



ANNUAL REPORT

Office of Integrity and
Compliance

FISCAL YEAR 2025

Frank S. Turner II

Integrity and Compliance Officer





Office of Integrity and Compliance

Frank Turner II, Integrity & Compliance Officer

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Statement from the Integrity and Compliance Officer

It is with immense pride and gratitude that I share the inaugural annual report from the Prince George's County Public Schools (PGCPS) Office of Integrity and Compliance (OIC). This report chronicles the journey from January 29, 2024, my first day as the Integrity and Compliance Officer, through the close of the OIC's first fiscal year (FY) on June 30, 2025.

Established by Maryland law on July 1, 2023, the OIC was founded on the pillars of credible, independent oversight, transparency, and operational improvements. This past year has been dedicated to building this foundational office from the ground up by establishing vital procedures, recruiting/hiring dedicated staff, and launching a public presence both online and in person. The OIC actively engaged in monitoring, advisory, audit, and investigative functions, while simultaneously establishing office space, meeting stakeholders, and the continual onboarding of a new team. This document fulfills the OIC's legal reporting requirement for FY 2025 and offers a high-level overview of our activities and accomplishments.

As I continue to learn, navigate the institutional history of PGCPS, and train the new OIC staff, I am particularly grateful for the trust placed in the OIC by the residents, employees, and stakeholders who have courageously shared their concerns. Your willingness to come forward is vital to our mission. Together, we are committed to fostering continuous improvements and upholding integrity within PGCPS.

Frank S. Turner II

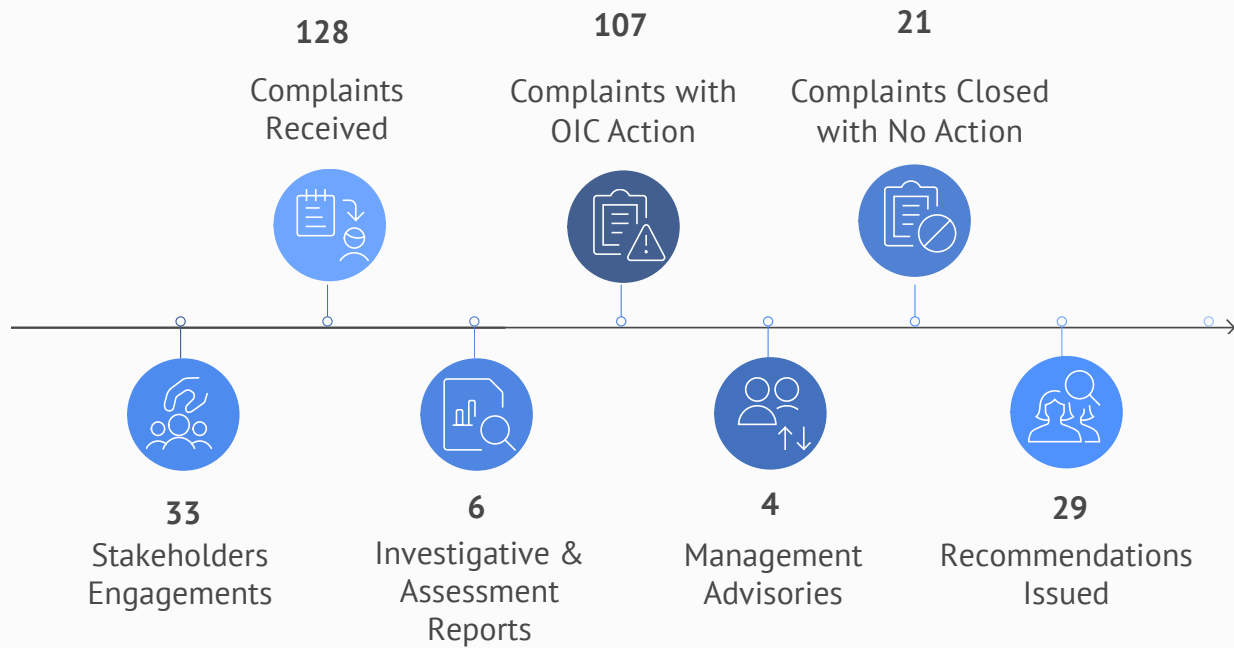
PGCPS Integrity and Compliance Officer

Table of Contents

FY 2025 Highlights	4
Mission, Vision, & Responsibilities	5
Organization, Staff & Budget	6
Establishing Our Presence & Operations	7
Our Work:	9
Overview of Complaint Activity	9
Significant Findings	11
Advisories to Mitigate Risks	13
Understanding, Assessing, and Monitoring PGCPs Operations	14
Other Investigative Efforts	16
Audit Related Activities	17
Outreach Efforts & Engagement with Stakeholders	18
Challenges in OIC Operational Execution	19
FY 2026 Initiatives & Strategic Goals	20
Appendix 1: Tracking Findings & Recommendations	21

FY 2025 Highlights

Below are the most significant highlights of OIC's work and impact during since January 2024:





Mission

To improve compliance, rigorously monitor, and enforce all applicable policies, procedures, and laws to prevent and detect fraud, waste, and abuse of funds and property while elevating its public service standards, ensuring transparent operations, robust accountability, and strengthened public trust.

Vision

To provide Prince George's County Public School System (PGCPS) continuous assistance in securing the highest standards of integrity and compliance while promoting trust and ensuring accountability into the future.

Responsibilities

- ✦ **Providing independent evaluation and recommendations** to PGCPS and the Prince George's County Council regarding opportunities to preserve PGCPS's reputation and improve the effectiveness of programs, policies, practices, and operations
 - ✦ **Ensure public accountability** by preventing, investigating, and reporting instances of fraud, waste, and abuse of property or funds
 - ✦ **Examine, evaluate, and report the adequacy and effectiveness of internal controls** and their related accounting, financial, technology, and operational policies
 - ✦ **Report noncompliance** and propose ways to improve employee compliance with applicable law, policy, and ethical standards of conduct
 - ✦ **Report any serious violations of federal, state, or local law** to law enforcement agencies, or any other agency with jurisdiction to enforce the law
-

Organization, Staff & Budget

Organizational Structure: The Prince George's County Council appointed the Integrity and Compliance Officer (ICO) to lead and oversee the OIC. The ICO is supported by a Financial Administrator/Deputy, a Compliance and Audit Specialist, two (2) Investigators, and an Executive Administrative Assistant. Since early 2024, the office has expanded from the ICO's appointment to a total of six (6) staff members who carry out the mission of the OIC.

OIC's Organization Chart



Staff Qualifications: 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 and detection, and legal studies. This diverse background and knowledge base ensures effective oversight of the PGCPs in executing policies and fiscal operations.

