

SIGNIFICANT ACTIVITY REPORT

THURSDAY, OCTOBER 6, 2016

**OIG INVESTIGATIONS REVEALED FRAUDULENT ATTENDANCE
RECORD-KEEPING PRACTICES AT FOUR CPS HIGH SCHOOLS**

The Office of Inspector General determined that four CPS high schools were fraudulently manipulating attendance data by systematically overriding (1) the period-attendance entries kept by individual classroom teachers, and (2) the daily-attendance entries that are calculated in the database used by CPS to maintain student records by adding the instructional minutes a student received in a given day. Thousands of such changes per year were made at each school. In fact, some attendance clerks stated that they could not keep up with the number of changes they were directed to make.

On June 30, 2016, the OIG issued four summary reports to the Chicago Board of Education, detailing its findings and recommendations with respect to the CPS high schools investigated. The key takeaways from those investigations are as follows:

- Because the schools systematically altered large volumes of attendance entries, the rates of changing daily attendance codes were unreasonably high at all four schools, ranging from four to seven times greater than the district-wide average.
- As a result of the fraudulent attendance record-keeping practices, the schools engineered the appearance of significantly improved attendance rates. The schools' official attendance rates were approximately 10 to 20 percentage points higher in years when they employed the fraudulent attendance practices than in years when they did not.
- Most of the improper changes were made via two methods. The first method involved changing attendance to reflect that a student was present for *the entire day* when records reflected that the student had merely been on campus *at some point during the day* (hereinafter, the "presumed-attendance

method”). That is, a full day’s attendance was recorded — by overriding period and daily entries — when classroom records reflected that the student had actually missed significant class time. Attendance clerks told the OIG that they operated under a system that “presumed” full attendance if there was any evidence that a student was on campus at all. The evidence, however, supports the opposite conclusion — that students were cutting numerous classes after appearing at school for a short time.

The second method, often referred to as “attendance recovery” by attendance clerks, is a system by which unexcused absences from regular class periods were “recovered” through after-school “study sessions” that appear to have been little more than detentions (hereinafter, the “attendance-recovery method”). The problem with these after-school sessions is that they were used to override periods of absence recorded by teachers. That, of course, is contrary to CPS guidelines that mandate that, if a student cuts class, the student is to be recorded as having been absent from class without an excuse. Furthermore, through the attendance-recovery method, students “recovered” several missed periods in one day by serving a single detention period that often took place days, weeks or even months after the classes were missed.

- By using these means to systematically alter attendance at the period level, the schools were able to offer a pretense for the numerous changes to daily-attendance entries that led to rising attendance rates.

The four investigations are summarized below.

School One (OIG 14-00047): At a CPS high school (“School One”), the OIG determined that, during the 2012-13 and 2013-14 school years, the principal (“Principal A”) instituted the presumed-attendance method for systematically falsifying attendance data. To implement this undertaking of altering such a large volume of attendance data, Principal A expanded the school’s attendance team from one staff member to five. Specifically, she employed four attendance clerks who devoted the majority of their workday to altering attendance records, and she directed the assistant principal (“Assistant Principal A”) to serve as the supervisor of the attendance clerks.

Each day the attendance clerks changed hundreds of entries in the database so that (1) students who had been marked by their teachers as absent from class were shown as having been present, and (2) students who would have been entered as absent for the day or half of the day were shown as having been present for the full day. The clerks referred to this falsification system as “cleaning attendance”.

Assistant Principal A told the OIG that School One implemented the attendance-cleaning practice in response to pressure from the Network to improve attendance. She also said that School One learned how to clean attendance from staff at another CPS high school (“School Two”). A clerk from School Two confirmed that Principal A

and two other staff members from School One had come to School Two and met with the principal of School Two (“Principal B”) to discuss attendance. Principal B and School Two are discussed further below.

The year before School One implemented its attendance-falsification system, its attendance office only changed 188 attendance days from “absent” to “present”, and the school’s attendance rate was 58.1%. In the first year that School One used the presumed-attendance method, however, the attendance office changed 15,916 attendance days from “absent” to “present”, and the school’s attendance rate jumped to 72.8%.

