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Infinite Campus Monitoring Audit (FY19-14)

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I. EXECUTIVE SUMMARY

We performed an audit of application controls over Infinite Campus and monitoring controls, both automated and manual, over the initial entry and subsequent changes to the student record including grades, attendance data, and personal demographic information (e.g., social security number, legal guardian, etc.). The purpose of the audit was to determine if controls are sufficient to provide reasonable assurance as to the accuracy and security of that data. We have identified some improvements that are needed in the monitoring, at the schools, of data entry for grades and attendance.

Management has agreed to all corrective actions recommended to address these improvement areas. Observations and related management action plans are described in greater detail in Section V of this report.

II. INTRODUCTION

Purpose

The purpose of the audit is to determine if the application controls over Infinite Campus combined with the monitoring controls, both automated and manual, over the initial entry and subsequent changes to the student record including personal demographic information (e.g., social security number, legal guardian, etc.), grades, and attendance data are sufficient to provide reasonable assurance as to the accuracy and security of that data.

Scope

Our scope was limited to application controls within Infinite Campus and monitoring controls, both automated and manual, over student data. The application controls procedures for the audit reviewed Infinite Campus as it was configured as of March 2019. The monitoring controls procedures for the audit reviewed monitoring controls during the first semester of SY19.

We reviewed vendor documentation, interviewed a vendor representative, Central Office management, and Principals and staff at non-Charter High Schools. We also performed analysis on student data extracted from Infinite Campus.

Background

Each student's information is protected under the Federal Educational Rights and Privacy Act of 1974 (FERPA). This Act is a federal law that protects the privacy of student education records. FERPA generally prohibits the improper disclosure of personally identifiable information (PII) derived from education records.

IT application controls are fully automated (i.e., performed automatically by the systems) and designed to ensure the complete and accurate processing of data, from input through output. These controls may also help ensure the privacy and security of data transmitted between applications.

Infinite Campus has the following application controls:

- Completeness checks - controls that ensure all records were processed from initiation to completion.
- Validity checks - controls that ensure only valid data is input or processed.
- Identification - controls that ensure all users are uniquely and irrefutably identified.
- Authentication - controls that provide an authentication mechanism in the application system.
- Authorization - controls that ensure only approved business users have access to the application system.
- Input controls - controls that ensure data integrity fed from upstream sources into the application system.

In 1992, The [Committee of Sponsoring Organizations of the Treadway Commission \(COSO\)](#) identified five components of an effective system of internal control:

- The Control Environment
- Risk Assessment
- Control Activities
- Information and Communication
- Monitoring

The purpose of monitoring controls is to provide reasonable assurance that information on the operations (in this case student demographic information, grades and attendance records) is appropriate, appears reasonable, is consistently prepared, and is secure.

This audit reviewed monitoring controls at both the Central Office and at the non-Charter High Schools. We limited our review of schools to the non-Charter High Schools for the following reasons:

1. It is at the high school level that most students begin to make their own decisions about attending school.
2. Grades gain more importance when a student enters high school.

Each student's demographic information is obtained and entered in Infinite Campus as part of the enrollment process. We did not review the enrollment process as part of this audit.

Attendance Control

Teachers enter attendance directly into Infinite Campus and it is the expectation of their Principals that they do so during the first 10 – 15 minutes of each period. Infinite Campus allows the teachers to change attendance until midnight of each day. After midnight of that day, teachers can no longer change the attendance records for any previous days. Only an attendance clerk can make changes to attendance records of the day before or earlier.

The Associate Superintendent for non-Charter High Schools is continuously monitoring attendance "Take-Rates" for each of his high schools via a dashboard updated daily by the Data and Information Group. He keeps attendance front-of-mind for his Principals by discussing their results when he has his regularly scheduled meetings with them.

Grade Input Control

It is Board policy that each student receives at least one grade per week for each course. Most high schools, however, require that their teachers enter at least two grades per student for each course. Exceptions are allowed for courses that meet only once per week.

Grades are entered into the Infinite Campus Grade Book. Teachers are allowed to change grades with the exception of “posted grades”. Once high school grades have been “posted” for report cards, end-of-course, or transcripts, changes may only be made with approval from the Associate Superintendent for High Schools.

Data and Information Group (DIG)

At APS, DIG manages Infinite Campus including user access and user rights. In a recent audit completed in March 2019, we concluded that logical access to Infinite Campus was well controlled. Strong logical access control assists in monitoring student data because it greatly reduces the risk of data changes being made by unauthorized individuals.

