

Internal
Audit
Report

Deputy Superintendent, Department of Schools, Office of School Safety

School Safety: SRO Program Audit

March 2023



Baltimore County Public Schools
Office of Internal Audit

Andrea M. Barr, CGAP, CBM
Chief Auditor



Report Highlights

School Safety: SRO Program

March 2023

Objective

To determine whether the SRO Program is operating in accordance with the MOU between BCPS and BCoPD and to evaluate whether the annual reporting of arrest data to MSDE is accurate and timely.

Background

The Office of School Safety facilitates a partnership between the BCoPD and BCPS to administer the SRO Program. This inter-agency partnership is designed to help ensure the maintenance of safe and orderly learning environments in all schools and offices.

Audit Period

FY23 for current departmental processes

FY22 data for testing

Summary of Results

School Resource Officer (SRO) Program Memorandum of Understanding (MOU) requirements were not met:

- SROs are not consistently providing Drug Abuse Resistance Education (DARE) at middle schools.
- The Baltimore County Police Department (BCoPD) Chief of Police and BCPS Superintendent do not meet on a regular basis.
- SRO program evaluations are not completed.
- Former SRO's have access to BCPS technology.
- BCoPD is not reporting information of students witnessing traumatic events to BCPS.
- BCoPD did not submit the date of charge for reportable offenses to BCPS.
- Professional development is not provided to BCPS Building Security Monitors.

Audit Rating

Needs Improvement

The Office of School Safety received a needs improvement audit rating for the SRO program:

- The design of controls only partially addresses key risks.
- Controls are not operating consistently.
- Non-compliance with the MOU requirements and guidelines have occurred.
- Some high and medium-rated issues were identified.

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BACKGROUND

Organizational Status & Purpose	The Office of School Safety is a part of the Department of Schools within the Division of the Deputy Superintendent. The Office of School Safety staff coordinates the SRO program and its services provided to BCPS by BCoPD. The SRO Program is a collaboration between the BCoPD and BCPS. The role of the SRO is threefold: law enforcer, law-related education resource, and counselor/mentor on law-related issues.
Governance	The current MOU between the BCoPD and BCPS, effective July 1, 2020, delineates roles and responsibilities regarding the SRO Program and is updated every five years. A committee of representatives from both BCoPD and BCPS also developed <i>A Guide to Safe Schools for School Resources Officers and School Administrators</i> to support and strengthen the administrator-school resource officer partnership in schools.

COMMENDATIONS

Communication	The Executive Director was prompt in her submission of audit requests and provided detailed explanations when follow-up was requested.
MOU Compliance	<p>The Office of School Safety is responsible for the administration of the SRO Program for BCPS. Internal Audit determined the Office of School Safety implemented processes to ensure compliance with the MOU between BCoPD and BCPS:</p> <ul style="list-style-type: none">• SROs submit monthly reports that detail their activities to the Office of School Safety.• BCPS Safety Managers are in place to interact with school-based personnel to monitor the effectiveness of the SRO Program.• The Office of School Safety promotes continuing education for SROs, including the National Association of School Resource Officers Annual Conference.• BCPS has adopted a Comprehensive Safety Plan and provided the plan to BCoPD.• The Office of School Safety provides professional development to BCPS staff in emergency response roles, including Safe Schools Conference, Incident Command Structure training, and ALICE training.

RESULTS

Issue 1 - SROs are not consistently providing DARE¹ at middle schools.

Issue Rating	Low
Criteria	The MOU, Appendix # 2, requires SROs to serve as instructors of law-related education by working closely with staff in customizing and designing instruction to address specific law-related issues. The <i>BCPS Guide to Safe Schools for SROs and School Administrators</i> includes an expectation for middle school SROs to teach the DARE course. Through inquiry with the Executive Director of School Safety, there is an expectation that DARE should be taught to all 6th graders.
Issue	In FY22, DARE was not taught at 16 of the 28 middle schools. Additionally, testing also indicated there were seven middle schools where the SRO was not certified to teach DARE in FY22.
Cause	When students returned from the pandemic closure, schools were primarily focused on recovery and getting students reacclimated to classroom learning.
Effect	Students may not be receiving the required drug awareness training and student relationships with the SRO may not be fostered.
Recommendation	<p>The Office of School Safety should:</p> <ul style="list-style-type: none">• Determine which schools have not received DARE and communicate this information to the Safe Schools Facilitator.• Collaborate with the BCoPD to ensure that all applicable SROs are trained to teach DARE.• Work with BCoPD to ensure that DARE is taught to all 6th graders.

