

# Peach County High School On-Site Audit Report

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*June 14, 2017*

*Conducted by:*

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## **Executive Summary**

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Per O.C.G.A § Section 20-14-26 (a)(2), the Governor’s Office of Student Achievement (GOSA) conducts academic audits and investigations to maximize the integrity of student achievement data and to ensure that LEAs implement Georgia Department of Education (GaDOE) assessment policies and procedures with fidelity, so that achievement data can be utilized in making critical decisions and reporting of student outcomes.

### **Audit Rationale**

The College and Career Ready Performance Index (CCRPI) is Georgia’s statewide accountability system. The CCRPI measures schools on a 110-point scale. For the 2015-2016 school year, Peach County High School earned a CCRPI score of 99.8, placing its overall performance and academic growth above 99% of Georgia’s other high schools. Its increase from a 57.2 (F) two years ago to a 99.8 (A) represented the highest increase in score among any school in the state by 17.4 points. The school had significant gains in its student test scores, graduation rates, and the percentage of students earning credit in Advanced Placement courses.

Since PCHS’s improvement over the last two years was well above any other school in the state, in February 2017 GOSA and the GaDOE reviewed student-level data to identify how the gains were achieved. The data analysis yielded the following results:

- A significant number of students who took End-of-Course (EOC) tests were not enrolled in the course associated with that test, resulting in their scores not counting in the CCRPI. The number of students who took the test but were not enrolled increased significantly from 2015 to 2016.
- Students who were not enrolled in the course overall had much lower test scores than those who were enrolled in the course, meaning that the school’s CCRPI score included most higher achieving students but excluded most lower achieving students.
- The graduation rate has increased sharply over the last two years. Data on student entries and withdrawals did not show any outlier behavior.
- The number of graduates who earned high school credit in an Advanced Placement (AP) course tripled from 2015 to 2016 (61 to 181). In other words, the number of graduates who took and passed the high school AP course increased significantly, while the number of students in the school who took AP exams decreased the last two years (89 students took exams across all grades in 2014, 86 students in 2015, and only 60 in 2016).<sup>1</sup>

Based upon this data analysis, GOSA conducted an on-site audit on April 12-13, 2017. The audit included interviews with the district superintendent, district data coordinators, the school principal, the school data coordinator, teachers, and students.

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<sup>1</sup> It should be noted that students are not required to take an AP exam if they take the course. However, a core purpose of AP courses is not just to prepare students for college level courses but also to provide college credit to students who earn a high enough exam score.

## ***Audit Findings***

### Graduation Rate

The increases in the graduation rate appear to be largely the result of intensive “credit repair,” increased student withdrawal documentation efforts, and the state’s removal of the Georgia High School Graduation Test as a graduation requirement.

### AP High School Credit

The increase in graduates receiving AP high school credit is largely due to a new policy introduced for 2015-2016 requiring all 12<sup>th</sup> grade students, regardless of prior preparation, course grades, or test scores, to take AP English. The school does not expect most students to take the AP exam for the course. The CCRPI indicator measures students earning high school credit, regardless of the course rigor or whether students earn a score on the AP exam that would provide college credit. As such, this policy change explains the increase in graduates earning high school credit in AP courses, although it does not appear to fully consider individual student differences or academic needs.

### Enrollment in EOC Courses

To encourage students who scored below 70 to return for remediation and retesting, the principal instituted a new policy in 2015-2016 requiring teachers to enter “Incomplete” for the final course grade of any student who received a grade-converted EOC assessment score below 70. In addition, some teachers input “Incomplete” grades for students with an overall grade below 70 whom they wanted to attend summer remediation to bring up their overall grade.

The annual Student Record collection for course enrollment and grades occurs in June each year. Any transcripts submitted with grades of “Incomplete” are rejected as an error and sent back to the district for correction. The school’s remediation and retesting window occurred after the data collection deadline, so the “Incomplete” grades were in the initial file that was submitted to the GaDOE. When the file was rejected, district staff requested that the student information system vendor clear all “Incomplete” grades to remedy the issue. This action cleared the grades in those courses but also any record of the student having a grade in that course for the data collection. As such, the file reported to the GaDOE did not have any course enrollment information for affected students in these courses.

While the school’s grading policy was used to encourage students to participate in remediation and retesting, it does not appear to have been used to intentionally exclude students from the CCRPI. However, a lack of clear internal processes for data reporting and review resulted in inaccurate files being reported to the GaDOE during Student Record. The batch clearance of “Incomplete” student grades was done without senior administrative input or a review of the impact on the file extracted from Infinite Campus for reporting to the state. In addition, the school and the district were negligent in not having proper controls and review processes in place to ensure that CCRPI data were accurately calculated and reported publicly, nor did they follow up with GaDOE when CCRPI data files reviewed prior to publication differed from what the school and district had anticipated.

