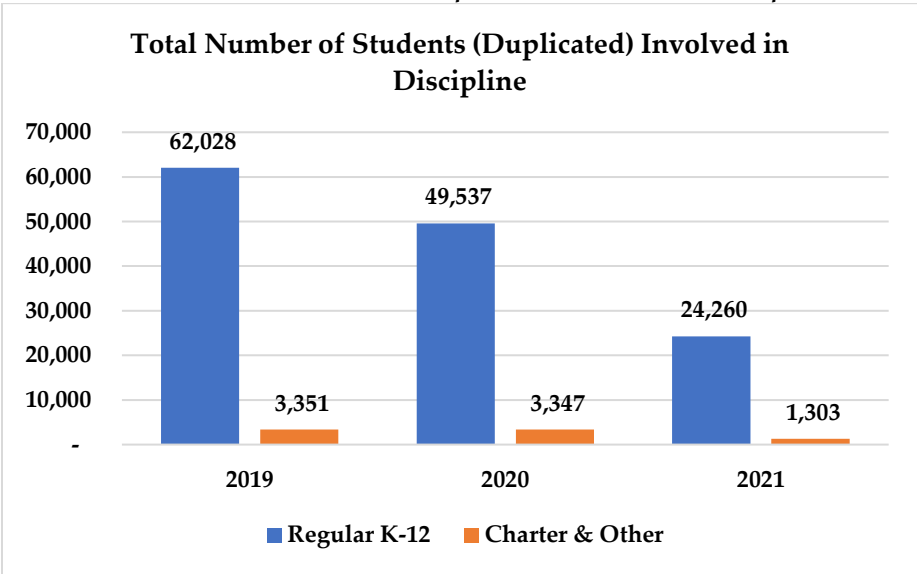
Source: Skyward - SQL SHED Database

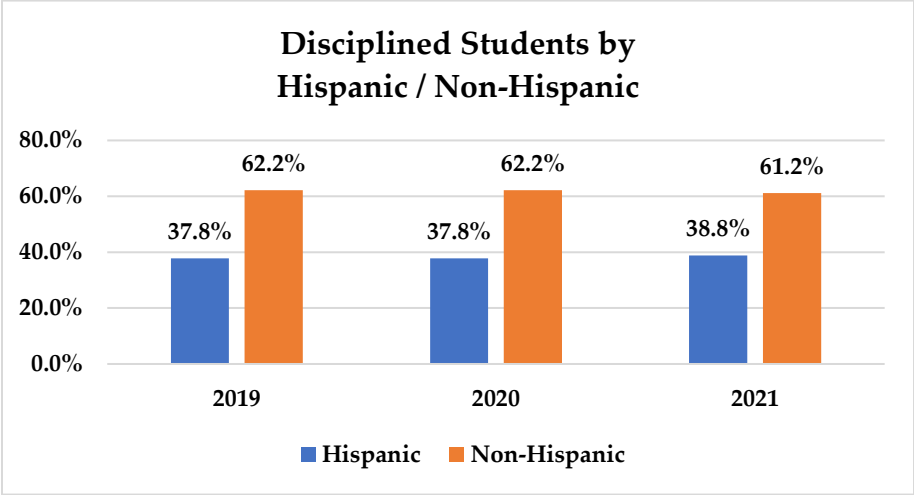*The number of students involved in one or more incidents also decreased from 62,028 to 24,260.*

Discipline Overview – Breakdown by Race and Ethnicity

Student demographic information is tracked two ways – one by Federal Race Category and one by Hispanic or Non-Hispanic. The Federal Race Categories are: Black or African American, Asian, American Indian or Alaskan Native, Native Hawaiian or Other Pacific Islander, White, and Multi-racial. The next charts show a breakdown of students involved in discipline during the audit period by Hispanic / Non-Hispanic and by Federal Race Category for each of the three years we analyzed.