Management's Corrective Action

BCoPD will work with BCPS to revise the MOU (one year early and on a three-year cycle) and the *BCPS Guide to Safe Schools for SROs and Administrators* to add conditions under which DARE might not be taught and authorize SROs to teach the Gang Resistance, Education and Training (GREAT) curriculum rather than the DARE curriculum if requested by the principal. BCPS will remind principals of the importance of scheduling officers to teach middle school students.

Responsible Person(s)

Executive Director, Office of School Safety and Safe Schools Facilitator, BCoPD

Anticipated Completion Date

DARE reminder- August 1, 2023, MOU Update- June 30, 2024

¹ DARE is a police officer-led series of classroom lessons that teaches children from kindergarten through 12th grade how to resist peer pressure and live productive drug and violence free lives.

Issue 2 - The BCoPD Chief of Police and BCPS Superintendent do not meet on a regular basis.

Issue Rating	Medium
Criteria	The MOU, Appendix #1, requires BCPS to meet with the Chief of Police and their Safe Schools Facilitator on a regular basis. It also requires the BCoPD to meet with the BCPS Superintendent, the Chief of School Climate and Safety, and the Executive Director of the Department of School Safety on a regular basis.
Issue	Routine meetings between the BCoPD Chief of Police and the BCPS Superintendent have not occurred.
Cause	The meetings did not occur due to the pandemic and closure of schools in March 2020. Once schools reopened, the routine meetings were not held.
Effect	Because the effectiveness of the partnership is not routinely assessed between the BCoPD Chief of Police and the BCPS Superintendent, potential areas of need and concern may not be identified.
Recommendation	The BCPS Superintendent should meet with the BCoPD Chief of Police on a regular basis to assess the effectiveness of the partnership and identify areas of need and concern.

Management's Corrective Action

Language in the MOU relative to meetings between the BCPS Superintendent, will be changed to specify quarterly meetings rather than regular meetings. Quarterly meetings began with a third quarter meeting on February 28, 2023. A schedule identifying the months of quarterly meeting will be coordinated between BCPS and BCoPD.

Responsible Person(s)

Executive Director, Office of School Safety, BCPS; Safe Schools Facilitator, BCoPD

Anticipated Completion Date

Establish Quarterly Meeting Schedule- April 1, 2023, Updates to MOU- June 30, 2024

Issue 3 - SRO program evaluations are not completed.

Issue Rating	Medium
Criteria	The MOU, Appendix #2, requires the BCoPD to review evaluations from school personnel concerning the SRO programs and make recommendations to precinct outreach supervisors.
Issue	SRO program evaluations are not completed by school personnel.
Cause	The Office of School Safety does not solicit evaluations of the SRO program from school personnel.
Effect	BCoPD cannot evaluate the effectiveness of the SRO program without appropriate feedback from school-based personnel.
Recommendation	The Office of School Safety should implement a policy requiring all applicable school administrators to evaluate the overall effectiveness of the SRO program on an annual basis. Results of these evaluations should be provided to appropriate BCoPD personnel.

Management's Corrective Action

The Office of School Safety should implement a policy requiring all applicable school administrators to evaluate the overall effectiveness of the SRO program on an annual basis. Results of these evaluations should be provided to appropriate BCoPD personnel.

Responsible Person(s)

BCoPD will work with BCPS to establish a formal evaluation process to supplement the informal process that exists.

Anticipated Completion Date

October 31, 2024 (for SY23-24)

Issue 4 - Former SRO's have access to BCPS technology.

Issue Rating	Medium
Criteria	BCPS Rule 4104, Section IV, Access Requirements, indicates that principals or office heads are responsible for determining when non-employees will have access to, and privileges on, BCPS technology.
Issue	Five SROs left their BCPS assignment during the period July 1, 2021 through December 31, 2022. All five former SROs remain in the BCPS active directory and continue to have access to BCPS technologies, including email, Teams, One Drive, etc.
Cause	When an SRO leaves BCPS, there is no communication to the BCPS Department of Information Technology (DoIT) to deactivate the former SRO access to BCPS technologies. Additionally, management did not consider the effect of not deactivating former SRO access to BCPS technologies.
Effect	Former SROs could potentially misuse BCPS information and resources.
Recommendation	The Office of School Safety should identify all former SROs that remain in the BCPS active directory and work with DoIT to ensure these accounts are deactivated. The Office of School Safety should work with DoIT to develop and implement a process to deactivate an account immediately when an SRO leaves BCPS.

Management's Corrective Action

The Office of School Safety has implemented a process to deactivate SRO accounts when they leave BCPS. All former SROs that remain in the active directory will be deactivated. BCoPD will create a notification process for informing BCPS when SROs exit their positions.

Responsible Person(s)

Executive Director, Office of School Safety

Anticipated Completion Date

April 1, 2023

Issue 5 - BCoPD is not reporting information of students witnessing traumatic events to BCPS.