***Recommendations***

**Graduation Rate**

Policies and procedures currently in place are in accordance with GaDOE policies and procedures and explain the reason for the increase. No further steps need to be taken.

**AP High School Credit**

While the expansion of AP English to all 12<sup>th</sup> grade students appears to have been done to maximize CCRPI points rather than serve students' individual needs appropriately, it is in accordance with GaDOE policies and procedures and explains the reason for the increase.

**Enrollment in EOC Courses:**

As outlined in further detail in the full report, the district must do the following:

1. Ensure that all students have a course grade when submitting transcripts to Student Record in June 2017.
2. Require all school and district data personnel to participate in annual data collection trainings and webinars provided by GaDOE, Infinite Campus, and local administration to ensure uniformity of procedures.
3. Develop and implement a written manual for district data collection, reporting, and review that clearly outlines staff responsibilities, data review procedures for data reported to the GaDOE as well as data received from the GaDOE for review for the CCRPI.

**CCRPI Score Adjustment**

GOSA recommends that the GaDOE recalculate the 2016 CCRPI score for Peach County High School to take into consideration the data for all students misreported in the Student Record data collection of June 2016. The GaDOE will recalculate the school's 2016 CCRPI score in summer 2017.

GOSA provided a draft audit report to Peach County Schools on May 5, 2017. On May 18, 2017, GOSA received an official response from Peach County Schools that concurred with the audit findings and recommendations. The response is attached as Exhibit B.

GOSA will follow-up with the superintendent six months and twelve months after receipt of this report to verify the implementation status of these recommendations. Failure to implement the corrective action plan, or a continuation/increase of errors, may lead to a future investigation. This audit will remain open until these recommendations are effectively implemented.

The following report includes further details about the audit authority, data analysis results, audit findings, and recommendations.

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## Authority

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GOSA conducts data audits in cooperation with the Georgia Department of Education (GaDOE), pursuant to the Official Code of Georgia Annotated as set forth in Section 20-14-26 (a)(2):

*To audit and inspect or cause to be audited or inspected for the purpose of verification, research, analysis, reporting, or for other purposes related to the performance of its powers and duties as provided in this article and for the purposes of auditing pre-kindergarten, elementary, middle grades, and secondary education, postsecondary education, and education work force programs and schools, local school systems, institutes, colleges, universities, regional education service agencies, and other public education programs and entities as defined by the council.*

## Audit Objective and Methodology

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The objective of this audit was to determine if Peach County High School's test score, graduation rate, and accelerated course credit gains were attributable to changes in school programming or other factors or behaviors. In addition, it was to determine whether PCHS properly assigned course codes for all students on Georgia Milestones EOC exams.

This audit was conducted in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives.

The audit scope included all students who took a Georgia Milestones exam in 2016, graduated in 2016, or 2016 graduates who took an AP course during high schools at Peach County High School.

To gain an understanding of the 2016 CCRPI score calculation and the 2016 Peach County High School CCRPI score, the *GaDOE High School Calculation Guide for 2016 CCRPI*, the *GaDOE An Overview of the College and Career Ready Performance Index (CCRPI)*, and the *GaDOE Analysis of Peach County High School CCRPI Data* were reviewed. To gain an understanding of CCRPI-related trend data for Peach County High School, GOSA's School Grades page for [Peach County High School](#), GaDOE CCRPI Files, and GaDOE Georgia Milestones student-level data files were reviewed.

## Background and Data Analysis

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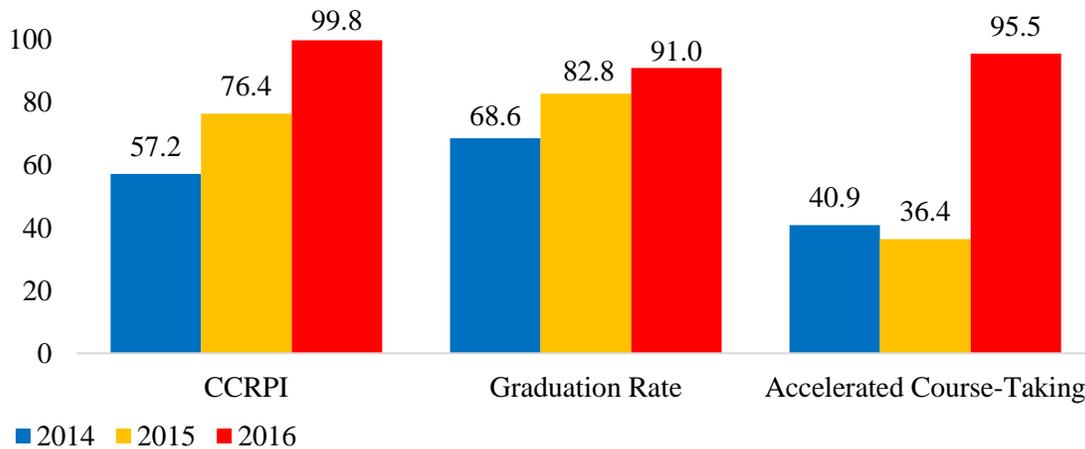
The College and Career Ready Performance Index (CCRPI) is Georgia's statewide accountability system. The CCRPI measures schools and school districts on a 110-point scale, and includes four main components: Achievement (out of 50 points), Progress (out of 40 points), Achievement Gap (out of 10 pts), and Challenge Points (up to 10 points). All public schools in the State of Georgia receive an annual CCRPI score.

