

AUDIT & MANAGEMENT ADVISORY SERVICES



University of California
San Diego

**UCSD Preuss Charter School Grades Investigation
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Executive Summary

On May 18, 2007, the UCSD Preuss Charter School (Preuss School) Board of Directors Chairman notified Audit & Management Advisory Services (AMAS) that potential inappropriate grade recordkeeping practices had occurred at the Preuss School, and requested an AMAS investigation of this issue. The Chairman had been informed by the Preuss School Principal that a Preuss School employee was involved in inappropriate practices and had been terminated. Subsequently, the Chairman received an allegation from a Preuss School administrative staff member that Preuss School senior administrative personnel had instructed office employees to improperly replace grades earned in Advanced Placement (AP) courses with grades earned for non-AP courses which were taken during a summer school session and for non-AP courses which had been offered online.

Allegations

During the investigation, AMAS received information regarding additional concerns. The review was then expanded to include the following allegations:

- Alleged inaccurate official Preuss School transcripts supporting applications for scholarship awards and college admittance that did not reflect the classes students had taken and the corresponding grades given by teachers. Specific allegations regarding transcript irregularities were:
 - Replacement of grades for AP courses with more favorable grades received for dissimilar courses, such as those completed during the Summer School session, or those completed on-line,
 - Replacement of grades for classes taken with more favorable grades received for repeated classes which students should not have been permitted to repeat, and
 - Instances of inappropriate individual grade replacements to benefit individual students in unique circumstances;
- Alleged undue influence being placed on teachers by the Preuss School Principal, former high school Counselor, and current 11th and 12th Grade Academic Advisor (Senior Advisor) to change grades to benefit students, to provide alternative grading measures for failing students, or to lessen the rigor of AP course content so more students could pass the courses;
- Alleged inconsistent and inaccurate recordkeeping for student class attendance and attendance data reported to the San Diego Unified School District (SDUSD) and San Diego County Office of Education;
- Alleged inappropriate expenditure of “before- and after-school” program funds, and disparate compensation for teachers participating in after-school activities;

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- Alleged inappropriate hire of two near-relatives (a teacher and the Senior Advisor) of the Preuss School Principal and the alleged lack of appropriate credentialing for one of these employees; and,
- Alleged de-enrollment of students from the Preuss School solely because of low standardized test scores so as to keep the School's average test scores high.

Conclusions

Conclusions based on AMAS review of allegations and related testing procedures were:

- Several aspects of Preuss School grade recordkeeping processes and internal controls were found to be inadequate, including the management of student information systems, preparation of student transcripts, staffing of the Registrar position and insufficient retention of documentation supporting student grades and authorized grade changes. A large number of transcripts reviewed (144 of 190 or 75.8%) were found to have one or more grades inaccurately reflected in student transcripts or discrepancies between grades posted to electronic grade tables and student transcripts. About 28.3% of the inaccuracies had a negative impact or no impact on student grades and academic standing, and 71.7% had a positive impact on student grades and academic standing. Ten of 190 (5.3%) students evaluated would not have met UC minimum eligibility requirements and one (0.5%) would not have met CSU minimum eligibility requirements had transcripts been accurately reported.
- Based on the preponderance of testimonial and documentary evidence evaluated during our review, AMAS concluded that the Principal and former Counselor likely had knowledge of and/or directed inappropriate grade changes. To a lesser extent, the Senior Advisor may also have had knowledge of these activities.
- Several former and current teachers interviewed indicated that that the Principal and/or former Counselor had pressured them to provide students with extraordinary accommodations, that these teachers would not normally have made, to permit students to improve their grades, such as giving students an opportunity to turn in assignments after the conclusion of the trimester/semester or submit unusual extra credit assignments not offered to the remainder of the class.
- AMAS determined there was no separate fund for "before- and after-school" programs and that school funds were not misspent for this activity. Although teachers were compensated at varying rates due to their participation in after-school activities, we concluded this compensation was appropriate as a result of their participation in various Preuss School program plans.
- Preuss School curriculum was designed so that students were required to take a series of AP courses regardless of their past academic performance in these subjects. As a result, some AP teachers indicated that in response to pressure from the Preuss School Principal, former high school Counselor, and/or Senior Advisor, they

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sometimes felt compelled to lower the rigor of AP courses in order to be able to assign more students passing grades.

- UCSD Human Resources concluded that the near-relative hiring of the Senior Advisor should have been disclosed to Human Resources at the time of the hire. Supervision and credentialing of the Senior Advisor appeared to be in accordance with policy. Human Resources also concluded that UC policy did not require the specific near-relative teacher position be disclosed at the time the near-relative teacher was hired.
- Reporting of Preuss School student attendance to the SDUSD was accurate, with minor exceptions that would not have materially changed funding for average daily attendance.
- Procedures for Preuss School de-enrollment appeared reasonable and were compliant with requirements. AMAS concluded that students were not de-enrolled as a result of low test scores.

Additional observations based on AMAS review of related management oversight and administrative practices and based on HR review of personnel practices were:

- The Preuss School Board of Directors and Academic Affairs oversight of Preuss School operations required improvement. Development and reporting of additional performance metrics to measure the overall success of the school in achieving educational outcomes would assist in improving oversight.
- Board of Director Bylaws delegated renewal of teacher contracts solely to the Principal. In addition, the Preuss School Policy Manual and Preuss School personnel policies are inconsistent or out-of-date with UCSD personnel policies, and require substantial revision.

Management Corrective Actions

The UCSD Chancellor, the Senior Vice Chancellor Academic Affairs and the Interim Vice Chancellor Resource Management & Planning (UCSD executive management) have evaluated the issues presented in this report and, as a result, plan to engage an external consulting firm with expertise in charter schools to conduct a more complete review of Preuss School operations. Interim corrective actions have also been taken as appropriate, and are noted in the report narrative.

Management of Student Information Systems

The Chancellor has directed that administrative oversight of Preuss School activities be assigned to the Interim Vice Chancellor Resource Management & Planning. Under his direction, the following internal control procedures for the management of student grades have been or will be implemented immediately:

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1. Administrative access to change student grades will be limited to the newly designated Preuss School Registrar and one additional individual for backup purposes. Employees will not be given system access to the academic records of their children or near-relatives;
2. Teacher grade sheets will be co-signed by the Registrar upon entry into the student information system;
3. The existing document retention policy will be adhered to for the filing and retention of signed teacher grade sheets and associated grade change authorization forms. The implementing procedures will include the location where such documents are to be stored;
4. Preuss School training and staff development activities will include an annual session specific to ethics, and personal rights and responsibilities for all staff;
5. Action will be taken to confirm that the *Aeries* system's audit feature has been enabled and is working properly; and
6. The capabilities of the *Aeries* system will be compared to the capabilities of the *Zangle* system, and a resulting system change will be made as appropriate.

