

**GOVERNMENT OF THE DISTRICT OF COLUMBIA  
OFFICE OF THE INSPECTOR GENERAL**

**AUDIT OF THE DISTRICT OF  
COLUMBIA PUBLIC SCHOOLS'  
GRADUATION REQUIREMENTS**



**CHARLES J. WILLOUGHBY  
INSPECTOR GENERAL**

**GOVERNMENT OF THE DISTRICT OF COLUMBIA**  
**Office of the Inspector General**

Inspector General



April 5, 2007

Clifford B. Janey, Ed.D.  
Superintendent  
District of Columbia Public Schools  
825 North Capitol Street, N.E., 9th Floor  
Washington, D.C. 20002

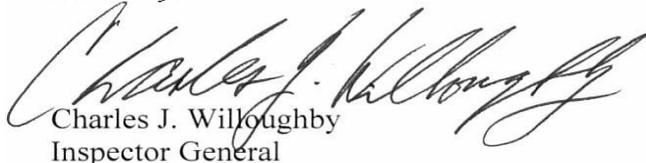
Dear Dr. Janey:

Enclosed is our final report summarizing the results of the Office of the Inspector General's (OIG) Audit of the District of Columbia Public Schools' Graduation Requirements (OIG No. 06-2-25GA).

Our report contains nine recommendations for necessary action to correct the described deficiencies. We received a response to our draft report from you on March 30, 2007. We consider actions taken and/or planned by the District of Columbia Public Schools (DCPS) to be responsive to the draft report. However, DCPS did not provide target dates for completing the planned actions. Thus, we respectfully request that DCPS provide our Office with the target dates for addressing the open recommendations no later than April 23, 2007. The full text of DCPS's response is included at Exhibit D.

We appreciate the cooperation and courtesies extended to our staff during the audit. If you have questions, please contact William DiVello, Assistant Inspector General for Audits, at (202) 727-2540.

Sincerely,

  
Charles J. Willoughby  
Inspector General

CJW/mg

Enclosure

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**AUDIT OF THE DISTRICT OF COLUMBIA PUBLIC SCHOOLS’  
GRADUATION REQUIREMENTS**

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## **EXECUTIVE DIGEST**

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### **OVERVIEW**

This report summarizes the results of the Office of the Inspector General's (OIG) Audit of the District of Columbia Public Schools' Graduation Requirements (OIG No. 06-2-25GA). The Superintendent of the District of Columbia Public Schools (DCPS) requested that our Office conduct the audit in response to allegations made by a teacher at Woodrow Wilson Senior High School (Wilson SHS).

Our overall audit objectives were to: (1) evaluate the protocols, authorities, and practices for certifying students for graduation; (2) determine if senior high school graduates satisfied the graduation requirements; and (3) assess the accuracy of student recordkeeping and the procedures for securing student records.

### **CONCLUSIONS**

This report contains four findings that detail the conditions found during our audit. In our first finding, we found that Wilson SHS officials allowed 17 students to graduate in June 2006 even though the students did not complete academic requirements. Students graduated without meeting the requirements because guidance counselors did not schedule students to attend required courses, and guidance counselors did not properly categorize courses. In addition, three graduates did not pass their required courses but were allowed to graduate, and one guidance counselor improperly granted credits to three graduates. As a result, we believe the 17 graduates did not acquire the necessary knowledge and skills required for high school graduation.

In our second finding, we found that Wilson SHS officials did not submit an accurate graduation list to the Superintendent. This condition occurred because Wilson SHS officials did not maintain the clearance forms used to certify each student's eligibility to graduate. In addition, the College Bureau staff - instead of the guidance counselors - prepared the graduation list, even though guidance counselors are responsible for certifying students. As a result, the Superintendent reported an incorrect number of graduates to the Board of Education.

In our third finding, we found that Wilson SHS officials did not maintain sufficient documentation to support that graduating students completed community service requirements. Specifically, Wilson SHS officials did not maintain sufficient documentation for 36 graduates. This condition occurred because DCPS has not issued official community service guidelines, and guidance counselors were unaware of the unofficial guidelines. As a result, we could not verify that these 36 graduates completed the required community service hours or otherwise met all requirements for graduation.

## **EXECUTIVE DIGEST**

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In our last finding, we found that school officials may misinterpret DCPS's graduation requirements and policies because DCPS does not have well-defined or documented requirements and policies in the District of Columbia Municipal Regulations (DCMR) and the Superintendent's Directives. The lack of well-defined or documented requirements and policies increases the risk that school officials will not consistently apply graduation requirements.

### **SUMMARY OF RECOMMENDATIONS**

We directed nine recommendations to the Superintendent, DCPS that we believe are necessary to correct the deficiencies noted in this report. The recommendations, in part, center on:

- Establishing and implementing measures to ensure: (1) students complete the required Carnegie units prior to graduation; (2) transcripts accurately reflect earned Carnegie units; and (3) school officials follow the grade change procedures in the Faculty Handbook.
- Instituting reforms for safekeeping records and requiring school officials to conduct a final review of the graduation list prior to submitting the list to the Superintendent.
- Developing a community service directive and requiring school officials to periodically review student files.
- Establishing new policies or revising existing policies to clarify graduation requirements and to institute consistent graduation protocols.

### **MANAGEMENT RESPONSE AND OIG COMMENTS**

DCPS provided a written response to our draft report on March 30, 2007. We consider the actions taken and/or planned to be responsive to each of the recommendations. However, DCPS did not provide target dates for completing the planned actions. Thus, we respectfully request that DCPS provide our Office with the target dates for addressing the open recommendations no later than April 23, 2007. The full text of DCPS's response is included at Exhibit D.

## INTRODUCTION

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### BACKGROUND

**DCPS Administration.** The District of Columbia Public Schools (DCPS) is a chartered independent agency. The District of Columbia Board of Education (Board) oversees DCPS. The Board appoints a Superintendent to serve as the Chief Executive Officer and run the day-to-day operations of the school system. According to the Board's website, DCPS's mission is to ensure "students acquire the knowledge, skills and values necessary to live rich and fulfilling lives as responsible, productive and enlightened members of a democratic society."<sup>1</sup>

**Regulations and Policies.** The Board's regulations are promulgated under Title 5 of the District of Columbia Municipal Regulations (DCMR). Chapter 22 covers the graduation requirements. To supplement the Board's regulations, the Superintendent's Office issues policies and procedures in the form of Superintendent's Directives. There are approximately 300 directives.

The Superintendent's Office also developed a School Administrator's Guidebook to provide guidance for administering day-to-day operations of each school. A Guidance and Counseling Handbook was also published to provide guidance for counseling students. Wilson SHS also has a Faculty Handbook documenting the school's policies and procedures.

**DCPS Operations.** DCPS currently operates over 150 schools and learning centers, including 20 senior high schools. A principal or director is appointed to head each senior high school. Among their many duties, the principals or directors must annually submit graduation lists to the Superintendent. Senior high school officials reported a total of 2,162 graduates in the June 2006 graduating classes. Wilson SHS reported 311 graduates, which was the largest number of graduates among all other senior high schools.

**Graduation Allegations.** A Wilson SHS teacher alleged 203 students were ineligible to graduate from Wilson SHS in June 2006. Specifically, the teacher alleged that these students: (1) did not complete the requirements to graduate; (2) improperly enrolled in night school; and (3) did not complete prerequisite courses prior to completing upper-level courses. Of the 203 students, 91 students were included on the graduation list submitted to the Superintendent.<sup>2</sup> In May 2002, this teacher also alleged that 77 ineligible students graduated from Wilson SHS in June 2001, and 15 ineligible students were scheduled to graduate in June 2002. Several reviews were conducted to address the May 2002 allegations. These reviews are discussed later in this report in the section entitled Prior Reviews.

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<sup>1</sup> [Http://www.k12.dc.us/dcps/boe/VisionMissionBeliefs.html](http://www.k12.dc.us/dcps/boe/VisionMissionBeliefs.html) (last visited Dec. 1, 2006).

<sup>2</sup> During our audit fieldwork, Wilson SHS officials identified four graduates who were not included on the graduation list. The teacher alleged that two of these four graduates were not eligible to graduate.

