



**TO:** Nellie Meyer, Deputy Superintendent of Academics  
**FROM:** Stephen Carr, Director, Office of Internal Audit *usc*  
**DATE:** March 12, 2012  
**RE:** Review of Instructional Minutes at Specific High Schools audit report

---

An Audit titled the "Review of Instructional Minutes at Specific High Schools" was conducted for the 2010/2011 and 2011/2012 school years. The audit report contains information regarding the audit findings and recommendations. Enclosed are copies of the audit report and the response from the Deputy Superintendent of Academics.

c: Members, Board of Education  
B. Kowba  
D. LaGace

email: Members, Audit Committee



## **Review of Instructional Minutes at Specific High Schools**

**February 15, 2012**

### **Introduction**

The San Diego Unified School District's (district) Office of Internal Audit performed a scheduled audit of instructional minutes at Point Loma High School. The review began on November 17, 2011, and included interviews with district employees. The audit included a review of documents from the 2010/2011 and 2011/2012 school years. Contact was made with the district's Attendance Department, Pupil Accounting Department, Legal Services Department, and the administration of Point Loma, Henry and Serra High Schools.

### **Background**

The California Education Code section 46201 provides for monetary incentives to school districts that meet instructional minutes minimums. District Administrative Procedure 4026 provides guidance for this process and district Administrative Circular 67 provides details for the completion of the annual instructional minutes schedule for each school. District Administrative Circular 67 states, "The California Department of Education requires an annual certification of each school's instructional minutes. Substantial financial penalties will be incurred by the district if a school fails to meet the minimum number of instructional minutes required by the state."

Point Loma High School had implemented an instructional minutes schedule for the 2009/2010 school year that included 25 instructional minutes during period 5 for an advisory class. This advisory class is used for intervention for underperforming students and was scheduled before the lunch period. Students with a specific grade point average were not required to attend this advisory class and may move freely around campus including extending their lunch period. During May of 2010, the scheduling of instructional minutes for this advisory class was reviewed. Contact was made with the California Department of Education, the district's auditors, and the district's Legal Services Department. When asked about the structure of the advisory/intervention class counting as instructional minutes, the California Department of Education (CDE) responded that, "The session would NOT count as instructional time." The CDE stated, "To count instructional time, there must be a "true" offering to all students in the grade level. What you are describing is an offering to students who need additional help. There is no "true" offering to students who are not in need of intervention or additional instruction." When asked to clarify this direction the CDE stated, "The instruction must be geared towards ALL students--not a requirement for those students who are not achieving a certain level, not an extra lunch time for those students who are achieving. Even though it is "available" to all students, if specific academic level students are required to take it and all other students have the option of going to an extended lunch, CDE does not view this as a 'true' offering."

The 2011/2012 instructional minutes were approved by the Attendance Program Management Office after correspondence with the Point Loma, Henry, and Serra High School principals.

### Audit Scope and Objectives

The scope of this review included the review of instructional minutes from the 2010/2011 and 2011/2012 school years. The specific objectives of this review were:

- To determine that instructional minutes for Point Loma High School complied with California Education Code, district policy, and district procedures.
- To determine if the advisory/intervention class schedule was implemented by other district high schools.
- To determine that the schedule implemented and based on instructional minutes at Point Loma High School, and other high schools, complied with the direction provided by the California Department of Education.

### Audit Findings Summary

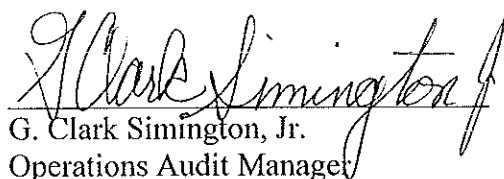
1. The approved instructional minutes for the 2011/2012 school year for Point Loma High School do not conform to the direction provided by the California Department of Education and may not meet the minimum requirement for calculation of instructional minutes.
2. The approved instructional minutes for the 2011/2012 school year for Henry High School do not conform to the direction provided by the California Department of Education and may not meet the minimum requirement for calculation of instructional minutes.
3. The approved instructional minutes for the 2011/2012 school year for Serra High School do not conform to the direction provided by the California Department of Education and may not meet the minimum requirement for calculation of instructional minutes.

### Conclusion

Based on the audit scope and analysis performed by Internal Audit, the advisory/intervention class scheduled at Point Loma High School, Serra High School, and Henry High School is not a "true" offering of instructional minutes as defined by the California Department of Education. The advisory/intervention class structure was continued at Point Loma High School since the 2009/2010 school year and was implemented for the 2010/2011 school year at Serra High School and implemented at Henry High School for the 2011/2012 school year. Approved instructional minutes for Point Loma High School, Serra High School, and Patrick Henry High School may not meet the minimum requirements for instructional minutes since all students are not attending the advisory/intervention classes. California Education Code 46201 provides for a monetary penalty for school districts that do not meet the minimum annual instructional minutes.



