

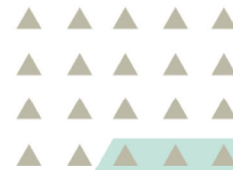
# FY 2025 MID-YEAR ACTIVITY SNAPSHOT

**July 1, 2024 - December 31, 2024**

Prince George's County  
Public School System

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*Integrity and Compliance Officer*



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### **1. Overview**

This report is a snapshot of activities and accomplishments for the Prince George's County Public Schools (PGCPS) Office of Integrity and Compliance (OIC) in the first half of the school year 2024/2025 (SY24-25). It summarizes the activities and accomplishments of the PGCPS OIC between July 1, 2024 thru December 31, 2024. It highlights the OIC team's constant commitment to promoting accountability, efficiency, and effectiveness in the county's public education programs, operations, and leadership.

The OIC was created by Maryland law on July 1, 2023, and my first day at the job as the PGCPS Integrity and Compliance Officer (ICO) was on January 29, 2024. During this inaugural year of the OIC's existence, I promoted/presented the office to internal stakeholders, began learning the institutional history of PGCPS, obtained/set up office space, started establishing OIC standard operating procedures, hosted meetings with key external stakeholders, created OIC team staff position descriptions (4 team members), and subsequently recruited and hired OIC staff between June and December 2024. In August 2024, prior to the start of the SY 24-25, the OIC launched its official web page, which includes a 24/7 access to the OIC's incident report form, an office public phone number, an email address, an OIC information brochure, examples of matters to report to the OIC, the Fiscal Year (FY) 2025 OIC Work Plan, and much more. This new PGCPS transformational office officially began its mission toward improving and preserving the school system's reputation while ensuring public accountability and compliance during SY 24-25.

While we have become more functional while still establishing the infrastructure, operating procedures, protocols, and policies, the OIC has produced a substantial amount of work. Nonetheless, we still face significant resource challenges in meeting the demand for our services. At the OIC's present conservative staffing and funding levels, we are working tirelessly at monitoring, advising, investigating, and overseeing the effectiveness and efficiencies of one of the nation's largest public school systems.

As the ICO, I am now working with the third PGCPs Board of Education Chair over the OIC's first year of existence. As I continue to learn more about PGCPs and train my new staff, I proudly disclose some high-level activity results midway through the SY 24-25. As required by law, a more comprehensive annual report will be produced at the conclusion of FY 2025.

## 2. Mission and Vision

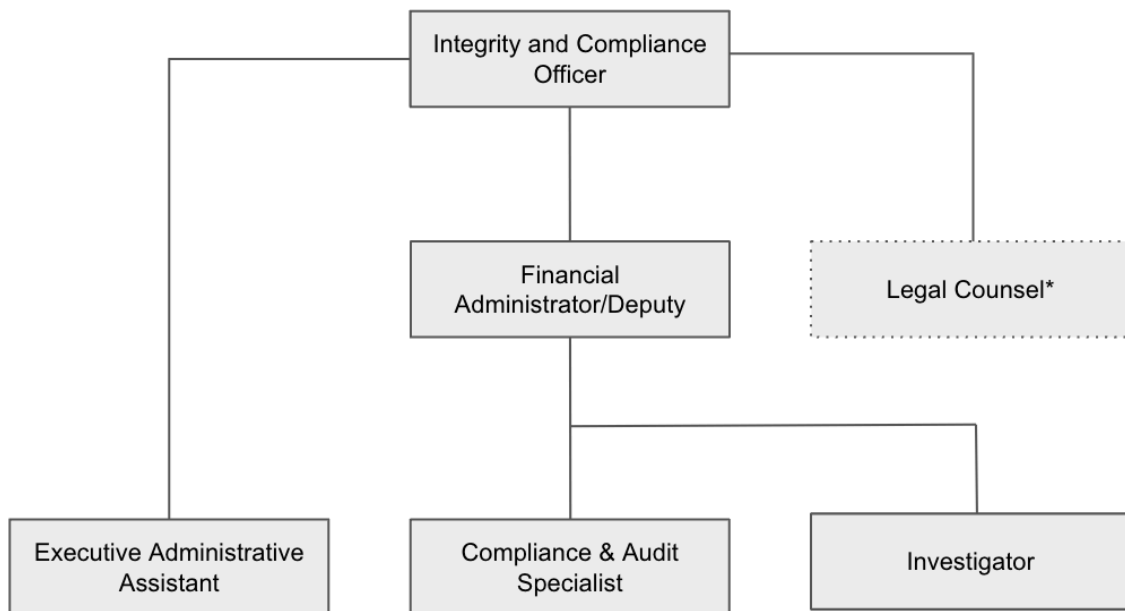
- **Mission:** It is our commitment to improve compliance, rigorous monitoring, and enforcement of all applicable policies, procedures, and laws to prevent and detect fraud, waste, and abuse of funds and property.
- **Vision:** To provide PGCPs continuous assistance in securing the highest standards of integrity and compliance while promoting trust and ensuring accountability into the future.