Chart 4 –Hispanic / Non-Hispanic Students Disciplined

Source: Skyward – Internal Audit Analysis of SQL SHED Database

Chart 5 –Federal Race Categories of Students Disciplined

Source: Skyward – Internal Audit Analysis of SQL SHED Database

Student demographic information is tracked two ways:

1. *By Hispanic/ Non-Hispanic*
2. *By Federal Race Categories*

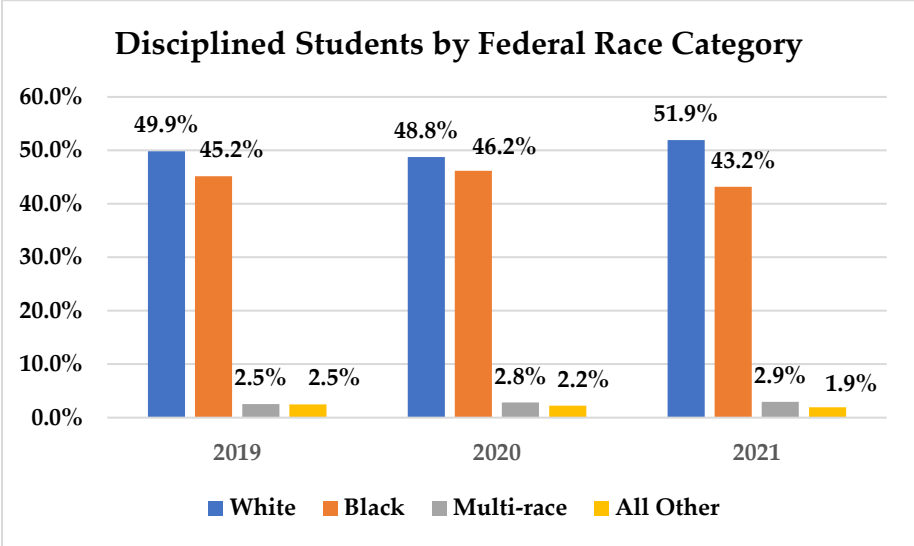*The split between Hispanic and Non-Hispanic students disciplined has essentially remained constant over the past three years.*

The demographics of disciplined students are similar over the past three years with Whites and Blacks comprising the majority.

Detailed Findings and Recommendations:

1) District staff are not monitoring student discipline data and do not have effective controls in place to ensure reliability of data. *Significant Risk and Deficiency*

Best Practice:
Effective monitoring occurs when system-generated reports use data extracted directly and accurately from databases and present it in an organized manner. This helps decision makers review, analyze, and make better decisions.

Audit Result:
During our entrance meeting, management reported difficulty monitoring student discipline activities due to problems with current system-generated reports. They indicated Skyward reports are not effective because they do not present data in a manner that facilitates their oversight and monitoring process. However, management has not implemented compensating controls to overcome the limitations of the Skyward reports and thus is not monitoring overall student discipline activities. Monitoring does occur at the individual incident level for Levels 4 and 5 offenses. Little monitoring is taking place for Levels 1, 2, and 3 offenses.

To verify this information, we generated established and custom reports from Skyward. The established reports contain student discipline data such as student name, offense code, school name, incident numbers, and actions but no student demographic data such as gender, ethnicity, race, grade, and ESE status.

The custom reports from Skyward contained basic student data, student demographic data, offense data, and action data. However, they do not present this data in an organized manner to facilitate review and analysis.

For the reasons described above, we downloaded all data used for our analysis directly from the database using SQL queries.

District staff are not monitoring student discipline data and do not have effective controls in place to ensure reliability of data.

Management reported problems with existing Skyward reports, but did not put compensating controls in place.

Little monitoring is taking place for Levels 1, 2, and 3 offenses.

We worked with existing and custom reports in Skyward.

We queried data directly from the database.

We concur with management that Skyward Student Discipline reports are not effective for reporting, decision making, auditing, or analysis purposes. However, Skyward has been in use for more than two years, and we believe district management should be more proactive in obtaining the necessary data to perform its essential oversight and monitoring functions. District Student Discipline staff have not "dug in" to Skyward to better learn how it tracks data or what reports and report options are available. They have not evaluated available information or taken steps to mitigate these challenges while waiting for improvements to existing reports or for better reports to be developed.

Recommendation:
Develop or redevelop organized and effective reports of student discipline activities. Until such reports can be developed as a part of the Skyward system, access the data directly and perform analyses using other tools.

2) Student Discipline management is not monitoring altered/ deleted offense records. *Significant Risk and Deficiency*

Best Practice:
Reduce the risk of unauthorized alteration or deletion of offense records and prevent/ detect fraud by reviewing, monitoring, and analyzing a tracking report or other audit trail. Deletion history should retain the unique identifiers of deleted records for accountability and effective monitoring.

Audit Result:
As mentioned previously, the Skyward system automatically generates incident numbers in sequence as incidents are entered by the schools. We noted 21,628 incident numbers were missing from the numerical sequence of incident numbers generated automatically by Skyward.