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## INTRODUCTION

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**Graduation Policy.** Title 5 DCMR § 2202.5 provides: “No student shall receive a high school diploma unless the student has first completed all requirements for the diploma.” Section 2202.1 further provides that students, including special education students, must satisfy the following requirements to be eligible to receive a high school diploma: (1) satisfactory completion of the required course work set forth in Section 2203; (2) achieve a basic level or higher in reading and mathematics on the 11th grade Stanford 9 exam<sup>3</sup> or pass the District Secondary Level Proficiency Exam; and (3) enroll and regularly attend D.C. public schools for at least 8 consecutive months prior to graduation.<sup>4</sup> 5 DCMR § 2202.1.

**Academic Requirements.** Title 5 DCMR § 2203.1(a) provides that students must satisfactorily complete 23.5 Carnegie units<sup>5</sup> to be certified as eligible to receive a high school diploma. In addition, pursuant to Section 2203.1(b), students must earn the 23.5 Carnegie units in the following subjects:

**Table 1. Academic Requirements**

Subject	Unit
Art	0.5 unit
Career/Vocational Education	1.0 unit
D.C. History-Government	0.5 unit
Electives	4.5 units
English	4.0 units
Mathematics	3.0 units
Foreign Languages	2.0 units
Health and Physical Education <sup>6</sup>	1.5 units
Music	0.5 unit
Science (including 1 year of lab science)	3.0 units
U.S. History	1.0 unit
U.S. Government	0.5 unit
World History	1.0 unit
World Geography	0.5 unit

**Community Service Requirement.** Title 5 DCMR § 2203.1(d) provides: “One hundred (100) hours of community service shall be required for graduation.” The Board established the community service program to: (1) increase the students’ perception of self-worth;

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<sup>3</sup> The Stanford 9 exam is a standardized test used to measure students’ math and reading levels.

<sup>4</sup> Title 5 DCMR § 2202.7 provides for an exemption to § 2202.1(c). If the student’s prior academic record, course work, and skill level achievement are satisfactory, the appropriate Assistant Superintendent, the principal, or other school head may grant an exemption to the enrollment/attendance requirement.

<sup>5</sup> One Carnegie unit is equivalent to two semesters and .5 Carnegie unit is equivalent to one semester.

<sup>6</sup> The health and physical education requirement is waived for students receiving an evening high school diploma.

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## INTRODUCTION

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(2) provide experiences for students to contribute to society without receiving monetary compensation; and (3) prepare students for the work world. Students can also complete the community service requirement through service learning. DCPS defines community service as the “independent act of providing a needed service to a person or persons” and service learning as an “educational strategy that incorporates the concept of service into the school curriculum.”<sup>7</sup>

Community service includes direct service, indirect service, and advocacy. Direct service includes “tutoring, mentoring and other forms of face-to-face contact between students and beneficiaries of the project.”<sup>8</sup> Indirect service includes “fundraising, collections, and other forms of support provided by students for others engaged in direct service,” and advocacy includes “letter writing, public relations efforts, and other means to influence citizens and policymakers to change their behavior.”<sup>9</sup>

**Certification Requirement.** According to 5 DCMR § 2202.2, students who meet all graduation requirements shall be “certified as eligible to receive the high school diploma by the principal or other person in charge of the school or program in which the student is enrolled.” Section 2202.3 provides: “Upon certification, the high school diploma shall be conferred upon the student....” Although principals or other school heads are ultimately responsible for certifying students to graduate, they commonly delegate this responsibility to the guidance counselors.

**Certification Process.** At Wilson SHS, the Guidance Department is responsible for ensuring that students complete the graduation requirements. In School Year (SY) 2005-2006, the Guidance Department included six guidance counselors, one of whom served as the Chairperson. The principal requires that the guidance counselors certify students eligible to graduate prior to the graduation ceremony. These 6 guidance counselors served approximately 1,500 students. All six guidance counselors were involved in certifying students who graduated in SY 2005-2006.

The principal also requires the College Bureau staff to verify that the students completed the required Carnegie units prior to issuing their diplomas. The College Bureau staff falls under the Guidance Department, and the staff consists of two coordinators. The principal began requiring the College Bureau staff to perform the verification process as a result of several reviews conducted in 2002 and 2003. Wilson SHS officials described the certification and verification process as shown in Exhibit B.

**Student Records.** DCPS recently implemented a new student information system called the District of Columbia Student Tracking and Reporting System (DCSTARS).

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<sup>7</sup> DISTRICT OF COLUMBIA PUBLIC SCHOOLS, COMMUNITY SERVICE AND SERVICE LEARNING FACTS 1.

<sup>8</sup> *Id.* at 2.

<sup>9</sup> *Id.*

## INTRODUCTION

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Wilson SHS currently uses the new system to track the schedules, attendance, and grades for students attending the school. The system generates report cards, transcripts, and other documents. DCPS previously used an old student information system called Campus America. Wilson SHS staff began using DCSTARS in the beginning of SY 2005-2006.

Wilson SHS staff maintains students' report cards, transcripts, and other documents in three locations: the Registrar's Office, the Guidance Office, and the College Bureau Office. The Registrar's Office maintains the cumulative files for all students. The cumulative files include Wilson SHS documents and documents transferred from other D.C. public schools and non-DCPS schools. The cumulative files generally include: (1) report cards, (2) standardized test scores, (3) grade change forms, and (4) transcripts received from other school jurisdictions.

Guidance counselors maintain files for their assigned students in their individual offices, which are located in the Guidance Office. Their files usually include letters of understanding (LOUs),<sup>10</sup> community service documentation, and notices of possible non-graduation. The College Bureau Office's files include the following documents: (1) final transcripts, (2) letters of recommendation, (3) Scholastic Assessment Test and American College Testing Program scores, and (4) transcript request forms.

### OBJECTIVES, SCOPE, AND METHODOLOGY

Our overall audit objectives were to: (1) evaluate the protocols, authorities, and practices for certifying students for graduation; (2) determine if senior high school graduates satisfied the graduation requirements; and (3) assess the accuracy of student recordkeeping and the procedures for securing student records. On July 18, 2006, the Superintendent requested that our Office conduct the audit due to the allegations made by a teacher at Wilson SHS.

To accomplish our objectives, we reviewed applicable regulations and policies established by the Board of Education and the Superintendent. We also conducted interviews with DCPS management and Wilson SHS officials, including administrators, guidance counselors, and teachers. In addition, we used a judgmental sample of students to determine if they completed the graduation requirements.

Our judgmental sample included 93 students. We selected these students because the Wilson SHS teacher alleged these students did not complete the required Carnegie units, and Wilson SHS officials either included them on the June 2006 graduation list or identified them

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<sup>10</sup> The counselors complete the LOUs to ensure students are scheduled for the courses they need to graduate. The LOU shows the following information for each required subject: (1) number of required Carnegie units, (2) number of earned units, (3) number of remaining units to complete the subject requirement, and (4) scheduled courses for the senior year. The counselors also record community service hours on the LOU.

## INTRODUCTION

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as graduates. For the 93 students, we analyzed their final transcripts and reviewed their report cards, LOUs, community service letters and forms, and other documents. Generally, we reviewed documents dating back to the students' ninth grade year (SY 2002-2003). However, we reviewed documents for some students prior to their ninth grade year because they received Carnegie units for courses taken in the seventh or eighth grade.

Although we used final transcripts generated by DCSTARS, we performed audit procedures to ensure the accuracy of the transcripts. Specifically, we reviewed hard copies of report cards generated by Campus America to ensure credits were converted from the old system to DCSTARS. For transferred students, we reviewed records from their previous schools (such as hard copies of report cards and transcripts) to ensure Wilson SHS officials accurately transferred their credits. Our review of the hard copy documentation found that there were instances where Carnegie units were not recorded on final transcripts. As a result of these irregularities, we could not rely on the data reported on the final transcripts; therefore, we reviewed all available documentation to support the students' records reflected in the final transcript.

We conducted the audit in accordance with generally accepted government auditing standards and included such tests as we considered necessary under the circumstances.

### PRIOR REVIEWS

DCPS officials, a management review task force, and a certified public accounting firm conducted a series of reviews to address previous allegations of graduation improprieties at Wilson SHS and/or to address student records management.