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Peach County High School (PCHS, grades 9-12) has approximately 985 students enrolled (2015-2016 enrollment) and is located in Fort Valley, Georgia. The school’s demographics in 2016 were: 53% Black, 29% White, 15 % Hispanic, and 3% Multi-racial. 88% of students received free and reduced lunch, 13% were students with disabilities, and 3% of students were English language learners.

For the 2015-2016 school year, PCHS earned a CCRPI score of 99.8, placing its overall performance and academic growth above 99% of Georgia’s other high schools. Its increase from a 57.2 (F) two years ago to a 99.8 (A) represented the highest increase in score among any school in the state by 17.4 points. The school had significant gains in its student test scores, graduation rates, and the percentage of students earning credit in Advanced Placement courses (one factor in the Accelerated Course-taking component of CCRPI), as seen in the chart below:

**Figure 1: Peach County High Schools Three-Year Performance Trend**



After noticing the growth in CCRPI scores at Peach County High School, GOSA requested that the Georgia Department of Education’s (GaDOE) Accountability Division review available data at both the school and student level. This analysis identified a significant number of students who took End-of-Course (EOC) tests but were not enrolled in the course for that test. For a student’s test score to count in the CCRPI, he/she must have been enrolled in the course associated with each EOC for at least 65% of the course (Full Academic Year, or FAY). As a result, these students were excluded from the CCRPI calculation. Since test scores count in multiple sections of the CCRPI, most notably the Content Mastery of Achievement (20 possible points), Progress (40 possible points), Achievement Gap (10 possible points), and ED/EL/SWD Challenge Points (up to 10 points), excluding a significant proportion of tested students has the potential to change the CCRPI score significantly.

The analysis then examined the performance level of students who were enrolled in courses compared to those who were not. As seen in Table 1 below, in 6 of the 8 EOC courses students who were not course enrolled were much more likely to have earned a test score in the Beginning and Developing Learner

level, the lowest two of four performance levels, relative to students who were enrolled in the course.<sup>2</sup>In fact, 84.9% of Beginning Learners and 23.7% of Developing Learners were not course enrolled. Conversely, less than 10% of students in the Proficient or Distinguished Learner levels were not course enrolled. For comparison, Table 2 includes the same data from 2015, demonstrating a significant shift in course enrollments from 2015 to 2016.

**Table 1: 2016 End-of-Course Course Enrollments by Performance Level**

2016 EOC	Beginning		Developing		Proficient		Distinguished	
	# CE	# NCE	# CE	# NCE	# CE	# NCE	# CE	# NCE
<b>9th Grade Literature</b>	6	57	67	42	74	1	7	0
<b>American Literature</b>	8	49	69	21	80	8	10	2
<b>Algebra I/Coordinate Algebra</b>	15	2	48	7	27	16	4	5
<b>Geometry/Analytic Geometry</b>	6	54	72	32	58	2	11	0
<b>Physical Science</b>	4	52	65	14	71	0	19	0
<b>U.S. History</b>	6	40	81	9	76	1	26	0
<b>Total</b>	45	254	402	125	386	28	77	7
<b>Percentages</b>	15.1%	84.9%	76.3%	23.7%	93.2%	6.8%	91.7%	8.3%

**Table 2: 2015 End-of-Course Course Enrollments by Performance Level**

2015 EOC	Beginning		Developing		Proficient		Distinguished	
	# CE	# NCE	# CE	# NCE	# CE	# NCE	# CE	# NCE
<b>9th Grade Literature</b>	84	5	102	1	73	0	7	0
<b>American Literature</b>	69	6	74	0	36	8	3	2
<b>Algebra I/Coordinate Algebra</b>	113	9	85	1	36	17	3	0
<b>Geometry/Analytic Geometry</b>	114	4	107	1	39	1	3	0
<b>Physical Science</b>	92	7	78	0	72	1	10	0
<b>U.S. History</b>	79	2	74	1	59	0	9	0
<b>Total</b>	551	33	520	4	315	27	35	2
<b>Percentages</b>	94.3%	5.7%	99.2%	0.8%	92.1%	7.9%	94.6%	5.4%

