

Audit Report

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**Maryland Center for School Safety**

January 2023

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**DEPARTMENT OF LEGISLATIVE SERVICES**  
**MARYLAND GENERAL ASSEMBLY**

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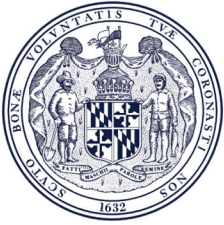
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DEPARTMENT OF LEGISLATIVE SERVICES  
OFFICE OF LEGISLATIVE AUDITS  
MARYLAND GENERAL ASSEMBLY

Victoria L. Gruber  
Executive Director

Gregory A. Hook, CPA  
Legislative Auditor

January 11, 2023

Senator Clarence K. Lam, M.D., Senate Chair, Joint Audit and Evaluation Committee  
Delegate Jared Solomon, House Chair, Joint Audit and Evaluation Committee  
Members of Joint Audit and Evaluation Committee  
Annapolis, Maryland

Ladies and Gentlemen:

We have conducted a fiscal compliance audit of the Maryland Center for School Safety (MCSS) for the period beginning June 1, 2018 and ending April 15, 2022. MCSS is responsible for collaborating with schools, educators, mental health professionals, law enforcement, students, parents, State/local agencies, and community and other organizations to provide a coordinated and comprehensive approach to school safety in Maryland.

Our audit disclosed that MCSS did not ensure School Resource Officer (SRO) grant payments were properly supported and subject to independent review. During fiscal years 2020 through 2022, SRO grant payments totaled \$8.0 million. In addition, MCSS had not developed written policies and procedures for the operation of the Safe Schools Maryland tip line to ensure all tips were addressed in a timely and comprehensive manner. The tip line provides students, teachers, school staff members, parents, and the general public with an anonymous method to report various school safety issues.

MCSS' response to this audit is included as an appendix to this report. We reviewed the response to our findings and related recommendations, and have concluded that the corrective actions identified are sufficient to address all audit issues.

We wish to acknowledge the cooperation extended to us during the audit by MCSS and its willingness to address the audit issues and implement appropriate corrective actions.

Respectfully submitted,

A handwritten signature in black ink that reads "Gregory A. Hook". The signature is written in a cursive style with a prominent initial "G".

Gregory A. Hook, CPA  
Legislative Auditor

# Background Information

## Agency Responsibilities

The Maryland Center for School Safety (MCSS) is responsible for collaborating with schools, educators, mental health professionals, law enforcement, students, parents, State/local agencies, and community and other organizations to provide a coordinated and comprehensive approach to school safety in Maryland. MCSS was created in July 2013 and was originally budgeted within the Department of State Police. Effective June 1, 2018, Chapter 30, Laws of Maryland 2018 established the MCSS as an independent unit of State government within the Maryland State Department of Education. MCSS operates under the direction of a six member governing board (the School Safety Subcabinet).

MCSS shares information on best practices, programs, and resources; provides grants, technical assistance, and training; collects, analyzes, and integrates statewide data; and promotes interagency efforts to ensure safe schools across Maryland. MCSS is also responsible for reviewing and commenting on school emergency plans, providing training for School Resource Officers and school security employees, and operating a school safety tip line.<sup>1</sup>

Furthermore, MCSS administers the Safe Schools Fund, a special non-lapsing fund, which is used to provide grants to local school systems to enhance school safety, including the Safe Schools Fund Grant and the School Resource Officer Grant. MCSS also received general funds to provide other grants such as the Hate Crimes Grant which funds local school systems, non-public and private schools, and childcare centers determined to be at risk of hate crime incidents. Beginning in fiscal year 2022, MCSS also administered the School Safety Grant Program and the Nonpublic School Security Improvement Grant which were previously administered by the Interagency Commission on School Construction.

According to the State's records, during fiscal year 2022, MCSS' operating expenditures totaled approximately \$14.0 million, including \$11.6 million for grants. A portion of the grant expenditures (\$2.8 million) was funded by the Safe Schools Fund which had a balance of approximately \$3.9 million as of June 30, 2022.

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<sup>1</sup> The tip line can be accessed via several methods, including a website at <https://schoolsafety.maryland.gov> and by phone at 833-MD-B-SAFE.

