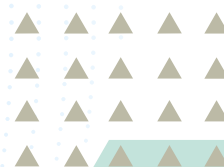


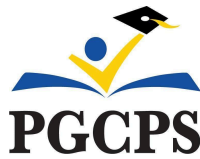
INVESTIGATIVE REVIEW REPORT **MISUSE OF SUBSTITUTE COVERAGE PAY**

Prince George's County
Public School System

Issued on: June 18, 2025

Frank Turner II
Integrity and Compliance Officer





Office of Integrity and Compliance

Frank Turner II, Integrity & Compliance Officer

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INVESTIGATIVE REVIEW REPORT - MISUSE OF SUBSTITUTE COVERAGE PAY

A. BACKGROUND

The Office of Integrity and Compliance (OIC) received a complaint regarding a Resource Teacher (Teacher-A) in Prince George's County Public Schools (PGCPS). The complaint alleged that Teacher-A was receiving their full salary, plus six additional hours of daily substitute coverage pay, for solely covering a vacant classroom position. It was claimed that Teacher-A was not fulfilling the duties of a Resource Teacher during this time.

According to the complaint, Teacher-A was promoted from a fourth-grade Classroom Teacher to a Resource Teacher at the start of the 2024-2025 school year. This promotion created a vacancy, and Teacher-A continued to teach in their former fourth-grade classroom until the vacant position was filled. The complainant stated that this situation resulted in staff inequity and requested a review of all substitute coverage pay at the school.

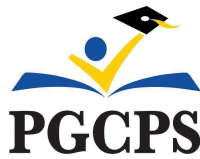
B. OBJECTIVES AND SCOPE:

Key aspects of the OIC investigative review include:

- **Purpose:** To assess the main allegations and determine if any compensation issued to Teacher-A for substitute coverage involved proper assignment, documentation, and approval in accordance with PGCPS administrative procedures as well as the negotiated agreement with the Prince George's County Educators' Association (PGCEA).
- **Methodology:** The OIC obtained, reviewed, and analyzed relevant documentation and data to include applicable PGCPS policy/procedure, the PGCEA negotiated agreement, as well as personnel and payroll data. Additionally, the OIC conducted interviews to obtain clarity around the required parameters and to identify the activity involved in facilitating substitute coverage pay at the school location.
- **Scope:** Considering the nature of the allegations and purpose of the review, the OIC took into consideration staff assignments, substitute coverage pay requested, and hours paid for substitute coverage at the employee's school from the start of the school year through the period in which a new hire was onboarded to fill the vacant Classroom Teacher position.

C. TIMELINE - TEACHER-A WORK HISTORY AND SUBSTITUTE COVERAGE

Teacher-A is classified as a Resource Teacher under the PGCEA (Unit 1) negotiated agreement and is assigned to a PGCPS Area 1 School (School-A). Hired as a Unit 1 Classroom Teacher in August 2003, Teacher-A earned salary grade advancements with additional coursework completed over a 21 year tenure. Most recently, Teacher-A served as a fourth-grade Classroom Teacher at School-A for several years before being promoted to a Resource Teacher effective August 19, 2024.



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After finalizing staff assignments for SY 2024-2025, School-A's principal (Principal-A) received notice on August 13, 2024 that another Classroom Teacher on staff (Teacher-B) would not be returning to their duties. As Teacher-A's promotion to Resource Teacher was in play, the last minute resignation of Teacher-B resulted in a vacancy within the fourth-grade. Teacher-A was then assigned to provide substitute coverage for the vacant Classroom Teacher position until the vacancy was filled. A new fourth-grade teacher (Teacher-C) was hired as of October 28, 2024, with Teacher-A providing substitute coverage until November 4, 2024.

The timeline below is a representation, in chronological order, of the events that occurred relative to Teacher-A's PGCPS work history through the beginning of SY 2024-2025:

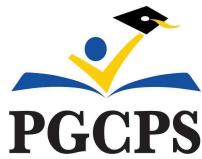
Teacher-A's PGCPS Work History	
Date	Description
08/18/2003	Teacher-A's effective hire date as an Elementary Classroom Teacher, a 10 month employee with a Bachelor's Degree, under PGCEA, receiving several salary grade advancements over a 21 year period with additional degrees/coursework obtained.
08/13/2024	Principal-A received a phone call from Teacher-B notifying they would not return to work at School-A for SY 2024-2025.
08/19/2024	Effective date Teacher-A was promoted to a Resource Teacher under PGCEA , as a 10 month employee with a Master's Degree plus 60 hours of coursework.
8/26/2024	Teacher-A began providing substitute coverage for the vacant fourth-grade classroom on the first day of school for students during SY 2024-2025.
10/28/2024	Effective date Teacher-C was hired to fill the vacant fourth-grade Classroom Teacher position.
11/4/2024	Last day Teacher-A provided substitute coverage as a newly hired Classroom Teacher, Teacher-C, was onboarded.