# CE - Number of students who were enrolled in the course  
 # NCE - Number of students who were not enrolled in the course

<sup>2</sup> Biology had a significant decrease in tested students from 2015 to 2016, but all students who were tested were course enrolled. All but one Economics EOC test taker were course enrolled, and most were 12<sup>th</sup> grade students. In addition, during the CCRPI review process, Peach County submitted an appeal because many Algebra I students had been enrolled in an incorrect course code and were not counted in CCRPI. The appeal was accepted, and all students enrolled in the incorrect code were included in CCRPI calculations. Thus, the final CCRPI score is Algebra I does not reflect the discrepancies of the other five subjects in Table 1.

When comparing the CCRPI weighted proficiencies for test performance with the weighted proficiencies of all test-takers who were enrolled in the school for the full academic year (FAY), five of six courses would have had a decrease of 15 or more percentage points (9<sup>th</sup> grade Literature, American Literature, Geometry, Physical Science, and US History).<sup>3</sup> In addition, the count of FAY students who were economically disadvantaged (ED), English language learners (EL), or Students with Disabilities (SWD) who had test scores decreased from 1,399 to 1,160 without a comparable decrease in school enrollment, and the school earned 7.4 more CCRPI points for the ED/EL/SWD Performance Challenge Points. Finally, the count of students who had a student growth percentile decreased from 1,799 to 1,083 from 2015 to 2016.

The graduation rate increase increased sharply over the last two years. State-level data on student entries and withdrawals did not show any outlier behavior, but given its importance in school accountability, the on-site audit includes questions regarding graduation rate increases.

Regarding the increase in Advanced Placement (AP) credit, the number of graduates who earned high school credit in an Advanced Placement (AP) course tripled from 2015 to 2016 (61 to 181). In other words, the number of graduates who took and passed the high school AP course increased significantly, but the number of students in the school who took AP exams decreased the last two years (89 students took AP exams across all grades in 2014, 86 students in 2015, and only 60 in 2016).

Given the results of the data analysis, on April 12 & 13, 2017, GOSA visited Peach County School District to collect documentation and information via interviews of administrators at the district level and administrators, teachers, and students at the school level. GOSA has reviewed the information collected during this audit in conjunction with state-level data. It has the following findings and conclusions.

## **Audit Findings and Conclusions**

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### ***Increase in Graduation Rates***

The graduation rate increases largely can be explained by statewide and local policy changes, as follows:

- As is the case across the state, as of 2014-2015, Peach County High School (PCHS) graduates no longer needed to pass the Georgia High School Graduation Test (GHS GT) to graduate. The superintendent stated that the GHS GT had been a barrier for many students at the school, explaining a portion of the increase.
- Beginning in 2014-2015, the new superintendent instituted a policy where district and school personnel were assigned students who withdrew to determine the reason for their withdrawal. This proactive process resulted in some students who formerly would have been classified as having an “unknown” reason for withdrawing and thereby counting as a dropout being classified as a transfer student.

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<sup>3</sup> The weighted proficiency rate includes 0.0 points for Beginning Learners, 0.5 points for Developing Learners, 1.0 points for Proficient Learners, and 1.5 points for Distinguished Learners.

- The use of “credit repair” instead of “credit recovery” was expanded at PCHS, allowing students to recover credit and earn a class grade of 70 for an unlimited number of courses each school year without having to retaking the EOC.<sup>4</sup> A “credit repair” teacher was hired to specifically work with students to improve failed grades, and all students have a 35-minute daily Academic Focus course to work on “credit repair” or other areas where additional support is needed.
- A review of student withdrawal data did not identify abnormal student withdrawal patterns.

In sum, the increases in the graduation rate appear to be largely the result of intensive “credit repair,” increased withdrawal documentation efforts, and the state’s removal of the GHS GT.

### ***Increase in High School Credit in AP Courses***

The increase in graduates receiving Advanced Placement (AP) high school credit is largely due to a new policy introduced for 2015-2016 requiring all 12<sup>th</sup> grade students, regardless of prior preparation, course grades, or test scores, to take AP English. Based upon interviews, the school does not require, or in many cases expect, most of these students to take the AP exam for the course. The CCRPI indicator measures students earning high school credit, regardless of the course rigor or whether students earn a score on the AP exam that would provide college credit. As such, this policy change explains the increase in graduates earning high school credit in AP courses.