**Wilson SHS Fact-Finding Investigation, August 19, 2002.** The former DCPS Superintendent organized a site visit team to conduct a fact-finding investigation at Wilson SHS to determine whether school officials allowed 15 ineligible students to graduate in June 2002. The site team consisted of former and current DCPS officials, but did not include any Wilson SHS officials. The site team determined that Wilson SHS officials certified 12 of the 15 students to graduate. Wilson SHS did not certify the remaining three students and, thus, they did not graduate. The site team agreed with Wilson SHS's decision to certify the 12 students to graduate. However, the team determined there were significant discrepancies warranting a comprehensive audit of student records. The team made several recommendations specific to Wilson SHS and also made some recommendations for the entire school system. The site team did not request a response to its report.

**Student Records Management Review Task Force, August 1, 2003.** The former Superintendent assembled a student records management review task force in September 2002. The task force was responsible for: (1) evaluating the policies and procedures for student records and grades, (2) reassessing current management information systems, and (3) determining training needs for grading and reporting, and managing student records. The

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## INTRODUCTION

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task force included many DCPS officials and school employees, including the teacher who made the allegations. The task force made several recommendations, which included: requiring schools to use a standard, system-wide grade change form to support grade changes and maintain the forms in the students' cumulative files; and appointing a monitor to oversee the implementation of the recommendations. The task force did not request a response to its report.

**Independent Accountant's Report on Applying Agreed-Upon Procedures Regarding Student Records at Sixteen High Schools/Sites, September 22, 2003.** DCPS hired Gardiner, Kamy & Associates, P.C. to perform an agreed-upon procedures review.<sup>11</sup> The firm visited 16 senior high schools, including Wilson SHS, to verify if the schools maintained student records in accordance with DCPS policies and procedures, and determine if information in their student records agreed with the information maintained by the DCPS Office of Information Technology. The firm also assessed whether the 15 Wilson SHS students discussed in the site team's fact-finding investigation completed the graduation requirements.

Gardiner, Kamy & Associates, P.C. found several deficiencies at the 16 high schools. The firm concluded the schools had incomplete, inaccurate, and unreliable student records, as well as ineffective internal controls over student records. The report also details other deficiencies. With respect to the 15 students, the firm concluded that 12 did not complete the academic requirements. In addition, the firm observed none of their files contained evidence that they completed the 100 hours of community service.

Gardiner, Kamy & Associates, P.C. did not make any recommendations in its report. On July 17, 2003, the former Acting Assistant Superintendent for Senior High Schools provided comments to the draft report. The former Acting Assistant Superintendent noted the firm's findings closely paralleled the student records management review task force's findings. The Acting Assistant Superintendent also noted the firm's findings for the 15 students were different than the site team's conclusions. The former Acting Assistant Superintendent stated that DCPS believed the difference was attributed to "a review of dissimilar data by the two groups," and he requested the firm review the site team's report and suggested amending the firm's report to reflect the differences.<sup>12</sup> In the response, the former Acting Assistant Superintendent did not address specific measures to correct the deficiencies cited in the

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<sup>11</sup> The Government Accountability Office defines an "agreed-upon procedures review" as an attestation engagement (Government Auditing Standards, June 2003). The Government Auditing Standards, Chapter 6 provides that "In an attestation engagement, auditors issue an examination, a review, or an agreed-upon procedures report on a subject matter, or an assertion about a subject matter, that is the responsibility of another party."

<sup>12</sup> GARDINER, KAMYA & ASSOCIATES, P.C. DISTRICT OF COLUMBIA PUBLIC SCHOOLS' INDEPENDENT ACCOUNTANTS' REPORT ON APPLYING AGREED-UPON PROCEDURES REGARDING STUDENT RECORDS AT SIXTEEN HIGH SCHOOLS/SITES 68 (Sept. 22, 2003).

## **INTRODUCTION**

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report. However, he stated the firm's report and the task force's report would be helpful as DCPS redesigns policies and procedures.

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## FINDINGS AND RECOMMENDATIONS

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<b>FINDING 1. COMPLETING CARNEGIE UNIT REQUIREMENTS AT WILSON SHS</b>
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### SYNOPSIS

Wilson SHS officials allowed some students to graduate in June 2006, even though the students did not complete the required graduation credits or Carnegie units. Specifically, 17 graduates did not complete the required Carnegie units and were not eligible to graduate. Students graduated without meeting the graduation requirements because guidance counselors did not schedule students to attend required courses, and guidance counselors did not properly categorize courses. In addition, three graduates did not pass their required courses but were allowed to graduate, and one counselor improperly granted credits to three graduates. As a result, we believe the 17 graduates did not acquire the necessary knowledge and skills required for high school graduation.

### DISCUSSION

#### **Graduates Did Not Complete Requirements**

Of the 93 students in our sample, 75 students graduated and 18 students did not graduate.<sup>13</sup> We concluded that 58 of the 75 graduates completed the required Carnegie units and were eligible to graduate. However, the remaining 17 graduates did not complete the required Carnegie units and were not eligible to graduate (see Exhibit C).

#### **Guidance Counselors Did Not Schedule Students to Attend Required Courses.**

Guidance counselors did not schedule four ineligible students (Students 10, 18, 90, and 93) to attend required courses because they did not accurately prepare their LOUs. The guidance counselors counted repeated courses on their LOUs or miscalculated the number of Carnegie units needed to graduate. For example, one student (Student 10) passed Spanish I twice prior to his senior year, and the guidance counselor counted the course toward both the language requirement and elective requirement on the LOU. As a result, the guidance counselor failed to schedule the student for an elective course in his senior year.

Guidance counselors correctly calculated the number of earned Carnegie units on the LOUs for three ineligible students (Students 47, 71, and 82), but they did not schedule the students to attend the required courses. For example, one student's LOU showed he did not complete world geography; however, the guidance counselor did not schedule the student (Student 82) to attend the course.

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<sup>13</sup> Deficiencies regarding the accuracy of the official graduation list are discussed in Finding 2.

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## FINDINGS AND RECOMMENDATIONS

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**Guidance Counselors Did Not Properly Categorize Courses.** Guidance counselors did not properly categorize courses for two ineligible graduates (Students 12 and 23). For example, one guidance counselor counted a student's driver education course as a career course (Student 23).

Although DCSTARS is designed to generate LOUs, guidance counselors manually prepared LOUs last year because the system did not correctly categorize certain courses. For example, some students in our sample completed biology, but the system did not correctly categorize the course as a laboratory course. When the system is correctly programmed, guidance counselors can then rely on computer-generated LOUs instead of manually preparing LOUs.

**Students Did Not Pass Required Courses.** Guidance counselors scheduled two students (Students 33 and 58) to attend the required courses in their senior year, but the students did not pass the courses. For example, one student needed to complete world geography in his senior year and his guidance counselor scheduled him to attend the course, but the student did not pass the course. The student's transcript shows he did not pass the course, and his teacher confirmed that he failed the course. However, Students 33 and 58 were allowed to graduate.

In another instance, a student's transcript shows she failed an elective course (Spanish III) in her junior year, but her guidance counselor claims she passed the course. The guidance counselor indicated he talked to the teacher, and the teacher stated that the student (Student 49) passed the course. However, the guidance counselor did not provide any documentation to support his claim. The teacher no longer works at Wilson SHS; therefore, we could not verify this information. The student's 11th grade report card shows she received a C for the first advisory,<sup>14</sup> an F for the remaining three advisories, and that she missed 15 days of the class. Consequently, we believe the student failed the course as shown on the transcript, but the student was permitted to graduate.

**Guidance Counselor Granted Improper Credits.** One guidance counselor granted credits to three students (Students 32, 37, and 41) for courses they apparently did not complete. The transcripts for these students show they did not complete the elective requirement. The guidance counselor stated that two of these students completed Office Assistant I and each earned a .5 Carnegie unit. The other student completed Office Assistant I and Office Assistant II and earned a .5 Carnegie unit for each course. However, there is no documentation to support that the students completed the courses. Neither their report cards nor transcripts show they were actually scheduled or passed the Office Assistant courses.

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<sup>14</sup> An advisory is equivalent to one half of a semester; therefore, two advisories are equivalent to one semester and four advisories are equivalent to two semesters. DCPS courses are generally either one semester courses (equivalent to .5 Carnegie unit) or two semester courses (equivalent to 1 Carnegie unit).