When we inquired about this, district Student Discipline management offered general information about why gaps in incident numbers might

We concur with management that Skyward reports are not effective for reporting, decision making or analysis.

District management should be proactive in learning about and obtaining data needed for their oversight and monitoring role.

Management is not monitoring changes / deletions of discipline records.

Reviewing records of data changes and deletions is essential to preventing and detecting unauthorized changes and fraud.

21,628 incident numbers are missing.

occur, however, they had no specific information about the missing incidents and they are not monitoring them.

Management told us that sometimes end users need to delete offense records from Skyward due to data entry errors, incomplete records, inaccurate records, or changes in the level of offense.

We were also told that some data was not migrated from the previous SMS system to Skyward, creating a need for end users to enter incident numbers and other data manually in Skyward. This procedure caused some gaps in incident numbers due to data entry errors, especially in the first year of our three-year analysis period.

As we looked further into this condition, we learned about a Skyward report titled, *Transaction Tracking – TT Report.* This report tracks added, changed and deleted offense records with the student name, school year, date and time of changes/deletion, what was changed with the previous field text, and who changed/deleted. District Student Discipline management was not aware of this report.

The *Transaction Tracking – TT Report* does not show changed/deleted records with the incident numbers. After deletion of a discipline record, **the incident number is removed** from the System. This creates gaps in the sequence of incident numbers.

Because of this we were unable to trace the missing incident numbers to deleted the *Transaction Tracking – TT Report*. Removing incident numbers from the System after the deletion presents a high risk that unauthorized deletions will not be detected.

In addition to not monitoring changed/deleted offense records in Skyward, district Student Discipline management does not have written policies and procedures over the changing/deleting of offense records to ensure they are authorized and approved. Written procedures and monitoring would help to detect unauthorized changes and deletions and prevent fraud.

Management had only general ideas about the missing incident numbers. They are not monitoring missing incident numbers.

We learned about an existing Skyward report that tracks changed and deleted offense records.

Management did not know about this report.

*When a discipline record is deleted, it **disappears** from the System.*

Removing incident numbers presents a high risk that unauthorized deletions will not be detected.

There are no procedures over the change/ deletion process.

Recommendations:

Policies – Develop and implement policies and procedures over changes and deletions of student discipline records. These should include who is authorized to make such changes and deletions, under what circumstances they are permitted, and who must approve before changes and deletions are made.

Monitoring – Student Discipline management should also develop procedures to track and monitor change/ deletion activities to ensure polices are followed and to detect unauthorized change / deletion activity. This monitoring should include using the existing Skyward *Transaction Tracking – TT Report* and pursuing revisions to the report that will track deleted incident numbers. It is important that there be a full record of all incident numbers for accountability and data reliability.

3) Too many persons have high levels of security clearance in the Skyward Student Discipline system. *Significant Risk and Deficiency*

Best Practice:

Provide access only to those persons who require it to perform essential job functions and limit what they can do with that access specifically to the tasks they need to perform. Monitor access and changes to data to prevent and detect unauthorized changes, deletions and fraud.

Audit Result:

The Skyward Student Discipline system has the following security levels:

- INQ/INQDST (Inquiry to records at school or district level)
- ACD (Add, change, delete records)
- MAX/MAXDST (Maximum access at school or district level)

Five hundred ninety-seven (542) persons have MAX privileges. By virtue of having ACD, MAX, or MAXDST security, 1,788 employees are able to delete offense records. Some of these persons are in positions that do not appear appropriate to have <u>any</u> access to student discipline records. Examples include: Bookkeeper, Food Service Worker, Registrar, and Substitute Teacher-Basic.

Policies and procedures are needed.

Active monitoring should occur.

Too many people can make changes/ deletions to student discipline records.

Access privileges should be limited to only what is needed to perform essential job functions.

Three levels of security:
- *Inquire (INQ)*
- *Add, change, delete (ACD)*
- *Maximum access (MAX)*

1,788 *district employees are able to change or delete discipline records.*

Table 3 – Student Discipline Security Groups as of April 5, 2022

	ACD	MAX	MAXDST	INQ	INQDST
Number of Positions (Job titles)	102	43	12	170	21
Number of Employees who can delete records	1,246	521	21	_	_

Source: Skyward Security Groups Report

Recommendations:

- Thoroughly review all positions and persons with access and revise to assign access and access levels only to those who need it to perform essential student discipline functions.
- Review and update access privileges as positions and personnel change.
- Monitor the Skyward *Transaction Tracking – TT Report* for any unauthorized changes/deletion of offense records.