## 3. Budget Summary, Organization Chart, and Staff Credentials

- **OIC Budget:** In FY24, the ICO as the sole member of the new OIC spent \$144,937.52 of its allocated operating budget. For FY25, as the OIC becomes fully staffed and operational, the total approved budget for the OIC is \$1,317,653 million. This budget funds personnel and other costs to support the day-to-day OIC operations. For FY26, the proposed operating budget for the OIC totals \$1,583,747. This represents an overall increase of \$266,094 from FY25, which includes funding to expand the team from five (5) to six (6) members by adding one additional full-time employee to further support the compliance and audit functions. It is highly likely, the current FY25 budgetary budget will not be burned due to unforeseen office setup setbacks. The FY25 approved budget of this new office equates to 0.0005% or five ten-thousandths of one percent of the overall PGCPs budget.

- Organization and Staff:** The County Council of Prince George's County appointed the Integrity and Compliance Officer (ICO) to oversee the OIC. The ICO is supported by a Financial Administrator/Deputy, a Compliance and Audit Specialist, an Investigator, and an Executive Administrative Assistant. Since early 2024, the office has expanded from the ICO only to a total staff of five (5) individuals who carry out the mission of the OIC.

The organizational structure for FY25 is outlined as follows:



\*The OIC is in the process of contracting an external legal counsel.

- Staff Credentials:** The OIC is staffed by highly educated professionals with specialized backgrounds and credentials who are committed to their work. The quality of the work reflects the team's experience and expertise in various fields, including law enforcement, auditing, accounting, compliance, risk analysis, fraud prevention, fraud detection, and legal studies. This diverse background and knowledge base ensures effective oversight of the PGCPs in executing policies and fiscal operations.

#### 4. Capturing Strategic Priorities, Activities and Accomplishments

The OIC documented adjustments to its strategic plan, and highlighted activities and accomplishments on the following reports:

Document	Outcome
<b>FY25 OIC Work Plan</b>	Adjustments were made to incorporate new work plan items projected for the rest of FY25, including upcoming audit work, management advisories, ongoing investigations and OIC outreach program.
<b>FY25 Mid-Year Snapshot</b>	Outlined metrics, findings, recommendations, potential risks identified, among other activities, for the period of July 1, 2024 thru Dec. 31, 2024.

#### 5. Key Achievements

During the calendar year 2024, the OIC received 73 complaints (57 direct complaints and 16 complaints elsewhere, but copied to the OIC). The OIC issued 10 referrals, opened 23 investigations, and 24 complaints remain under review for proper disposition. The office closed 11 investigations. As you will read in this report, OIC formal and informal management advisories had a notable impact on PGCPs.

The OIC has issued formal OIC Management Advisory memorandums to the Board of Education and/or PGCPs leadership. Additionally, the OIC communicated informal direction and/or advice on countless occasions to the school system. The OIC also suggested audit areas to the Board of Education Internal Audit office in preparation for their FY25 Audit Plan.

In the first half of FY25, the OIC has issued the following:

- **Management Advisories** - Four (4) management advisories providing recommendations on policy enforcement and improvements for the effectiveness of procedures and operations:

Date Issued	Matter	PGCPs Component
1. 07/05/2024	Violation of the Board of Education's attendance policy	Board of Education
2. 07/29/2024	Revision to incorporate the existence and authority of the OIC	Board of Education

	in PGCPs' Administrative Procedure	
3. 08/21/2024	OIC input for Internal Audit's FY25 Audit Plan and other areas of collaboration	Internal Audit
4. 12/19/2024	Enforcement of Financial Disclosure Statement (FDS) Filings	Board of Education

- **Investigations** - One (1) Memorandum was issued to management, and one (1) Investigative Report was issued reporting the total of findings identified throughout the investigative process:

Date Issued	Matter	PGCPS Component
1. 10/07/2024	Improper Use of PGCPs Fleet Vehicle	Chief Operating Officer
2. 11/04/2024	Missing PGCPs Board Member	Board of Education

- **FY26 PGCPs Budgetary Cursory Analysis** - In late December 2024, the OIC team conducted a cursory analysis of the Superintendent's FY26 Proposed Budget with the purpose to gather an understanding and identify budget areas of interest. A meeting was scheduled on January 15, 2025, with the Chief Financial Officer and the Budget Director to learn more of the budget development process, insights on the areas of OIC inquiry identified, and any challenges faced during the budget development process. An OIC FY26 Proposed Budget analysis opinion memorandum will be issued by the OIC in February 2025.

## 6. Risk Assessment Activities

### A. Continuous Risk Assessment

The OIC is implementing a risk-based approach focused on the identification, assessment, and mitigation of high-risk areas. This strategic plan will drive OIC's decisions on areas to review, evaluate, or audit the effectiveness of the school system's operations. In addition, this plan is designed to generate leads for investigating and reporting on areas that are vulnerable to fraud, waste, or abuse of PGCPs resources.

Continuous Risk Assessment activities Include:

- **Deploy Annual Risk Assessment Survey** to incorporate collaboration and input of PGCPS stakeholders to identify new, critical, and emerging areas of risk in addition to opportunities for improvement in programs, policies, procedures, and operations.
- **Reviewing and assessing the nature of complaints** received to identify patterns that may reveal high-risk areas related to deficiencies in operations, policies, programs, and opportunities of fraud, waste, and abuse of PGCPS funds and resources
- **Obtaining risk insights through observations and interactions** with other PGCPS offices, which support the OIC infrastructure and operations (e.g., Purchasing Office, Billing Department, Human Resources, Warehouse, etc.)
- **Communicating risk information to PGCPS stakeholders** via management advisories, investigative audits, evaluations, reviews, and other reporting
- **Monitoring the implementation of OIC recommendations** by following up and meeting with school system officials to ensure the corrective action is agreed upon, understood, and implemented.

## **B. Identification of Potential Risk Areas**

During the first half of FY25, the OIC has observed and identified potential areas of risk relating to operational inefficiencies, opportunities for mismanagement, and improper use of PGCPS resources. The OIC is continuously assessing these areas of concern for a subsequent review, evaluation, audit, or investigation.

Some major high-risk areas identified include:

- **Governance Framework:** Policies and procedures across the organization may not provide effective and clear direction to the PGCPS administration and staff. Observed delays in review and revisions of policies and procedures further result in outdated guidance that does not reflect the actual operations and procedures in practice. Additionally, opportunities are missed in maintaining compliance with applicable laws and regulations. As such, the governance framework is identified as an area of high risk for non-compliance, lack of accountability, misalignment with applicable legislation, and ineffective implementation, among other detrimental consequences.

- **Soliciting and Granting Contracted Services:** The OIC has observed a lack of vendor due diligence to include minimal efforts and involvement from the Procurement staff in providing adequate guidance to vendors for the effective completion and execution of a PGCPS contract. In addition to inadequate governance, non-adherence to operational procedures and a lack of proper internal controls (i.e., review processes) may result in contractual agreements that leave the organization at risk.
- **Inspection/Approval of Procured Goods and Services:** Common practice requires review and/or approval of procured goods and services by the receiving entity against the stipulations of a purchase agreement and/or statement of work, prior to issuing payment for vendor invoices. A lack of or weakness in such internal controls can render payment for defective services and additional expenses to repair or replace needed goods and services in addition to loss of opportunity and delays. As such, the inherent risk is considered to be high.
- **Disability Accommodation Process:** Federal, as well as state, laws and regulations stipulate the responsibilities and requirements of employers around employee rights when it comes to disabilities and requests for workplace accommodations. Additionally, the process involved in processing the associated leave, accommodation requests, and return-to-work assignments requires proper reporting and timely due diligence. Observed weaknesses in this area prevent the organization from mitigating the risk of liability resulting from violations of laws/regulations as well as loss of unnecessary time away from work, employee compensation, and paid extended leave.
- **Communication between PGCPS Offices:** The OIC has observed a lack of collaboration between different PGCPS functions, which results in operational delays, inefficiencies in the day-to-day operations of the school system, and unnecessary opportunities to waste school resources (e.g., the Purchasing Office does not notify Accounts Payable of the execution of a new contract to set up the invoicing process with the new vendor contract).