D. INVESTIGATIVE ANALYSIS

1. Governance of Substitute Coverage Pay

- Substitutes Teachers (temporary) vs. Substitute Coverage (internal staff) - A **Substitute Teacher** is classified as a temporary on-call position that is not represented by a bargaining unit. Upon hire, Substitute Teachers are placed in an on-call pool where they may, based on availability, respond to requests submitted by schools within the district as a result of instructional teacher absences. Substitute Teachers maintain the continuity of quality learning by delivering instructional plans and materials prepared by an absent regularly employed Classroom Teacher.

Classroom Teachers are full-time instructional Unit 1 members who develop instructional plans, assignments, and materials; establish learning objectives; as well as prepare and administer evaluations and assessments of student progress. A **Resource Teacher** is a Unit 1 member that is considered a "teacher of teachers", providing support



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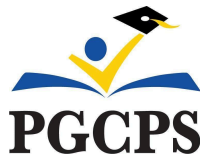
and training to Classroom Teachers for the development and implementation of curriculum, assessments, and professional development. Both position classifications, as well as some additional Unit 1 members, may be utilized to provide substitute coverage (defined below in section b.) in the instance of instructional teacher absences in lue of obtaining Substitute Teachers from the on-call pool.

- b. Substitute Coverage Terms Under PGCEA Negotiated Agreement - The negotiated agreement between PGCPS and PGCEA, effective July 1, 2022 through June 30, 2025, dictates the terms and conditions for Unit 1 members who act in a substitute capacity. Per the agreement, those who volunteer or are assigned to cover/teach a class *other than* their regular scheduled assignment are entitled to an additional hourly rate of \$34.00 per hour, in one (1) hour increments for the SY 2024-2025. This rate also applies to each member who provides coverage for another Unit 1 member's class that is divided between staff members. Compensation for substitute coverage is paid in addition to the Unit 1 employee's salary for their regular scheduled assignment.

The agreement further states that the use of non-classroom teachers to cover classrooms shall not negatively impact the instructional program or be overused in the event a Unit 1 member is absent. Per the Assistant Executive Director (AED) of the PGCEA, *the use of Unit 1 staff for substitute coverage is not intended for long-term classroom coverage* but rather for situations in which coverage is needed for last minute/unexpected teacher absences on a short-term basis. Furthermore, the PGCEA AED and the PGCPS Chief Human Resources Officer agreed that Unit 1 members receiving substitute coverage pay are expected to fulfill the duties of their regular scheduled assignment as well as the coverage assignment.

- c. PGCPS Procedure - Administrative Procedure (AP) 4108, *Use of Temporary and Substitute Employees*, specifies that Classroom Teachers, Resource Teachers, Media Specialists, and Reading Specialists *are eligible to provide substitute coverage and receive substitute coverage pay*. Paraprofessionals will not be required to substitute for teachers except in emergency situations and for a limited duration of time as they are not members of PGCEA and are subject to coverage pay under different rates and terms.
- d. School-A Substitute Coverage Procedures - The PGCPS Payroll Services Office (Payroll) issued a memorandum to PGCPS schools on December 20, 2022 to highlight PGCEA contract language and provide a template to track substitute coverage, days and times. While the typical workday for Unit 1 members consists of 7.5 hours, *substitute coverage pay is limited to six (6) hours per day per coverage assignment*. When a Unit 1 member teaches/covers for more than one Unit 1 member, they are eligible for up to six (6) hours of substitute coverage pay per assignment.

Per the memorandum, schools are permitted to use their own tracking method in lue of the tracking template. School-A's secretary (Secretary-A) created and implemented an electronic Google Form at the beginning of SY 2024-2025 to track substitute coverage, replacing the use of Payroll's template. Teachers use the Google Form to request substitute coverage pay by entering the days and times in which they provided such



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coverage. As the timekeeper for all school staff, Secretary-A reviews each request entry for accuracy and transfers the appropriate number of hours for each applicable employee into a weekly spreadsheet before entering those hours into the Oracle timekeeping system. As School-A's Time approver, Principal-A approves timesheets for all school staff in Oracle, to include substitute coverage, at the end of each pay period. This process is in alignment with the guidance provided within PGCPS AP 4132, *Timekeeping and Leave Reporting*.