4) In Skyward, 340 student discipline unsubstantiated incidents (unconfirmed) and 5 Hope Scholarships for eligible victims are noted under the student discipline offense Level 1 to 5 category with the student name and student number. *Significant Risk and Deficiency*

Best Practice:

Unsubstantiated incidents should not have a student identity as those incidents are unconfirmed. Hope Scholarship eligible victims' names should not be attached with the incident. Per FL Statute 1006.13 *Policy of Zero Tolerance for Crime and Victimization (2)(d), minimizes the victimization of students, staff, volunteers, including taking all steps necessary to protect the victim of any violent crime from any further victimization.*

Audit Result:

Unsubstantiated incident means there is not enough evidence that a student conducted an offense. Hope Scholarships are for those students who are victims of offense and eligible for Hope Scholarships.

In Skyward, we noted 340 unsubstantiated incidents and five Hope Scholarships for eligible victims that included the student name and

Students were identified in 340 unsubstantiated incidents and 5 Hope Scholarship victim incidents.

Unsubstantiated incidents and those involving Hope Scholarships should not include student identity.

student number. These incidents should be recorded without the student name and student number under the *Unknown Perpetrator* category in Skyward.

These exceptions are attributed to user errors in preparing the records. It appears student discipline and Skyward trainings are not effective in this area.

Recommendations:
End users should be trained on the requirement to not reference Hope Scholarship students' identity with the incident. Unsubstantiated incidents and Hope Scholarships should be recorded under the *Unknown Perpetrator* category in Skyward.

5) Student discipline documents could not be located for 48 of 106 discipline incidents selected for testing. (45% of the sample) *Significant Risk and Deficiency*

Best Practice:
Proper documentation provides evidence to support procedures, makes communications more effective and demonstrates accountability and transparency.

Audit Result:
In our test of 106 incidents, we reviewed supporting documents such as Discipline Team Review Forms, Referral Forms, District contracts, principal letters, and Superintendent recommendation letters. Schools manage student discipline Levels 1 to 3 and maintain related documents. District Student Discipline staff manages Levels 4 and 5 and maintains related documents. We requested student discipline documents to school staff for Levels 1 to 3 and to district student discipline staff for Levels 4 and 5.

Out of 106 incidents tested, we received no documents for 16 (15%) incidents and at least one document was missing for another 32 incidents for a total exception of 48 (45%) incidents. We made multiple requests for these documents and they were not made available. We are

unable to determine whether the missing documents were not created or were lost.

We noted Level 4 student discipline documents are maintained at district offices as well as at schools rather than in one place. District Student Discipline staff could not provide all documents for the selected Level 4 incidents. District staff guided us to request to schools, and the schools provided some documents for Level 4.

We are unable to determine whether the missing documents were not created or were lost.

Level 4 offenses are managed at the district level, but they don't have all the records for those offenses.

Sixteen (16) incidents, representing 15% of our sample, had no documents available.

Table – 4 Number of Missing / Incomplete Student Discipline Records

Document /Missing/ Incomplete /Incorrect	Level 1	Level 2	Level 3	Level 4	Level 5	Unsub-stantiated
No Docs	1	4	1	1	6	3
Signed Student Code of Conduct	–	–	–	11	–	–
Referral Form	–	–	–	1	–	–
Discipline Review Form	–	–	–	17	1	–
Background Report	–	–	–	2	–	–
DTM Meeting Notification Letter to Parents	–	–	–	2	6	–
Incomplete or missing Contracts	–	–	–	26	13	–
Manifesta-tion Docs	–	–	–	2	–	–
Superintendent for BOT (4A, 4F, 4O)	–	–	–	6	–	–
Felony Notification Principal Letter to Superinten-dent/ Adminis-trator	–	–	–		6	–

|					
Superintendent Letter for PPTC	–	–	–	–	11	–
Missing or incorrect incident number on Forms	–	1	–	6	5	–
Incomplete other docs	–	–	–	–	–	3

Source: Audit Work Papers

We also noted the offense level on forms did not agree with the offense level in Skyward for four records of the sample.

Recommendation:
Student discipline documentation should be retained. Records for Level 4 offenses should be kept in one place.