Inappropriate Grade Reporting, Suppression and Replacement

1. During the course of the audit, all transcripts for graduating seniors for the Class of 2008 were thoroughly evaluated by Preuss School administrators with the assistance of the UCSD Admissions Office. Transcripts were corrected as needed prior to distribution for college admission purposes. The Preuss School is now in the process of reviewing the accuracy of transcripts for all other current Preuss School students, also with the assistance of the UCSD Admissions Office.
2. AMAS has provided Preuss School administrative staff with a comprehensive listing of exceptions noted during the transcript review. Preuss School administrative staff is in the process of reviewing this listing and making changes to student Course History table in *Aeries*, as well as to manual Word transcripts.
3. Preuss School administration, under the direction of the UCSD Senior Vice Chancellor Academic Affairs, will develop an internal grade suppression policy which will mirror SDUSD policy. In addition, Preuss School administration will review the "Criteria for Approval of Online Providers and Courses to Satisfy UC A-G Requirements" document, as provided on the UCOP website, to ensure that future online courses offered at Preuss School will be acceptable.
4. UCSD executive management has directed that the Preuss School Principal and Senior Advisor be disciplined as appropriate based on the conditions noted in this report.

Undue Teacher Influence

1. The UCSD external review directed by the Chancellor to be conducted of Preuss School operations will evaluate alternative means to offer Preuss School teachers a direct line of communication to the Board and/or Academic Affairs to voice concerns over school issues.
2. As UC employees, all Preuss School staff have access to the University Ombudsperson, the Netclaims program as well as other internal avenues. These

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programs will be presented at a required annual in service training session conducted by UC Human Resources staff.

Advanced Placement Course Requirements

The external review directed by the Chancellor of Preuss School operations will include a reassessment of AP course requirements and the impact of these requirements on student outcomes. In addition, the review will include a thorough evaluation of current implementing practices to assure that AP standards are maintained.

Board of Directors and Academic Affairs Oversight

1. The external review directed by the Chancellor of Preuss School operations will include:
 - a. An assessment of best practices for charter schools;
 - b. The development of additional performance measurement criteria for the operation of the school and long term success of the students;
 - c. Reevaluation of the Preuss School Charter and revisions to strengthen accountability for oversight of school operations; and
 - d. Development of a well defined evaluation process for the Principal and administrative staff that includes an annual evaluation with written Board input.
2. Based on results of the consultation noted above, UCSD executive management will require the preparation of a comprehensive annual report by the Principal to UCSD executive management and to the Preuss School Board of Directors.
3. The Preuss School Board of Directors will meet with the Chancellor, Senior Vice Chancellor for Academic Affairs, and the Interim Vice Chancellor for Resource Management and Planning at least once a year following the annual report to review the academic performance of the Preuss School, to advise as needed on policy revisions, and to adopt upcoming quantitative goals and metrics for the school.

Personnel Practices

1. The external review directed by the Chancellor of Preuss School operations will include:
 - a. Consideration of teacher contract periods of longer than one year, or renewable contracts based on a defined set of criteria made available to teachers at the time the contract is signed.
 - b. Revisions in the timing for the contract renewal periods to allow those leaving ample time to seek employment in other school settings.
 - c. Revision of Preuss School Personnel Policies to align with current versions of University and applicable SDUSD policies adopted by Preuss School, and to include additional policy deficiencies noted by Human Resources.
2. In collaboration with University Human Resources, UCSD executive management will direct the conduct of exit interviews with Preuss School teachers and or administrators whose contracts have not been extended or who leave voluntarily. In

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addition, UCSD executive management will consider career appointments for Preuss School administrative staff.

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I. Background

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During the investigation, AMAS received information regarding additional concerns. The review was then expanded to include the following allegations:

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- Alleged inappropriate hire of two near-relatives (a teacher and the Senior Advisor) of the Preuss School Principal and the alleged lack of appropriate credentialing for one of these employees; and,
- Alleged de-enrollment of students from the Preuss School solely because of low standardized test scores so as to keep the School’s average test scores high.

AMAS initiated an investigation to review all concerns. The SDUSD was notified that a review was in process, and, as a result, similar allegations made to the SDUSD were referred to AMAS for review.

History of Preuss School

The Preuss School opened in 1999 and is jointly chartered by the SDUSD and UCSD. According to the Preuss School Charter, the school is “designed as an intensive college preparatory environment for low income students who would represent the first generation in their families to graduate from a four year college or university.” The concept for the Preuss School was developed by a group of UCSD faculty who wished to address the under representation of students from low income communities who were eligible for admission to the University of California. The Preuss School operates with an expanded school year (198 days vs. the traditional 180 days), an extended school day (7 hours vs. the traditional 6 hours), and smaller class sizes (27 students vs. 34 students district-wide). Preuss School enrollment has grown steadily since inception in 1999 to an approximate enrollment of 750 students for school year 2007, as noted below.

School Year	Grade 6	Grade 7	Grade 8	Grade 9	Grade 10	Grade 11	Grade 12	Total Enrollment
1999/00	52	50	48	0	0	0	0	150
2000/01	130	129	81	83	0	0	0	423
2001/02	126	105	107	96	64	0	0	498
2002/03	138	139	105	112	82	63	0	639
2003/04	135	138	133	113	109	82	56	766
2004/05	113	131	128	124	99	97	75	767
2005/06	118	129	132	128	116	86	89	798
2006/07	112	111	116	123	113	99	78	752

Source: California Department of Education

The Preuss School admits students who meet the following criteria:

- The student comes from a low socioeconomic background, which generally includes families whose income does not exceed 200% of the federal poverty standard;
- The student’s parent or guardian has not graduated from a four-year college or university; and
- The student exhibits a level of academic potential to benefit from the Preuss School’s approach and mission. This generally includes any student who scores in at least the 50% percentile of one subtest of the California standardized tests and demonstrates

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high motivation and family support as defined by the Advancement Via Individual Determination (AVID) program in San Diego schools.

Students are selected by a lottery drawing when more eligible students apply for admission to the Preuss School than there are spaces available.