### ***Lack of Course Enrollment for EOC-Tested Students***

The GaDOE’s Student Record (SR) data collection provides the state with student-level course enrollment, course grade, entries, withdrawals, and other data that are used for the CCRPI and other state-level purposes. The reporting window is open during the spring semester and closes on June 15. Districts upload data files into the system and receive error codes if data include unallowable values or formats. In order to fix the errors, the district must either change the data file or enter a statement explaining why the error flag should be removed that then must be approved by state personnel. One such error is that the data collection does not allow student grades of “Incomplete,” so districts must remove this grade before being allowed to submit the file. Prior to submission, the superintendent must sign off on the data. Course enrollment and course grades from this file are used to determine which courses students took during the preceding school year. For students’ Georgia Milestones scores to count, students must be enrolled in the course accompanying the test for at least 65% of the school year or course. Students who are tested but not enrolled in the course as reported to the state are excluded from the CCRPI.

Regarding the Georgia Milestones assessments, high school students on a full-year course calendar take the EOC during April or May. State Board Rule 160-4-2-.13 requires that student performance on the

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<sup>4</sup> “Credit repair” is defined as allowing students who have a failing grade at the end of a course to make up assignments and retake assessments to bring the grade to a passing score. Per an email communication from GaDOE Director of Assessment (dated April 18, 2016), students participating in “credit repair” for an EOC course that earn course credit, are not required to re-test on the EOC for that course, unless the student reenrolls and participates in that course previously failed. In “credit recovery,” a student retakes a course in its entirety and is required to retake the EOC.

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EOC count for 20% of the final course grade, and the GaDOE provides a grade-converted score between 0-100 for that purpose. First-time test takers who earn a grade-converted score below a 70 are allowed one retest, which typically occurs during the summer following testing for full-year courses. Since the EOC grade converted score is worth 20% of students’ final course grade, it is possible for students to pass a course even if their EOC score is below 70 as long as the other 80% of the grade is high enough to earn an overall average of 70.

In 2015-2016, PCHS was on a full-year course schedule, so the remediation and retest for students occurred in summer 2016. To encourage students who scored below 70 to return for remediation and retesting, the principal instituted a new policy requiring teachers to enter “Incomplete” for the final course grade of any student who received a grade converted EOC score below 70. Without this policy, the principal stated that many students would have passed the course and had less incentive to return for remediation and retest. He used this policy in his prior high school for the same stated purpose. Teachers were notified of this policy at the beginning of the school year and were reminded throughout the year via email and in faculty meetings. In addition, students reported being told during the school year that they would need to return to summer school if they did not pass the EOC test.

The school received EOC scores for all courses but 9<sup>th</sup> Grade Literature and American Literature prior to the end of the school year. In all courses with scores except Economics, teachers manually entered “Incomplete” as the final course grade if the student’s grade converted EOC score was below 70. If the score was above 70, they entered the score and the student received a final grade. Economics is a 12<sup>th</sup> grade course at PCHS, so the principal did not apply this policy for 12<sup>th</sup> grade students who would graduate before remediation would occur.<sup>5</sup> Ninth Grade Literature and American Literature EOC scores were received after school ended. Since teachers were no longer under contract, the principal had the school’s data coordinator enter those scores as described above. For students who earned an EOC grade-converted score below 70, parents received a letter with the Report Card explaining the “Incomplete” grade and the requirement for the student to attend remediation. In total, this occurred for 345 students, as split out in the table below.

**Table 3: Number of Students by EOC Subject Who Received an “Incomplete” Grade Due to EOC Score below 70**

2016 EOC	9 <sup>th</sup> Literature	American Literature	Algebra	Analytic Geometry	Physical Science	US History	Economics	Total Number
Number of Students	75	62	9	84	66	48	1	345

The GaDOE reporting deadline for Student Record is June 15, which falls before PCHS’ remediation and retesting occurred. As such, students marked as “Incomplete” were reported as such when the district attempted to submit transcripts with final course grades of “Incomplete” to GaDOE in early June 2016. Since the data collection does not allow for grades of “Incomplete,” the district received an error for all grades of “Incomplete.” To fix the error, district data personnel submitted a request for a batch data

<sup>5</sup> One student was not enrolled in the Economics course when data were submitted to the GaDOE for undetermined reasons.



clearance to Infinite Campus on June 13 for all courses with a final grade of “Incomplete” at PCHS. This change allowed PCHS’s second transcript upload for Student Record (SR) to GaDOE to be completed without any errors on June 14, but it also removed any course grade from being reported for affected students. The superintendent stated that he was not aware of this request being made to address the error. As such, the file uploaded for the GaDOE Student Record collection did not count those students as having enrolled in the course associated with the EOC. Since students must be enrolled in the course and have a test score to be counted in the CCRPI, these students, all of whom were low-performing, were excluded from the CCRPI.