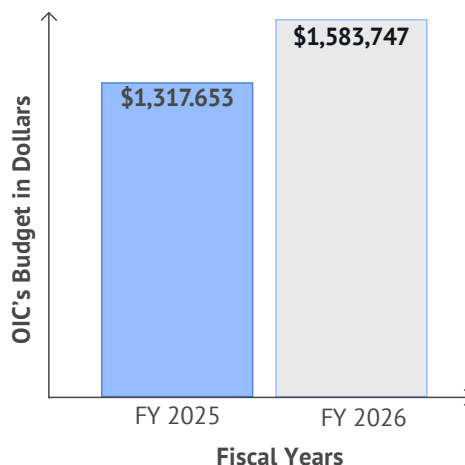
Budget: For FY 2025, the total estimated budget for the OIC was \$1,317,653. This budget funds personnel and other costs to support the day-to-day OIC operations. For FY 2026, the proposed operating budget for the OIC is \$1,583,747. This amount represents an overall increase of \$266,094 from FY 2025, which includes funding to staff one additional full time employee to further support the compliance and audit functions. The FY 2025 budgetary cost of the OIC represents 0.0005448 of the overall PGCPs \$2.9 billion budget.



Minimal PGCPs Budgetary Cost

0.054% of PGCPs's total budget is allocated to OIC's operations

FY 2026 OIC Budget Increase of \$266,094 for staffing enhancement



Establishing Our Presence & Operations

Onboarding Inaugural OIC Staff: After the ICO's appointment, the OIC has onboarded five (5) staff members since June 2024. The office is expecting to bring a second Compliance & Audit Specialist within the next first few months of FY 2026 to complete the OIC team:

Onboarded	January 2024>	Integrity and Compliance Officer
	June 2024>	Financial Administrator/ ICO Deputy
	July 2024>	Executive Administrative Assistant
	September 2024>	Compliance & Audit Specialist #1
	December 2024>	Investigator #1
Upcoming	May 2025>	Investigator #2
	September 2025>	Compliance & Audit Specialist #2



Promoting Our Role: The OIC's main priority at the beginning of FY 2025 was to raise awareness of the existence of this office, expand reach, and ultimately build trust within the PGCPs community.



OIC's Informational Brochure



Launched OIC's **Webpage** to establish online presence and accessibility to PGCPs community



Distributed OIC's **Informational Brochure** to the PGCPs Community



Incorporated the OIC as a reporting channel in **PGCPs administrative procedure**



Developed **OIC Training Module** for PGCPs Staff to be launched for School Year (SY) 2025-2026



Participated as **guest speakers at PGCPs executive retreats and summits** to educate about OIC's role

Establishing Our Presence & Operations Cont.

Complaint Intake Channels: The OIC established several channels to report fraud, waste, or abuse within PGCPs:



OIC Email:

Send an electronic correspondence to:
oic@pgcps.org



Online Incident Report Form:

Submit a complaint:
<https://www.pgcps.org/offices/integrity-and-compliance>



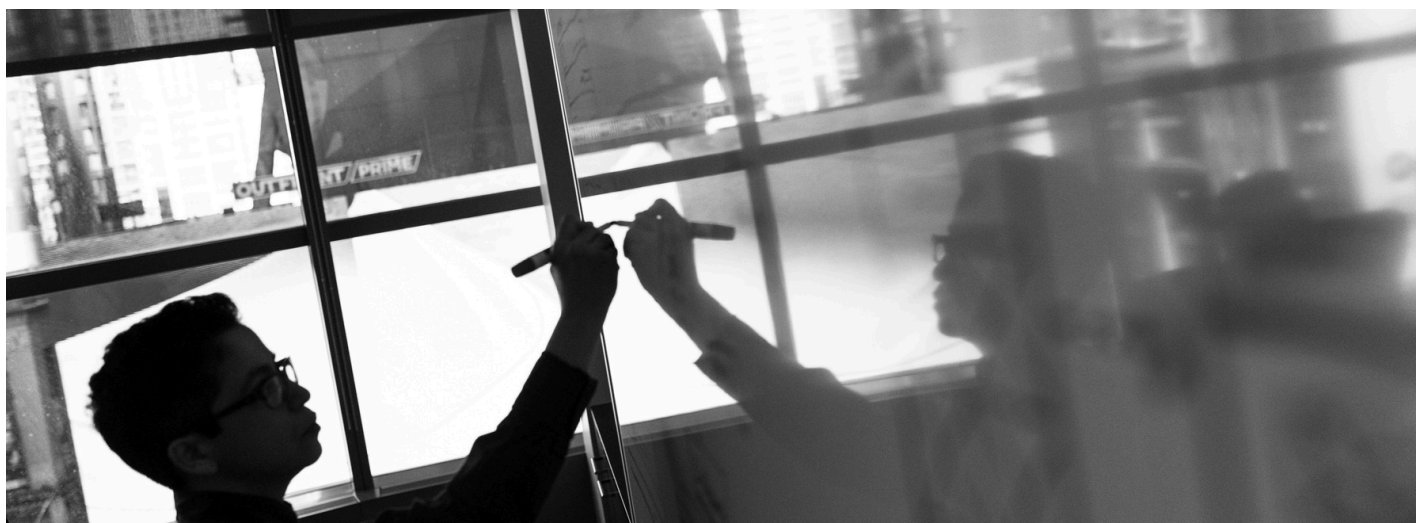
Mailing Address:

Wayne K. Curry Admin. Bldg.
Attn: PGCPs Integrity & Compliance Officer
1301 McCormick Dr., Suite 3-124
Largo, MD



Phone:

Call us at 301-952-6113



The Work Plan: At the beginning of FY 2025, the OIC **established and captured periodic goals and priorities** in a work plan based on an assessment of relative risks. The work plan was published in the OIC's website at the beginning of FY 2025 to allow the PGCPs community to understand the focus areas of the OIC and how it will fulfill its mission to promote efficiency, effectiveness, and accountability within PGCPs. This work plan **is regularly reviewed** and updated as needed to closely align the work planning process with current priorities.