Issue Rating	Medium
Criteria	The MOU, Appendix 6: Information Sharing, requires the BCoPD to provide information (name, age, school) of students witnessing traumatic events to a designated BCPS email address. ²
Issue	The BCoPD is not consistently reporting instances of students witnessing traumatic events to BCPS per the MOU requirements. Since April 2020, BCoPD has only reported 1 instance.
Cause	BCoPD indicated that this is not always a priority when an officer is responding to a situation involving a student that witnessed a traumatic event.
Effect	The information about student exposure to trauma is not communicated to the personnel who can assist the student with mitigating the negative effects of the trauma.
Recommendation	The BCPS Office of School Safety should work with the BCoPD to ensure that information related to students witnessing traumatic events is properly reported.
Management's Corrective Action BCoPD reissued the Handle with Care policy on February 10, 2023. Reminders of the procedures to submit incidents to the designated BCPS email address will be sent to patrol officers semiannually.	
Responsible Person(s) Safe Schools Facilitator, BCoPD	
Anticipated Completion Date February 10, 2023, and ongoing	

² BCPS has participated in the *Handle with Care Program* since its inception in August 2019. The purpose of the program is to prevent children's exposure to trauma and violence and mitigate the negative effects experienced by children's exposure to trauma.

Issue 6 - BCoPD did not submit the date of charge for reportable offenses³ to BCPS.

Issue Rating	High
Criteria	The MOU, Appendix #6, requires BCoPD to report to the designated BCPS official information pertaining to reportable offenses within 24 hours of the charge.
Issue	BCoPD did not submit the date of charge for reportable offenses to BCPS. Twenty-one of the 25 reportable offenses tested were reported to BCPS between 2 and 240 days after the charge ⁴ .
Cause	BCoPD indicated they had changes in records management and experienced employee shortages. Consequently, this information was not provided.
Effect	Critical information on community-based arrests is not received by BCPS or communicated to school administrators in a timely manner. Therefore, school administrators cannot take appropriate action, if needed.
Recommendation	The Office of School Safety should request that BCoPD provide the date of charge for all reportable offenses. The Office of School Safety should use this data to monitor the timeliness of the reporting and work with BCoPD to ensure that all reportable offenses are reported to BCPS within 24 hours of the charge.

Management's Corrective Action

BCoPD will request central records to add the date of the charge in its reports to BCPS. BCPS will continue to communicate untimely receipt of charges.

Responsible Person(s)

Safe Schools Facilitator, BCoPD

Anticipated Completion Date

March 8, 2023

³ Reportable offenses are student arrests made by community-based officers, not on school grounds or at school sponsored events. Reportable offenses are communicated by BCoPD to the Office of School Safety and this information is provided to the appropriate school administrator.

⁴ At our request, the Office of School Safety obtained the date of charge for our sample from BCoPD.

Issue 7 - Professional development is not provided to BCPS building security monitors⁵.

Issue Rating	Low
Criteria	The MOU, Appendix 7: Support Services, states that BCoPD will provide professional development for building security monitors as agreed upon by both agencies.
Issue	BCoPD does not provide the required professional development to BCPS building security monitors.
Cause	Office of Facilities Support Services has not requested training for building security monitors.
Effect	Building security monitors are not properly trained to report crimes or issues to the BCoPD when they are on school property before, during, and after school hours.
Recommendation	BCPS should work with the BCoPD to ensure that all building security monitors receive professional development as agreed upon by both agencies.

Management's Corrective Action

The Department of Facilities Management and Strategic Planning will determine what, if any, training is needed for building security monitors and communicate such with the Office of School Safety for coordination of training with BCoPD.

Responsible Person(s)

Executive Director, Office of School Safety; Safe Schools Facilitator, BCoPD

Anticipated Completion Date

September 1, 2023

⁵ Building security monitors are primarily focused on the building's physical security. They respond to school building alarms, physical building issues after business hours, and complaints to the BCPS 24-hour emergency call center. They are also responsible for randomly visiting BCPS properties when they are not responding to calls.

MSDE REPORTING

The Code of Maryland Regulations (COMAR) 13A.08.01.12 - Arrests on School Premises, requires local school systems to report data on school arrests and referrals to law enforcement agencies or the Department of Juvenile Services (DJS) annually. The *Student Arrests Data Collection Manual*, provided by MSDE, defines reportable arrests as: “Arrests that occur as a result of a physical arrest or a paper arrest/student referral to law enforcement or to the Department of Juvenile Services (DJS) by school personnel for a disciplinary-related offence that was committed on school property or at an off-campus school activity.”