Newsweek magazine ranked the Preuss School ninth among 1,200 schools in its “The 100 Best High Schools in America” article of May 2007, and in November 2007 *US News & World Report* ranked the Preuss School the 10th best high school in the nation. Also in 2007, Preuss School was recognized as a California Distinguished School. The Preuss School is accredited by the Western Association of Schools & Colleges (WASC) and certified by the California Charter School Association (CCSA).

II. Audit Objectives, Scope, and Procedures

The primary objective of our review was to assess all allegations referred to AMAS. Specifically, AMAS evaluated:

- The accuracy of grades reported on student transcripts as compared to Preuss School databases and other available records for student populations identified during interviews and for those which were randomly selected;
- Specific concerns expressed by some of the teachers regarding undue influence from the Preuss School Principal, former Counselor and/or Senior Advisor to either change student course grades or lessen AP course content and any related impact on teacher turnover;
- The appropriate usage of “before- and after-school” program funds;
- The accuracy of attendance reporting to the SDUSD and the San Diego County Office of Education (SDCOE); and,
- Preuss School student de-enrollment data and related standardized test and GPA data.

The secondary objective of our review was to evaluate selected management oversight and administrative practices relevant to these allegations and to recommend areas for improvement. AMAS asked UCSD Human Resources (HR) to conduct a concurrent review to determine whether the allegations of inappropriate near-relative hires were substantiated and whether appropriate personnel policies were followed. Information obtained from the results of the HR review is incorporated in this report.

In order to achieve our objectives we performed the following:

- Reviewed selected California Educational Code and SDUSD Policies and procedures;
- Obtained electronic copies of the Preuss School “*Aeries*” database for school years 2001 through 2007, and “*Zangle*” database grade records for the school year 2005;
- Obtained additional available documentation from the Preuss School and current or former employees regarding student grades and enrollment, including Summer School and Educational Options rosters, UCSD Math Class rosters and grades, and other available grade records;

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- Obtained UCSD records for Preuss School applicants and compared this data to Preuss School records;
- Reviewed the transcripts for 190 students in populations identified during interviews and from a randomly selected sample;
- Interviewed 28 Preuss School staff members including current and former administrators, current and former teachers, a former Counselor, the current Senior Advisor and the Principal;
- Evaluated Preuss School annual teacher turnover rates for the school years 2002 through 2007;
- Interviewed representatives from SDUSD regarding attendance reporting and the Preuss School external financial auditor regarding attendance validation procedures;
- Compared Preuss School attendance records for a sample of 20 individual students randomly chosen from the Class of 2007 with electronic data in the *Aeries* system;
- Compared aggregate Preuss School attendance data with data supplied to SDUSD and evaluated any discrepancies;
- Evaluated GPA and standardized test scores for students de-enrolled from the Preuss School in the Classes of 2004 through 2007 and analyzed the results for any patterns;
- Reviewed minutes from the Preuss School Board of Directors meetings from school years 2006 and 2007 and interviewed three current Board members;
- Reviewed accounting procedures between the Preuss School, SDUSD and UCSD, sources and uses of funds provided to the school, and specifically focused on “before-and after-school” funding;
- Reviewed additional compensation provided to Preuss School teachers (above regular contract pay) during school years 2006 and 2007, and compared the additional income levels for agreement with documents supporting additional work performed; and,
- Performed an analytical review of Preuss School aggregate expenditures to identify whether further detailed testing was warranted.

AMAS compared all transcript entries to corresponding records of students who were enrolled in the following specific classes which were raised as a concern during preliminary interviews:

- AP Physics class grades (22 students in the Class of 2005)
- Summer School 2006 (37 students in various Classes)
- Educational Options (on-line courses) given during school year 2007 (24 students in various Classes)
- English Online Courses (28 students in the Class of 2006)
- UCSD Math Class (22 students in various Classes)

The test population was expanded to include 10 randomly selected transcripts from each of the graduating Classes of 2004 through 2008; and, transcripts for all Preuss School students who applied to UCSD from the Classes of 2004 through 2007.

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Test Population	Test Count
AP Physics 2005	22
Summer School 2006	37
Educational Options (On-line Courses) during 2006-07	24
English On-line Courses in 2006	28
UCSD Math Class	22
Random Sample (10 students per class 2004-2008)	50
UCSD Transcripts	41

Because several students were included in multiple test populations, the total number of unique student transcripts reviewed was 190. The transcript test included a comparison of the transcript information to data in the *Aeries* and *Zangle* systems and to hard-copy grade records (when available), including course number, name, grade, total credits, Advanced Placement credit, and compliance with SDUSD policy on course repeats and grade suppression. The 9-12 GPA was recalculated for each transcript with an error or discrepancy and the student's college eligibility was reassessed based on UCSD and CSU system baseline eligibility criteria (see **Attachment A** for UCSD and CSU eligibility criteria).

III. Conclusions

Conclusions based on AMAS review of allegations and related testing procedures were:

- Several aspects of Preuss School grade recordkeeping processes and internal controls were found to be inadequate, including the management of student information systems, preparation of student transcripts, staffing of the Registrar position and insufficient retention of documentation supporting student grades and authorized grade changes. A large number of transcripts reviewed (144 of 190 or 75.8%) were found to have one or more grades inaccurately reflected in student transcripts or discrepancies between grades posted to electronic grade tables and student transcripts. About 28.3% of the inaccuracies had a negative impact or no impact on student grades and academic standing, and 71.7% had a positive impact on student grades and academic standing. Ten of 190 (5.3%) students evaluated would not have met UC minimum eligibility requirements and one (0.5%) would not have met CSU minimum eligibility requirements had transcripts been accurately reported.
- Based on the preponderance of testimonial and documentary evidence evaluated during our review, AMAS concluded that the Principal and former Counselor likely had knowledge of and/or directed inappropriate grade changes. To a lesser extent, the Senior Advisor may also have had knowledge of these activities.
- Several former and current teachers interviewed indicated that the Principal and/or former Counselor had pressured them to provide students with extraordinary accommodations, that these teachers would not normally have made, to permit

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students to improve their grades, such as giving students an opportunity to turn in assignments after the conclusion of the trimester/semester or submit unusual extra credit assignments not offered to the remainder of the class.