- **Planned Activities**

Ongoing investigations, advisories, evaluations and audit engagements

- **Areas of Focus**

Delineates strategic areas and planned objectives

- **Outreach Program**

Strategic outreach to provide awareness about OIC's role within PGCPs

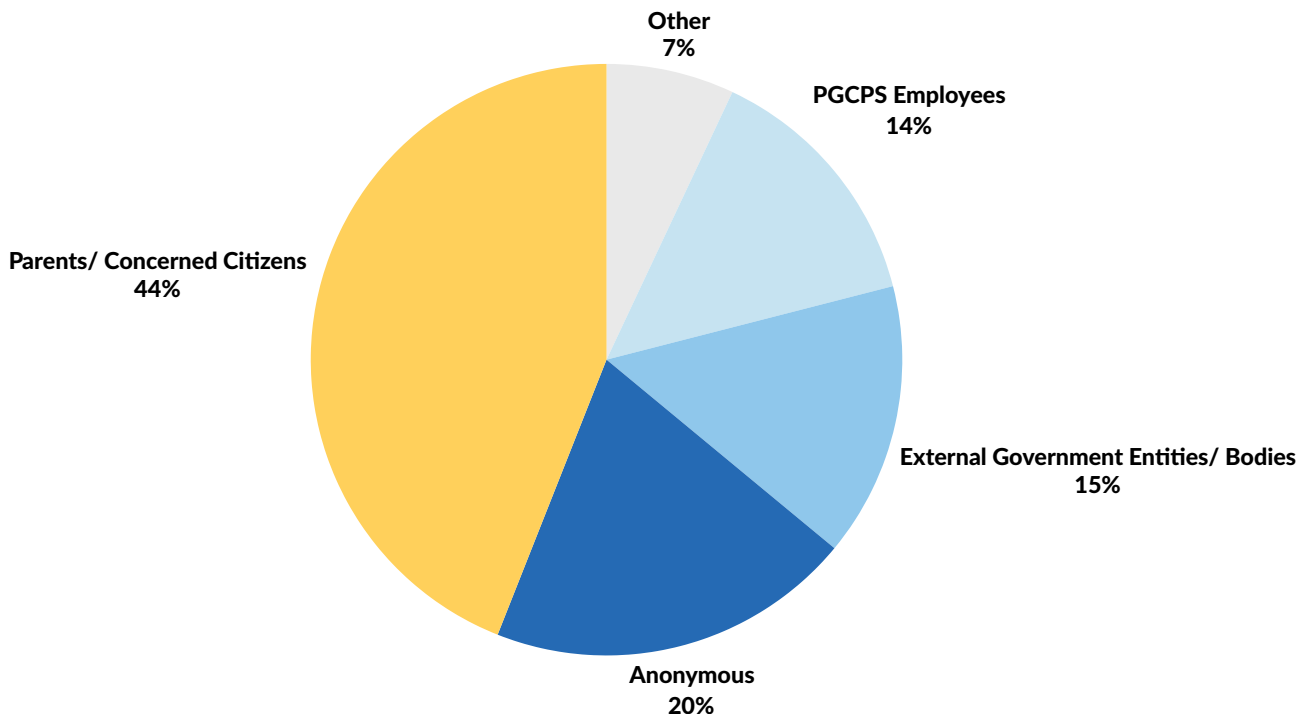
Our Work: Overview of Complaint Activity

Complaint Population: The OIC received a total of 128 complaints from the onset of operations in February 2024 through June 30, 2025. Some relating to allegations of fraud, waste, and/or abuse, while others were unrelated to financial mismanagement. The complaints were received through various channels to include the OIC Inbox, OIC Incident Report Form, telephone, traditional mail, direct emails, verbal reports, and observation of PGCPS operations. Although 20% of the total amount of complaints were submitted anonymously, complainants generally included parents, concerned citizens, PGCPS staff, and other external government entities. Of the 128 total complaints received, the OIC took some degree of action into a total of 107 complaints.

Areas of Concern Based on Complaints Received

- ➔ Financial Mismanagement and Resource Abuse
- ➔ Leadership and Staff Relations
- ➔ Policy and Compliance Violations
- ➔ Employee Compensation & Benefits
- ➔ Staff to Student Relations & Conduct
- ➔ Safety and Security
- ➔ Inadequate Administrative Action

Type of Complainants



Our Work: Overview of Complaint Activity Cont.

Intake Process: The OIC follows a review plan to carefully assess whether the complaint falls within the OIC’s jurisdiction. If a complaint has allegations indicating **systematic, program impact, or high-profile fraud, waste, or abuse**, the OIC will conduct a preliminary investigative inquiry to validate the information and determine potential violations to applicable law, policies, or procedures, and request additional details, if needed. If the complaint was previously reported to another PGCPs office or another external authority for investigation, the OIC will not take any immediate action to prevent unnecessary duplication of efforts. Based on the results of the initial assessment, a determination is made to either conduct a full investigation; hold and monitor external investigative actions; or to administratively close it. Therefore, not every complaint leads to a complete investigation.

Complaint Intake Process



Complaint Referrals: Following the review process, if the complaint has allegations indicating **fraud, waste, or abuse at the school-based level (non-systematic or programmatic)**, the OIC typically refers the matter to the PGCPs Office of Internal Audit for action. For complaints that pertain to concerns **unrelated to fraud, waste, or abuse**, the OIC typically refers the matter to the appropriate PGCPs division or external authority for review and investigation. Also, the OIC often is notified or informed for awareness on complaints that are reported to other PGCPs divisions. In both instances, the OIC will monitor complaints handled by other divisions and follow-up within 30 days on actions taken by PGCPs management to determine if reported issues were addressed or if additional investigative actions are needed.



Assisting Complainants: The OIC reviews and assesses each complaint, providing guidance to complainants on how to address their concerns. This often includes advice on relevant policies, available grievance procedures, or directing them to the appropriate PGCPs division or office for support. This method ensures that the system follows established procedures for matters outside the OIC’s direct scope, while also allowing the OIC to monitor and evaluate PGCPs operations.

Our Work: Significant Findings

The OIC investigates allegations of fraud, waste, or abuse of PGCPs funds and property. Additionally, the OIC conducts proactive reviews assessing the effectiveness and efficiency of PGCPs programs, operations, and procedures. The OIC staff develops specific and thorough recommendations to address inefficiencies or systemic weaknesses identified.



Compensated Missing Board Member Working for an Out of State School System

The OIC investigated allegations related to a Board member working full-time for an out of state school district, while still maintaining a compensated and elected seat as a PGCPs Board member. Prior to a formal complaint being sent to the OIC, the ICO had already advised Board leadership regarding his observed absences of the Board member and provided written recommendations for the Board to enforce and/or strengthen the attendance policy for Board members. The results of this investigation revealed the Board leadership failed to promptly address violations to the Board's attendance policy to hold the former Board member accountable. The formal referral was made to the OIC after the matter was covered by local news media. In addition, the investigation also revealed that the Board failed to pursue a timely and actionable remedy to request the Board member's removal from the Board on the basis of willful neglect of duty. The Board's omission to take prompt action on this matter created the right set of circumstances for wasteful receipt of PGCPs funds and/or property by an absent Board member in the amount of \$9,792.32.



Misuse of Substitute Coverage Pay

The OIC investigated claims that a PGCPs Resource Teacher received their full salary in addition to substitute coverage pay though the Resource Teacher exclusively filled a vacant Classroom Teacher position without performing the duties of their regular assignment. The OIC's review revealed that a last minute resignation at the start of the school year led the Principal in assigning the Resource Teacher to cover the vacancy until filled. Per the school Principal, this decision supported efforts for establishing a stable learning environment. Although no violations of policy/procedures were identified, the employee received significantly more coverage pay than all other staff. The review confirmed the Resource Teacher was not able to fulfill the duties of their regular and substitute coverage assignments. However, the teacher was entitled to compensation for both assignments, per the negotiated agreement between the PGCPs Board and Prince George's County Educators' Association (PGCEA). The OIC issued one (1) recommendation proposing stronger language within the PGCEA agreement to ensure members fulfill the duties of their regularly assigned position in addition to any coverage assignments in order to receive compensation for both. An additional recommendation, as proposed by School Administration, was issued to decrease increments in which substitute coverage is paid, from one (1) hour to half (.5) hour, to better align with time worked. Such a change could lead to potential annual savings of up to \$1.3 million across all PGCPs schools.

Our Work: Significant Findings Cont.