In addition to the students described above, 70 students with scores above 70 were excluded from file reported in Student Record. While most of these students earned scores just above 70, a few earned scores well above 70. A significant number of these students were concentrated in one ELA teacher’s course sections. After interviews with students, teachers, and the school data coordinator, this issue appears to be the result of misinterpretation of the policy whereby the teacher applied this policy to students who had a total course grade below 70. In addition, there appear to have been data errors for these students when EOC scores were input into Infinite Campus. In another course, one teacher requested permission to input an “Incomplete” for students who had not completed sufficient coursework to pass the course but would attend summer remediation to finish the course. All personnel interviewed were unaware that the “Incomplete” input in the final grade entered would result in the students’ test scores not counting in the CCRPI.

School and district personnel did not check the file that was uploaded to the state to see how the batch clearance affected those students and were unaware of their exclusion until the audit visit. District and school personnel stated that they were not aware that clearing “Incomplete” grades in this way would result in clearing the student from the enrolled course, thereby excluding them from the CCRPI. The principal implemented this policy at his prior high school, Atkinson County High School, and upon GOSA review of the CCRPI data files for that school, there were no students who took the EOC who were not course enrolled for the years that he was principal (2012-2014).

When the CCRPI was calculated the following fall, the GaDOE provides all schools and districts with student-level files to verify that CCRPI calculations are correct. Then, after those are reviewed, the fully calculated CCRPI is provided for review. District data personnel reported that they do not review the CCRPI files or Student Record files but depend on the school-level administration to ensure data are accurate. The school’s principal did review the fully calculated CCRPI files because he noticed that Algebra I scores were much lower than expected. The superintendent reported this concern to the GaDOE on October 26, 2016. Upon investigation, the GaDOE noticed that an outdated course code from 2011 had been used for the course, causing none of the students’ scores to count. Since none of these students had course enrollments, the district agreed to have all students count regardless of course enrollment status. This correction was made for the final public CCRPI. District and school personnel did not identify and/or report any other discrepancies during either data review period, even though the scores increased so significantly, and principal said in the interview that “The scores do not reflect what I calculated for my EOC scores, and I told the superintendent at the time. I don’t know what happened. I know when you pull the CCRPI up in the data details that the people shown taking the class is [sic] a lot different than what we had enrolled in the class.”

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In summary, the manual inputting of “Incomplete” grades was the primary driver of the lack of course enrollments as reported in Student Record. While this policy was used to encourage students to participate in remediation and retesting, it does not appear to have been used to intentionally exclude students from the CCRPI. However, a lack of clear internal processes for data reporting and review resulted in inaccurate files being reported to the GaDOE during Student Record. The batch clearance of “Incomplete” student grades was done without senior administrative input or a review of the impact on the file extracted from Infinite Campus for reporting to the state. The school and the district were negligent in not having proper controls and review processes in place to ensure that CCRPI data were accurately calculated and reported publicly, nor did they follow up with GaDOE when CCRPI data files reviewed prior to publication differed from what the school and district had anticipated.

As a result of the audit, the Peach County School District Superintendent, Dr. Daryl Fineran, issued a directive to school and district staff on April 13, 2017 stating that no students should have a grade of incomplete on their transcript after June 12, 2017, attached as Exhibit A.

## Recommendations

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Based upon a review of interviews, student records, and documentation, the reasons for the errors appear to have occurred because of a combination of new policies and procedures, events, omissions, and negligence of data review and reporting responsibilities.

For the categories discussed above, Peach County School District should take the following steps:

### *Increase in Graduation Rates*

Policies and procedures currently in place are in accordance with GaDOE policies and procedures and explain the reason for the increase. No further steps need to be taken.

### *Increase in High School Credit in AP Courses*

While the expansion of AP English to all 12<sup>th</sup> grade students appears to have been done to maximize CCRPI points rather than serve students' individual needs appropriately, it is technically in accordance with GaDOE policies and procedures and explains the reason for the increase. No further steps need to be taken unless the district wishes to provide more appropriate differentiation to meet the needs of individual students. However, GaDOE and the State Board of Education should consider the potential future consequences of continuing to measure AP course-taking outcomes using high school credit rather than postsecondary credit in the state accountability system, CCRPI.