2. Review of Substitute Coverage Pay within School-A

- a. Substitute Coverage Paid to Teacher-A - Teacher-A is a Unit 1 member who is eligible for substitute coverage pay at \$34.00 an hour. Teacher-A provided coverage in teaching a fourth-grade class from August 26, 2024 (first instructional day of SY 2024-2025) until November 4, 2024, a week after Teacher-C was hired to fill such vacancy and began onboarding.

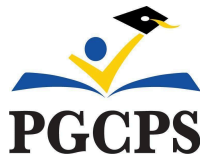
During that period, Teacher-A requested and received substitute coverage pay for 42 of the 45 instructional days the employee was not on leave, earning a total of \$9,316.00 across 274 hours. While compensated for six (6) hours of substitute coverage on most days, there were several days in which Teacher-A covered for and received substitute coverage pay for a second, absent, Unit 1 position. Such compensation was supported by the school documentation managed by Secretary-A and approved by Principal-A within the Oracle system.

- b. Substitute Coverage Compared to All School-A Unit 1 Members - Of the 47 Unit 1 staff members eligible to receive substitute coverage pay under PGCEA, 91% received substitute coverage pay at least one (1) day during the period in which Teacher-A provided substitute coverage for the vacant fourth-grade class.

The chart below delineates the total compensation paid to School-A Unit 1 members for substitute coverage from August 26, 2024 thru November 4, 2024:

Substitute Coverage Paid to School-A Unit 1 Members from 8/26/2024 - 11/04/2024				
Description	# of Days Compensated	# of Hours Compensated	Total \$ Compensation	Total Compensation in Percentage
Total for all Unit 1 Members	382	1583	\$53,822.00	100.00%
Teacher-A	42	274	\$9,316.00	17.31%
Second Highest Unit 1 Member	15	78	\$2,652.00	4.93%
Avg of All Unit 1 Members	8.88	36.81	\$1,251.67	2.33%

Based on this data, the OIC gathered the following insights on substitute coverage pay relative to Teacher-A and other Unit 1 members within School-A:



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- Teacher-A was compensated 196 hours and \$6,664.00 (or 251%) more in coverage pay than the Unit 1 member earning the second highest total amount of substitute coverage pay;
- Teacher-A was compensated 644% more than the average Unit 1 member; and
- Only one (1) of three (3) other Resource Teachers received substitute coverage pay during that period, earning \$136.00 for four (4) hours of coverage.

3. Justification of Substitute Coverage Assignments

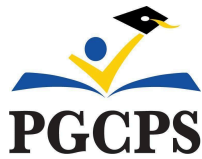
According to Principal-A, staff assignments were planned for all classes in each grade prior to receiving the last minute resignation of Teacher-B at the beginning of the school year. Principal-A immediately reached out to PGCPS Human Resources Office to begin the process of filling that vacancy. While the hiring process for a full-time Classroom Teacher typically takes one (1) to two (2) months, PGCPS often experiences longer recruiting periods due to a shortage in aspiring teachers.

Principal-A shared a history of challenges in securing Substitute Teachers from the on-call pool who are willing to substitute on a long-term and/or daily basis. As such, constant searching and rotation of Substitute Teachers in addition to staff resources needed to train and lesson plan on behalf of the vacant teacher were of concern at the beginning of the school year. Considering Substitute Teachers are not required to hold a teaching certification or college degree, an experienced teacher was preferred in this instance as the fourth-grade curriculum and standardized testing scores were said to be historically more challenging for students in comparison to other grades.

Prioritizing a stable learning environment for all students at the start of the school year, Principal-A assigned Teacher-A to cover/teach the vacant class until a permanent teacher was hired. Principal-A acknowledged that Teacher-A would not be able to fulfill the duties of their new role as a Resource Teacher while primarily covering the duties of the vacant Classroom Teacher position. Beyond that of a temporary Substitute Teacher, Teacher-A was tasked with developing and implementing lesson plans, assessments, and evaluation of student performance while maintaining student records/grades until a permanent Classroom Teacher was hired. The decision capitalized on Teacher-A's recent experience as a fourth-grade teacher while limiting disruption of the student learning experience and staff workload in rotating various teachers to provide coverage. The additional option of dividing students amongst the other fourth-grade classrooms would multiply classroom coverage pay by the number of teachers providing coverage and widen the student-to-teacher ratio.