PGCPs improperly paid \$36,111.92 for legal fees incurred by a Board Member

The OIC's investigation substantiated allegations that legal fees incurred by a former Board member and paid by PGCPs were not for the defense of the member during litigation, as required by state law. The investigation revealed the approval for PGCPs payment was reliant on the legal opinion issued by the Board's counsel, who interpreted that the Board member incurred legal fees as part of a litigative process. However, the OIC found that the legal fees were incurred as a result of the Board member being subject to an investigation. Also, the Board member incurred such legal fees to file a lawsuit against PGCPs, taking a non-defendant position. The OIC's final report included four (4) recommendations for the Board to rectify internal controls, processes, and compliance procedures related to the approval and payment of legal fees incurred by a Board member.

Workplace Accommodation

The OIC investigated a complaint from a PGCPs employee who alleged they did not receive reasonable accommodations after workplace accidents and major surgery, despite submitting a physician's work release with restrictions. The investigation determined that PGCPs provided an untimely response to the employee's medical leave request, improperly denied the request for workplace accommodations, and failed to engage in the interactive process mandated by the Americans with Disabilities Act (ADA). Furthermore, PGCPs failed to report the employee's inpatient hospitalization following the workplace accidents, a requirement of the Maryland Occupational Safety and Health Program. As a result of these findings, the OIC issued four recommendations to enhance internal controls, practices, and procedures concerning accident reporting, medical leave requests, and the processing of reasonable accommodation requests to ensure regulatory compliance.

Investigative Review & Inquiry of Fundings Status: DuVal Athletic Field

The OIC investigated the renovation priorities for DuVal High School's stadium, the use of a Capital Grant for athletic field improvements, and issues with defective landscaping services. The review revealed that PGCPs paid a contractor \$10,359 who used hazardous contaminated soil on the athletic field, resulting in additional expenses for remediation and legal action. PGCPs secured a \$500,000 Capital Grant and additional funding through the Aging Schools Program for Phase I of the renovations with plans to seek additional future funding. The OIC found that \$265,059 in costs were absorbed by PGCPs for remediating efforts that were later sought in damages via legal counsel. The OIC recommended implementing internal controls to ensure inspection and approval of procured services and to withhold payment from contractors who fail to meet contractual obligations.

Our Work: **Advisories to Mitigate Risks**

The OIC issued four (4) Management Advisories during FY 2025 to include a total of 16 recommendations related to policy enforcement and operational improvements:

Violations to Board's Attendance Policy

1

Based on observation of a Board of a member's recurrent absences, as well as a public complaint, the OIC issued an advisory reminding the Board of the requirement for each member of the Board to participate in regularly scheduled Board meetings and other required engagements, pursuant to Board Policy. The OIC emphasized that the Board Chair has the duty to file a complaint with the Maryland State Board for a request for removal in the event a Board member is considered absent per Board Policy.

OIC's Legal Authority to Investigate Financial Impropriety

2

In July 2024, the OIC formally opposed PGCP's newly revised PGCP's Administrative Procedure 2200 as it conflicted with OIC's statutory authority by granting primary responsibility over fraud, waste, and abuse to Internal Audit. The OIC requested for the Board to revise this procedure to acknowledge the OIC's statutory authority on this investigative matter. The OIC proposed six (6) amendments to clarify language in the procedure to incorporate OIC's investigative authority on financial impropriety matters and therefore, add the OIC as the main PGCP's reporting channel for such complaints.

OIC's Input on PGCP's FY 2025 Audit Plan

3

As a result of the FY 2025 audit brainstorming kick-off meeting with Internal Audit, the OIC issued an advisory recommending five (5) audit areas for Internal Audit's FY 2025 Audit Plan and other projects to promote collaboration between the two (2) offices. The advisory also noted the Board's concerns shared during the coordination meeting about a perceived overlap between the roles and responsibilities of both offices. However, the OIC will focus mostly on investigations and/or investigative audits. In addition, the OIC distributed a Risk Assessment Input form to relevant PGCP's stakeholders to obtain their feedback in sharing potential areas of risk.

Lack of Enforcement of Financial Disclosure Statement Filings

4

A former Board Member failed to file a final Financial Disclosure Statement within 60 days after resigning, as required by Board Policy. This omission denoted the lack of compliance and enforcement of this requirement, which may present opportunities for conflicts of interest without proper oversight or accountability. The OIC provided five (5) recommendations to prevent similar situations, aiming to ensure policy adherence and to enhance the Ethics Panel's role in tracking, maintaining and reviewing Financial Disclosure Statement.

Our Work: Understanding, Assessing, and Monitoring PGCPS Operations

The work of the OIC in FY 2025 included opportunities to understand, monitor and provide timely, unbiased, and impactful input on the effectiveness of PGCPS systemic operations. Below is a summary of our most significant work on this area:

OIC Special Project - PGCPs Budget Development Process

The OIC conducted a cursory assessment of seven (7) budgetary areas of the proposed \$2.9 billion PGCPs operating budget for FY 2026, which were indicative of the challenges observed during the PGCPs budget development process. This assessment identified six (6) limitations of potential constraints on available funds and cost increases to the school system. The OIC's final assessment report was delivered to the Prince George's County Council in anticipation of the budget requested cycle.

School Safety - Doors Chained

A complaint was referred to the OIC alleging that the school custodians and building services at a PGCPs high school were securing the exit doors with chains during the day while the school was occupied. Pursuant to its authority, the OIC addressed this matter from an operational standpoint as an initial assessment revealed ongoing concerns around the safety of students and staff as well as compliance with applicable laws, regulations, and administrative procedures. The OIC coordinated closure of this complaint to the attention of the Director of Safety and Security Services to orchestrate prompt action and reporting of corrective actions. Intervention efforts by the OIC led to observation and remediation to include a staff meeting held to advise when it is appropriate to chain school doors in adherence to fire code laws and PGCPs administrative procedures.