The OIG found that School One’s attendance practices were fraudulent and violated CPS attendance guidelines. The OIG recommended that Principal A’s employment be terminated and that a Do Not Hire (DNH) classification be placed in her personnel file. The OIG also recommended appropriate discipline for the three attendance clerks from School One who are still employed by CPS. Because the fourth attendance clerk and Assistant Principal A have since left CPS, the OIG recommended that DNH classifications be placed in their personnel files.

In addition, the OIG determined that a supervisor (“Supervisor A”) working for a school-management company (“Company A”) was negligent in her supervision of the administration at School One. Significantly, Supervisor A was previously employed as a CPS principal, but resigned in the wake of an unrelated OIG investigation and was classified as a DNH. After leaving CPS, she promptly obtained her current position with Company A supervising CPS schools. The OIG recommended that the Board advise Company A of the OIG’s findings in this report, as well as the findings in the OIG’s prior report that resulted in her DNH, so that Company A can consider what appropriate action to take.

School Two (OIG 14-01011): At School Two, the former principal (“Principal B”) implemented both the presumed-attendance method and the attendance-recovery method. The attendance clerks told the OIG that, during the 2012-13 school year, they refused to make questionable attendance changes ordered by Principal B. They said that Principal B threatened to eliminate their positions if they did not help the school improve its attendance rate. The clerks still refused, and Principal B eliminated one of their positions at the end of that year.

Then, before the start of the 2013-14 school year, Principal B hired a new supervisor (“Supervisor B”) who was tasked with managing and executing the school’s fraudulent attendance practices, which included overriding attendance entries for students who cut classes to show that they were present because either (1) they were presumed to be in the school building that day, or (2) they attended detention during a later period or on a later date. On a daily basis, Supervisor B compiled lengthy lists of students whose attendance entries needed to be changed from

“absent” to “present”. She then distributed the lists to the clerks, who made the changes in the computer system. One clerk complained that there were so many changes that it was difficult to finish them in a day without staying late. These attendance practices continued into the following school year until after Principal B left the school.

School Two’s attendance data shows that, for the year that the attendance clerks apparently refused to make the improper changes, the attendance office changed approximately 1.9% of the students’ attendance days from “absent” to “present” — a rate below the district-wide percentage. The next year, when Supervisor B was brought in and the remaining clerks relented, the attendance office changed at least 8.8% of the school’s attendance days from “absent” to “present” — a rate that was nearly five times greater than the district-wide percentage that year.

The OIG found that School Two’s attendance practices were fraudulent and violated CPS guidelines. In addition, the OIG found that the principal at School Two prior to Principal B (“Principal C”) also bore some culpability for School Two’s fraudulent attendance practices. During Principal C’s tenure at School Two, Principal B served as the assistant principal and initiated the improper attendance-recovery method on Principal C’s watch. Significantly, Principal C eventually resigned from CPS in the wake of an unrelated OIG investigation and was classified as a DNH.

Principal C is currently the director of a Chicago charter school (“Charter One”), and Principal B now works as the assistant director at Charter One under Principal C. Thus, once again, Principal C is supervising Principal B at a Chicago school. Supervisor B now works as the director of a different Chicago charter school (“Charter Two”). The OIG recommended that DNH classifications be placed in Principal B’s and Supervisor B’s personnel files. Additionally, the OIG recommended that the Board advise Charter One of the findings in the OIG’s report with respect to Principal B and Principal C, and also advise Charter One of the findings in the OIG’s previous investigation with respect to Principal C. The OIG recommended that the Board advise Charter Two of the findings in the OIG’s report with respect to Supervisor B.

One of the two attendance clerks who had made fraudulent attendance changes at School Two continues to work at the school, but the other clerk left the school and is working at another charter school. The OIG further recommended appropriate discipline for the clerk still working at School Two, and recommended that a DNH classification be placed in the personnel file of the clerk who no longer works for CPS.

