

TO: Dena Dosset, Chief of Data Management, Planning and Program Evaluation  
Dr. Donna Hargens, Superintendent

CC: Tom Hudson, Chief Business Officer  
Cordelia Hardin, Chief Financial Officer/Treasurer

FROM: Jim Tencza, - Internal Audit, Dean Dorton Allen Ford

SUBJECT: Final Report – Behavior Support System Audit

DATE: June 3, 2016

### Summary

On May 10, 2016, Internal Audit met with the Board of Education (Board) to discuss the preliminary internal audit report and results (see attached for the “Preliminary Report”). Subsequent to that meeting Internal Audit completed the remaining open audit procedures as listed in the Preliminary Report. The completion of the audit procedures did not result in any additional, significant findings. Below are the final Internal Audit recommendations along with management’s response.

### Completion of Audit Procedures

As part of completing our audit procedures, Internal Audit reviewed the Behavior Incident Logs (BIL) for 12 selected schools for the 2013-14 and 2014-15 school years. There were a total of 5,875 incidents in BILs. Internal Audit reviewed the “behavior” reported and the “consequence” for each of the 5,875 incidents noting that there were only 20 incidents (.3%) that might be considered a restraint or seclusion. The following is a summary of the 20 incidents:

- 2 of the incidents were properly reported in Infinite Campus
- 11 of the incidents were identified by reading the “behavior” – when JCPS reviewed the BILs reports they performed a search for certain terms within the “consequence” field only because that is where all schools were required to report the response to the student behavior. Of these 11 incidents, 7 of them clearly meet the definition of a restraint.
- 5 of the incidents were student fights in which teachers physically separated the students – currently, there is no clear guidance that this situation fits the definition of a restraint. JCPS will provide clear guidance for such incidents for the upcoming school year.
- The remaining incidents were cases in which the student was “isolated”; however, it is not clear as to whether or not a teacher was present and whether or not it meets the definition of seclusion.



Based on the results of our testing and after considering Management’s remediation efforts, we conclude that the restraint and seclusion information for the 2013-14 and 2014-15 school years included in Infinite Campus is substantially accurate and complete with the likelihood of an error rate of less than .5%.

**Recommendations and Management Responses**

The following recommendations are provided by Internal Audit as a result of our audit of the restraint and seclusion information reported for the 2013-14 and 2014-15 school years.

1. For reporting restraints and seclusions in Infinite Campus for the 2015-16 school year Management should ensure the completeness and accuracy of such information by establishing and following a process similar to what they used for remediating the 2013-14 and 2014-15 school years.

<b>Management Response:</b>	JCPS Data Management division is currently working with JCPS IT and schools to ensure that all restraints and seclusions from the internal systems for the 2015-16 school year have been reviewed and entered into Infinite Campus. Data Management will run the Safe Schools report to check for any errors before the district verification window closes.
<b>Person Responsible:</b>	Dena Dossett
<b>Estimated Due Date:</b>	June 30, 2016 – district verification window closes

2. To ensure the accuracy and completeness of reporting restraints and seclusions in Infinite Campus for the 2015-16 school year, the following processes/controls should be implemented:
  - a. All Early Childhood Schools should properly report restraints and seclusions in Infinite Campus for the 2015-16 school year.
  - b. In addition to searching the “consequence” field, Management should also search the “behavior” field for all BILs reports for all schools for the 2015-16 school year to determine if there are any additional incidents that might be a restraint or seclusion to be reported in Infinite Campus.
  - c. Management should thoroughly review and analyze all the restraint and seclusion data for all schools. This analysis should include, at a minimum, a comparison of the number of incidents by school in 2015-16 to prior years, a comparison of the number incidents between schools of the same type, a comparison of the trend at JCPS compared to other schools, and identifying schools with zero or very few incidents. All unusual variances should be discussed with the Principal and should be properly explained.
  - d. Before finalizing the 2015-16 information for inclusion in the State Report Card all Principals should thoroughly review their school’s information and verify the accuracy and completeness of the restraint and seclusion information. In addition, all Assistant Superintendents should thoroughly review their schools’ information and verify the



accuracy and completeness of the restraint and seclusion information. Lastly, the Superintendent should review all information prior to the release of the State Report Cards. All reviews should be documented with a positive statement regarding the review of information and a manual signature.