## 7. Management Advisories

The OIC issued four (4) Management Advisories during the first half of FY25 to include a total of 16 recommendations made relating to policy enforcement and improvements for the effectiveness of procedures and operations. The following depicts the details of the recommendations included in the management advisories issued during the course of quarters one (1) and two (2) of FY25.



<b>1. Violations of the Board of Education's Attendance Policy</b>	
<b>OIC Recommendation</b>	<b>Status/Outcome</b>
1. Board members are to notify, as well, of any potential absence of an emergency meeting, public hearings, appeals, and executive sessions 24 hours prior to such engagement to ensure accountability and adherence to Board Policy 0108.	Unknown
2. Update Board Policy 0108 to require publishing of the Board's attendance record on the Board's website.	Not Implemented
3. Create a policy as soon as possible granting appeals in favor of the appellant (due to PGCPs caused hardships) if the Board fails to have a quorum on a set number (e.g., two or three) of occasions.	Not Implemented

<b>2. Revision to Administrative Procedure (AP) 2200 (Improper Conduct and Financial Impropriety)</b>	
<b>OIC Recommendation</b>	<b>Status/Outcome</b>
1. Clarify language that OIC has the primary responsibility for the investigation of financial impropriety.	Not Implemented
2. Add the "Office of Integrity and Compliance" as a reporting channel.	Implemented in October 14, 2024
3. Add the 'Office of Integrity and Compliance' as a referral channel for an administrative complaint filed with the Superintendent for matters related to Financial Impropriety.	Not Implemented
4. Request for the PGCPs' General Counsel to review the legality of the third condition to grant Whistleblower Protection.	Not Implemented
5. Clarifying language to provide the Office of Integrity and Compliance (instead of Internal Audit) will investigate and objectively evaluate information obtained relative to allegations of financial impropriety. Internal Audit will	Not Implemented

continue to investigate and objectively evaluate information relative to allegations of improper conduct.	
6. Equity Labor Relations Office (ELRO), in coordination with the PGCPS Office of Government Relations, Compliance, and Procedures (OGRCP), must provide a newly revised version of AP 2200 by August 15, 2024, after meeting with Internal Audit and the OIC for inputs and comments, in addition to the proposed recommendations included in this memo. It is crucial that the revised AP 2200 be corrected and published before employees report back to the schools.	Partially implemented on October 14, 2024. AP 2200 was revised to implement one OIC recommendation (see #2 above)

3. OIC input for Internal Audit’s FY25 Audit Plan and other areas of collaboration	
OIC Recommendation	Status/Outcome
1. Audit Areas to be incorporated in the Internal Audit’s FY25 Audit Plan: 1) <i>Board Policy &amp; Administrative Procedures Audit (Process Audit)</i> , 2) <i>Construction Audit (P3 Phase I)</i> , 3) <i>Performance Evaluations (Director &amp; Above)</i> , 4) <i>Warehouse Audit</i> , 5) <i>Office of General Counsel (OGC) Inventory Management Audit</i>	Not Implemented
2. Internal Audit to collaborate in other areas with the OIC: 1) <i>Construction Audit (P3 Phase I)</i> ; 2) <i>Change Hotline (Filter calls into two types: (1) Human Resources matters and (2) Fraud, Waste, and Abuse)</i> ; 3) <i>Collaboration between Internal Audit and the Ethics Advisory Panel</i>	Not Implemented

4. Enforcement of Financial Disclosure Statement (FDS) Filings	
OIC Recommendation	Status/Outcome
1. Revise and update the training materials on the Panel’s duties and responsibilities	Not Implemented
2. Create a tracker for FDS Deadlines and Delinquent Filings	Not Implemented

3. Provide notice to delinquent FDS filers	Not Implemented
4. Impose a penalty for late filing	Not Implemented
5. Establish a Due Diligence Procedure for the Review of Financial Disclosures	Not Implemented

## 8. Complaint Intake and Investigations

### A. Complaint Population

As of December 20, 2024, the OIC received a total of 73 complaints, through various channels to include the OIC Inbox, OIC Incident Report, office phone, postal mail, staff emails, verbal reports, and through observation of PGCPs operations. See below for the number of complaints received through each reporting channel.