# Findings and Recommendations

## School Resource Officer Grants

### Finding 1

**The Maryland Center for School Safety (MCSS) did not ensure that School Resource Officer (SRO) Grant payments were properly supported and subject to independent supervisory review.**

### Analysis

MCSS did not ensure that SRO Grant payments were properly supported and subject to supervisory review. MCSS began administering the SRO Grant in fiscal year 2020 to reimburse local education agencies (LEAs) and local law enforcement agencies for SRO costs, including certain related costs. As noted in Figure 1, according to MCSS' records, SRO Grant payments totaled \$8.0 million during fiscal years 2020 through 2022.

### Grant Payments Were Not Supported

MCSS did not obtain documentation to support the propriety of payments made to grantees and to ensure the grantees only claimed allowable costs. MCSS' agreement for the SRO Grant specified allowable costs (such as salaries, equipment, and training) and unallowable costs (such as attending conferences, purchasing weapons and vehicles, and travel).

During fiscal year 2020, grantees submitted reimbursement requests directly to the Maryland State Department of Education (MSDE) for payment; however, MCSS did not require grantees to provide supporting documentation, nor did MCSS approve these payments. Consequently, neither MSDE nor MCSS had documentation to support the amounts paid. We requested MCSS to obtain supporting documentation from two grantees for fiscal year 2020 grant payments totaling \$498,670. Our review of the documentation received from these grantees disclosed that it did not include sufficient specificity to support the amounts paid. For example, one grantee provided copies of invoices from the local police

**Figure 1**  
**SRO Grant Payments**  
**Fiscal Year 2020 to 2022**  
**(dollar amounts in millions)**

Fiscal Year	Number of Grantees *	Awards	Payments
2020	25	\$7.5	\$2.3
2021	23	4.7	3.1
2022	22	5.2	2.6
<b>Total</b>	<b>70</b>	<b>\$17.4</b>	<b>\$8.0</b>

\* Certain jurisdictions received multiple awards (such as grants to multiple local law enforcement agencies) while other jurisdictions did not apply for SRO grants.

Source: MCSS Records

department for officer payroll costs totaling \$249,512. However, the invoices did not include, and the grantee did not submit documentation such as the names of officers who provided the safety coverage and the specific schools where the coverage was provided supporting that the costs related to SRO Grant activities.

Subsequent to fiscal year 2020, MCSS advised that it started to request support from grantees; however, we found the documentation provided by grantees did not consistently include adequate support, as noted above for fiscal year 2020. Specifically, our test of 18 payments totaling \$2.3 million made to 8 grantees during the period from July, 2021 to April, 2022 disclosed that all 18 lacked sufficient supporting documentation. For example, for one payment to an LEA totaling \$902,000 MCSS only received payroll reports for 13 employees with gross earnings totaling \$593,000. MCSS was not aware that the remaining \$309,000 in charges were not supported by the reports and it could not explain the difference. In response to our inquiries, MCSS contacted the LEA and was advised that the \$309,000 represented fringe benefits for the 13 employees, but the LEA did not provide documentation to support this assertion. In addition, MCSS did not request or receive timesheets for the 13 employees to ensure the payroll charges were related to school safety activity.

#### Grant Payments were not Subject to Independent Supervisory Review

Grant payments were not subject to supervisory review and approval. MCSS advised us that fiscal year 2020 and subsequent years' payments generally only required an independent supervisory review and approval if the grant payment was in excess of \$100,000. Further, when an approval was required, the related review was limited to ensuring that the total payments to the grantee did not exceed the grant award, and there was no review of the supporting documentation submitted by the grantee. Finally, we found that the review and approval process was not always documented. Specifically, our test of nine payments over \$100,000 disclosed that seven payments totaling \$967,000 lacked documentation of an independent supervisory approval.

#### **Recommendation 1**

##### **We recommend MCSS**

- a. ensure that appropriate and sufficient documentation is received to support all grant payments, including the payments noted above;**
- b. perform a documented independent supervisory review to ensure the propriety of all grant payments; and**
- c. pursue recovery from grantees for payments that cannot be supported, including those noted above.**

## Safe Schools Maryland

### Background

MCSS is responsible for Safe Schools Maryland, an anonymous tip line to report various school safety issues including bullying, assault, planned school attack, general school accountability, and drugs. Tips can be submitted online, by phone, or via a mobile application to facilitate anonymous reporting. According to its records, MCSS received 1,746 tips from the inception of the tip line in October 2018 through May 2022 (see Figure 2).