We wish to thank the Teaching and Learning – Student Discipline and schools' staffs for their cooperation and assistance with this audit.
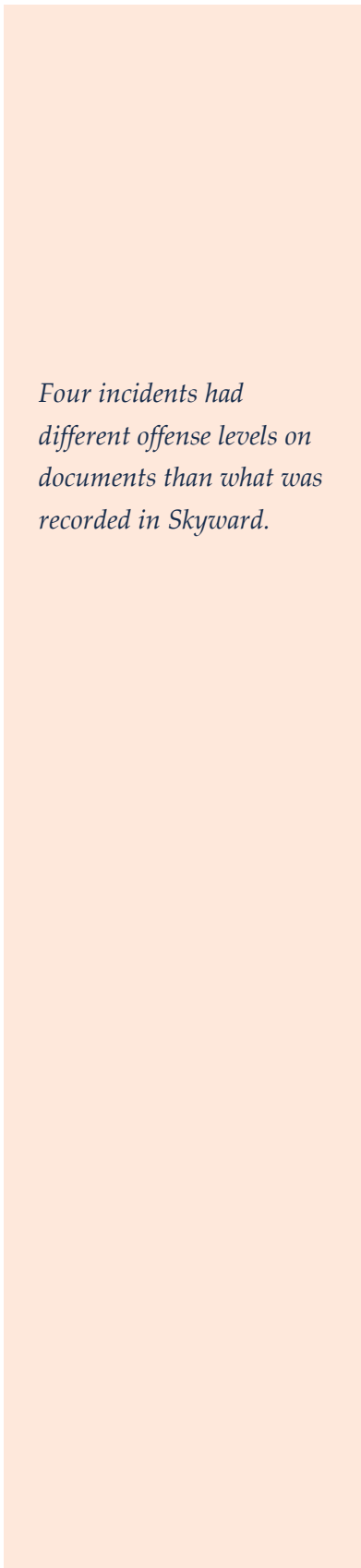
Four incidents had different offense levels on documents than what was recorded in Skyward.

APPENDIX A - METHODOLOGY

Details of our audit methodology included:

- Reviewing OCPS *Code of Student Conduct* and *Student Discipline Procedures Guide*
- Reviewing School Board Policies such as:
    o *ADC Tobacco-Free Schools*
    o *ADD Safe Schools, JB Equal Educational Opportunities*
    o *JF School Admissions*
    o *JIC Code OF Student Conduct*
    o *JICH Drug and Alcohol Use by Students*
    o *JICK Threats*
    o *JIH Student Interrogations Searches and Arrests*
    o *JK Discipline of Students*
    o *JKB Detention of Students*
- Reviewing Florida Statutes such as:
    o *1001.212 Office of Safe Schools*
    o *1001.54 Duties of School Principals*
    o *1003.04 Student Conduct and Parental Involvement*
    o *1003.31 Students Subjects to Control of School*
    o *1006.07 School Board Duties Relating to Student Discipline*
    o *1006.08 District School Superintendent Duties Relating to Student Discipline and School Safety*
    o *1006.09 Duties of School Principal Relating to Student Discipline*
    o *1006.13 Policy of Zero Tolerance*
    o *1006.147 Bullying and Harassment*
    o *1002.40 Hope Scholarships*

Detailed testing of student discipline records for a statistical sample of 106 discipline incidents out of 126,014 total discipline incidents included in the Skyward *Entry by Incident Report* of fiscal years 2019 to 2021. Detailed testing included review of:

    o Signed Code of Student Conduct Elementary and Secondary
    o Completed Referral Forms
    o Completed Student Background Report
    o Witness Statements
    o Notification letter of student's offense and Discipline Team Meeting (DTM) to parents from Principal
    o Completed Discipline Team Meeting (DTM) Review Form

- o Completed Waiver Out of School Removal and District Behavior Contract / Behavior Contract / "No Contact" Contract
- o Felony Suspension notification letter from Principal to parents and Felony Suspension notification and recommendation letter from Principal to Superintendent
- o District's decision/recommendation letter of Positive Pathways Transition Center (PPTC) / Back on Track (BOT) / Expulsion / Exclusion from Superintendent to parents
- o Manifestation documents for ESE/504 students
- o Completed Bullying/Harassment Incident Reporting Form
- o Bullying/Harassment Safety Plan
- o Student Safety and Supervision Plan
- o Hope Scholarship parent Letter from Principal to parents
- Discussing with Student Discipline, Legal Services, and Teaching and Learning Staff
- Reviewing Student Discipline training materials / attendee's list / feedback / evaluation materials / SESIR certificates
- Reviewing Skyward Student Discipline accounts, Skyward Student Discipline Reports, Skyward User Guide
- Using Structure Query Language (SQL) for analysis of Student Discipline data
- Using Student Enrollment reports as of January 15, 2019, 2020, and 2021
- Reviewing SESIR OCPS Reports
- Reviewing vendor contracts, Purchase Orders (PO) and Invoices
- Analysis of:
  - o Demographic makeup of students disciplined compared to the demographic composition of all enrolled students in each of those years