Infinite Campus provides DIG with a tool for auditing changes to certain data, including grades and attendance. DIG uses this tool, the Data Change Tracker, to respond to inquiries from schools. For example, if a teacher notices that a grade in the Grade Book has been changed, DIG can identify who made that change and when it was made. However, due to the level of complexity represented by the underlying data, the **Data Change Tracker does not allow for continuous monitoring and is used as an ad hoc tool only.**

Another tool provided by Infinite Campus for internal use in monitoring the accuracy, integrity and security of data is the Transcript Auditing Report. This tool is used near the end of each term to monitor any changes made to Transcript Grades. This report, when run, specifies any and all changes made to transcript grades for a specified school. If anything suspicious is noted, the report is forwarded to the appropriate Associate Superintendent for further action.

III. AUDIT METHODOLOGY

We followed standard internal audit methodology in performing the audit of application controls in Infinite Campus and monitoring controls over student data. Through reviews of application documentation, interviews with key personnel, and observations we gained a good understanding of both the automated and manual controls surrounding Infinite Campus and student data maintained within IC’s database.

Our review of IC’s application controls relied heavily on:

- System documentation
- Infinite Campus’ 2017 SOC 2 Report
- Interviews with an Infinite Campus representative
- The testing results from our Logical Access Audit of Infinite Campus, where we tested identification, authentication, and authorization controls.

Our review of monitoring controls for grades and attendance at the non-Charter High Schools included:

- Interviews with Principals at each of ten schools
- Corroborating interviews with attendance clerks at six of the schools
- Data analysis as explained below.

Data Analysis

We analyzed data extracted from Infinite Campus for grades and attendance for the first semester of SY19 from all 97 schools.

The grade data comprised all grades recorded in Infinite Campus during the audit period, all changes made to those grades and records of all grades that had been deleted. We analyzed more than 6.2 million grade records from the 97 schools. Of those 6.2 million records, 363,281 (5.8%) had been changed. Additionally, there were 52,671 grades (0.8%) that had been deleted during that time frame. Closer inspection of the changed and deleted grades allowed us to conclude that almost all of the deletions and changes had been made by the teacher who had entered the grade to begin with. We noted a relatively small number of grade changes and deletions made by the schools' Registrars.

The attendance data we obtained comprised all absent and tardy records to which changes had been made or which had been deleted. (Auditor's Note: There are no 'Present' records as only absences and tardiness are noted in the official records.) We analyzed the 221,470 attendance records that had been changed or deleted during the first semester of SY19. There are 158,600 deletions among these attendance records and 62,870 changes. More than 98% of the changes were changed from absent to tardy with the remainder being changed from tardy to absent.

IV. CONCLUSIONS

A. Application Controls

Infinite Campus is a mature application that has been used extensively throughout the country by many school districts for many years. The SOC 2 report raises no questions about application controls and finds them to be acceptable. Our own audit and testing of logical access to Infinite Campus found the application controls of Identification, Authentication, and Authorization to be strong. These facts, combined with our review of system documentation and interviews with the Infinite Campus representative for the area, allowed us to conclude that the application controls within Infinite Campus meet the Control Objectives of Information Technology (COBIT) as defined by the Information Systems Audit and Control Association and are sufficient to assure a reasonable level of accuracy, integrity, and security of the grades and attendance data.

B. Students' Demographic/Personal Information

Student demographic and personal information is entered into Infinite Campus during the initial enrollment in the school district. Once entered, the only users who have authorization to make changes are personnel at the Central Office Data and Information Group in response to a parent/guardian request submitted and supported by the appropriate documentation. We find this process to be satisfactory in reasonably assuring the integrity and security of the students' demographic and/or personal information.

V. FINDINGS and RECOMMENDATIONS

A. Not All Non-Charter High Schools Have implemented Strong Controls Over Entering Grades

Criteria: The Board of Education policy (IHA-R(1): Grading Systems – Grading Expectations) requires, with some exceptions, that:

“Each student should receive at least one (1) grade in each subject each week. Grades should be entered in the grade book on a weekly basis.”

Some non-Charter High Schools have established a policy requiring at least two grades per week per course for each student. To assure compliance it is necessary to monitor teacher performance in meeting the requirement.

Condition: Two of the 10 non-Charter High Schools have a strong control in place for the monitoring of teacher compliance with the Board’s or school’s policy on entering grades. Each of these two schools require that Assistant Principals, on a weekly basis, review the Grade Books of teachers assigned to them for compliance with the policy. We rate the compliance with the grading policy at these two schools as **well-controlled**.

Six of the 10 schools have a process in place to monitor teacher compliance but could improve that process to strengthen it. In each of these six cases, the school assigns Assistant Principals or, in two cases, Instructional Coaches to review teachers’ Grade Books. However, these six schools require such review to be performed not weekly but only every 4 to 4 ½ weeks. We rate the compliance with the grading policy at these six schools as **needs improvement**.