- AMAS determined there was no separate fund for “before- and after-school” programs and that school funds were not misspent for this activity. Although teachers were compensated at varying rates due to their participation in after-school activities, we concluded this compensation was appropriate as a result of their participation in various Preuss School program plans.
- The Preuss School curriculum was designed so that students were required to take a series of AP courses regardless of their past academic performance in these subjects. As a result, some teachers indicated that in response to pressure from the Preuss School Principal, former high school Counselor, and/or Senior Advisor, they sometimes felt compelled to lower the rigor of AP courses in order to be able to assign more students passing grades.
- UCSD Human Resources concluded that the near-relative hiring of the Senior Advisor should have been disclosed to Human Resources at the time of the hire. Supervision and credentialing of the Senior Advisor appeared to be in accordance with policy. Human Resources also concluded that UC policy did not require the specific near-relative teacher position be disclosed at the time the near-relative teacher was hired.
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Additional observations based on AMAS review of related management oversight and administrative practices and based on HR review of personnel practices were:

- The Preuss School Board of Directors and Academic Affairs oversight of Preuss School operations required improvement. Development and reporting of additional performance metrics to measure the overall success of the school in achieving educational outcomes would assist in improving oversight.
- Board of Director Bylaws delegated renewal of teacher contracts solely to the Principal. In addition, the Preuss School Policy Manual and Preuss School personnel policies are inconsistent or out-of-date with UCSD personnel policies, and require substantial revision.

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IV. Observations and Management Corrective Actions

A. Review of Allegations and Related Tests

1. Management of Student Grades

Several aspects of Preuss School grade recordkeeping processes and internal controls were found to be inadequate, including the management of student information systems, preparation of student transcripts, staffing of the Registrar position and insufficient retention of documentation supporting student grades and authorized grade changes. As a result of these conditions, a large percentage of transcripts reviewed (144 of 190 or 75.8%) were found to have one or more grades inaccurately reflected on student transcripts or discrepancies between grades posted to teacher grade books and student transcripts. About 28.3% of the inaccuracies had a negative impact or no impact on student grades and academic standing, and 71.7% had a positive impact on student grades and academic standing. The number of students whose eligibility was impacted by these errors was relatively low.

Management of Student Information Systems

In the Fall of 1999, the SDUSD provided the Preuss School with the *Aeries* information system to electronically maintain student information including grades, attendance records, and course schedules. The system maintained this data on Preuss School computer servers within a number of Microsoft Access databases segregated by school year. Teacher grades were submitted to the Registrar on signed Scantron forms. The Registrar fed the Scantron forms through a reader which entered the data into an *Aeries* Grade Reporting table. The Grade Reporting table was used to produce report cards. Once the Grade Reporting table was populated, the *Aeries* system would transfer the grade data to another table called the Course History table. The *Aeries* system required a new database be created for each school year. Information such as student name, address, parent name, and the Course History table were transferred to each new year's database. According to the systems analyst supporting the *Aeries* system, the Principal directed that access permissions not be restricted, allowing full system access to the Principal, the former Counselor, the Dean of Students,

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Academic Advisors, and the Registrar. The Principal disagreed that she directed this access, and stated that the Dean of Students was in charge of system changes.

The State of California Education Code permits grade changes at the discretion of the teacher. We were informed during the review that teachers used signed grade change forms when changes to original grades were needed. The change forms were given to the Registrar who entered the changes into the Course History table (not the Grade Reporting table) and then attached the forms to the original Scantron forms. Based on interviews conducted, we understand that all Scantron and grade change forms were to be filed in the Registrar's office or held in storage. California Code of Regulations, title 5, requires these documents be retained for three years after the student leaves the school. Based on interviews conducted, it is our understanding that grade changes requested by Administration (the Principal, the former Counselor, and the Senior Advisor) were handled more informally using email or hand written notes, which were destroyed by the Registrar and/or her assistant after the changes were posted.

The Preuss School was on a trimester year schedule, whereas SDUSD schools were on a semester year schedule. The *Aeries* system provided by the SDUSD could not recognize trimester scheduling and was therefore unable to generate accurate transcripts for Preuss School students. As a result, the Preuss School implemented a practice of creating transcripts manually using a Microsoft Word template.

Prior to the start of school year 2005, the SDUSD provided Preuss School at no cost, a new student information system called *Zangle*. The *Zangle* system utilized Scantron forms and maintained separate report card and grade history data tables similar to the *Aeries* system. Unlike the *Aeries* system, the *Zangle* system recognized trimester scheduling and was therefore able to generate Preuss School student transcripts; allowed grade changes to be posted only to the Report Card Table (not to the Course History Table); established an audit trail of persons making changes to the grade table by logging a name, date and time stamp; and, housed all district schools' databases, including the Preuss School, on computer servers which were maintained by SDUSD personnel.

Although the *Zangle* system appeared to be a capable automated system, the Preuss School opted to continue creating student transcripts manually through school year 2005. The Principal indicated this was necessary as a result of problems with *Zangle* service and data retrieval.

After the start of school year 2005, Preuss School Administration decided to obtain a grading system other than *Zangle* and independently acquired a newer version of the *Aeries* system. Because system licensing was no longer paid by SDUSD, the Preuss School purchased this version of *Aeries* for an initial cost of

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\$15,200 with annual license renewal fees of \$2,200, and began using the *Aeries* system in school year 2006.

Although the Preuss School currently uses the *Aeries* system for student grading and other information, the Preuss School is also required to use the *Zangle* system to report student enrollment to the SDUSD.

The Preuss School Principal indicated that the former Counselor requested that the new *Aeries* system be purchased rather than adopting *Zangle*. The former Counselor indicated that the *Zangle* system was difficult to use as a result of the trimester school year schedule and an increased number of classes. Other former administrative staff interviewed indicated that the new *Aeries* system was purchased primarily because the Principal and former Counselor were concerned that *Zangle* grade data was maintained offsite and that *Zangle* grade changes were appended with identity, date and time stamps, which would be visible by SDUSD personnel. The Principal indicated that she was unaware of *Zangle* audit trails supporting grade changes, and that this capability was not a factor in deciding to purchase *Aeries*.

It appears that the *Aeries* system's compatibility with other information systems in use at the Preuss School was not adequately assessed during the acquisition process. Prior to the *Aeries* system acquisition, the Preuss School Library utilized an information system called Horizon, which interfaced with the *Zangle* system and allowed the Library to participate in a book exchange program with other SDUSD schools. It was discovered after the *Aeries* system acquisition and installation in school year 2005 that the *Aeries* system was unable to interface with the Horizon library system. Consequentially, the Preuss School was forced to purchase a new library information system, Destiny, from Follett Software Company, at a cost of approximately \$9,000 with an additional \$3,000 expense to export data from the Horizon system into the Destiny system. In addition, the Destiny system did not interface with the *Zangle* system, preventing the Library from participating in the SDUSD book exchange program.