School Three (OIG 14-00497): The OIG found similar fraudulent attendance practices at a third CPS high school (“School Three”) beginning in the 2012-13 school year and continuing into the 2015-16 school year. School Three’s former principal (“Principal D”) implemented the attendance-recovery method, and the school’s current principal (“Principal E”) continued that program. Principal E also admitted that School Three operates the presumed-attendance method.

School Three’s attendance clerks told the OIG that they primarily used the “school function” attendance code when making attendance changes. Several teachers complained that their attendance entries were regularly changed for numerous students who had been marked “absent unexcused” for cutting class. The teachers complained that those students were being marked present, after the fact, via the school-function code, even though the students were, in fact, cutting class and not merely missing class due to a school function. The attendance clerks informed the OIG that they used the school-function code to override absence codes entered by teachers when students who cut one or more classes during the day later attended after-school detention.

Principal D admitted that he initiated the school’s attendance-recovery program at the direction of the Network Chief (who has since left CPS) and that the school’s attendance rate rose as a result of the program. Although Principal E stated that she discontinued the attendance-recovery program in the first or second month of her administration, the school’s attendance records demonstrate that the program persisted into the second year of her administration. Moreover, Principal E admitted that, during her administration, students who swiped in for school were counted as being present for the day and for all their classes. The OIG determined that the attendance clerks used “swipe reports” to clean attendance by marking students “present” for classes that they cut because the students were presumed to be in the building.

School Three’s attendance data reflects that the school was changing nearly 8% of the students’ period entries to “school function”. The data also reflects that the number of changed attendance days at School Three was unreasonably high over several years — approximately three to four times greater than the district-wide average. By implementing the aforementioned attendance practices, School Three was able to artificially inflate its attendance rate from 71.6% to 85.2% over the course of a few years.

The OIG found that School Three’s attendance practices were fraudulent and violated CPS guidelines. The OIG recommended that Principal E’s employment be terminated and that a DNH classification be placed in her personnel file, as well as in the personnel file of Principal D. With regard to the attendance clerks, the OIG

recommended appropriate discipline for the two clerks who still work for CPS, and recommended a DNH for the one clerk who has left CPS.

School Four (OIG 16-00274): At a fourth CPS high School (“School Four”), the OIG found that attendance records were falsified at the direction of the former principal (“Principal F”) during the 2013-14 and 2014-15 school years. The attendance changes were executed by two attendance coordinators. The first attendance coordinator (“Coordinator A”) has since left CPS and refused to cooperate fully in the OIG’s investigation. However, the second attendance coordinator (“Coordinator B”) informed the OIG that Principal F gave him long lists of student names and directed him to change those students’ attendance entries without providing any explanation for the changes. The OIG was not able to ascertain whether Principal F was putting students on those lists because they had been on campus at some point during the day or whether he was simply making wholesale changes in cases when students were never on campus at all. Additionally, the OIG determined that, under Principal F, School Four employed the attendance-recovery method and abused the school-function code.

Attendance data reflects that during Principal F’s administration, School Four’s number of changed attendance days was unreasonably high. In his last year, the school’s rate of changing attendance days was more than seven times the district-wide average, and that year the school’s attendance rate was 87.9%. The following year, when the school was under new leadership, the high level of attendance changing ceased, and the school’s attendance rate fell to 76.1%.

The OIG found that the attendance practices implemented by Principal F were fraudulent and violated CPS guidelines. The OIG recommended that a DNH classification be placed in Principal F’s personnel file. The OIG also recommended a DNH for Coordinator A and recommended appropriate discipline for Coordinator B.

General Policy Recommendations: In addition to the specific disciplinary recommendations detailed above, the OIG recommended that the Board adopt a formal policy explicitly prohibiting the “attendance recovery” method of changing attendance records to reflect that, based on post-hoc “recovery” time, students were “in-attendance” for otherwise unexcused absences from regular classroom instruction. The OIG also recommended that the Board develop controls to prevent the types of abuse of the school-function code discovered by the OIG.