

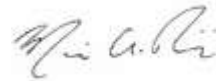
Internal Audit Unit
MONTGOMERY COUNTY BOARD OF EDUCATION
Rockville, Maryland

July 29, 2026

MEMORANDUM

To: Mrs. Stephanie P. Valentine, Principal
Springbrook High School

From: Melvin A. Phillips, Supervisor, Internal Audit Unit



Subject: Audit of Extracurricular Activity Stipend Administration Springbrook High School

Executive Summary

The Internal Audit Unit (IAU) has reviewed the administration of Extracurricular Activity (ECA) stipends and supplemental hourly assignments at Springbrook High School for school years 2024-2025 and 2025-2026, initially in response to OIG Complaint C-26-372 forwarded by the Montgomery County Office of the Inspector General on April 30, 2026, and subsequently expanded to test compliance with the Montgomery County Public Schools (MCPS) Extracurricular Activities Program Handbook across the school's stipend program.

Background

On April 17, 2026, a classroom teacher at Springbrook HS, sent a written inquiry to an Associate Superintendent for Division of School Leadership and Improvement (DSLII), with a copy to the Montgomery County Office of the Inspector General, alleging that a single Springbrook staff member had been assigned to a substantial concentration of ECA stipend roles, specifically NEC Signature Coordinator, Co-AP Testing Coordinator, SSL Coordinator, Class of 2026 Sponsor, Yearbook Sponsor, Newspaper Sponsor, Graduation Coordinator, and Varsity Girls Tennis Coach, for a combined payout exceeding \$20,000 and a workload the complainant characterized as "physically impossible to perform outside of the standard duty day." The complainant further alleged instructional impact through overcrowding of other English classes and expressed concern about retaliation from the school's principal.

On April 30, 2026, the Office of the Inspector General formally referred the matter (OIG Complaint C-26-372) to the MCPS Chief of Staff. The referral was routed to the Department of Compliance and Investigations, then forwarded to the Internal Audit Unit(IAU) on May 7, 2026.

Findings

Finding 1: Concentration on a single resource teacher

A single resource teacher holds five active ECA stipends and six supplemental hourly assignments and is the outlier among resource teachers at Springbrook HS by a factor of 5 to 6 times her nearest peer.

The ECA Handbook provides that "The principal shall make every effort to select a different unit member for each stipend activity." permits multiple stipends only where "the activities do not conflict with the normal responsibilities of another stipend-compensated activity or normal teaching duties" and where the vacancy was posted with no other qualified unit member volunteering.

Springbrook's practice, per its own vacancy communications, is to post only unfilled positions and to re-assign already-held stipends without opening them to the broader unit-member pool. This practice concentrates assignments on incumbents.

IAU recommends that the ECA stipend assignments be redistributed so that no single unit member holds a disproportionate concentration. Going forward, make every effort to select a different unit member for each activity, retain written documentation of the effort, and offer already-held stipends to other qualified unit members before renewing them.

Finding 2: Failure of resource teacher eligibility test

The ECA Handbook permits resource teachers to lead ECA stipends only if: (a) the activity is at the employee's current work location; (b) the stipend was offered to other unit members and none expressed interest; (c) the activity does not conflict with normal resource teacher duties, including required after school meetings; and (d) the appointment is temporary, for one year, and only be renewed if the same conditions are met the following year. The school produced no documentation that this offering occurred, and the school's own vacancy communications affirmatively excluded the positions in question.

IAU recommends before assigning any ECA stipend to a resource teacher, document in writing that each of the four conditions are met, prior offering to other unit members, no conflict with normal resource teacher duties, and a one-year appointment. Retain this documentation with MCPS Form 430-59, *Extracurricular Activity (ECA) Stipend Agreement and Assignment*, and re-perform the test annually before renewal.

Finding 3: Vacancy posting failure

Four Class 3 stipends held by a single resource teacher were not posted. Newspaper Advisor (E3-J03), Yearbook Advisor (E3-J04), Student Service Learning (SSL) HS (E3-S04), and Senior Class Advisor (E3-N06), no vacancy posting was made in either of the FY25 or FY26 school-wide vacancy communications. The ECA Handbook requires that the principal post notice of sponsor vacancies. The sole exception is that the principal "need not post a vacancy notice if they have selected the satisfactorily evaluated incumbent." The school produced no evaluations for any sponsor.

IAU recommends that Springbrook posts every ECA sponsor vacancy school-wide at the start of each school year, including positions previously held by a returning sponsor. Where the incumbent exception is invoked, the school should retain the prior-year's satisfactory evaluation, on MCPS Form 430-59, as supporting documentation and note the basis for re-selection on the current-year assignment.

Finding 4: Form 430-59 integrity concerns

Springbrook's MCPS Form 430-59 submissions included prefilled dates, incomplete signatures, internally inconsistent compensation fields, and a substantial number of forms were missing altogether. Most of Springbrook's ECA assignments are unsupported by a complete MCPS Form 430-59. In the absence of contemporaneous, signed agreements and annual evaluations, the school cannot substantiate that stipends were properly authorized under the handbook.

IAU recommends that a complete, fully signed and dated MCPS Form 430-59, be obtained for every ECA assignment prior to the start of the school year; and that the use of prefilled dates be discontinued. An annual evaluation on MCPS Form 430-59 should be completed within 30 days of activity completion for every sponsor. Reconcile the school's ECA Plan to the signed MCPS Form 430-59 before submitting to payroll.

Finding 5: Payment above written authorization (School Store)

The signed MCPS Form 430-59, authorizes 50 Class 1 hours for the School Store; the ECA Plan recorded 100 hours and payroll shows 75 hours paid, 25 hours above the principal's written authorization. A resource teacher has been paid for 25 hours above the principal's written authorization (approximately \$450 at the \$18 hourly rate). The larger control concern is that the ECA Plan entry and the MCPS Form 430-59 authorization are internally inconsistent, meaning the school's ECA Plan cannot be relied upon as a control over authorized hours.

IAU recommends that going forward, ensure that the ECA Plan hours entered for every Class 1 activity match the principal's MCPS Form 430-59 authorization prior to any work being performed.

Finding 6: Additional eligibility concerns among SEIU staff.

Several supporting services employees at Springbrook, including paraeducators and an English composition assistant, hold multiple ECA stipends despite the ECA Handbook restrictions on instructional supporting services personnel.

The ECA Handbook restricts supporting services personnel from stipend assignments, it treats paraeducators, media assistants, and English composition assistants as "instructional" and caps combined hours at 8 hours/day or 40 hours/week; bars from stipend hire "under any circumstances" full-time supporting service personnel whose major job description involves working directly with students.

Paraeducators and the English Composition Assistant hold ECA stipends despite the restrictions. IAU recommends a review of all ECA stipends currently assigned to SEIU staff at Springbrook against the ECA Handbook restrictions on supporting services personnel. Discontinue stipend assignments to paraeducators, English composition assistants, and other full-time supporting services personnel whose major job description involves working directly with students, and confirm that any remaining SEIU stipends satisfy the eligibility conditions in the handbook before payroll is processed.

Mrs. Stephanie P. Valentine, Principal

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July 29, 2026

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