The new *Aeries* system purchased by the Preuss School incorporated some improved functionality over the older version, including a web-based browser interface feature that allowed teachers to electronically submit and review student grades. As a result, Preuss School discontinued its use of Scantron grade sheets after school year 2005. In its place, teachers submitted signed grade sheets to the Registrar which they could print directly from the *Aeries* system. The new *Aeries* system also automatically generated student transcripts on demand for either trimester or semester school schedules. This practice was implemented for the Class of 2007.

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While the use of the new *Aeries* system improved some aspects of grade recordkeeping, certain Preuss School administrative practices and the non-use of some available system features continued to make the legitimacy and accuracy of student transcripts questionable. We were informed that the new *Aeries* system's student information and grade change audit trail feature was not enabled (by default) when the new *Aeries* system was installed. According to the system analysts supporting the *Aeries* system, the Principal directed that access permissions not be restricted, allowing full system access to the Principal, the former Counselor, the Dean of Students, Academic Advisors, and the Registrar. The Principal disagreed that she directed this access, and stated that the Dean of Students was in charge of system changes. In our view, ultimate responsibility for reasonable system controls rested with the Principal. The exclusion of an audit trail combined with extensive system access created a lack of accountability for anyone making student grade and/or class name and number changes.

We also noted that the Registrar, employed between August 2003 and April 2007, was the parent of two Preuss School students (one current and one former). In our judgment, this relationship created a conflict of interest condition, which the Principal should have managed by limiting the Registrar's access to her children's grades. In April 2007, the Principal terminated the Registrar for inappropriately changing grades and making other modifications to her current student's transcript. During the interview with AMAS, the Registrar admitted to making these changes. Nevertheless, AMAS found much of her testimony credible because it was consistent with the testimony of the instructors, the Registrar's assistant, and others; and, with documents evaluated.

During our review, Preuss School Administration was unable to provide any signed Scantron forms supporting initial grade entries to the system, any signed grade authorization forms, or any signed teacher grade sheet printouts for the records which we evaluated, with the exception of signed *Aeries* grade sheet printouts for the Fall 2007 semester. It is unclear as to whether these records were intentionally or unintentionally lost, misplaced or destroyed; and by whom.

Management Corrective Action:

The Chancellor has directed that administrative oversight of Preuss School activities be assigned to the Interim Vice Chancellor Resource Management & Planning. Under his direction, the following internal control procedures for the management of student grades have been or will be implemented immediately:

1. Administrative access to change student grades will be limited to the newly designated Preuss School Registrar and one additional

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- individual for backup purposes. Employees will not be given system access to the academic records of their children or near-relatives;
2. Teacher grade sheets will be co-signed by the Registrar upon entry into the student information system;
 3. The existing document retention policy will be adhered to for the filing and retention of signed teacher grade sheets and associated grade change authorization forms. The implementing procedures will include the location where such documents are to be stored;
 4. Preuss School training and staff development activities will include an annual session specific to ethics, and personal rights and responsibilities for all staff;
 5. Action will be taken to confirm that the *Aeries* system's audit feature has been enabled and is working properly; and
 6. The capabilities of the *Aeries* system will be compared to the capabilities of the *Zangle* system, and a resulting system change will be made as appropriate.

Inaccurate Grade Reporting

Based on available information, AMAS noted instances where grades, and class names and numbers reported on student transcripts were not the same as grades issued by teachers and/or were not reported in compliance with SDUSD policy. We also noted other types of errors on transcripts generated during the years they were prepared using the Microsoft Word template such as: grades posted to the wrong class or wrong trimester; incorrect totals of credits earned; transposed grades; and grades were not always recorded on the transcript although they were present in the grade information system(s).

Based on the preponderance of testimonial and documentary evidence evaluated during our review, AMAS concluded that the Principal and former Counselor likely had knowledge of and/or directed inappropriate grade changes. In this regard, the grade discrepancies related to AP Physics, Summer School, EdOptions courses, and Online English were of particular concern.

We also concluded that although the Senior Advisor and other administrative persons may have had knowledge of the inappropriate grade changes, their involvement to direct grade changes was likely minimal.

Of 190 total student transcripts tested, 144 (75.8%) were found to have contained one or more errors or grade discrepancies. Based on information provided by UCSD Admissions office, 10 of these students would not have met UC minimum eligibility standards, and one student would not have met CSU minimum eligibility standards had transcripts been accurately reported. A brief description of significant exception types is provided below.

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- **Grade Discrepancies**

- Record Differences - In 92 instances, the grade recorded on the transcript did not correspond to either the grade recorded in the Grade Reporting table of *Aeries* or to the *Zangle* grade data for school year 2005. Because Preuss School Administration was unable to provide the Scantron and grade change authorization forms submitted by teachers, it is not known whether these grade discrepancies represent grade changes appropriately authorized by teachers.
- AP Physics - AMAS reviewed an allegation that the Preuss Principal and former Counselor directed that grades issued to students in a school year 2005 AP Physics course be changed without the authorization of the teacher. A comparison of a course grade sheet for 22 students provided by the instructor to the student transcripts revealed 15 grade discrepancies for the Fall 2005 trimester. Seven grades were changed from a “D” or “F” to a passing grade. (One “F” was changed to an “A”; four “F’s” were changed to “C’s”; and two “D’s” were changed to “C’s”.) In addition, three grades were changed from “F’s” to “D’s” and one grade was changed from a “B” to an “A”. Also, four grades were changed from a higher passing grade to a lower passing grade. (Two “B’s” were changed to “C’s” and two “A’s” were changed to “B’s”.) The Principal and former Counselor denied any knowledge of inappropriate grade changes. The Registrar’s assistant recollected the former Counselor handing her a note directing her to make these changes. The instructor stated that any changes made were unauthorized and without her knowledge. As with all other grade discrepancies, records supporting these grade changes could not be located by Preuss School administrative staff.

- **Inappropriate Grade Suppression & Replacement**

SDUSD Policy 4705 Section C.9., states “Students receiving either a “D” or “F” on their final grade may repeat the same district course with the same course number until they receive a “C” or higher grade. When the “C” or higher grade is received, the “D” or “F” shall be suppressed on the transcript and from cumulative grade point average calculations.”