Parent Retaliatory Ban

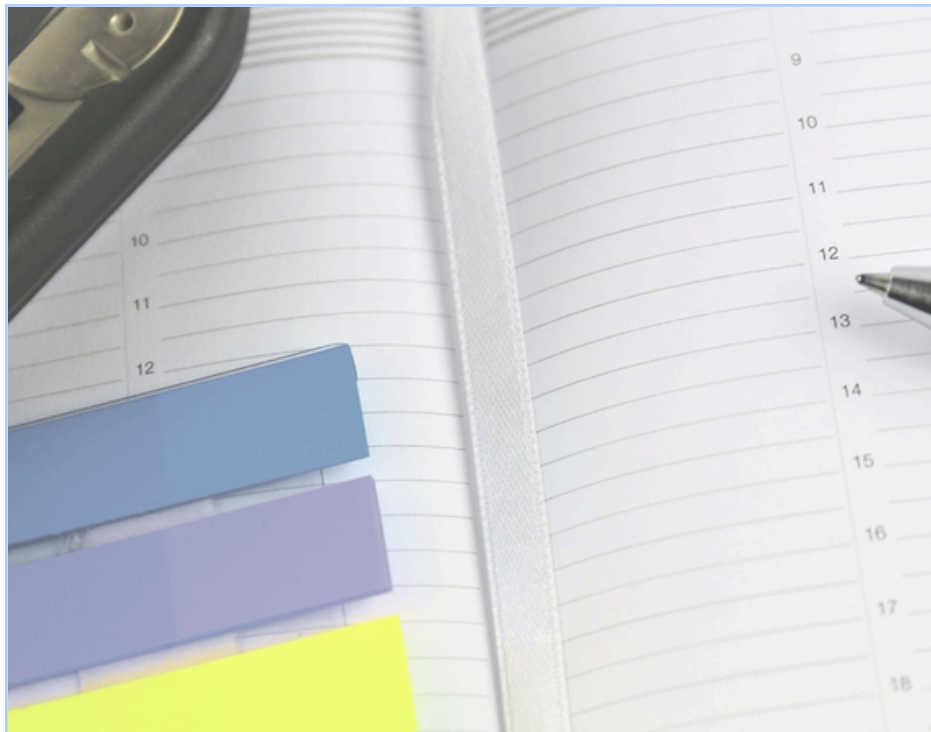
The OIC received a complaint about a parent who alleged they were unfairly banned from their child's school. The ban stemmed from an incident on school property involving another parent, a PGCPs employee. The complainant stated they never received official notification of the ban and that no witnesses were consulted before the decision was made. Concerns about retaliatory parent bans were also raised during a public Board meeting. The OIC escalated the issue to the Superintendent's office, requesting immediate action and a detailed response to the parent's concerns. In response, the Superintendent's office provided the OIC with comprehensive documentation, including witness statements, to support their decision to ban the parent, citing the need to maintain a safe and orderly learning environment.

All parents involved in the incident received "No Trespass Letters." Arrangements were made for affected parents to attend necessary appointments and meetings, and a range of Mental Health Support was offered. Additionally, a Child Protective Services report was filed and a Safety Plan was developed for the students involved. The OIC concluded that PGCPs had taken appropriate steps to resolve the matter.

Our Work: Understanding, Assessing, and PGCPs Monitoring Operations Cont.

Addressing Student Transportation Needs

Two (2) complaints were referred to the OIC regarding the immediate transportation needs of two Special Education students. Pursuant to its authority, the OIC addressed this matter from an operational standpoint. An initial assessment of both complaints revealed safety and ADA concerns. As a result, the OIC forwarded this complaint to the Chief Operating Officer (COO) and the Superintendent for prompt action. The OIC requested a plan of action to address these transportation issues and to accommodate the transportation needs of these students. The OIC's involvement and monitoring efforts on this matter resulted in an expeditious response and action from the COO's office in collaboration with the Office of General Counsel, which led to the effective resolution of this matter.



Our Work: Other Investigative Efforts

The OIC conducts other preliminary investigative efforts that are critical to monitor, detect and prevent any potential and serious violation of a federal, state, or local law. If reasonable grounds exist to believe such violation has occurred, the ICO has the obligation to report the allegation to the agency with jurisdiction to enforce the law.

Board's Alleged Intention to Hold Election of Officers Without the Vote of Newly Elected Members



In late 2024, the ICO received allegations that the Board was intending to proceed with the election of officers (i.e., Board leadership) during their annual meeting, prior to the certification and swearing-in of new elected members. It was further alleged such approach was inconsistent with state law. Furthermore, there were concerns about a legal interpretation from the Board's counsel suggesting that outgoing members may cast their votes in such elections. Upon receiving these allegations, the ICO immediately warned the Board and their counsel that if the election of officers was held inconsistent with state law, such violation would be reported to the appropriate enforcement agency. Ultimately, following a motion presented during the public meeting, the Board voted to postpone the election of officers until the newly elected members were certified and sworn-in. The OIC's oversight and intervention on this matter promoted prompt adherence and compliance with the law.

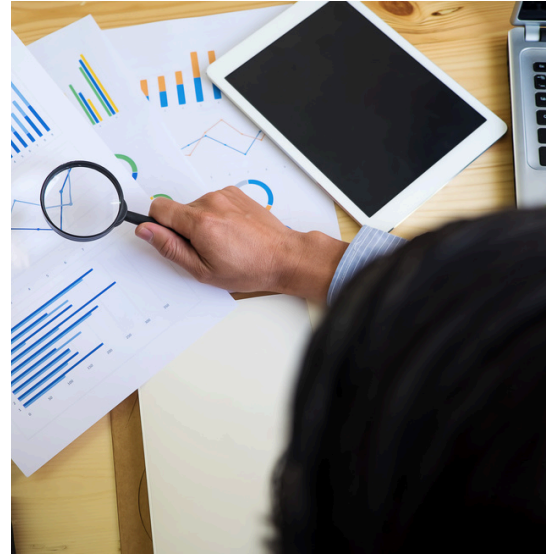
Board Member's Imminent Run for Another Public Office

The OIC received allegations that a recently re-elected Board member was campaigning for another county public office while still holding their PGCPs Board seat, which would be against state law. The OIC's initial investigation found online activity, including public endorsements, indicating the Board member's intent to run for another county office. The OIC then monitored candidate filings to see if the Board member would officially declare their candidacy without resigning from the PGCPs Board. Ultimately, the Board member formally announced their candidacy shortly after resigning from the PGCPs Board. The OIC's investigation in this matter demonstrated its commitment to ensuring accountability and compliance within PGCPs.