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## FINDINGS AND RECOMMENDATIONS

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### **Transcripts Were Not Accurate and Grade Changes Were Not Properly Documented**

Wilson SHS officials did not update student records or implement existing procedures mandated in the Faculty Handbook. Specifically, Wilson SHS officials did not update the transcripts for graduates to reflect their earned Carnegie units, and they did not maintain grade change forms to support grade changes made to transcripts, as required by the Faculty Handbook.

**Transcripts Did Not Reflect Earned Carnegie Units.** Transcripts for 12 of the 75 graduates showed that they did not complete graduation requirements, but in actuality, the students had completed the requirements. The transcripts were inaccurate because Wilson SHS officials did not accurately transfer credits earned at non-DCPS schools, and officials did not update transcripts to reflect authorized grade changes. For example, one student's transcript did not include any courses he completed in the ninth grade at a non-DCPS school. Wilson SHS officials updated this student's transcript when we brought it to their attention.

In another example, one student's transcript showed he only completed 22.5 Carnegie units, and that he did not complete 1 elective unit. However, the student had completed all requirements. The transcript showed the student received an F in an elective course in his senior year; however, his teacher authorized changing his grade to a D. The student should have received .5 Carnegie unit for this course. The student also completed two elective courses (each worth .5 Carnegie unit) at his previous school, but these courses had not been transferred to his transcript. The student's transcript should have shown he completed 24 Carnegie units, and that he completed all requirements.

Because the transcripts for these 12 graduates had not been updated, it is reasonable for anyone to incorrectly conclude that any one of these students should not have graduated because his/her transcript did not reflect completion of all required courses.

**Grade Change Forms Not Maintained for Transcript Changes.** Wilson SHS officials did not consistently maintain grade change forms when changes were made to transcripts. For example, we requested 43 grade change forms for students in our sample, but officials only had grade change forms for 8 of the grade changes. For 13 grade changes, school officials simply wrote the grade changes on copies of the report cards or transcripts, or wrote notes, instead of completing grade change forms.

The Faculty Handbook contains adequate procedures for documenting grade changes, but teachers were not complying with these procedures. The Faculty Handbook provides:

If a grade change is needed, regardless of the reason, it can only be made by the registrar once she receives the official *Grade Change Form*.... The teacher must initiate and complete the

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form. The teacher submits the signed document directly to the grade level administrator. Once all signatures are verified, the registrar will make the change.<sup>15</sup>

### RECOMMENDATIONS

We recommended that the Superintendent, D.C. Public Schools:

1. Require the Principal of Wilson SHS to establish and implement measures to:  
(a) schedule students to attend required courses; (b) properly categorize courses, including programming changes to DCSTARS to correctly categorize courses; (c) prevent students from graduating when they have not completed the required Carnegie units; (d) update transcripts to include transferred credits and to reflect authorized grade changes; and (e) maintain grade change forms, as required by the Faculty Handbook.
2. Require the Principal of Wilson SHS to periodically review the: (a) scheduling and certification processes to ensure guidance counselors schedule students to attend their required courses and properly certify students to graduate; and (b) processes for transferring credits and documenting authorized grade changes.
3. Perform a series of internal reviews of other District high schools to evaluate whether June 2006 graduates satisfied course and other requirements prior to graduation.

### MANAGEMENT RESPONSE

DCPS responded positively to the above recommendations, stating that the Principal of Wilson SHS convened a committee of parents, students, staff, and community representatives to make recommendations for providing counseling and administrative services to students and recordkeeping. DCPS also stated that the Principal of Wilson SHS will also convene a group of staff to randomly select student records and review completion of graduation requirements prior to confirming graduates to the Principal, the Superintendent, and Board of Education. Further, DCPS stated that the DCPS Office of Compliance will review the eligibility and confirmation processes at other senior high schools.

### OIG COMMENTS

We consider DCPS's actions to be responsive to the recommendations and request DCPS provide target completion dates for the corrective actions.

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<sup>15</sup> DISTRICT OF COLUMBIA PUBLIC SCHOOLS, WOODROW WILSON HIGH SCHOOL FACULTY HANDBOOK 31 (2005-2006).

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## FINDINGS AND RECOMMENDATIONS

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<b>FINDING 2. REPORTING AND CERTIFYING WILSON SHS STUDENTS ELIGIBLE FOR GRADUATION</b>
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### SYNOPSIS

Wilson SHS officials did not submit an accurate graduation list to the Superintendent. Of the 93 students in our sample, we found 35 students who were ineligible to graduate. This condition occurred because Wilson SHS officials did not maintain clearance forms, which document the students certified to graduate. In addition, the College Bureau staff - instead of the guidance counselors - prepared the graduation list, although guidance counselors are responsible for certifying students. As a result, the Superintendent reported the incorrect number of graduates to the Board of Education.

### DISCUSSION

**Reporting Requirements.** Title 5 DCMR § 2205.1 provides:

The Superintendent of Schools shall annually compile and present to the Board of Education at its June regular meeting, the names of all students who have been certified as eligible to receive the high school diploma by the appropriate principal or other person in charge of the school or program in which the student is enrolled.

The Superintendent relies on the senior high school principals to provide their graduation lists to the Division of Student and School Support Services, and the Superintendent forwards the lists to the Board. On May 24, 2006, the Division of Student and School Support Services requested the principals to submit their lists by June 5, 2006.

**Graduation List.** Wilson SHS officials submitted the graduation list on June 14, 2006, which was after Wilson SHS held its graduation ceremony on June 5, 2006. In addition to submitting the graduation list late, officials submitted an inaccurate list. For example, the graduation list incorrectly included 35 students as eligible for graduation. During our audit, Wilson SHS officials indicated that 18 of these students were non-graduates and were not permitted to graduate. We identified the remaining 17 students as graduates who were not eligible to graduate (see Finding 1). In addition, officials identified four students as graduates, but their names were not on the graduation list.

The graduation list should include only students certified to graduate. However, Wilson SHS officials did not maintain clearance forms, which the guidance counselors should use to certify the students eligible to graduate. The clearance forms should be maintained in a centralized file or in the students' cumulative files. We requested these clearance forms;

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however, College Bureau staff stated the clearance forms were located in a box sitting on the floor in the College Bureau Office, and a custodian mistakenly trashed the forms. We could not conclusively establish whether a custodian mistakenly discarded these forms, whether the forms were deliberately discarded or destroyed, or whether the forms were ever completed.

Guidance counselors should have prepared the graduation list and maintained the clearance forms used to certify students to graduate. Instead, a College Bureau coordinator prepared the graduation list. The coordinator stated that she relied on information provided by the guidance counselors to develop the list. If Wilson SHS officials maintained the clearance forms, the College Bureau staff or any staff person could have prepared an accurate graduation list.

Because Wilson SHS officials did not submit an accurate graduation list, the Superintendent reported the incorrect number of graduates to the Board of Education. If the Superintendent and Board of Education use the reported graduation numbers to develop statistics, they risk developing inaccurate statistics. In addition, any individual may incorrectly conclude a student graduated because the student's name is included on the list, or incorrectly conclude a student did not graduate because the student's name is not on the list.

### RECOMMENDATIONS

We recommended that the Superintendent, D.C. Public Schools:

4. Require the Principal of Wilson SHS to: (a) institute reforms for safekeeping documents; (b) formally assign the guidance counselors to prepare the graduation list; and (c) perform a final review and verification of the graduation list prior to submitting the list to the Superintendent's Office.

### MANAGEMENT RESPONSE

DCPS responded positively to the above recommendation, stating that the Principal of Wilson SHS convened a committee of parents, students, staff, and community representatives to make recommendations for recordkeeping. DCPS also stated that the Principal of Wilson SHS will also convene a group of staff to randomly select student records and review completion of graduation requirements prior to confirming graduates to the Principal, the Superintendent, and Board of Education.

### OIG COMMENTS

We consider DCPS's actions to be responsive to the recommendation and request DCPS provide target completion dates for the corrective actions.