W. Stephen Carr  
Director, Office of Internal Audit



G. Clark Simington, Jr.  
Operations Audit Manager

## Explanation of Findings

- 1. The approved instructional minutes for the 2011/2012 school year for Point Loma High School do not conform to the direction provided by the California Department of Education and may not meet the minimum requirement for calculation of instructional minutes.**

Internal audit conducted a review of the approved 2011/2012 instructional minutes for Point Loma High School. This review included analysis of class rosters, student schedules, student grades, and student attendance. An interview was conducted with the principal and a site visit was performed at Point Loma High School during the 5<sup>th</sup> period advisory class. More than 200 students are not scheduled for the 5<sup>th</sup> period advisory class at Point Loma High School. These students wear a specific lanyard for identification and they may eat lunch, go to the library, move around the campus, socialize, or meet with other teachers. Students qualify for the lanyard based on their grade point average. Students that do not qualify by grade point average must attend the scheduled advisory class.

The CDE has provided the district with the direction that the structure of the advisory/intervention class would not count as instructional time. The approved 2011/2012 instructional minutes for Point Loma High School included 25 minutes of instructional time for the advisory/intervention class. Disqualification of the instructional minutes for the advisory/intervention class may result in Point Loma High School not meeting the minimum instructional minutes for the 2011/2012 school year.

### Recommendation

Internal Audit recommends that Point Loma High School develop an approved instructional minutes schedule that conforms to the direction provided by the CDE or have the current advisory/intervention class format approved by the CDE for instructional minute calculation. In addition, all students should be scheduled for the 5<sup>th</sup> period.

- 2. The approved instructional minutes for the 2011/2012 school year for Henry High School do not conform to the direction provided by the California Department of Education and may not meet the minimum requirement for calculation of instructional minutes.**

Internal audit conducted a review of the approved 2011/2012 instructional minutes for Henry High School. This review included analysis of class rosters, student schedules, student grades, and student attendance. An interview was conducted with the principal and a site visit was performed at Henry High School during the advisory period class. All students are scheduled for the advisory period class, but are permitted to leave the classroom after recording their initials and the location and purpose for where they will be on campus. Students not attending the advisory class may go to the library, move around the campus, socialize, or meet with other teachers. These students wear a specific lanyard for identification and qualify for the lanyard based on grade point average. Students that do not qualify by grade point average must attend the scheduled advisory class. Because a significant number of students scheduled to attend the 5<sup>th</sup> period advisory class are not

required to attend and therefore do not attend, as many as 52 students are scheduled into advisory classrooms.

The CDE has provided the district with the direction that the structure of the advisory/intervention class would not count as instructional time. The approved 2011/2012 instructional minutes for Henry High School included 25 minutes of instructional time for the advisory/intervention class. Disqualification of the instructional minutes for the advisory/intervention class may result in Henry High School not meeting the minimum instructional minutes for the 2011/2012 school year.

### **Recommendation**

Internal Audit recommends that Henry High School develop an approved instructional minutes schedule that conforms to the direction provided by the CDE or have the current advisory/intervention class format approved by the CDE for instructional minute calculation.

- 3. The approved instructional minutes for the 2011/2012 school year for Serra High School do not conform to the direction provided by the California Department of Education and may not meet the minimum requirement for calculation of instructional minutes.**

Internal audit conducted a review of the approved 2011/2012 instructional minutes for Serra High School. This review included analysis of class rosters, student schedules, student grades, and student attendance. An interview was conducted with the principal and a site visit was performed at Serra High School during the 5<sup>th</sup> period advisory class. All students are scheduled for the 5<sup>th</sup> period advisory class which is in the same classroom as the 4<sup>th</sup> period class. Students that qualify are not required to attend the 5<sup>th</sup> period advisory class. These students wear a specific lanyard for identification and they may eat lunch, go to the library, move around the campus, socialize, or meet with other teachers. Students qualify for the lanyard based on their grade point average. Students that do not qualify by grade point average must remain in the 4<sup>th</sup> period classroom for the scheduled 5<sup>th</sup> period advisory class. Because a significant number of students scheduled to attend the 5<sup>th</sup> period advisory class are not required to attend and therefore do not attend, as many as 59 students are scheduled into advisory classrooms.


The CDE has provided the district with the direction that the structure of the advisory/intervention class would not count as instructional time. The approved 2011/2012 instructional minutes for Serra High School included 30 minutes of instructional time for the advisory/intervention class. Disqualification of the instructional minutes for the advisory/intervention class may result in Serra High School not meeting the minimum instructional minutes for the 2011/2012 school year.

### **Recommendation**

Internal Audit recommends that Serra High School develop an approved instructional minutes schedule that conforms to the direction provided by the CDE or have the current advisory/intervention class format approved by the CDE for instructional minute calculation.



**MEMORANDUM**

**TO:** S. Carr  
**FROM:**   
N. Meyer  
**DATE:** March 5, 2012  
**RE:** **RESPONSE TO INSTRUCTIONAL MINUTES AT SPECIFIC HIGH SCHOOLS  
AUDIT**

---

This memorandum is prepared in response to the February 15, 2012 draft audit report regarding instructional minutes at specific high schools. The draft report indicates that by including 25 instructional minutes during an advisory/intervention class that is not mandatory for all students, Point Loma, Henry and Serra High Schools may not be providing the required number of instructional minutes per day.

Upon receipt of the final audit report, Area Superintendents of these high schools will be contacted to follow up with site principals to develop a plan to bring these sites into compliance with the required number of instructional minutes per day.

NM:ms

Encl.

c: W. Kowba