Department / School Name	High School Office – Area Administrators
Administrator / Department Head	Martha C. Chang, Executive Area Director/DeMiki Joiner, Area Administrator
Cabinet Official / Area Superintendent	Jose Martinez, Chief of High Schools *Jose T. Martinez* 10/25/2022

Audit Result / Recommendation	Management Response Acknowledgement/Agreement of Condition	Responsible Person (Name & Title) Target Completion Date (MM/YYYY)	Management's Action Plan
District staff are not monitoring student discipline data and do not have effective controls in place to ensure reliability of data.	Monitor Level 2 & 3 offenses across Learning Communities through SHED.	DeMiki Joiner Area Administrator Martha Chang Executive Area Director May 2023	• Level 2 & 3 offenses will be monitored bi-weekly. • 10% of schools will be randomly selected for checks & balances.
Student Discipline management is not monitoring altered/deleted offense records.	• Identify acceptable reasons to alter/delete an offense record in a memorandum to all principals and disciplinary team members. • Create a SHED report to identify deleted incidents.	Alysia Leonard Sr. Instructional Process Spec. DeMiki Joiner Area Administrator Cindy Schoenauer Administrative Specialist May 2023	• District level 4 changes will be flagged with a new Skyward district code. • Monitor transaction tracking (TT report) in Skyward and SHED (once created) for school deletions infractions bi-weekly. • Provide additional training quarterly for entering/editing incidents.
Too many persons have high levels of security clearance in the Skyward Student Discipline system.	• Restrict the ability to delete incidents to only users with MAX access and limit schools as follows: o Elementary – 2 o Middle/K-8 – 4 o High – 6 (9th grade center-2)	DeMiki Joiner Area Administrator Martha Chang Executive Area Director May 2023	• Monitor users with Discipline MAX or ACD access in Skyward annually. • Notify ITS of any access that needs to be removed for non-authorized employees through he HELP Ticket process.

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Audit Result / Recommendation	Management Response Acknowledgement/Agreement of Condition	Responsible Person (Name & Title) Target Completion Date (MM/YYYY)	Management's Action Plan
In Skyward, 340 student discipline unsubstantiated incidents (unconfirmed) and 5 Hope Scholarships (HSN) for eligible victims are noted under the student discipline offense Level 1 to 5 category with the student name and student number.	This is an end user error and moving forward this will be part of the Survey R monthly check.	Cindy Schoenauer Administrative Specialist May 2023	• Unknown Perpetrator screen in Skyward will be reviewed monthly for unsubstantiated and HSN to ensure that names are not attached: FLDOE states HSN's and unsubstantiated offenses will never be attached to student records. • Provide additional training quarterly for proper data entry with individual schools.
Student discipline documents could not be located for 48 of 106 discipline incidents selected for testing. (45% of the sample)	• The Level 4 offenses will be housed at the RBELC. • Level 4 check sheet will be revised and monitored to ensure all documents and data are in level 4 packets. • Random checks will occur at schools to ensure that all level 1 through level 3 records are in order and filed in an organized fashion. • Once Scribbles (electronic cumulative folder software) is implemented for school use, a secure discipline folder will be created for uploading discipline documents.	Yamilex Ortiz-Rivera Luis Payne Rios Administrative Secretary Cynthia Schoenauer Administrative Specialist Alysia Leonard Sr. Instructional Process Spec. DeMiki Joiner Anthony Bolyard Derrick Fontaine Dalila Hernandez David Schmidt Area Administrators May 2023	• Administrative assistants will file level 4 folders alphabetically by student last name. Files will be housed and labeled at the RBELC and after three years, files three years or older will be transferred to Records Department. • Administrative assistants will review level 4 packets with revised checklist before entering discipline information in Skyward. • Area Administrators will randomly select two schools per month to review three discipline folders per school and enter findings in a Google form. • Area Administrators will monitor the number of records submitted in Scribbles (once implemented) compared to the number of student offenses entered in Skyward monthly.