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## FINDINGS AND RECOMMENDATIONS

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<b>FINDING 3. MAINTAINING COMMUNITY SERVICE DOCUMENTATION FOR WILSON SHS GRADUATES</b>
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### SYNOPSIS

Wilson SHS officials did not maintain sufficient documentation to support completion of the community service requirements. Specifically, Wilson SHS officials did not maintain sufficient documentation for 36 of the 75 graduates in our sample.<sup>16</sup> This condition occurred because DCPS has not issued official community service guidelines, and guidance counselors were unaware of the unofficial guidelines in the “Community Service and Service Learning Programs” document. As a result, we could not verify that these 36 graduates completed the required community service hours or that these students met all requirements for graduation.

### DISCUSSION

**Community Service Requirements.** Title 5 DCMR § 2203.1(d) provides: “One hundred (100) hours of community service shall be required for graduation.” DCPS’s Community Service and Service Learning Programs policy (Community Service guidelines) provides that students may begin community service in the elementary, middle, or junior high school grades. *See* DISTRICT OF COLUMBIA PUBLIC SCHOOLS, COMMUNITY SERVICE AND SERVICE LEARNING PROGRAMS 1.

The Community Service guidelines, which are not signed or dated, require (in part) that school advisors either use the attached forms to document students’ community service hours or they may use their own forms, provided that: (1) service hours are recorded on agency letterhead, or a DCPS verification form; (2) the supervisor’s signature and phone number are included on the submitted form; and (3) verification forms are placed in the students’ cumulative folders. *Id.* at 2. DCPS also has several undated handouts addressing the community service requirement.

**Tracking Community Service.** Wilson SHS currently does not have a community service liaison (i.e., one person dedicated to tracking community service hours). A guidance counselor served as the community service liaison prior to SY 2005-2006. The guidance counselor handled her counseling duties and tracked community service hours for all Wilson SHS students. Effective SY 2005-2006, each guidance counselor became responsible for tracking the community service hours for students assigned to them.

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<sup>16</sup> Although there were 93 students in our sample, we did not review the community service support for the 18 students who did not graduate.

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**Letters and Verification Forms.** Wilson SHS officials did not maintain letters and verification forms supporting the community service hours earned by students. Specifically, Wilson SHS officials did not maintain sufficient support for 36 of the 75 graduates in our sample. Officials either did not maintain support for these students or only maintained partial support (i.e., support documenting less than 100 hours). On their LOUs, the guidance counselors indicated that 20 of the 36 graduates completed 100 hours.

When we interviewed some of the guidance counselors, they stated that their students definitely completed the required community service hours. Although they claimed to have received supporting documentation, the guidance counselors did not know where the documents were located. However, the former community service liaison stated that she required students to provide documentation before she recorded their hours. One guidance counselor also admitted that she did not always obtain documentation. The guidance counselor stated that she sometimes obtained verbal confirmation by contacting the organizations where the students completed their community service via telephone, and she documented the confirmation by initialing the hours written on the LOUs.

Wilson SHS officials generally did not maintain community service documentation in the cumulative files. Instead, guidance counselors maintained community service documentation in their files. While we agree that guidance counselors should maintain documentation in their files, we believe the cumulative files should also include community service documentation because students can perform community service in elementary, middle, or junior high school, and the cumulative files include the documents transferred from these schools. In addition, we believe placing the documents in the cumulative files will ensure they are not lost due to staff turnover and guidance counselor/student reassignments.

**Community Service Guidelines.** Wilson SHS officials may not have maintained sufficient documentation for completion of community service because there were no official guidelines requiring support of completed community service. The former community service liaison stated that DCPS has not issued official guidelines for community service. In addition, the chairperson of the guidance department stated she was unaware of any official guidelines requiring guidance counselors to obtain supporting documentation. We confirmed that the DCMR and the Superintendent's Directives do not provide these requirements. Further, we noted that the job description for an ET-15 guidance counselor requires the counselor to comply with the Board of Education's rules and regulations and the Superintendent's Directives, but does not mention other guidance that would include community service guidelines.

Because the DCMR cites 100 hours of community service as a graduation requirement, we believe DCPS must issue official guidelines and provide adequate training to ensure adherence. To ensure that the guidelines are widely-circulated, DCPS must incorporate them in the DCMR or a Superintendent's Directive. Because the DCMR provides the overall rules and regulations, it may be more appropriate for DCPS to include the guidelines in a

## **FINDINGS AND RECOMMENDATIONS**

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Superintendent's Directive. At a minimum, the directive should require school officials to maintain letters or verification forms in the students' cumulative files.

Because Wilson SHS officials did not maintain sufficient documentation, we cannot verify that 36 graduates completed 100 hours of community service, as required by 5 DCMR § 2203.1(d).

### **RECOMMENDATIONS**

We recommended that the Superintendent, D.C. Public Schools:

5. Develop a community service directive requiring school officials to maintain supporting documentation for tracking completed community service in students' cumulative files, and require school officials to perform periodic reviews of the files.
6. Require the community service tracking requirement to be emphasized in periodic guidance counselor meetings.

### **MANAGEMENT RESPONSE**

DCPS responded favorably to the above recommendations, stating that the DCPS Office of General Counsel has been reviewing and updating Title 5 of the DCMR and related documents. DCPS also stated that our audit report has caused DCPS to accelerate its review and revise ineffective current Superintendent's Directives. Further, DCPS stated that there is a Superintendent's Directive related to community service hours, and Wilson SHS has acknowledged the directive.

### **OIG COMMENTS**

We consider DCPS's actions to be responsive to our recommendations and request DCPS provide target completion dates for the corrective actions.

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<b>FINDING 4. DCPS CURRICULUM REQUIREMENTS, EXAMINATION REQUIREMENT, AND GRADUATION PROTOCOLS</b>
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### SYNOPSIS

In our assessment of curriculum and examination requirements and graduation protocols at Wilson SHS, we found that DCPS does not have well-defined or documented requirements and policies in the DCMR or the Superintendent's Directives. The lack of well-defined or documented requirements and policies increases the risk that school officials will not consistently apply curriculum and examination requirements and graduation protocols at all of the District's high schools.

### DISCUSSION

**Math Requirement.** Title 5 DCMR § 2203.1 provides that students must complete three Carnegie units in math, including algebra (or its equivalent until SY 2007-2008).<sup>17</sup> Some students in our sample completed algebra and lower level math courses (such as Math Foundations and Test Taking Strategies) to fulfill the math requirement.

The Assistant Superintendent of Curriculum and Instruction stated that a few years ago, DCPS decided math courses lower than Algebra I could only count as electives, but DCPS did not document the decision. We confirmed that the DCMR and the Superintendent's Directives do not state that lower level math courses cannot count toward the math requirement. Consequently, we counted lower level math courses toward the math requirement when we conducted our review. According to the Assistant Superintendent, DCPS is currently revising the promotion policy, and the new policy will state Algebra I is the lowest level math course students can use toward the math requirement.

We also noted that some students in our sample received one Carnegie unit for Math Foundations (Part I and Part II) and Algebra I (Part I and Part II), although the course catalog<sup>18</sup> shows these courses are only worth a half of a Carnegie unit. As a result, there may be some uncertainties as to whether guidance counselors should count these as a full credit or a half credit courses. We noted many students in our sample completed these math courses at Jefferson Junior High School and not Wilson SHS.

The Assistant Superintendent stated that the Carnegie unit assigned to each course is based on the course length (i.e., the number of hours spent in a class). She added that some schools

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<sup>17</sup> Section 2203.1 further provides that for SYs 2007-2008 and thereafter, students shall be required to complete one Carnegie unit of Algebra I and/or higher level courses to satisfy the three-unit requirement.

<sup>18</sup> The course catalog lists the courses offered by DCPS and the Carnegie units assigned to the courses. The DCPS Office of Academic Services published the course catalog in School Year 2001-2002.

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may have offered these math courses over two semesters instead of one semester and, if so, the students should have received one Carnegie unit. We could not verify if students actually completed the courses over two semesters. Thus, if a student's transcript showed he/she received one Carnegie unit for the math courses, we counted the courses as one Carnegie unit.

When DCPS used Campus America, school officials could alter the units assigned to courses. However, DCPS officials stated that school personnel cannot alter the units in DCSTARS. DCPS Office of Information Technology officials stated that their division programs the units assigned to courses in DCSTARS based on the Office of the Chief Academic Officer's direction, and school officials cannot override the units. There will continue to be some uncertainties for a few years because some current students completed these math courses when DCPS used Campus America. Consequently, we believe DCPS should issue guidance specifying the procedures for handling inflated Carnegie units.