Internal Audit reviewed the FY21 arrest data in FOCUS⁶ and noted that arrests initiated by a "School Assigned SRO" were omitted from the submission to MSDE. Internal Audit contacted the MSDE to determine if SRO initiated arrests should be omitted from the annual submission of arrest data. There is a difference in the interpretation of MSDE reporting requirements regarding the definition of school personnel. MDSE interprets that arrests initiated by SROs should be included in the annual submission of arrest data. However, BCPS interprets that SROs are not considered school personnel and their arrests should not be reported to MSDE.

The BCPS Office of Law advised the Office of School Safety to continue to report arrest data based upon the guidelines in the manual until clarifying guidance is received from MSDE.

⁶ Focus is the current electronic student information system used by BCPS.

AUDIT RATING

Needs Improvement	<p>The Office of School Safety received a needs improvement audit rating for the SRO program:</p> <ul style="list-style-type: none">• The design of controls only partially addresses key risks.• Controls are not operating consistently.• Non-compliance with the MOU requirements and guidelines have occurred.• Some high and medium-rated issues were identified.
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See **APPENDIX B** for the audit rating definitions.

OBJECTIVE, SCOPE & METHODOLOGY

Objective	<p>To determine whether the Office of School Safety is operating the SRO Program in accordance with the MOU between BCPS and BCoPD and to evaluate whether the annual reporting of arrest data to MSDE is accurate and timely.</p>
Scope	<p>The audit period was FY23 for departmental processes and FY22 data was used for testing of compliance requirements.</p>
Methodology	<p>To achieve the audit objectives, we performed the following:</p> <ul style="list-style-type: none">• Planned the audit in cooperation with the Office of School Safety to ensure an understanding of the SRO Program and the BCPS annual arrest data reporting to MSDE.• Interviewed key personnel knowledgeable of the SRO Program and the BCPS annual arrest data reporting to MSDE.• Reviewed the MOU between BCPS and BCoPD, effective July 1, 2020, and <i>A Guide to Safe Schools for School Resource Officers and Administrators</i>.• Evaluated risks and controls over the SRO Program and the BCPS annual arrest data reporting to MSDE.• Performed detailed tests to support our conclusions:<ul style="list-style-type: none">○ Tested compliance with 19 significant requirements of the MOU.○ Reviewed the FY21 submission of arrest data to MSDE for accuracy

APPENDIX A – Issue Rating Definitions

Issues will be rated high, medium, or low based on these factors:

1. Level of financial impact.
2. Extent of violation of external laws, regulations, and restrictions.
3. Lack of documented policy, procedure, or noncompliance with a policy in an important matter.
4. Lack of internal controls or ineffective controls and procedures.
5. Fraud, theft, inappropriate conflicts of interest or serious waste of school system resources.
6. Significant opportunity exists for real gains in processing efficiency.
7. Poor cost controls or potential for significant savings and/or revenue generation.
8. Condition places the school systems reputation at risk.
9. Ineffective reporting and/or communication structure results in financial risks and/or inefficient operations.
10. Post audit implementation review reveals little or no effort to implement an action plan in response to a previous audit finding.

APPENDIX B – Audit Rating Definitions

Audit Rating	Definition
Unsatisfactory	<p>Design - Design of controls is ineffective in addressing key risks</p> <p>Documentation and communication - Non-existent documentation and/or communication of controls/policies/procedures</p> <p>Operation/implementation - Controls are not in operation or have not yet been implemented</p> <p>Compliance - Significant breaches of legislative requirements and/or departmental policies and guidelines</p> <p>Risk management - Risks are not being managed</p> <p>Issues/deficiencies - Most issues were rated as high and urgent corrective actions are necessary</p>
Needs Improvement	<p>Design - Design of controls only partially addresses key risks</p> <p>Documentation and communication - Documentation and/or communication of controls/policies/procedures is incomplete, unclear, inconsistent, or outdated</p> <p>Operation/implementation - Controls are not operating consistently and/or effectively or have not been implemented in full</p> <p>Compliance - Breaches of legislative requirements and/or departmental policies and guidelines have occurred</p> <p>Risk management - Risks are not effectively managed which could result in failure to ensure school objectives are met</p> <p>Issues/deficiencies - Some high-rated and/or medium-rated issues were identified</p>
Satisfactory	<p>Design - Design of controls is largely adequate and effective in addressing key risks</p> <p>Documentation and communication - Controls/policies/procedures have been formally documented and are up to date but are not proactively communicated to relevant stakeholders</p> <p>Operation/implementation - Controls are largely operating in a satisfactory manner and are providing some level of assurance</p> <p>Compliance - No known breaches of legislative requirements and/or departmental policies and guidelines have occurred</p> <p>Risk management - Risks are largely effectively managed</p> <p>Issues/deficiencies - No high-rated or medium-rated issues identified</p>