<p>Management Response:</p>	<p>a. Below is the information that JCPS Early Childhood provided regarding documentation of seclusions and restraints (4/26/16):</p> <p>“On March 8, 2016 an email was sent by Data Management that “All seclusion and restraint incidents must be documented in Infinite Campus by those in your building who have behavior rights to enter behavior referrals.” Below is the process that our Early Childhood Site Administrators have been instructed to follow:</p> <ul style="list-style-type: none"> <li>• Site administrators are responsible for establishing discipline plans in their centers.</li> <li>• Behaviors requiring assistance from an administrator or members of the safe crisis management team must be documented.</li> <li>• It is at the discretion of the site administrator to determine what tool they would use at their centers to document behaviors requiring assistance. Our Compliance Specialist offered to provide a standard disciplinary form for EC sites to use upon request.</li> <li>• Anytime a student is restrained the incident is to be documented on a Behavior Incident Report.</li> <li>• <b>Seclusion and Restraint events are to be documented on the Behavior Incident Reports in Infinite Campus.</b> Site Administrators are responsible for reviewing each form for consistency and to ensure the “restraint” is in accordance with the state definition.</li> <li>• If any student displays a challenging behavior the Site Administrators should use the Early Childhood referral system to request assistance with the student.”</li> </ul> <p>b. Data Management will search the “behavior” field of the BILs reports for all schools for the 2015-16 school year. The search will be for terms such as restraint, seclusion, safe crisis, SCM, hold, cradle, hook, transport, carry, arm, etc. For all incidents with such terms in the “behavior” field, Data Management will review the incident, discuss it with the school if needed and ensure that it is properly reported in Infinite Campus if it is a restraint or seclusion.</p> <p>c. Data Management will prepare a 3 year trend report for each school and flag schools that show a change in trend patterns and schools with zero incidents. This report will be shared with Assistant Superintendents for review with principals. Data Management will also prepare a data report for Early Childhood review that shows the number of incidents for early</p>
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	<p>childhood students (2015-16 school year is the 1<sup>st</sup> year that early childhood incidents will be reported on the school report card).</p> <p>d. Data Management will prepare a sign-off sheet with signatures that indicates that the school's principal and Assistant Superintendent has reviewed the 2015-16 seclusion and restraint data (as well as all the behavior data that is reported on the KY School Report Card). Additionally, the Superintendent will review the sign-off sheets and summary information and will provide a written approval regarding the process.</p>
Person Responsible:	Dena Dossett
Estimated Due Date:	<p>a. Early Childhood Procedures received April 26, 2016;</p> <p>b. June 30, 2016 – Data reports will be provided to early childhood, schools, and Asst. Superintendents</p> <p>c. July 22, 2016 - signature forms are due back to Data Management; July 29, 2016 – school report card verification of behavior data ends closes</p>

3. Prior to July 31, 2016, Management should make a final decision regarding the computer system used by all schools to document restraint and seclusion information. There should be only one data entry point and the information must be in the proper format with enough detail so that Principals and other school officials can properly address and improve student behaviors and responses to those behaviors. The computer system can be Infinite Campus or SBRT. If Infinite Campus is utilized, then there may need to be modifications made to Infinite Campus so that it provides Principals with the appropriate information. If SBRT is utilized, then changes to SBRT will need to be made so that the information can automatically interface with Infinite Campus. JCPS should include all key parties in making this decision including, Principals, Assistant Superintendent, Superintendent, Chief of Data Management, Information Technology Department, student behavioral specialists, KDE, etc.