**Foreign Language Requirement.** Title 5 DCMR § 2203.1(b) provides that students must complete two Carnegie units in foreign language. To fulfill the language requirements, some students in our sample completed courses in the same language (such as Spanish I and Spanish II) while some completed courses in different languages (such as Spanish I and French I).

The Assistant Superintendent of Curriculum and Instruction stated that the intent has been for students to complete courses in the same foreign language, but the requirement is not written in an official policy. We confirmed that the DCMR and the Superintendent's Directives do not state that students must complete courses in the same language. Thus, we concluded students satisfied the foreign language requirement if they completed two different languages for the requisite Carnegie units. According to the Assistant Superintendent, DCPS plans to clarify this requirement in the DCMR.

We also noted that DCPS does not have documentation addressing whether students can use sign language to fulfill the foreign language requirement. The Assistant Superintendent stated that DCPS does not consider a sign language course as fulfilling the foreign language requirement, but special education students have used the course toward the requirement if the course was included in their individualized education programs. However, DCPS does not have documentation restricting students from using sign language to fulfill the foreign language requirement. To avoid misinterpretation, we believe DCPS should issue a policy specifying which students can use sign language courses to fulfill the foreign language requirement.

**Career/Vocational Education Requirement.** DCPS does not have clear written guidelines specifying its career/vocational courses. The course catalog effective SY 2001-2002 lists the courses by subject area, but does not specify which courses can be counted toward the career/vocational requirement. When we interviewed Wilson SHS officials, they identified

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the following courses as career/vocational courses: computer technology and application, health occupations, business education, family and consumer science, and military science.

The chairperson of the guidance department also stated that, in the past, guidance counselors could use their discretion on classifying courses as career/vocational. For example, if a student expressed an interest in music and the student planned to major in music in college, the guidance counselors could count the student's music courses toward the career/vocational requirement. However, the Assistant Superintendent stated that only students attending Duke Ellington School of the Arts could count music and art classes toward the career/vocational requirement. To avoid misinterpretations, we believe DCPS should specify which courses will fulfill the career/vocational requirement and whether guidance counselors can use their discretion in determining whether career/vocational requirements have been fulfilled.

**English Requirement.** There may be uncertainties whether students can simultaneously complete two levels of English. These uncertainties are centered on the high school promotion policy in 5 DCMR § 2201.8, which provides (in part):

- (a) Any student who earns five (5) Carnegie Units, including units in ninth (9th) grade English ... shall be eligible to be promoted from the ninth (9th) to the tenth (10th) grade;
- (b) Any student who earns ten ... Carnegie Units, including tenth (10th) grade English, shall be eligible to be promoted from the tenth (10th) to the eleventh (11th) grade;
- (c) Any student who earns fifteen (15) Carnegie Units, including eleventh (11th) grade English, shall be eligible to be promoted from the eleventh (11th) to the twelfth (12th) grade ....

Some students in our sample did not pass 11th grade English, and Wilson SHS officials allowed the students to complete this course and 12th grade English in their senior year. Wilson SHS officials required the students to complete one course at Wilson SHS and complete the other course in night school. We found this practice is not unique to Wilson SHS, as other high schools also allow students to simultaneously complete both courses. DCPS officials stated that this is a city-wide practice established to prevent students from dropping out of high school. If students in our sample simultaneously completed two levels of English, we counted the courses toward the English requirement. Based on DCPS assertions that the practice of allowing students to simultaneously complete two English courses prevents students from dropping out of high school, we believe DCPS officials should issue a policy to state whether students can simultaneously complete the English requirement.

**Night School Enrollment.** There may be uncertainties whether all 11th and 12th grade day students are eligible to attend night school because Roosevelt School to Aid Youth's night school referral form states that students whose classes are available in their day schools

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cannot attend night school. DCPS officials stated that there is no official night school policy, and the referral form includes the statement so that the night schools will give first priority to night students based on capacity. The officials added that students may have extenuating circumstances and may need to attend night school, and the purpose of allowing students to attend night school is to prevent students from dropping out of high school.

We agree students may have extenuating circumstances requiring them to attend night school, and officials should take measures to prevent students from dropping out of high school. If the students in our sample satisfactorily completed courses in night school, we counted these courses toward the graduation requirements, notwithstanding classes offered by their day schools. We believe DCPS officials need to clarify policies for day student eligibility to attend night school.

**Exam Requirements.** DCPS did not require students to achieve a basic level or higher in reading and math on the 11th grade Stanford 9 exam or to pass the District Secondary Level Proficiency Exam, as required by 5 DCMR § 2202.1(b). Although the law became effective at the beginning of SY 2002-2003, DCPS never implemented the requirement. According to DCPS officials, DCPS never implemented the requirement because the Stanford 9 exam was not consistent with the DCPS curriculum.

In 2006, DCPS began administering the District of Columbia Comprehensive Assessment System (DC-CAS) examination instead of the Stanford 9 examination. DCPS officials stated the DC-CAS exam is consistent with the curriculum. Consistency between the District curriculum and the design of the examination is a requirement of the No Child Left Behind Act. We believe the Board of Education should seek to modify 5 DCMR § 2202.1(b) to include the DC-CAS exam, or eliminate the exam requirement if students do not have to fulfill the requirement. We discussed this matter with DCPS officials. The officials acknowledged DCPS needs to either repeal this regulation, or create a new regulation for the DC-CAS.

**Graduation Protocols.** Wilson SHS officials listed all of the enrolled seniors as candidates for graduation on the graduation program. In SY 2005-2006, DCPS issued commencement protocols to ensure there is a unified design for high school commencement exercises. The protocols discuss the program book, program format, and commencement decorum, and instruct school officials to add a disclaimer in the program book stating that the roster of graduates is subject to change. However, protocols do not specify which students are to be included as graduation candidates on the graduation program. We contacted other D.C. high schools and surrounding school jurisdictions to establish their graduation protocols.

*D.C. High Schools* - The senior high schools do not have uniform protocols for developing a list of candidates to be placed on graduation programs. Similar to Wilson SHS, Woodson SHS and Roosevelt SHS include all enrolled seniors on their graduation programs. However, nine other District high schools only include the graduates or the definite and

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potential graduates. A potential graduate is defined as a student whose graduation status is uncertain. Some officials stated that they must submit their programs to the printers several days or weeks before the seniors take their final exams; thus, school officials must include potential graduates to ensure they do not exclude a student on the program who will actually graduate.

While we recognize school officials may have to include potential graduates on their graduation programs, we believe school officials should exclude students who clearly will not graduate. For example, for 18 of the 35 students listed on the official graduation list who were not eligible to graduate, 12 completed less than 10 Carnegie units, which is the required number of units to be classified as a junior. Clearly, Wilson SHS officials should not have included these 12 students on the graduation program. The disclaimer on the program should not preclude officials from performing due diligence and excluding those students who clearly will not graduate. We believe DCPS should require school officials to follow the same protocol when they prepare their candidates for graduation lists.

*Other School Jurisdictions* - Fairfax County (Virginia) schools include all enrolled seniors on their graduation day program. The schools in Howard County (Maryland), Prince Georges County (Maryland), and Montgomery County (Maryland) include only the definite and potential graduates. In Arlington County (Virginia), the schools include all seniors eligible to graduate by the end of summer school because the county does not have a separate summer school graduation ceremony. Officials from these school jurisdictions indicated that they applied a uniform graduation protocol for all high schools in their respective jurisdictions.

### RECOMMENDATIONS

We recommended that the Superintendent, D.C. Public Schools:

7. Establish policies to clarify the: (1) math; foreign language; career/vocational; English curriculum; and night school enrollment requirements; and (2) to revalidate the Carnegie units achieved in these disciplines for all current students.
8. Revise 5 DCMR § 2202.1(b) to include the DC-CAS exam, or repeal the exam requirement if students do not have to pass an exam to graduate.
9. Incorporate standard guidelines for preparing graduation lists, which are to be followed by all District high schools.