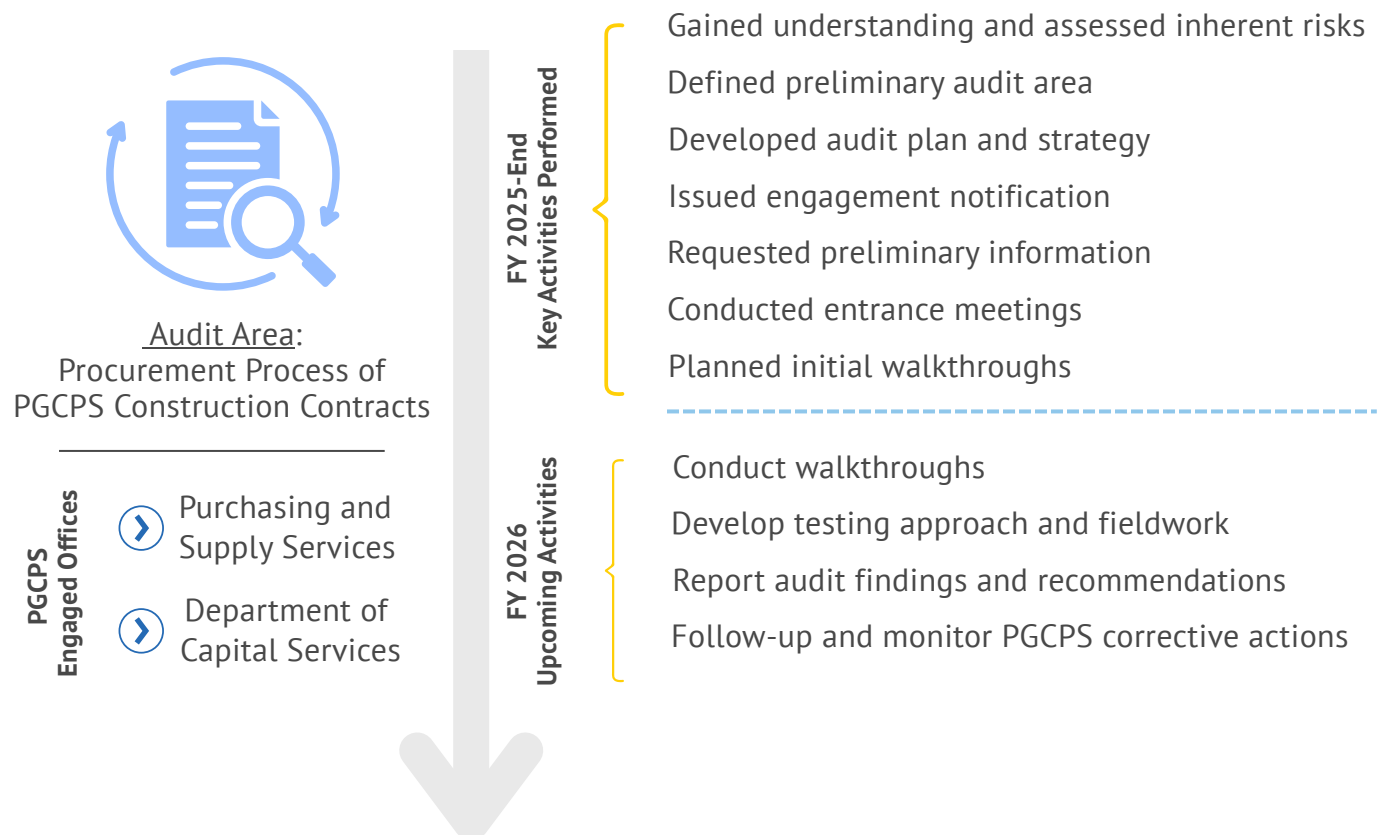
Our Work: Audit Related Activities

One of the main functions of the OIC is to conduct audits and similar reviews to evaluate the efficiency and effectiveness of PGCPs operations and programs. In general, audits are helpful to assess risks, internal controls, business processes, regulatory compliance, and can act as a deterrent in reducing the likelihood of fraud.



Towards the end of FY 2025, the OIC initiated the planning phase of our inaugural audit engagement to be focused on the procurement of PGCPs construction contracts. This audit was included in the OIC's FY 2025 Work Plan and the OIC anticipates that it will be completed during FY 2026.

Highlights of Ongoing Audit Engagement



Outreach Efforts & Engagement with Stakeholders

On a recurrent basis, the OIC engages with internal and external stakeholders to collaborate, understand and identify potential risks related to operational deficiencies, mismanagement or improper use of PGCPs funds or property.



Collective Bargaining Unions

ASASP, ACE-AFSCME Local 2250, PGCEA

Gain valuable insights into areas of concern of union members

Other Government Entities/ Bodies

Prince George's County Council, Maryland-Area Inspector General Offices, Maryland State's Attorney, U.S. Attorney's Office

Collaborate on investigations and enforcement efforts

Local Community

PGCPS Parents, Citizens, Community Advocacy Groups

Build trust with citizens to understand PGCPS concerns and needs

PGCPS Leadership

Board of Education, Superintendent, Chief of Staff, Chief/Department Heads, School Leaders

Promote transparency and target impactful oversight efforts

PGCPS Partnered Organizations

Parents and Community Advisory Council, We are Casa

Build trust and understand areas of concerns

Other PGCPS Offices

General Counsel's Office, Safety & Security, Employee and Labor Relations, Equity Assurance, Internal Audit, BOE Ethics Panel

Collaborate with other PGCPS investigative entities

Challenges in OIC Operational Execution

The OIC's role is crucial to deter the likelihood of fraud, waste, and abuse in PGCPs. Since the onset of operations in January 2024, the OIC has experienced several operational challenges that hinders our ability to effectively fulfill our statutory mission. Mitigating these obstacles in the upcoming FY is critical to ensuring and protecting the integrity and reputation of the school system.

> Operational Capacity and Resource Allocation

The OIC is built on system oversight; however, due to limited staff, this oversight is often restricted due to capacity, which increases the inherent risk. This constraint impacts the scope and effectiveness of our work. It also affects feasibility, quality, and timelines in certain instances. The desired scope and focus of OIC oversight activities (i.e., financial reporting, operational efficiency, compliance, risk management) is directly related to the size and skills of the team.

> Access to Information and Systems

Gaining essential information and access to PGCPs systems is not merely crucial, but absolutely vital for identifying and rectifying critical issues. Despite this, the OIC has faced significant resistance to disclosure. This requires escalating efforts to secure critical and timely information for the OIC to fulfill its statutory duties.

> Resistance to Oversight and Implementation of OIC Recommendations

PGCPs frequently deprioritizes OIC recommendations, despite their potential for operational improvement. This resistance to addressing serious issues could lead to operational failures and reputational damage.



FY 2026 Initiatives & Strategic Goals



Goal #1: Improve Access to Information and System Integration

Initiatives

- Enrich the OIC centralized data request and case management tracking system to streamline information gathering and identify areas of resistance.
- Equip the OIC staff with a thorough understanding on navigating legal complexities to secure information more effectively.



Goal #2: Strengthen Implementation of OIC Recommendations

Initiatives

- Develop a structured follow-up process for OIC recommendations, to include clear timelines for PGCPs responses and public tracking of implementation status.
- Implement a regular review process for OIC operations, incorporating feedback from stakeholders to continually improve effectiveness and responsiveness.



Goal #3: Increase Focus on Systemic Issues to Maximize Impact and Improve Accountability

Initiatives

- Implement a proactive approach to target larger impact instances of potential waste, fraud, and abuse while still diligently responding to individual complaints in order to maintain public trust



Goal #4: Promote a Culture of Compliance, Involvement, and Continuous Feedback

Initiatives

- Develop and implement a comprehensive communication strategy to clearly articulate compliance expectations and the value of the OIC to all PGCPs stakeholders.
- Collaborate with the new PGCPs Superintendent in articulating OIC's recommendations as opportunities to improve operational efficiencies, compliance, and risk mitigation.



Goal #5: Propose Legislative Changes

Initiatives

- Propose legislative revisions to be effective in FY 2027. Amendments to the law are necessary to strengthen the authority and independence of the OIC.

Appendix 1: Tracking Findings & Recommendations

Maryland Code, Education, § 4-404 (e)(5)(i) requires the ICO to publish a report at least once every two (2) years that summarizes the activities, findings, recommendations, and accomplishments of the OIC. This Appendix provides a description of major findings and recommendations in published reports, as well as the status of each recommendation, as assessed by the OIC.