4. Additional Concerns Around Substitute Coverage Pay

Principal-A and Secretary-A raised concerns around the stipulations of substitute coverage pay, as provided in the PGCEA negotiated agreement, in which Unit 1 members are entitled to such pay in one (1) hour increments. In reviewing daily requests submitted by teachers, Secretary-A has taken note of a number of time entries for substitute coverage that contain partial hours, often



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ending with 10 or even five (5) minutes into a full hour. As such, Principal-A and Secretary-A suggested that perhaps the negotiated agreement with PGCEA should redefine the time increments in which substitute coverage is paid, adjusting compensation to half-hour (.5) increments rather than one (1) hour increments.

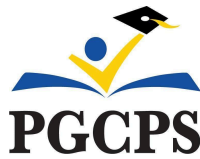
Per School-A's records, over 640 requests were submitted for substitute coverage pay by Unit 1 members during the first half of SY 2024-2025. Of these, 195 requests contained a partial hour of 30 minutes or less that were paid at the full rate of \$34.00 per hour, totaling \$6,630.00. All other factors remaining the same, if members were paid in half-hour (.5) increments instead of full hour increments, the district would have paid \$3,315.00 less in substitute coverage pay at School-A over the first half of the school year, a potential savings of \$6,630.00 for the entire year.

As each school varies in size and population, the OIC was able to determine that the student and teacher population at School-A represents the average populations of both groups across all 198 schools within PGCPS. As such, the district could potentially save over an estimated \$1 million per year if the substitute coverage pay was based on half-hour (.5) increments instead of one (1) hour increments.

OIC Review - School-A Substitute Coverage Requests Through Quarter 2 August 2024 - January 2025	
Number of Requests Containing Partial Hours of 30 Minutes or Less, Paid in Full Hour Increments	195
Savings at School-A for First Half of SY 2024-2025 if Paid in Half-Hour (.5) Increments	\$3,315.00
Potential Savings at School-A for the Entire SY 2024-2025 if Paid in Half-Hour (.5) Increments	\$6,630.00
Potential Savings Across the District for Entire Year if Paid in Half-Hour (.5) Increments	\$1,312,740.00

E. KEY FINDINGS AND RECOMMENDATIONS

- ❖ **Finding 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.
 - **Recommendation #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



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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.

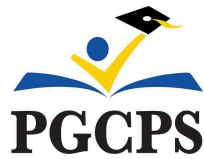
- ❖ **Finding 2** - As compensation for substitute coverage is paid in one (1) hour increments, the negotiated agreement between PGCPS and PGCEA institutes full hour compensation for instances in which substitute coverage includes a partial hour, 30 minutes or less. Such terms of the agreement forgo potential savings for individual school budgets within the entire school district.
 - **Recommendation 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.

F. CONCLUSION

The OIC investigative review revealed that a last minute resignation for the SY 2024-2025 led Principal-A in assigning a recently promoted Resource Teacher to cover a fourth-grade class until a vacant Classroom Teacher position was filled. As such, Teacher-A received a total of \$9,316.00 in substitute coverage pay in addition to their regular salary, for two hundred seventy-four (274) hours across forty-two (42) days, between August 26, 2024 through November 4, 2024. This was a significant difference in comparison to other Unit 1 members on staff as Teacher-A received 251% more in coverage pay than the Unit 1 member earning the second highest amount of substitute coverage pay and 644% more than the average Unit 1 member during that same period.

While no violations of policy/procedures were identified and the decision was justified considering the circumstances and focus on establishing a stable learning environment, the opportunity to earn such additional income was not applied equitably to remaining Unit 1 staff members. Furthermore, Teacher-A was not able to fulfill the duties of a Resource Teacher while covering for the vacant teacher position, though entitled to compensation for both per the conditions specified within the negotiated agreement with the PGCPS BOE and PGCEA.

To address scenarios such as this, the OIC has issued one (1) recommendation around proposing stronger language within the PGCEA agreement to ensure Unit 1 members are fulfilling 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 redefine the increments from which substitute coverage is paid to promote potential savings and align with time worked. Through data extrapolation and analysis, considering similar factors, the OIC identified potential annual savings of up to \$1.3 million



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across all PGCPS schools if substitute coverage was paid in half (.5) hour increments versus one (1) hour increments.

The OIC appreciates PGCPS's cooperation during the review and awaits a response from the Board regarding implementation of these recommendations by July 18, 2025.

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