### MANAGEMENT RESPONSE

DCPS responded positively to the above recommendations, stating that the DCPS Office of Accountability, which has direct supervision of school administration, will initiate any

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necessary clarifications for senior high schools and recommend any policy or directive revisions that are needed to minimize ambiguities surrounding graduation criteria and confirmation of students eligible to receive a high school diploma. DCPS stated that the DCPS Office of General Counsel has been reviewing and updating Title 5 of the DCMR and related documents, and our audit report has caused DCPS to accelerate its review. Further, DCPS stated that Wilson SHS will only list students meeting all graduation criteria on the graduation ceremony program to reduce confusion among the staff, parents, students, and community.

### **OIG COMMENTS**

We consider DCPS's actions to be responsive to our recommendations and request that DCPS provide target completion dates for the corrective actions.

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**EXHIBIT A. SUMMARY OF POTENTIAL BENEFITS  
RESULTING FROM AUDIT**

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Recommendation	Description of Benefit	Amount and/or Type of Monetary Benefit	Status <sup>19</sup>
1	<b>Compliance.</b> Require establishment and implementation of measures to ensure students complete the required Carnegie units prior to graduation, and school officials update transcripts and follow established grade change procedures.	Non-Monetary	Open
2	<b>Internal Control and Compliance.</b> Requires periodic review of the scheduling process, certification process, and grading process to ensure school officials adhere to established regulations and guidelines.	Non-Monetary	Open
3	<b>Compliance.</b> Requires a series of internal reviews of other District high schools to evaluate whether June 2006 graduates satisfied course and other requirements prior to graduation.	Non-Monetary	Open

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<sup>19</sup> This column provides the status of a recommendation as of the report date. For final reports, “**Open**” means management and the OIG are in agreement on the action to be taken, but action is not complete. “**Closed**” means management has advised that the action necessary to correct the condition is complete. “**Unresolved**” means that management has neither agreed to take the recommended action nor proposed satisfactory alternative actions to correct the condition.

**EXHIBIT A. SUMMARY OF POTENTIAL BENEFITS  
 RESULTING FROM AUDIT**

Recommendation	Description of Benefit	Amount and/or Type of Monetary Benefit	Status
4	<b>Internal Control and Compliance.</b> Requires institution of reforms for safekeeping records and formally assigning guidance counselors to prepare the graduation list, and requires school officials to conduct a final review of the graduation list prior to submission.	Non-Monetary	Open
5	<b>Internal Control and Compliance.</b> Requires establishment of a community service directive and requires school officials to perform periodic reviews of student files.	Non-Monetary	Closed
6	<b>Compliance.</b> Requires the community service requirement to be emphasized in periodic guidance counselor meetings.	Non-Monetary	Open
7	<b>Internal Control.</b> Requires establishment of policies to clarify math, foreign language, career/vocational, English curriculum, and night school enrollment requirements, and the revalidation of the Carnegie units achieved in these disciplines for all current students.	Non-Monetary	Open

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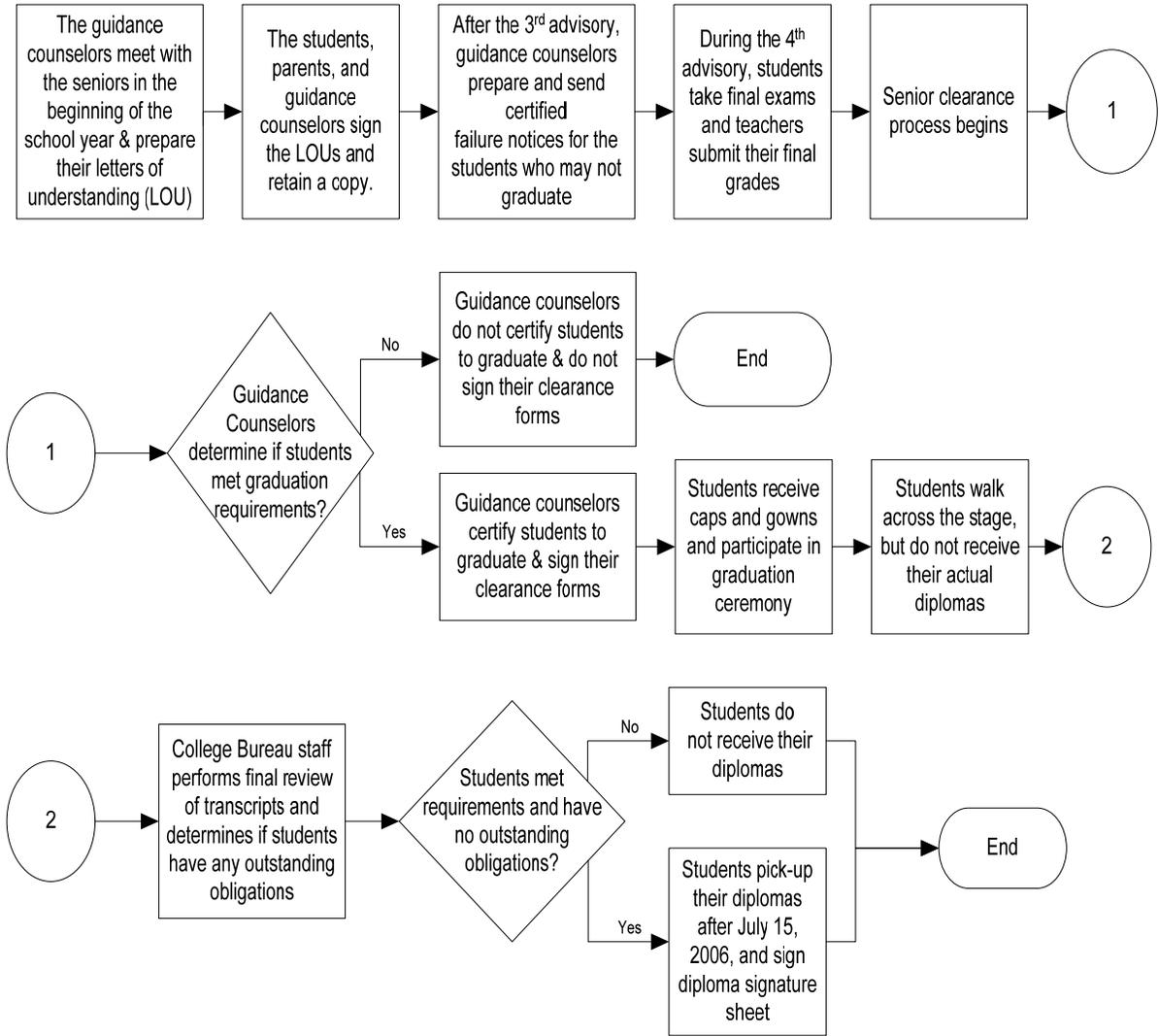
**EXHIBIT A. SUMMARY OF POTENTIAL BENEFITS  
 RESULTING FROM AUDIT**

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<b>Recommendation</b>	<b>Description of Benefit</b>	<b>Amount and/or Type of Monetary Benefit</b>	<b>Status</b>
8	<b>Internal Control.</b> Revise or repeal 5 DCMR § 2202.1(b) to reflect current requirements.	Non-Monetary	Open
9	<b>Internal Control.</b> Incorporate standard guidelines for preparing graduation lists, which are to be followed by all District high schools.	Non-Monetary	Open

**EXHIBIT B. CERTIFICATION AND VERIFICATION PROCESS**

**Wilson’s Certification and Verification Process (SY 2005-2006)**



**Note:** The guidance counselors complete the LOUs to ensure students are scheduled for the courses they need to graduate. The LOU shows the following information for each required subject: (1) number of required Carnegie units, (2) the number of earned units, (3) the number of remaining units to complete the subject requirement, and (4) the scheduled courses for the senior year. The guidance counselors also record the community service hours on the LOU. When the guidance counselors certify students to graduate, they determine if the students completed the scheduled courses.