MANAGEMENT ADVISORIES			
Report No.	Report Name	Recommendations	Status
MA 1	Violation of the Board of Education's Attendance Policy	1. Board members to notify the Chair of the Board or the Board office, of any potential absence from an emergency meeting, public hearing, appeal, and/or executive session 24 hours prior to such engagement to ensure accountability and adherence to Board Policy 0108.	Unknown
MA 2	Revision to incorporate the existence and authority of the OIC in PGCPs' Administrative Procedure (AP)	1. Clarify language in PGCPs AP 2200 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 for individuals to report financial impropriety, specifically waste, fraud and abuse of funds and property	Implemented
		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. Per the third condition (AP 2200, V.C.3.c.), the employee must have reported the activity, policy, or practice to a PGCPs supervisor/administrator in writing and afforded PGCPs reasonable opportunity to correct the activity, policy, or practice.	Not Implemented

Appendix 1: Tracking Findings & Recommendations Cont.

MANAGEMENT ADVISORIES

Report No.	Report Name	Recommendations	Status
MA 2	Revision to incorporate the existence and authority of the OIC in PGCPs' Administrative Procedure (AP)	5. Clarifying language within PGCPs AP 2200 to identify the Office of Integrity and Compliance (instead of Internal Audit) as the unit specified to investigate and objectively evaluate information obtained relative to allegations of financial impropriety. Internal Audit will continue to investigate and objectively evaluate information relative to allegations of improper conduct.	Not Implemented
		6. Employee and 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
MA 3	FY 2025 Internal Audit and OIC Kick-Off Meeting	1. Audit Areas to be incorporated in the Internal Audit's FY 2025 Audit Plan: 1) Board Policy & Administrative Procedures Audit (Process Audit), 2) Construction Audit (Public Private Partnership-P3, Phase I), 3) Performance Evaluations (Director & Above), 4) Warehouse Audit, 5) Office of General Counsel (OGC) Inventory Management Audit.	Not Implemented
		2. Internal Audit to collaborate in other areas with the OIC: 1) Construction Audit (P3 Phase I); 2) Change Hotline (Filter calls into two types: (1) Human Resources matters and (2) Fraud, Waste, and Abuse); 3) Collaboration between Internal Audit and the Board appointed Ethics Advisory Panel.	Not Implemented

Appendix 1: Tracking Findings & Recommendations Cont.

MANAGEMENT ADVISORIES			
Report No.	Report Name	Recommendations	Status
MA 4	Enforcement of Financial Disclosure Statement (FDS) Filings	1. Revise and update the training materials on the Ethics Panel's duties and responsibilities (<i>refer to the Management Advisory for more details on this recommendation</i>)	Partially Implemented
		2. Create a tracker for FDS deadlines and delinquent Filings (<i>refer to the Management Advisory for more details on this recommendation</i>)	Implemented
		3. Provide notice to delinquent FDS filers (<i>refer to the Management Advisory for more details on this recommendation</i>)	Implemented
		4. Impose a penalty for late filing (<i>refer to the Management Advisory for more details on this recommendation</i>)	Not Implemented
		5. Establish a Due Diligence Procedure for the Review of Financial Disclosures (<i>refer to the Management Advisory for more details on this recommendation</i>)	Implemented

Appendix 1: Tracking Findings & Recommendations Cont.

INVESTIGATIVE REPORTS				
Report No.	Report Name	Findings	Recommendations	Status
25-I-1003	Missing PGCPs Board Member* <small>*(MA 1 Follow-Up)</small>	1. The Board failed to promptly address Board attendance violations and hold the former Board member accountable, despite multiple notices and recommendations from the ICO.	1. Update Board Policy 0108 to require publishing of the Board's attendance record on the Board's website.	Not Implemented
		2. The Board failed to pursue a timely procedural remedy with the Maryland State Board of Education to request his removal based on willful neglect of duty.	2. 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
		3. The Board demonstrated a lack of knowledge and/or understanding of their own internal policies and applicable law.		
25-I-1005	DuVal High School Athletic Field	1. Adequate inspection and/or approval did not take place prior to PGCPs issuing payment to a Landscaping Company for contracted services rendered defective.	1. Internal processes and controls should be implemented to withhold payment in instances where a contractor fails to fulfill a contractual obligation by supplying faulty and/or defective goods and services. Coordination should be incorporated to ensure inspection and approval of services rendered is documented and verified prior to issuing a payment under the contract terms.	In-Progress
		2. While Purchasing guidance and procedures require a final inspection to determine if materials purchased meet specifications, there is no mention of any inspection or approval requirement for procured services.	2. PGCPs should incorporate into written procedure (i.e. AP 3323 - Purchasing Guidelines) a requirement to perform and document inspection and/or approval of procured services by an on-site PGCPs representative at the time of service.	In-Progress

Appendix 1: Tracking Findings & Recommendations Cont.

INVESTIGATIVE REPORTS				
Report No.	Report Name	Findings	Recommendations	Status
25-I-1011	Eligibility for PGCPs Payment: Legal Fees Incurred by a PGCPs Board Member	1. As a result of the release of the Ethics Panel's Final Report, Board Member-A became a plaintiff by filing a complaint at the Prince George's County Circuit Court against the PGCPs Board, the Ethics Panel, and each of the Panel members.	1. To ensure proper understanding and application of the amended Section 4-104 of the Code, the PGCPs Board must be provided with updated guidance and training on the process for retaining legal counsel and paying related fees. This comprehensive understanding is essential for the Board to accurately assess whether the legal requirements are satisfied before voting on such matters.	In-Progress
		2. Board Member-A started incurring legal fees (subsequently submitted for PGCPs approval and payment) prior to the Ethics Panel issuing the Final Report related to the ethics complaint filed against Board Member-A. There is no indication of any legal proceedings at the time against Board Member-A.		
		3. PGCPs paid legal fees for legal services provided by Law Firm with regards to the referenced complaint filed by Board Member-A as a plaintiff, with the Prince George's County Circuit Court. This complaint was dismissed by the court, as a result of the Board Member-A and Law Firm not timely serving the defendants (i.e., PGCPs Board, the Ethics Panel and each of the Panel members).	2. To ensure compliance with Section 4-104 of the Code, PGCPs needs to review and update its procedures for approving and issuing payments for legal fees. This update should strengthen the due diligence process conducted by PGCPs staff. The improved process must guarantee that all submitted legal fee invoices meet the legal criteria. This includes verifying that the fees were incurred to defend a Board member involved in litigation due to their official service to the Board and that all other necessary legal conditions are met.	In-Progress
		4. Fees invoiced by Law Firm for legal services provided to Board Member-A following the dismissal of the complaint were approved and paid by PGCPs, although there was no indication of a subsequent legal proceeding in which Board Member-A was in a defending position due to their capacity as a member of the PGCPs Board.		
		5. The legal fees submitted by Board Member-A for PGCPs payment were approved by the Board Chair and without the Board's vote. At the time, the former version of PGCPs Bylaw 9250 did not delineate an approval process to be followed by the Board or required the Board's vote to approve the payment of legal fees pursuant to Section 4-104 of the Code.		

Appendix 1: Tracking Findings & Recommendations Cont.