- Summer School – At the end of the school year 2006, two Preuss School faculty members approached the Principal with a prospect for creating a three week Summer School session with two courses for students who had failed AP US and/or AP European History courses during the year. Based on information we received, the faculty who taught these courses intended the Summer School session to provide

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students with up to two trimesters of “A-G” course credit requirements (with two separate grades). Because the design, structure and content of the Summer School courses differed from the original AP courses, the faculty did not intend for students to receive AP credit or weight. The two instructors indicated that they clearly conveyed this opinion to the Principal. Based on instructor interviews, the content and rigor of the Summer School courses was not equivalent to the AP History courses taught during the school year. However, the Registrar indicated that following the Summer School session, the Principal directed her to replace the original failed grades with “C’s” for the Summer School courses. The Principal indicated that she did not direct the Registrar to replace original failing grades with “C’s”. The Principal also stated that it was her understanding that the Summer School courses were AP caliber because the same faculty that taught the AP History courses during the regular school year also taught the Summer School courses, and the courses were intended as a repeat for those students that had failed the AP courses. Because instructors interviewed indicated that Summer School session courses were not comparable to the regular AP History Courses, the use of these courses to replace or suppress AP grades did not comply with SDUSD policy for grade suppression.

Based on data available during the course of our review, AMAS noted 65 Summer School course grades which were not reflected on the transcripts as required by SDUSD policy. Specifically, we noted that 43 original failing grades were replaced with passing grades for AP credit and weight, 19 failing AP grades were suppressed with passing grades from non-AP weighted courses, and three failing grades were replaced with passing grades without AP credit or weight.

In addition, we noted that the instructors had issued failing grades to three of the Summer School students. One of these three students had already participated in the June 2006 graduation commencement. One of the instructors notified the Registrar of the failing grades via email. The Registrar indicated that she presented this email to the Principal, who directed the Registrar to issue a passing grade to each of the three students. The Principal and the Senior Advisor denied any knowledge of the students receiving failing grades. The former Counselor had separated employment with the Preuss School prior to the recording of the Summer School grades.

- EdOptions – During the school year 2007, the Preuss School offered students the opportunity to earn “A-G” course graduation credits using online courses purchased from Educational Options, Inc (EdOptions).

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We understand that the EdOptions courses were administered by Preuss School faculty, and were considered comparable to Preuss School course requirements, other than AP courses. The UC and SDUSD policy for certifying online courses as comparable with classroom courses resides with the school principal. In addition, UC does not accept online courses in the areas of visual/performing arts or laboratory sciences.

During the review for the treatment of EdOptions courses at the Preuss School, we noted 18 instances where the EdOptions course completed either replaced or suppressed a previously earned “D” or “F” in an AP level course. This practice was not in compliance with SDUSD policy 4705, because the EdOptions courses were not comparable to AP level courses. Two additional EdOptions courses replaced or suppressed a laboratory science course (Advanced Chemistry), which was not in compliance with UC policy.

- Online English – Prior to school year 2007, the Preuss School allowed students to use an online American Literature English course, identified as course number 1584 in the *Aeries* system, to replace failing grades students had received for an 11th grade AP English course, identified as course number 1655 in the *Aeries* system. Based on the Uniform Course Code published in the SDUSD Uniform Course File, American Literature 1584 is not an AP level course. However, the online American Literature course was recorded on the students’ transcripts with course number 1655, which was the course number of the original AP English course. Because the online American Literature course was not the same as the original course, suppressing the AP English failing grade was not in compliance with SDUSD policy 4705. AMAS noted 16 instances were this condition occurred; all instances were from the graduating Class of 2006.
- **Inappropriate AP Credit – Spanish**
AMAS noted 26 instances in which students received AP credit and weight for trimesters in which they had taken a non-AP level Spanish class; identified as Spanish 5-6 in the *Aeries* Grade Reporting table. In all instances, the first two trimesters were identified in the Grade Reporting table as Spanish 5-6, with the third trimester identified as an AP Spanish course. These discrepancies had a positive effect on student GPAs.
- **Inappropriate Re-Take**
AMAS noted 39 instances in which students who had earned an original passing grade but repeated the same course and received a higher grade. In some instances the lower grades were suppressed from the transcripts, while

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in other instances, both course grades were displayed on the transcripts. During interviews, AMAS was informed that Preuss School Administration permitted some students to re-take Spanish or Japanese courses even though they had originally received passing grades in these courses. AMAS was also informed Preuss School administrative staff required some students to re-take classes in order to fill their course schedules, due to curriculum and faculty shortages, and course demand. In all instances, the repeated course was counted toward the “A-G” credit requirement. Both the Principal and Senior Advisor have indicated that this is an acceptable practice under UC policy. However, while the CSU system does not place a restriction on the number of times a student may repeat a course, UC does not accept a grade earned in a course repeated where the original course grade was a “C” or better, with the exception of a visual/performing arts course.

- **Grades Not on Transcripts**

- UCSD Math Class - A number of students who had completed the math curriculum offered at the Preuss School were permitted to enroll in several, pre-determined, UCSD Math classes. An *Acknowledgement of Requirements for Preuss Students Enrolled in the UCSD Preuss Visitors Program*, signed by the student and the parent, included a number of terms and conditions. One condition was that the result of the UCSD Math course would be included on the student transcript, be recognized as an “A-G” requirement, and be included in the student’s GPA calculation. The Principal and the Senior Advisor confirmed that this was the Preuss School policy. We noted that 17 students from the graduating Classes of 2007, 2008 and 2009, who participated in this program, did not have the UCSD Math class or grades reflected on their transcripts. Instead, their transcripts reflected a non-academic Study course with an “A” assigned as the course grade. The UCSD Math class and grades were, however, included on transcripts for students in graduating classes prior to 2007. In 14 of the 17 cases, not including the grade change benefited the student.
- Grade Omissions – Six instances were noted where student grades recorded in the *Aeries* Grade Reporting table were not included on the student’s transcript. None of the unreported grades appeared to be the result of repeated courses which would have prompted grade suppression. In two instances, the Grade Reporting table indicated “F’s” were issued for all three trimesters of a 2006 AP Chemistry course. These failing grades were excluded from the transcripts, thereby increasing the student’s cumulative GPA in an “A-G” subject. In another instance, the table indicated a “C” was issued for one trimester of a Spanish course. The “C” was not included on the transcript, resulting in a slightly higher cumulative GPA. For the

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remaining three instances, the grade omission had an adverse effect on the student's cumulative GPA. The Principal indicated she was unaware of these instances.

- **Grades Not Suppressed Appropriately**
AMAS noted 87 instances in which students repeated failed courses and then had earned passing grades in subsequent equivalent courses. However, the original failing grade was not suppressed on the student's transcript; adversely affecting the student by lowering the cumulative GPA.