Management Response:	<p><b>Infinite Campus will be the single system used to record and report all of the behavior data throughout the district.</b> The SBRT system has been decommissioned and BILS will not be available for use in 2016-17. JCPS Data Management, JCPS IT, and a special school met in April to explore the options to facilitate more data analysis so that schools can properly address and improve student behaviors and responses to those behaviors, as recorded in Infinite Campus. In response to this need, the JCPS IT department is exploring the feasibility of creating additional reports and graphs using the behavior data resident in Infinite Campus.</p>
Person Responsible:	<b>Raghu Seshadri/Dena Dossett</b>
Estimated Due Date:	<b>July 31, 2016</b>

4. Management should review the JCPS Organizational Chart and determine if changes need to be made related to overseeing the documentation, reporting, monitoring and training for student



behavior incidents. There should be a clear understanding of who is responsible for such matters. Principals, Assistant Principals and teachers should clearly understand who they should contact with questions and concerns – and there needs to be clear and consistent responses to any such questions.

Management Response:	Dr. Zeitz will be working with a team to design and implement a districtwide Behavior Management System. Clear roles and responsibilities of each central office department involved in the districtwide Behavior Management System (including documentation/reporting, monitoring, and training of student behavior incidents) will be delineated in writing and communicated with schools prior to the 2016-17 school year.
Person Responsible:	Donna Hargens
Estimated Due Date:	July 27, 2016

5. For the upcoming school year there needs to be clear, consistent and strong messaging from top level management and Assistant Superintendents regarding the importance of properly documenting and reporting all seclusion and restraint incidents and other safe school reporting information. It should be clear that this is a top priority and that Management will not tolerate under-reporting any such information.

Management Response:	Dr. Zeitz will be working with a team to design and implement a districtwide Behavior Management System. Clear roles and responsibilities of each central office department involved in the districtwide Behavior Management System will be delineated in writing and communicated with schools. Additionally, expectations for schools regarding reporting and monitoring will be reviewed prior to the 2016-17 school year.
Person Responsible:	Donna Hargens/Katy Zeitz
Estimated Due Date:	July 27, 2016

6. The Safe Crisis Management (SCM) curriculum taught by JCPS appears to be excellent. The training provides a comprehensive continuum of prevention, de-escalation, intervention and post intervention strategies. This training results in SCM certifications and is provided to all members of the schools’ SCM Team. We recommend the following changes to the training program:
  - a. The training program should include training on proper documentation – what needs to be reported, what information should be included in the documentation, what boxes should be checked, common errors in documentation, etc.
  - b. Management should encourage members of the SCM teams to be the ones to actually document the incident; however, it may not be practical for all schools. For employees who are inputting the information into Infinite Campus or SBRT but are not certified in SCM, they should receive some level of training on SCM strategies. These employees



need to have a basic understanding of the various strategies and techniques so that they can properly document the incident.

- c. The SCM Training Team should have access to Infinite Campus or SBRT information and review all incidents reported on a regular basis to ensure that various student behavior incidents are being handled in an appropriate manner. The SCM Training Team should modify the training program throughout the year to address common errors. The SCM Training Team should also determine if certain individuals or schools need additional training based on their review of the incidents reported.

<b>Management Response:</b>	<ul style="list-style-type: none"> <li>a. JCPS Academic Support Services will work with Data Management to revise the SCM training to include a component on documentation.</li> <li>b. JCPS Academic Support Services, Data Management, and Computer Education Services will work together to update the Infinite Campus Behavior Manual course to include a component on the various strategies and techniques of SCM.</li> <li>c. JCPS Academic Support Services, Data Management, and Computer Education Services will work together to ensure that SCM training team has access to Infinite Campus and to create ad-hoc reports that may assist in analysis of data such that future training can address common errors.</li> </ul>
<b>Person Responsible:</b>	<b>Alicia Averette/Dena Dossett</b>
<b>Estimated Due Date:</b>	<b>July 31, 2016</b>

- 7. Management should provide written guidelines and requirements regarding documenting and reporting seclusion and restraint incidents. These written materials should be sent to all Principals and Assistant Principals and should also be maintained on the website. The written materials should include examples and various situations that are commonly seen at schools. This will allow schools to refer to the examples if needed and will help in reporting the information in a consistent and appropriate manner. The written materials should be specific regarding certain groups of students including early childhood and special needs students.