MCSS executed an interagency agreement with

the Maryland Department of Emergency Management (MDEM) to operate the tip line. The initial agreement covered the period October 2018 through June 2021, and a second agreement extended the period through June 30, 2025. Under the agreement, MDEM personnel are responsible for recording the tips and forwarding them to the appropriate entities including school systems or law enforcement agencies, and documenting the actions taken on MCSS' automated system. According to MCSS records, MCSS has paid MDEM approximately \$298,000 through June 30, 2022 to operate this tip line.

**Figure 2**  
**Tips Received From October 2018 to May 2022**

Type of Tip	Count
Bullying / Cyber-Bullying / Teasing	185
Assault / Intend to Harm Others	176
Planned School Attack	154
General School Complaint / School Accountability	154
Drug Distribution / Use / Sale / Abuse	117
Other	960
<b>Total</b>	<b>1,746</b>

Source: MCSS Records



**Finding 2**

**MCSS had not developed written policies and procedures for the operation of the Safe Schools Maryland tip line to ensure all tips were addressed in a timely and comprehensive manner.**

**Analysis**

MCSS had not developed written policies and procedures for the Safe Schools Maryland tip line to ensure all tips were addressed in a timely and comprehensive manner. Such procedures<sup>2</sup> should include critical processes to be followed by MCSS and MDEM including:

- MDEM procedures to determine the appropriate entity (for example, school or law enforcement) to which to communicate tips, including potential issues that may arise impacting timely reporting of tips for investigation, such as if the designated contact is not available.
- Methodology to be used by schools for prioritizing the investigation of tips.
- MDEM time and reporting requirements, such as time requirements for communicating tips to appropriate entities and for following up to determine the tip investigation status or resolution.
- MCSS and MDEM monitoring policies and procedures, such as requiring a periodic documented review of the status of all tips, including tips with a status recorded as closed.

MCSS advised us that it has an informal monitoring process to periodically review the information recorded on the automated system; however, MCSS could not document the extent and nature of this review. For example, MCSS did not perform a documented periodic review of the status of tips received to ensure all tips were addressed in a timely and comprehensive manner. We judgmentally selected 12 tips received by MDEM during the period January 2020 through April 2022 that we considered to be critical events such as planned school attacks, child abuse, or sexual assault. Based on our review of available documentation, these tips appeared to have been addressed in a timely and comprehensive manner.

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<sup>2</sup> We reviewed procedures recommended by the Pacific Institute for Research and Evaluation (an independent, non-profit research organization that focuses on individual and social problems to improve the health, safety, and well-being of individuals, communities, and nations of the world) and a 2021 United States Department of Justice study entitled *Evaluating a Statewide Anonymous Reporting System for Students and Multidisciplinary Response Teams: Methods for a Randomized Trial*, which assessed the implementation and outcomes needed for a statewide tip line. These sources confirmed the need for formal policies and procedures to establish accountability over tips received.

## **Recommendation 2**

**We recommend MCSS develop comprehensive written policies and procedures for Safe Schools Maryland to ensure all tips are addressed in a timely and comprehensive manner.**

## **Audit Scope, Objectives, and Methodology**

We have conducted a fiscal compliance audit of the Maryland Center for School Safety (MCSS) for the period beginning June 1, 2018 and ending April 15, 2022. The audit was conducted in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

As prescribed by the State Government Article, Section 2-1221 of the Annotated Code of Maryland, the objectives of this audit were to examine MCSS' financial transactions, records, and internal control, and to evaluate its compliance with applicable State laws, rules, and regulations.

In planning and conducting our audit, we focused on the major financial-related areas of operations based on assessments of significance and risk. The areas addressed by the audit included operating and capital grant programs, and oversight of the Safe Schools Maryland tip line.

Our audit did not include certain support services (such as human resources, payroll activities, and invoice processing) provided to MCSS by the Maryland State Department of Education (MSDE). These support services are included within the scope of our audit of MSDE.

Our assessment of internal controls was based on agency procedures and controls in place at the time of our fieldwork. Our tests of transactions and other auditing procedures were generally focused on the transactions occurring during our audit period of June 1, 2018 to April 15, 2022, but may include transactions after this period as we considered necessary to achieve our audit objectives.