Of the remaining two schools, one requires that the Assistant Principals check the Grade Books only once per quarter while the other requires only “random” checks of the Grade Books. We rate the compliance with the grading policy at these two schools as **not well-controlled**.

Effect: Failure to utilize a strong practice for the review of Grade Books reduces the likelihood of compliance with the Board’s policy of one grade per week, per course.

Recommendation:

Principals, along with the District, should develop a process to ensure the requirements of entering grades are being met effectively.

In developing such a process, we suggest that the Principals consider the process in current use at the two well-controlled schools:

The Principal at each non-Charter High School should assign departments to Assistant Principals and/or Deans and require the assignees to monitor compliance to the school’s grading policy within their assigned departments. To be most effective, such monitoring should be required every week.

Management Corrective Action Plan:

- *At the June 7, 2019 meeting of high school principals, the Associate Superintendent of High Schools will review the expectations related to grading and will set the expectation that schools identify a person or persons to be responsible for monitoring compliance at each school on a weekly basis.*
- *By the end of August 2019, the Schools & Academics Team will review the current administrative regulations and make recommended revisions to ensure the appropriate level of flexibility by grade-band in alignment with signature programs and current best practices. Those expectations will be communicated to all principals at a meeting to take place before the conclusion of the 1st quarter of the 19-20 school year.*
- *The Schools & Academics Team will collaborate with the Data & Information Group to develop a dashboard to support schools with the monitoring of these grading expectations. The goal for rolling out this dashboard is fall 2019.*

B. Not All Non-Charter High Schools Have implemented Strong Controls Over Attendance Taking

Criteria: Each of the Principals at the 10 non-Charter High Schools requires their teachers to take attendance within the first 10 - 15 minutes of each period. To assure compliance it is necessary to monitor teacher performance in meeting the requirement.

Condition: Five of the 10 non-Charter High Schools have a strong control in place for the monitoring of teacher attendance-taking. Each of these five schools requires that the employee designated as the Attendance Clerk (usually the School Clerk), during each period, identify which teachers have not taken attendance. Infinite Campus provides a real-time tool which allows the Attendance Clerks to quickly identify teachers who have not yet taken attendance. The Attendance Clerks perform this review each period after 15 minutes has elapsed, thereby allowing the teachers time to take attendance. The Attendance Clerks notify the teachers before the period has ended, reminding them to take attendance. These schools also have an Attendance Committee which monitors teacher compliance with attendance taking. Our audit noted that these five schools have the higher “take rates” among the non-Charter High Schools. We rate the compliance with the attendance taking requirement at these two schools as **well-controlled**.

The remaining five of the 10 schools have a monitoring process in place, but it does not result in strong control for the monitoring of teacher attendance-taking. At these schools the Attendance Clerks review attendance taking at the end of the day and report the results to an administrator and to the teachers who have failed to take attendance. Our audit noted that these five schools have the lower “take rates” among the non-Charter High Schools. We rate the compliance with the grading policy at these five schools as **needs improvement** because accuracy will be better for those schools where teachers are notified *during* the period rather than at the end of the day.

Effect: Failure to exert strong control over the taking of attendance reduces the likelihood of a compliant and accurate attendance taking.

Recommendation:

Principals, along with the District, should develop a process to ensure the requirements of recording attendance are being met effectively.

In developing such a process, we suggest that the Principals consider the process in current use at the five well-controlled schools:

The Principal at each non-Charter High School should require that the Attendance Clerk monitor attendance taking each period to identify those teachers who have not taken attendance for the current period. The clerk should immediately notify those teachers so they can take attendance during the period.

Management Corrective Action Plan:

- *At the June 7, 2019 meeting of high school principals, the Associate Superintendent of High Schools will review the expectations related to attendance and will share the Infinite Campus Classroom Monitoring Tool that allows schools to monitor attendance per class period.*
- *By the end of August 2019, the Schools & Academics Team will share the Infinite Campus Classroom Monitoring Tool with all other principals, ensuring that all principals develop a system to monitor take-rates.*
- *Over the course of the 19-20 school year, Associate Superintendents (or their designee) will monitor attendance take-rates at all schools and will require any school with take-rates falling below 95% to implement a more rigorous period-by-period monitoring system.*
- *The Schools & Academics Team will collaborate with the Data & Information Group to bring together all individuals responsible for school-level attendance (attendance clerks, office clerks, registrars, etc.) to share the Infinite Campus Monitoring Tool and to provide additional training around best practices in attendance. The goal for implementing this training is fall 2019.*