## EXHIBIT C. INELIGIBLE WILSON SHS GRADUATES

Student No. <sup>a</sup>	Earned Carnegie Units (OIG) <sup>b</sup>	Missing Carnegie Units	Comments
10	22.5	1.0	The student is missing 1 elective unit. The guidance counselor counted a repeated foreign language course twice on the LOU. The guidance counselor counted the repeated course toward the language requirement and the elective requirement. Thus, the guidance counselor did not schedule the student for any elective courses.
12	26.0	0.5	The student is missing a .5 unit science course. The guidance counselor counted a .5 unit health course (Introduction to Medical Procedures, O11) as a science course on the LOU. Thus, the guidance counselor did not schedule the student for a needed .5 science course.
18	23.0	0.5	The student is missing a .5 unit elective course. The guidance counselor miscalculated the elective credits needed to graduate on the LOU. Thus, the guidance counselor did not schedule the student for an elective course.
23	24.5	0.5	The student is missing a .5 unit career course. The LOU shows the student needed to complete a .5 career unit course. The guidance counselor scheduled the student to complete a .5 unit career course (Computer Application I) in her senior year; however, the student had already passed the same career course in her freshman year. Because the repeated course could not count toward the career requirement, the guidance counselor classified a .5 unit driver education course as a career course.
32 <sup>c</sup>	23.0	0.5	The student is missing a .5 unit elective course. The guidance counselor stated the student served as his Office Assistant, and the student should have received .5 elective unit for the course. However, the course is not listed on the student's transcript or report cards. The guidance counselor did not provide any documentation to support his claim.
33	23.0	0.5	The student is missing a .5 unit music course. The LOU shows the student needed to complete a .5 unit music course, and the guidance counselor scheduled the student for a music course. However, the student failed the course.

<sup>a</sup>This is the number assigned to the students in our sample.

<sup>b</sup>This number represents the number of units that we calculated.

<sup>c</sup>These students did not pick up their diplomas, but Wilson SHS officials identified the students as eligible to receive their diplomas.

**EXHIBIT C. INELIGIBLE WILSON SHS GRADUATES**

Student No. <sup>a</sup>	Earned Carnegie Units (OIG) <sup>b</sup>	Missing Carnegie Units	Comments
37	23.0	0.5	The student is missing a .5 unit elective course. The guidance counselor stated the student served as his Office Assistant, and the student should have received .5 elective unit for the course. However, the course is not listed on the student's transcript or report cards. The guidance counselor did not provide any documentation to support his claim.
41	22.5	1.0	The student is missing 1 elective unit. The guidance counselor stated the student completed Office Assistant I and Office Assistant II, and the student should have received .5 elective unit for each course. However, the courses are not listed on the student's transcript or report cards. The guidance counselor did not provide any documentation to support his claim.
47 <sup>c</sup>	22.0	1.5	The student is missing 1.5 elective units. The LOU shows the student needed 1.5 elective units to graduate. However, the guidance counselor did not schedule the student to attend elective courses in her senior year.
49	22.5	1.0	The student is missing 1.0 elective unit. The student completed Spanish III in her junior year, but she failed the course. If the student had passed the course, she could have used the course toward the elective requirement because she received 2 world language units prior to her junior year. The guidance counselor stated the student actually passed the course and he believed the teacher told him so. The teacher no longer works at Wilson SHS and, thus, we could not verify this information. The guidance counselor did not provide any documentation to support his claim. In addition, the student's report card shows the student received a C for the first advisory and a F for the remaining three advisories.
58	25.5	0.5	The student is missing .5 unit in world geography. The guidance counselor scheduled the student for the needed course. However, the student failed the course.

<sup>a</sup>This is the number assigned to the students in our sample.

<sup>b</sup>This number represents the number of units that we calculated.

<sup>c</sup>These students did not pick up their diplomas, but Wilson SHS officials identified the students as eligible to receive their diplomas.

**EXHIBIT C. INELIGIBLE WILSON SHS GRADUATES**

<b>Student No.<sup>a</sup></b>	<b>Earned Carnegie Units (OIG)<sup>b</sup></b>	<b>Missing Carnegie Units</b>	<b>Comments</b>
66	22.0	1.5	The student is missing a .5 unit music course, and 1 elective unit. We did not find this student's LOU.
71 <sup>c</sup>	24.5	0.5	The student is missing a .5 unit career course. On the LOU, the guidance counselor showed the student only completed .5 unit toward the career requirement. However, the guidance counselor did not show the student needed to complete another .5 unit career course to graduate. Thus, the guidance counselor did not schedule the student to attend a .5 unit career course.
81	22.5	1.0	The student is missing 1 unit in English. The student did not complete English II.
82	23.5	0.5	The student is missing .5 unit in world geography. The LOU shows the student did not complete the course, and the guidance counselor did not schedule the student for the course.
90	22.5	1.0	The student is missing a 1 unit world language course. The student completed the same world language course (Conversational Spanish 2) in her sophomore and junior years. The student did not complete any other world language course. The guidance counselor counted the repeated course on LOU. Thus, the guidance counselor did not schedule the student to attend a world language course in her senior year.
93 <sup>c</sup>	23.0	0.5	The student is missing a .5 unit elective course. The guidance counselor counted a repeated course on the LOU. The transcript shows the student completed Test Taking Strategies-Math twice in her freshman year. Though the title is identical in both instances, there are two different course codes - M16 and TTS/M. The course catalog does not include TTS/M as a course code. The student's report card shows the student completed M16 and not TTS/M.

<sup>a</sup>This is the number assigned to the students in our sample.

<sup>b</sup>This number represents the number of units that we calculated.

<sup>c</sup>These students did not pick up their diplomas, but Wilson SHS officials identified the students as eligible to receive their diplomas.

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## EXHIBIT D. DCPS RESPONSE TO THE DRAFT REPORT

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### DISTRICT OF COLUMBIA PUBLIC SCHOOLS

OFFICE OF THE SUPERINTENDENT  
825 North Capitol Street, NE, 9<sup>TH</sup> Floor  
Washington, D.C., 20002-1994  
(202) 442-5885 – fax: (202) 442-5026

March 30, 2007

Mr. Charles J. Willoughby  
Inspector General  
Government of the District of Columbia  
717 14th Street, N W  
Washington, DC 20005

Dear Mr. Willoughby:

I greatly appreciate your office accepting my request to investigate alleged errors in certifying graduation criteria, specifically at Wilson Senior High School. I acknowledge receipt of and have reviewed your report (OIG No. 06-2-25GA) Audit of the District of Columbia Public Schools' Graduation Requirements.

I have directed that the four major findings be thoroughly reviewed by the Office of Accountability, which has direct supervision of school administration. The Office of Accountability will initiate any necessary clarifications for senior high schools and recommend to me any such policy or directive revisions that are required to minimize ambiguities around graduation criteria and confirmation of students' eligible for a District of Columbia Public School high school diploma.

For your information, several actions have taken place to address your findings and other related graduation issues. First, for several months, the DCPS Office of General Counsel has been reviewing and updating Title V and related documents. Your report has caused us to accelerate the review and revise the ineffective current Superintendent's Directives. For example, there is a Superintendent Directive related to community service hours and that Directive has been acknowledged by Wilson Senior High School.

Secondly, your review of Wilson Senior High School graduation, eligibility and confirmation will be advanced to other senior high schools over time by our Office of Compliance. More specific to Wilson Senior High School, the principal convened a committee of parents, students, staff and community representatives to provide recommendations around counseling and administrative services for students and recordkeeping. The principal will also convene a group of staff to randomly select student records and review completion of graduation criteria and recording prior to confirming the graduates to the principal and subsequently to the Superintendent of Schools and the Board of Education.

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*"DCPS: Success, One Student at a Time"*

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## EXHIBIT D. DCPS RESPONSE TO THE DRAFT REPORT

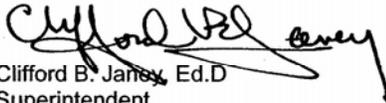
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Mr. Willoughby  
March 30, 2007  
Page 2

To reduce confusion with staff, parents, students and community, Wilson Senior High School will immediately list only students meeting all graduation criteria on the graduation ceremony program.

I am available if there are additional questions or comments from your office or they can be directed to Dr. Robert C. Rice, Special Assistant to the Superintendent.

Respectfully,



Clifford B. Janey, Ed.D  
Superintendent

CBJ:rcr

cc: Robert Bobb, President, Board of Education  
Daniel M. Tangherlini, City Administrator  
Peter Parham, Chief of Staff  
Robert C. Rice, Special Assistant to the Superintendent