### *Lack of Course Enrollment for EOC-Tested Students*

#### *Recommendation 1*

The policy requiring teachers to input course grades of "Incomplete" for students who earn a grade-converted score of 70 to encourage their participation in remediation is at the discretion of the local district. However, as directed by the superintendent on April 13, 2017, "Incomplete" or blank grades should not be in students' transcripts when the district reports student grades in the Student Record collection. This will ensure all courses and grades are uploaded in accordance with GaDOE policies and procedures and counted in the CCRPI.

#### *Recommendation 2*

All data personnel should be required to participate in annual data collection trainings and webinars provided by GaDOE, Infinite Campus, and local administration. This will ensure uniformity in procedures and keep all data personnel current with new policies, procedures, or updates.

#### *Recommendation 3*

Develop and implement a written manual for district data collection, reporting, and review. This manual should clearly explain but not be limited to:

- The process (including who is responsible at the district and school levels) for reviewing, communicating, approving, and submitting Student Record data to the GaDOE.

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- The process (including who is responsible at the district and school levels) for reviewing, correcting, approving, and resubmitting reported errors to the GaDOE.
- The process (including who is responsible at the district and school levels) for reviewing, approving, and submitting large-scale changes to Infinite Campus.
- The process for receiving and reviewing data from the GaDOE (such as student-level data or embargoed CCRPI scores in the CCRPI portal) to ensure there are no errors.

### *Recommendation 4 (for GaDOE)*

GOSA recommends that the GaDOE recalculate the 2016 CCRPI score for Peach County High School to take into consideration the data for all students misreported in the Student Record data collection of June 2016. The GaDOE will correct Peach County High School's 2016 CCRPI score in summer 2017.

GOSA provided a draft audit report to Peach County Schools on May 5, 2017. As outlined in the audit letter, GOSA requested that Peach County provide an official response to the audit report and provide a corrective action plan for each of the recommendations outlined above. On May 18, 2017, GOSA received an official response and corrective action plan from Peach County Schools that concurred with the audit findings and recommendations. The response is available in Exhibit B of this report.

GOSA will follow-up with the superintendent six months and twelve months after receipt of this report to verify the implementation status of these recommendations for Peach County High School and the school district. Failure to implement the corrective action plan, or a continuation/increase of errors, may lead to a future investigation. This audit will remain open until these recommendations are effectively implemented.

### *GOSA Point of Contact:*

David Greenstein  
Program Manager, Academic Auditing  
404-844-8534  
[dgreenstein@georgia.gov](mailto:dgreenstein@georgia.gov)

## Exhibit A

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\*Names of email recipients have been redacted.

----- Forwarded message -----

From: **Daryl Fineran** <[dfineran@peachschools.org](mailto:dfineran@peachschools.org)>

Date: Thu, Apr 13, 2017 at 9:14 AM

Subject: Re: EOC Scores

To:

All,

Please read the email above that explains how EOCT's are recorded for state purposes and then read my directive.

Please read this email and consider it as a directive from the superintendent. Due to the recently discovered problems that in-completes given for high school classes have caused for state reporting purposes, I want all in-completes cleared up immediately on infinite campus from the school level. At this point there should be none from last year and none from first semester on the block scheduling. The timeline for retakes of EOCT subjects for students who achieved below a grade of 70 is over because the next testing opportunity begins June 19, 2017 and the deadline for correcting all errors and in-completes is by the state is June 15, 2017. Even if a student did not utilize his or her one opportunity to retake the EOCT after this year's first semester in which the course is complete and the EOCT retake opportunity has come and gone the score that the student made on his first EOCT by state procedures needs to be recorded. Should the student eventually take the EOCT exam and improve his score utilizing his one retake opportunity, the score can then be recorded and should be recorded immediately.

If a student is a candidate for credit repair, when the student completes the course requirements or retakes the EOCT, the teacher and or \_\_\_\_\_ if the teacher is not on contract needs to record the grades correctly in infinite campus immediately.

In no circumstances should there be any in-completes after June 12, 2017. The teachers need to have all make up work and EOCT's recorded in infinite campus before leaving post planning. What this ultimately means is after we receive the EOCT results from the administration of the 2017 Spring testing that begins on May 3rd, the teachers are going to have to record that EOCT testing score in infinite campus. Again, if the student should retake the exam or do credit repair when this is completed the teacher can then make the correction for the student. In the event this takes place in the summer when the teacher is off contract-- \_\_\_\_\_ is to record it immediately.

\_\_\_\_\_ and \_\_\_\_\_ are to see that the in-completes are corrected at the high school level. This correction cannot be done at the county level. I want all in-completes that remain from last year and the first semester corrected to show their EOCT score regardless of whether or not they have retaken the EOCT or finished or attempted credit repair. Plenty of time has elapsed from last year and the completion of the first semester on Block scheduling. I need all in-completes corrected before Friday April 14, 2017. There should not be many from last school year (2015-2016). The grades from first semester should be completed by now but as I ran a report yesterday there still is quite a few in-completes (app. 33 students and 38 courses).