- **Other**
AMAS also noted a minimal number of other discrepancies that were less significant or smaller in number, such as: students received AP weighted credit although they did not take the AP exam (required to receive AP weight); classes appeared on student transcripts that were not included in the classes listed in the *Aeries* Grade Reporting table; grades were included on student transcripts when no grade was found in the *Aeries* Grade Reporting table; grades were displayed in the wrong trimester; credit totals were mathematically incorrect on transcripts; and, grades were transposed between trimesters or courses.

Management Corrective Actions:

1. During the course of the audit, all transcripts for graduating seniors for the Class of 2008 were thoroughly evaluated by Preuss School administrators with the assistance of the UCSD Admissions Office. Transcripts were corrected as needed prior to distribution for college admission purposes. The Preuss School is now in the process of reviewing the accuracy of transcripts for all other current Preuss School students, also with the assistance of the UCSD Admissions Office.
2. AMAS has provided Preuss School administrative staff with a comprehensive listing of exceptions noted during the transcript review. Preuss School administrative staff is in the process of reviewing this listing and making changes to student Course History table in *Aeries*, as well as to manual Word transcripts.
3. Preuss School administration, under the direction of the UCSD Senior Vice Chancellor Academic Affairs, will develop an internal grade suppression policy which will mirror SDUSD policy. In addition, Preuss School administration will review the "Criteria for Approval of Online Providers and Courses to Satisfy UC A-G Requirements" document, as provided on the UCOP website, to ensure that future online courses offered at Preuss School will be acceptable.

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4. UCSD executive management has directed that the Preuss School Principal and Senior Advisor be disciplined as appropriate based on the conditions noted in this report.

2. Undue Teacher Influence

Several former and current teachers interviewed indicated that that the Principal and/or former Counselor had pressured them to provide students with extraordinary accommodations, that these teachers would not normally have made, to permit students to improve their grades, such as giving students an opportunity to turn in assignments after the conclusion of the trimester/semester or submit unusual extra credit assignments not offered to the remainder of the class.

During the review, AMAS interviewed 13 current and eight former teachers regarding the school's administrative practices and concerns over grade change practices. Of these 21 current and former teachers interviewed, ten teachers advised that they had no knowledge of inappropriate grade changes, nor did they question any aspect of the grading system. Two of these 10 teachers indicated that they were approached by the Principal and/or Counselor to provide students with additional accommodations to improve their grades, but that they did not find these requests to be unreasonable. The remaining 11 teachers discussed a number of concerns regarding student grades or assessment of student performance. Four of these 11 were current teachers, and seven of these 11 were former teachers. Of the 11 teachers, four of the former teachers taught AP courses, and three of the current teachers taught AP courses.

The primary concern expressed by the remaining eleven current and former teachers was that the Principal and/or former Counselor had pressured them to provide students with extraordinary accommodations, that these teachers would not normally have made, to permit students to improve their grades, such as giving students an opportunity to turn in assignments after the conclusion of the trimester/semester or submit unusual extra credit assignments not offered to the remainder of the class. Another teacher indicated that he/she was pressured to change grades of select students due to his/her availability after the final exam had been conducted and graded. One additional teacher indicated that he/she had been counseled by the Principal for grading students too leniently. The Principal and former Counselor stated they were unaware that teachers felt pressured.

It appears that the underlying reason that many of these teachers felt pressure was that they reported directly to the Principal, former Counselor, and/or Senior Advisor, and that they did not know they had other University avenues that they could utilize to report concerns.

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Management Corrective Actions:

1. The UCSD external review directed by the Chancellor to be conducted of Preuss School operations will evaluate alternative means to offer Preuss School teachers a direct line of communication to the Board and/or Academic Affairs to voice concerns over school issues.
2. As UC employees, all Preuss School staff have access to the University Ombudsperson, the Netclaims program as well as other internal avenues. These programs will be presented at a required annual in service training session conducted by UC Human Resources staff.

3. Advanced Placement Course Requirements

Preuss School curriculum was designed so that students are required to take a series of AP classes regardless of their past academic performance in a subject. As a result, some AP teachers interviewed indicated that in response to pressure from the Preuss School Principal, former high school Counselor, and/or Senior Advisor, they sometimes felt compelled to lower the rigor of AP courses to be able to assign more students passing grades.

According to the Preuss School Charter, the Preuss School is designed to be “an intensive college preparatory education environment” where the goal is to “create a highly enriched middle and high school instructional environment that will prepare the graduates to distinguish themselves academically so they will be competitively eligible for admission at the University and other selective institutions of higher learning.” To accomplish this goal, the Preuss School designs all courses at the college-preparatory level, with AP classes offered in several subjects. In certain subjects such as English, Science and Social Studies, students were required to take an AP level course, and there was no option to enroll in a similar course at a college preparatory (but not AP) level. AP level course electives, which students were not required to complete, included AP Spanish Literature and AP Art History.

A concern expressed by some of current and former AP teachers interviewed was that rigor of certain AP courses was reduced by the instructors so that, in their opinion, most Preuss School students enrolled in the course passed. Some teachers indicated that this was necessary because all Preuss School students, regardless of class ranking or past scholastic performance, are required to take a pre-established series of AP level courses, whereas students taking AP level courses at other SDUSD schools have past academic performance above that of the average student. Other teachers indicated that the level of their AP courses needed to be reduced because students typically entered their courses ill prepared.

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AMAS noted during our transcript review many students who appeared, based on their grades in previous courses, to be unable to maintain passing grades in AP classes, nevertheless continued to enroll in AP classes the following terms. Students who did not achieve passing grades in advanced classes were required to re-take the course in subsequent years in order to suppress the original grade on their transcript and maintain their chances for eligibility for University admission.

AMAS compared the average passing rates of AP exams for all students in California from school years 2002 through 2007, with the pass rates for Preuss School students for the same subjects and same years. We noted that the percentage of Preuss School students who passed AP exams with a score of 3 or higher was significantly lower than the State average in most subjects. The only subjects where Preuss School student passed at a rate near or above the State passing rate on a consistent basis were Spanish Language and Spanish Literature.

Management Corrective Action:

The external review directed by the Chancellor of Preuss School operations will include a reassessment of AP course requirements and the impact of these requirements on student outcomes. In addition, the review will include a thorough evaluation of current implementing practices to assure that AP standards are maintained.