To accomplish our audit objectives, our audit procedures included inquiries of appropriate personnel, inspections of documents and records, tests of transactions, and to the extent practicable, observations of MCSS' operations. Generally, transactions were selected for testing based on auditor judgment, which primarily

considers risk, the timing or dollar amount of the transaction, or the significance of the transaction to the area of operation reviewed. As a matter of course, we do not normally use sampling in our tests, so unless otherwise specifically indicated, neither statistical nor non-statistical audit sampling was used to select the transactions tested. Therefore, unless sampling is specifically indicated in a finding, the results from any tests conducted or disclosed by us cannot be used to project those results to the entire population from which the test items were selected.

We also performed various data extracts of pertinent information from the State's Financial Management Information System (such as revenue and expenditure data) and the State's Central Payroll Bureau (payroll data). The extracts are performed as part of ongoing internal processes established by the Office of Legislative Audits and were subject to various tests to determine data reliability. We determined that the data extracted from these sources were sufficiently reliable for the purposes the data were used during this audit. We also extracted data from various MCSS systems for the purpose of testing certain areas, such as grants and hotline tips. We performed various tests of the relevant data and determined that the data were sufficiently reliable for the purposes the data were used during the audit. Finally, we performed other auditing procedures that we considered necessary to achieve our audit objectives. The reliability of data used in this report for background or informational purposes was not assessed.

MCSS' management is responsible for establishing and maintaining effective internal control. Internal control is a process designed to provide reasonable assurance that objectives pertaining to the reliability of financial records; effectiveness and efficiency of operations, including safeguarding of assets; and compliance with applicable laws, rules, and regulations are achieved. As provided in *Government Auditing Standards*, there are five components of internal control: control environment, risk assessment, control activities, information and communication, and monitoring. Each of the five components, when significant to the audit objectives, and as applicable to MCSS, were considered by us during the course of this audit.

Because of inherent limitations in internal control, errors or fraud may nevertheless occur and not be detected. Also, projections of any evaluation of internal control to future periods are subject to the risk that conditions may change or compliance with policies and procedures may deteriorate.

Our reports are designed to assist the Maryland General Assembly in exercising its legislative oversight function and to provide constructive recommendations for

improving State operations. As a result, our reports generally do not address activities we reviewed that are functioning properly.

This report includes a finding relating to a condition that we consider to be a significant deficiency in the design or operation of internal control that could adversely affect MCSS' ability to maintain reliable financial records, operate effectively and efficiently, and/or comply with applicable laws, rules, and regulations. Our report also includes a finding regarding a significant instance of noncompliance with applicable laws, rules, or regulations. Other less significant findings were communicated to MCSS that did not warrant inclusion in this report.

MCSS' response to our findings and recommendations is included as an appendix to this report. As prescribed in the State Government Article, Section 2-1224 of the Annotated Code of Maryland, we will advise MCSS regarding the results of our review of its response.

January 4, 2023

Mr. Gregory A. Hook, CPA  
Legislative Auditor  
Office of Legislative Audits  
The Warehouse at Camden Yards  
351 West Camden Street, Suite 400  
Baltimore, MD 21201

Dear Mr. Hook:

Enclosed please find the Maryland Center for School Safety (MCSS) response to the audit report of MCSS for the period beginning June 1, 2018 and ending April 15, 2022. As a recently expanded and new granting agency, we appreciate the professionalism and efforts of your team in helping us improve our processes.

If you have any questions or need additional information, please contact me at 410-281-2335 or [kate.bryan@maryland.gov](mailto:kate.bryan@maryland.gov).

Regards,



Kate Bryan  
Executive Director

Enclosures

cc: Mohammed Choudhury, State Superintendent of Schools  
Gifty Quarshie, Fiscal and Grants Manager  
Joseph Pignataro, Deputy Director  
Kimberly Buckheit, Policy, Communications, and Engagement Manager

# Maryland Center for School Safety

## Agency Response Form

### School Resource Officer Grants

#### Finding 1

The Maryland Center for School Safety (MCSS) did not ensure that School Resource Officer (SRO) Grant payments were properly supported and subject to independent supervisory review.

We recommend MCSS

- a. ensure that appropriate and sufficient documentation is received to support all grant payments, including the payments noted above;
- b. perform a documented independent supervisory review to ensure the propriety of all grant payments; and
- c. pursue recovery from grantees for payments that cannot be supported, including those noted above.