<b>Management Response:</b>	JCPS Data Management, Academic Support Services, and Computer Education Services will work together to revise the JCPS Behavior Manual to include examples and various situations that are commonly seen at schools (including early childhood and special needs students). The JCPS Behavior Manual will be shared with all principals and assistant principals and maintained on the website.
<b>Person Responsible:</b>	<b>Dena Dossett/Alicia Averette</b>
<b>Estimated Due Date:</b>	<b>July 31, 2016</b>

- 8. JCPS should revise its policies regarding SCM teams. Currently, the policy is for each school to have at least 5 people on their SCM team. JCPS should mandate larger SCM teams for schools



with a larger student population or for schools with special needs students. Additionally, JCPS should require all Principals and Assistant Principals to be members of the SCM team because Principals and Assistant Principals are normally involved in all serious student behavior incidents (if certain Principals or Assistant Principals are not certified in SCM, then they should receive some level of training on SCM strategies and techniques).

Management Response:	JCPS Academic Support Services will provide written guidance to schools regarding the composition of their SCM teams. JCPS policies will be revised to make reference to the revised written guidance. Professional development on the fundamentals of SCM will be provided to all Principals and Assistant Principals currently not certified in SCM. Additionally, training opportunities for Principals and Assistant Principals interested in becoming certified will be available during the 2016-17 school year.
Person Responsible:	Alicia Averette
Estimated Due Date:	December 1, 2016

- Assistant Principals should meet periodically (i.e., twice a year) to discuss student behavior matters. These meetings can include additional instructions or training on student behavior matters.

Response:	Assistant Principals currently meet in role groups twice a year. Dr. Zeitz will ensure that the agendas of these meetings include training on student behavior matters. Additional professional development on fostering a positive school culture and climate and providing Tier I supports will be required for available to Assistant Principals during the 2016-17 school year.
Person Responsible:	Katy Zeitz/Alicia Averette
Estimated Due Date:	June 30, 2017

- Management should monitor the seclusion and restraint information on at least a monthly basis. Additionally, management should monitor various other student behavior information on a monthly basis – such as suspensions, bullying, harassment, interventions, bus referrals, etc. Any unusual variances should be followed up on immediately. Management should be reviewing the information to ensure it is being documented and reported properly, as well as making sure various student incidents are being handled appropriately and in accordance with JCPS policies and guidelines. This monthly review should also include an analysis of trends by school, race, type of incident, etc. This trend analysis should be used to address any significant matters in a timely manner. Management should also provide a summary report to the Board on a periodic basis throughout the year (i.e., quarterly).

Management Response:	JCPS Data Management has worked with Achievement Area Assistant Superintendents to develop a monthly report that tracks key behavior and
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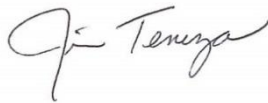
	<p>academic performance indicators. The data report will show 2016-17 data compared with prior year, and will provide links to on-line resources, district contact information, and opportunity for schools to provide next steps. Achievement Area Assistant Superintendents will review the monthly reports and conduct follow-up with principals as needed for the purpose of identifying possible additional supports.</p> <p>Additionally, as Dr. Zeitz works with a team to design and implement a districtwide Behavior Management System, adjustments to student behavior tracking and monitoring processes may be implemented and quarterly updates will be provided to the Board.</p>
Person Responsible:	<b>Dena Dossett/Katy Zeitz</b>
Estimated Due Date:	June 30, 2017 (1 <sup>st</sup> quarterly report to Board – Nov. 2016)

11. Internal Audit should develop a plan and perform audits throughout the upcoming school year on the reporting of various student behavior incidents.

Management Response:	JCPS Management agrees with this recommendation and will work closely with Internal Audit as they implement their plan to perform audits on student behavior incidents during the 2016-17 school year. The JCPS contact person will be Dena Dossett.
Person Responsible:	Dena Dossett
Estimated Due Date:	June 30, 2017

Note: Names in BOLD (and listed first) represent the primary person responsible.

Thank you for your cooperation and assistance.



Jim Tencza  
Internal Audit-Dean Dorton Allen Ford

Attachments:  
Preliminary Report