B. Review of Selected Preuss School Management Oversight and Administrative Practices Relevant to Allegations

1. Preuss School Board of Directors & Academic Affairs Oversight

The Preuss School Board of Directors and Academic Affairs oversight of Preuss School operations required improvement. Development and reporting of additional performance metrics to measure the overall success of the school in achieving educational outcomes would assist in improving oversight.

A Board of Directors has been established for the Preuss School to provide oversight of School operations. According to the Preuss School Charter, the Board has responsibility to advise the Chancellor in each of the following areas: Policies & Procedures, School Principal, Operating Budget, Capital Budget, Educational Program Administration, and Other Duties. In addition, the UCSD Academic Affairs Associate Vice Chancellor Academic Planning is designated the School's Administrative Official. This official is responsible for approval of the School's budget, performance evaluations for the Principal, and approval of any contracts entered into by the School. According to the Charter, the Principal is responsible for the daily operations of the school, including reporting to the

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Board on Preuss School performance and developing and implementing the curriculum of the school.

AMAS reviewed the Preuss School Board of Director minutes for school years 2006 and 2007, and noted that oversight is at an extremely broad level, with focus on budget and fiscal results. The Board is not directly involved in Preuss School personnel actions (e.g., teacher and counselor hires) or in oversight of the academic program, but is active in approving large purchasing contracts (computers, busing). Programmatic reporting appears to be at the primary direction of the Principal. We noted that the only discussion of overall academic performance or reporting of performance measures occurred in the form of summary statistics provided by the Principal on the percent of graduating students accepted to universities, and a presentation of UCSD CREATE reports issued in 2007 which compared Preuss School student performance against an eligible group of students not selected into the Preuss School during the lottery. The Board and Academic Affairs did not routinely receive other information regarding Preuss School academic programs, such as comprehensive reports on student achievement, SAT or AP test scores, instructor turnover, or de-enrollment statistics.

The Preuss School Charter indicates that “A goal of the School is to graduate students who will be in the top 12 percent of high school graduates in the State and who will meet all admission and enrollment requirements for the University of California or equivalent four-year higher education institutions.” Other than this goal, AMAS was unable to locate any other programmatic measures by which the Board could evaluate Preuss School academic programs and performance. AMAS also noted that the Preuss School has not undergone a comprehensive, external programmatic review or peer evaluation (other than WASC accreditation and CCSA certification), since its inception.

Management Corrective Actions:

1. The external review directed by the Chancellor of Preuss School operations will include:
 - a. An assessment of best practices for charter schools;
 - b. The development of additional performance measurement criteria for the operation of the school and long term success of the students;
 - c. Reevaluation of the Preuss School Charter and revisions to strengthen accountability for oversight of school operations; and
 - d. Development of a well defined evaluation process for the Principal and administrative staff that includes an annual evaluation with written board input.

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2. Based on results of the consultation noted above, UCSD executive management will require the preparation of a comprehensive annual report by the Principal to UCSD executive management and to the Preuss School Board of Directors.
3. The Preuss School Board of Directors will meet with the Chancellor, Senior Vice Chancellor for Academic Affairs, and the Interim Vice Chancellor for Resource Management & Planning at least once a year following the annual report to review the academic performance of the Preuss School, to advise as needed on policy revisions, and to adopt upcoming quantitative goals and metrics for the school.

2. Personnel Policies

Board of Director Bylaws delegated renewal of teacher contracts solely to the Principal. In addition, the Preuss School Policy Manual and Preuss School personnel policies are inconsistent or out-of-date with UCSD personnel policies and require substantial revision.

AMAS noted several aspects of Preuss School personnel policies and procedures that were problematic. All Preuss School personnel were considered employees of the University. Preuss School teachers and most administrative staff were hired via employment contract, and all contracts were for a maximum one-year term. Contracts were renewable each year at the sole discretion of the Principal. These contract renewals were typically announced in late spring, near the end of a school year. The Preuss School Board and UCSD Academic Affairs were not involved in personnel contracting issues.

Representatives of the Preuss School Board interviewed during our review believed that offering contracts for more than one year might negatively impact teacher performance. However, several teachers expressed concerns that the Principal used the contract authority to influence or intimidate teachers, and that notification of the Principal's intent not to renew a contract were presented too late in the school year to provide sufficient time to find alternative employment. One teacher refused to be interviewed by AMAS for this investigation due to the concern that his/her contract would not be renewed if the Principal found out that he/she cooperated with this investigation.

Some teachers also noted that the uncertainty regarding their employment contributed to the high teacher turnover rate at Preuss School. AMAS noted that teacher turnover (voluntary and involuntary) ranged from 40% in 2001/02 to 17% in 2006/07.

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In our judgment, the use of one-year contracts, and the Principal's sole discretion over who is offered a renewal, contributed to an environment where teachers could feel pressured by Administration to comply with requests regarding student grades or course curriculum that would place them in an ethical conflict and possibly compromise the quality of school curriculum or the validity of student grades.

UCSD Human Resources conducted a review of Preuss School Personnel policies. According to the Preuss School Charter, in the absence of any previously adopted policy by the Preuss School, the Preuss School shall follow the adopted policy of the University, where appropriate. In the absence of a University policy, Preuss School shall follow policy adopted by SDUSD. The Chancellor may also adopt any policy or procedure that is consistent with the Charter. The Board of Directors has responsibility for advising the Chancellor on Preuss School policies and procedures.

When the Preuss School was established, the Administration developed a Personnel Policy Manual (Manual) which was then reviewed by campus HR for compliance with the policy provisions of the Charter. The current HR review concluded that the initial Manual had been changed substantially, and that several personnel policies were out of date. The current Manual includes policies not previously included in the original Manual and the omission of policies that were previously included. HR further concluded that specific SDUSD policies included in the Preuss School Manual should be revised to incorporate the Preuss School's unique organizational structure and relationship to UCSD.

Management Corrective Actions:

1. The external review of Preuss School operations directed by the Chancellor will include:
 - a. Consideration of teacher contract periods of longer than one year, or renewable contracts based on a defined set of criteria made available to teachers at the time the contract is signed.
 - b. Consideration of revisions in the timing for the contract renewal periods to allow those leaving ample time to seek employment in other school settings.
 - c. Revision of Preuss School Personnel Policies to align with current versions of University and applicable SDUSD policies adopted by the Preuss School, and to include additional policy deficiencies noted by Human Resources.

2. In collaboration with University Human Resources, UCSD executive management will direct the conduct of exit interviews with Preuss

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School teachers and or administrators whose contracts have not been extended or who leave voluntarily. In addition, UCSD executive management will consider career appointments for Preuss administrative staff.