Agency Response	
Analysis	Factually Accurate - with context
Please provide additional comments as deemed necessary.	<p>MCSS would like to provide additional context to the analysis.</p> <p>Local Education Agency (LEA) grantees determine the location and hours needed for law enforcement coverage and pay their law enforcement agency counterparts directly for those services. The LEA in turn submits a request for reimbursement to the MCSS. The support for such requests primarily includes the law enforcement agency's invoice (to the LEA) and the proof of payment from the LEA. Some LEAs also include a tally of the SRO or adequate coverage hours provided during any one period.</p> <p>Law enforcement agency grantees on the other hand, submit their reimbursement requests directly to MCSS. The support documentation for such requests primarily includes timesheets, payroll, and salary information.</p> <p>Support documentation is not consistent from applicant to applicant because applicants use different timekeeping systems.</p> <p>Specifically, (1) the lack of standardized timekeeping systems among all twenty-four local jurisdictions may create the perception of incomplete or insufficient support for SRO grant reimbursements, (2) fringe benefit rates vary by jurisdiction, and (3) grantees were only reimbursed for allowable costs as specified in the Notification of Funding Availability</p>

# Maryland Center for School Safety

## Agency Response Form

	(NOFA) and as approved in their application. No funds were reimbursed for unallowable costs.		
<b>Recommendation 1a</b>	<b>Agree</b>	<b>Estimated Completion Date:</b>	06/30/2023
<b>Please provide details of corrective action or explain disagreement.</b>	<p>MCSS continues to evaluate processes to ensure applicants have provided sufficient supporting documentation prior to reimbursement. Since its first year of administering grants in FY19, MCSS has identified and addressed several reimbursement issues.</p> <p>In the first fiscal year, MCSS used the existing MSDE grant financial system, which allows LEAs to draw down funds without providing supporting documentation. Because of this, MCSS stopped allowing LEAs to use the MSDE financial system to draw down funds for grants administered by MCSS. Since this change, all invoices and supporting documentation must be sent to MCSS for review and processing before reimbursements are made.</p> <p>To address inconsistencies in timekeeping systems between jurisdictions, in FY23, MCSS developed a template that is used by both the school system and the law enforcement agency that includes overtime hours, overtime pay, the name of the officer(s), the name of the school(s) where SRO or adequate coverage was provided, and whether an SRO has completed the MCSS Model SRO Training Program*. Reimbursement submissions by law enforcement agencies are validated with the LEA. Although local agency payroll and accounting systems differ across the state, this new process will help ensure that MCSS has records of work times and locations prior to reimbursement.</p> <p>*An important item of note is that overtime hours for patrol officers that provide additional (adequate) coverage to schools are eligible under the grant. However, these officers are <i>not</i> statutorily required to complete the MCSS SRO training program.</p>		
<b>Recommendation 1b</b>	<b>Agree</b>	<b>Estimated Completion Date:</b>	Ongoing
<b>Please provide details of corrective action or explain disagreement.</b>	<p>MCSS concurs that robust documented, consistent, and independent supervisory review is necessary to approve grant payments.</p> <p>Over the course of the last few years, MCSS has implemented several new steps to ensure grant payments receive an independent supervisory review. These changes include (1) increasing the grant unit from one grant position to two, which will ensure we have appropriate staffing levels to conduct independent reviews, (2) implementing a process in our</p>		

# Maryland Center for School Safety

## Agency Response Form

	current invoicing system that triggers tiered supervisory review, and (3) regular evaluation of workflow processes and staffing levels to ensure grants payments have independent supervisory review.		
<b>Recommendation 1c</b>	<b>Agree</b>	<b>Estimated Completion Date:</b>	6/30/2023
<b>Please provide details of corrective action or explain disagreement.</b>	MCSS concurs with the recommendation and will pursue recovery from grantees for payments that cannot be supported.		

### Safe Schools Maryland

**Finding 2**  
**MCSS had not developed written policies and procedures for the operation of the Safe Schools Maryland tip line to ensure all tips were addressed in a timely and comprehensive manner.**

**We recommend MCSS develop comprehensive written policies and procedures for Safe Schools Maryland to ensure all tips are addressed in a timely and comprehensive manner.**

<b>Agency Response</b>			
<b>Analysis</b>	<b>Factually accurate</b>		
<b>Please provide additional comments as deemed necessary.</b>			
<b>Recommendation 2</b>	<b>Agree</b>	<b>Estimated Completion Date:</b>	6/30/2023
<b>Please provide details of corrective action or explain disagreement.</b>	Policies and procedures for Safe Schools Maryland are in development and MCSS anticipates completion of both by June 30, 2023.		



AUDIT TEAM

**Mark S. Hagenbuch, CPA**  
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