INVESTIGATIVE REPORTS				
Report No.	Report Name	Findings	Recommendations	Status
25-I-1011	Eligibility for PGCPs Payment: Legal Fees Incurred by a PGCPs Board Member	6. The legal opinion issued by the Board's Attorney stated that the Ethics Panel and the Board issued charges against members of the Board, although COMAR specifically grants this power to the State Board to issue charges for the removal of a county Board Member-A.	3. The Board shall revisit and review the applicability of Section 4-104 of the Maryland Code, the timeline of events related to Board Member-A's legal services, and the actions of the Ethics Panel and OIGE. This review is imperative to ensure accountability and verify whether PGCPs payment of the legal fees met the criteria set forth in Section 4-104.	Partially Implemented
		7. The legal opinion issued by the Board's Attorney concluded that the Board was required to pay the legal fees for three (3) members of the Board, including Board Member-A, stating all actions taken by the Ethics Panel and the Maryland Office of the Inspector General for Education (OIGE) were indicative of a litigative process, although the actions taken were related to their respective investigations.	4. To ensure strict adherence to legal requirements and proper interpretation of Section 4-104 of the Maryland Code, the Board must obtain a formal legal review from the Board's Attorney regarding OIC Recommendation #3. This review should specifically re-examine the investigative actions of the Ethics Panel and the OIGE, in light of their respective authorities and the findings detailed in this report, to guarantee compliance with applicable statutes and policies.	Not Implemented
		8. The Board Chair relied on the legal opinion issued on the matter by the Board's Attorney to instruct the PGCPs payment of the legal fees incurred by Board Member-A, absent internal guidance for an approval process, including the Board's vote. The version, at the time, of Bylaw 9250 did not establish an internal rule to require the Board's vote to approve the payment of legal fees incurred pursuant to Section 4-104 of the Code (i.e., Bylaw 9250 was revised effective April 25, 2024 to include such requirement).		

Appendix 1: Tracking Findings & Recommendations Cont.

INVESTIGATIVE REPORTS				
Report No.	Report Name	Findings	Recommendations	Status
25-I-1012	Workplace Injury and Accommodation	1. There is no established process at PGCPs for recording and tracking workplace accidents/ injuries if an employee chooses not to file a worker's compensation claim. Furthermore, current PGCPs practice is inconsistent with its own administrative procedures and hinders compliance with regulatory reporting as all workplace accidents/injuries are not recorded and maintained.	1. Assess reporting processes and implement controls to ensure all workplace accidents/injuries are recorded and maintained by the Risk Management and Workers' Compensation (RMWC). Applicable procedures and supporting guidance should be reviewed for necessary updates on a routine basis and new guidance drafted where needed to ensure governance reflects actual practice, adequate procedures, as well as appropriate roles and responsibilities. Efforts should include a review of applicable laws and regulations to facilitate compliance with external reporting (i.e. Maryland Occupational Safety and Health Act of 1973) as well as an appropriate distribution of updated guidance and training to PGCPs staff.	Partial Implementation In-Progress
		2. Both AP 2805.3 and AP 4146.1 are significantly outdated as over 10 years has passed since their effective date of August 1, 2013 and references a third party administrator that is no longer contracted by the school system.		
		3. PGCPs current practice requires employees to provide a medical clearance to work at full capacity, on-site without accommodations, before receiving approval to return to work or being eligible to request reasonable accommodations. This practice violates ADA and Family and Medical Leave Act (FMLA) protections and lacks support in PGCPs policy. It also risks litigation and extended leave for employees who could return with accommodations.	2. PGCPs should review and assess its practices, procedures, and supporting guidance to ensure all accommodation requests are reported to the Equity Assurance team, tracked, and processed according to ADA regulations, regardless of leave status. This includes refining practices and governance documents across coordinating offices, aligning roles and responsibilities, and providing organization-wide training.	Not Implemented
		4. An official accommodation request from an employee preparing to return from FMLA leave was improperly denied. The Supervisor subsequently failed to report the request to the appropriate office, though instructed by the division leadership. As such, PGCPs failed to engage in the interactive process, as required by the ADA, with an employee seeking accommodation for a qualifying disability.		

Appendix 1: Tracking Findings & Recommendations Cont.

INVESTIGATIVE REPORTS				
Report No.	Report Name	Findings	Recommendations	Status
25-I-1012	Workplace Injury and Accommodation	5. PGCPs failed to provide timely notification (within 5 days as required) of designated FMLA leave, issuing it over a month after receiving complete documentation, which increases the risk of regulatory non-compliance and potential liability for compensation and benefits loss.	3. PGCPs should enhance quality control for processing leave requests to ensure timely responses and notifications within regulatory timeframes. Internal controls should track intake, aging, actions, and inter system collaboration. Increased written guidance for medical leave requests is also recommended. Employees will benefit from clearer written guidance and instruction that is specific to requesting medical leave, as provided for other forms of leave (e.g. assault, disability, military).	Not Implemented
		6. Analyst-A was assigned sole responsibility for backup duties of another position as no other employee was trained to perform such duties and procedures were not documented. As a result, an employee with a qualifying disability was unable to utilize workplace accommodations or telework benefits granted to other division employees.	4. PGCPs should document functional processes of individual positions and cross train employees within the same division in order that vital duties are not dependent on a sole individual. It is also recommended that PGCPs balance the coverage needed for individual position duties by distributing such responsibility across multiple employees.	Partially Implemented
25-I-1016	Misuse of Substitute Coverage Pay	1. Assigning Teacher-A to cover a vacant Classroom Teacher position over an extended period for educational stability precluded them from fulfilling the duties of their regular assignment as a Resource Teacher, although compensated for both assignments per the PGCEA agreement. Language within PGCPs policy/procedure and the PGCEA negotiated agreement overlook such nuances as they lack specific guidance/stipulations around long-term usage of substitute coverage by Unit 1 members and/or the expectation to perform the duties of both the coverage and regularly assigned position.	1. The PGCPs Board of Education (BOE) should update policy/procedure as well as propose strengthening and further clarifying the language within the PGCEA negotiated agreement around compensation paid to Unit 1 members who are assigned to provide substitute coverage. Contract terms should ensure that Unit 1 members who provide substitute coverage are required to fulfill the duties of their regular assignment in addition to the coverage assignment if they are to receive compensation in addition to their regular salary. If a coverage assignment takes the place of, becomes long-term, and/or the Unit 1 member is unable to fulfill the duties of their regular assignment, they should only be compensated for their regular salary.	Awaiting Management Response

Appendix 1: Tracking Findings & Recommendations Cont.

INVESTIGATIVE REPORTS				
Report No.	Report Name	Findings	Recommendations	Status
25-I-1016	Misuse of Substitute Coverage Pay	2. As compensation for substitute coverage is paid in one (1) hour increments, the negotiated agreement between PGCPs and PGCEA institutes full-hour compensation for instances in which substitute coverage includes a partial hour, 30 minutes or less. Such terms of the agreement forgo potential savings for individual school budgets within the entire school district.	2. As suggested by School-A administration, the PGCPs BOE should consider proposing the redefining of the time increments in which substitute coverage is paid as specified within the negotiated agreement between PGCPs and the PGCEA. Adjusting such compensation to half-hour (.5) increments rather than one (1) hour increments could result in significant potential savings across the entire school district.	Awaiting Management Response