Reporting Medium	Number of Complaints
OIC Inbox	31
Staff Email	14
OIC Incident Form	13
Verbal	4
Postal Mail	4
OIC Observation	1
OIC Office Phone	1
Multiple Channels	5
<b>Total</b>	<b>73</b>

## B. Complaint Assessment/Dispositioning

The OIC's intake process includes an initial assessment plan to determine the appropriate next steps. For complaints that pertain to concerns unrelated to fraud, waste, or abuse, the OIC refers the complaint to the appropriate PGCPD division for review and investigation. Also, the OIC is often notified or informed for awareness of complaints that are reported to other PGCPD divisions. In both instances, the OIC will monitor complaints handled by other divisions and follow up on actions taken by PGCPD management to determine if reported issues were addressed or if additional investigative actions are needed.

As depicted below, the OIC maintained ownership of 23 complaints received through the intake process:

Complaint Population	
Complaint Coverage	Count
Cases Held by OIC	23
Cases Referred to Other PGCPD Divisions	10
Cases Under Review for Proper Disposition	24
OIC Notified of Complaints to Other Divisions	16
<b>Total</b>	<b>73</b>

## C. Complaints Held by The OIC

Subsequent to determining proper division coverage, cases held by the OIC are assigned for investigation. Depending on the results of the planning process and remaining phases of the investigation, cases determined to have a lack of allegation details for further action or contain allegations that do not relate to any PGCPD employee, operation, or funds will be closed.

The cases managed by the OIC vary across different categories to include the following areas:

<b>Cases Held by OIC</b>	
<b>Complaint Category</b>	<b>Count</b>
Earning Improper Pay/Time	2
Embezzlement/Theft of Assets	1
Employee Comp/Leave/Benefits/Rights	2
Failed/Improper Admin Corrective Actions	2
Intimidation/Harassment by Senior Leadership	1
Misuse/Neglect of Resources/Property	2
Misuse/Needless Expenditures	1
Other/Multiple Policy/Regulation Violation	2
Other Suspicious Activity	2
Teacher/Student v Student Relations	1
Transportation Safety	2
Unethical/Mismanagement of Operations	5
<b>Total</b>	<b>23</b>

#### **D. Reporting Results**

During the second half of calendar year 2024, the OIC issued one (1) Closure Memorandum and one (1) Investigative Report identifying a total of 4 findings identified throughout the investigative process.

The following depicts the details of the Investigative Reports issued during the course of FY25:

### 1. Improper assignment and/or use of a PGCPS fleet vehicle

There were no findings reported as a result of the investigative work performed. As such, a memorandum was issued to the PGCPS Chief Operating Officer to notify the closure of the case.

### 2. Missing PGCPS' Board Member

#### Investigative Findings

1. The Board leadership failed to promptly address Board attendance violations to hold the former Board member accountable.
2. The Board failed to pursue a timely and actionable procedural remedy to request his removal from the PGCPS Board action or elevation to the Maryland State Board of Education on the basis of willful neglect of duty.
3. The Board demonstrated a lack of knowledge and/or understanding of their own internal policies and applicable law.

## 9. Training and Education

On November 13-15, 2024, the ICO and ICO Deputy attended the *2024 Association of Inspector General (AIG) Annual Training Conference* in New Orleans, Louisiana. This was an enriching opportunity for the OIC leadership to connect with other Inspector Generals (IGs), share best practices and learn from experienced speakers on the critical role of maintaining independence in both fact and appearance. Some of the topics covered during the AIG conference and relevant to the IG nature of our work included the following:

- IG Report Writing
- Threats to Independence
- Building Engagement Through Annual Reports
- Investigative Planning
- Education for Effective Oversight
- The Fight for Independence
- Developing Analytics Tools Using Real Cases
- Practices and Challenges of an Office of Inspector General
- Avoiding Implicit Bias in Investigations

## **10. Stakeholder Engagement and Future Initiatives**

Stakeholder Engagement and Future Initiatives will be discussed in the FY25 Annual Report.

## **11. Conclusion**

I look forward to continuing to work with the Superintendent, the Board of Education, other PGCPs stakeholders, and the public to foster an environment of integrity within the school system. Although the OIC is new, and the 2025 calendar year will be the first full year the OIC has had staff, my goal is to demonstrate the OIC's positive impact on PGCPs through transparency, accountability, and overall system-wide improvements.

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