Thanks,

D. Fineran

Exhibit B



Peach County School District Response Letter and Corrective Action Plan

Governor's Office of Student Achievement
Academic Auditing Program
205 Jesse Hill Jr. Drive, SE
952 Twin Towers East
Atlanta, GA 30334

RE: Peach County High School On-Site Audit

Dear Executive Director Todd:

In connection with your on-site audit conducted at Peach County High School on April 12 and 13, 2017 and the subsequent draft audit report received on May 5, 2017, we conclude the following in regard to the Governor's Office of Student Achievement's enrollment verification audit (select only one option):

- Checked box: We have reviewed a draft copy of GOSA's audit findings report of Peach County High School, and concur that the findings and conclusions are fairly presented.
Unchecked box: We have reviewed a draft copy of GOSA's audit findings report of Peach County High School for the on-site audit conducted on April 12 & 13, 2017 and believe the findings and conclusions contained within GOSA's audit report are not fairly presented for the following reasons:

Please be specific and attach appropriate documentation:

Four horizontal lines for providing specific details and documentation.

Along with this letter, we have attached a Corrective Action Plan to address the recommendations stated in the audit report.

Respectfully,
David W. Ferguson
Superintendent
Peach County School District





**Peach County School District Corrective Action Plan**

**Recommendation Number 1:** The policy requiring teachers to input course grades of “Incomplete” for students who earn a grade-converted score of 70 to encourage their participation in remediation is at the discretion of the local district. However, as directed by the superintendent on April 13, 2017, “Incomplete” or blank grades should not be in students’ transcripts when the district reports student grades in the Student Record collection. This will ensure all courses and grades are uploaded in accordance with GaDOE policies and procedures and counted in the CCRPI.

We concur with this finding. The District will ensure, as directed by the Superintendent on April 13, 2017, “Incomplete” or blank grades will not be in students’ transcripts when the district reports student grades in the Student Record collection. The District understands and agrees that this will ensure all courses and grades are uploaded in accordance with GADOE policies and procedures and counted in CCRPI.

Contact Person: Dr. Daryl W. Fineran, Peach County Superintendent of Schools  
Phone: (478) 825-5933  
Email: [dfineran@peachschools.org](mailto:dfineran@peachschools.org)

**Recommendation Number 2:** All data personnel should be required to participate in annual data collection trainings and webinars provided by GaDOE, Infinite Campus, and local administration. This will ensure uniformity in procedures and keep all data personnel current with new policies, procedures, or updates.

We concur with this finding. All data personnel will be required to participate in annual data collection trainings and webinars provided by the GaDOE, Infinite Campus, and local administration. The District understands that participating in the trainings and webinars will ensure uniformity in procedures and keep all data personnel current with new policies, procedures, or updates.

Contact Person: Dr. Daryl W. Fineran, Peach County Superintendent of Schools  
Phone: (478) 825-5933  
Email: [dfineran@peachschools.org](mailto:dfineran@peachschools.org)

**Recommendation Number 3:** Develop and implement a written manual for district data collection, reporting, and review. This manual should clearly explain but not be limited to:

- The process (including who is responsible at the district and school levels) for reviewing, communicating, approving, and submitting Student Record data to the GaDOE.
- The process (including who is responsible at the district and school levels) for reviewing, correcting, approving, and resubmitting reported errors to the GaDOE.





**Governor's Office of Student Achievement**  
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- The process (including who is responsible at the district and school levels) for reviewing, approving, and submitting large-scale changes to Infinite Campus.
- The process for receiving and reviewing data from the GaDOE (such as student-level data or embargoed CCRPI scores in the CCRPI portal) to ensure there are no errors.

We concur with this finding. The District will develop and implement a written manual for district data collection, reporting, and review. The manual will clearly explain but will not be limited to:

- The process (including who is responsible at the district levels) for reviewing, communicating, approving, and submitting Student Record data to the GaDOE.
- The process (including who is responsible at the district and school levels) for reviewing, approving, and submitting reported errors to the GaDOE.
- The process (including who is responsible at the district and school levels) for reviewing, approving, and submitting large-scale changes to Infinite Campus.
- The process for receiving and reviewing data from the GaDOE (such as student-level data or embargoed CCRPI scores in the CCRPI portal) to ensure there are no errors.

Contact Person: Dr. Daryl W. Fineran, Peach County Superintendent of Schools  
Phone: (478) 825-5933  
Email: [dfineran@peachschools.org](mailto:dfineran@peachschools.org)

