

SAVANNAH-CHATHAM COUNTY BOARD OF EDUCATION
Internal Audit Department



TO: Board of Education

THROUGH: M. Ann Levett, Ed.D, Superintendent of Schools
Dr. Kimberly Hancock, Associate Superintendent- Learning Support Services

FROM: Marshall Withers, Senior Director, Internal Audit

DATE: December 17, 2020

SUBJECT: Report on Audit of School Social Workers

We have completed our Audit of School Social Workers. Our audit report is presented in the sections listed below:

- I. AUDIT OBJECTIVES**
- II. AUDIT SCOPE**
- III. BACKGROUND**
- IV. AUDIT FINDINGS**
- V. OTHER MATTERS**

Management's response to our report is attached in its entirety. In addition, the specific action that management has agreed to take in response to each recommendation is included in the Management Action Plan, along with who is responsible for the action and when it will be completed.

I. AUDIT OBJECTIVES

Our Audit of School Social Workers was designed to meet specific objectives. Within those objectives, we focused on areas where we identified opportunities for improvement. The objectives of our audit were as follows:

- Review all local, State and Federal requirements for Social Workers to ensure the District meets all requirements, including staffing levels, certification and experience requirements, mandated reporting, etc.
- Review District policies, administrative regulations and guidance related to Social Workers to ensure they provide adequate and appropriate direction to achieve the District goals.
- Review District spending for/by Social Workers to ensure funds are spent according to District guidelines and policies.
- Document the processes for assigning Social Workers to the District's elementary, K-8, middle, high schools, and alternative education programs and determine if these processes meet State guidelines and/or local policies, as well as provide equity for the District's schools to meet the needs of the schools' unique populations.
- Review the duties and responsibilities of Social Workers at the elementary, K-8, middle, high schools, and alternative programs to ensure that appropriate grade-level Social Worker services are available and provided to the District's students.
- Review professional development opportunities for Social Workers to ensure that training in current research-based exemplary strategies is provided.
- Identify exemplary strategies currently in use in the District for school Social Workers and determine if these strategies can be implemented at all school sites.

II. AUDIT SCOPE

The Audit of School Social Workers was determined for review based on the Internal Audit Department's yearly risk assessment. The objectives of the audit are designed to review the District's social worker program to assess if the social worker program is functioning effectively and with efficiency in meeting its goals and program objectives.

In meeting the objectives of the Audit of School Social Workers, we performed the following:

- Reviewed National and State standards, guidance and intervention models, and local policies/regulations for school social workers.
- Interviewed the District's School Social Workers and principals concerning processes, expectations, and best practices.
- Reviewed budgets and expenditures for FY18-FY19.
- Identified school assignments within the District in relation to ratio recommendation from National Standards for School Social Workers.
- Identified handbooks, forms and other work processes provided to the District's School Social Workers.
- Held discussions with other Georgia School Districts' School Social Worker Directors to identify best practices and intervention model/work processes.
- Reviewed continuing education requirements for School Social Workers and the methods the District's School Social Workers obtain their training.

Our fieldwork was conducted during the period of February 2020 through May 2020.

Internal Audit conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that the audit be planned and performed to obtain sufficient, appropriate evidence to provide a reasonable basis for the findings and conclusions based on the audit objectives. Internal Audit believes that the evidence obtained provides a reasonable basis for the findings and conclusions based on the audit objectives.

Details of each area tested and recommendations for strengthening the internal controls in that area are listed below.

The Board's District Accountability System (DAS) lists five goals:

- I. To ensure all students are college and career ready.
- II. To provide a supportive learning environment that is conducive to teaching and learning.
- III. To maximize family and community engagement that contributes to the advancement of student success.
- IV. To build professional capacity in order to achieve a premier student-focused workforce.
- V. To maximize resource stewardship and fiscal responsibility by ensuring District resources are used efficiently, effectively, economically, and equitably (4E's).

IV. BACKGROUND

School Social Workers have been functioning in school settings since the early 1900's. The traditional view of their function was to serve as visiting teachers. Their roles have shifted through the years as educational policies have changed.

In 1976, the National Association of Social Workers (NASW) developed the first standards for school social work services. The NASW functions not only as an advocate for the social worker profession but also as a source of information for industry knowledge. The NASW has developed a set of standards and ethical responsibilities for social workers that set the foundation for social work. The standards are grouped into three areas: attainment of competence; organization and administration; and professional practice. In 1994, the School Social Work Association of America (SSWAA) was formed. SSWAA serves separate from the NASW and focuses solely on School Social Workers.

The SSWAA, in conjunction with the NASW's Standards for School Social Work Practices and Code of Ethics, has developed a practice model that serves to improve academic and behavioral outcomes for students. With students being the center of the model, the social work practice model identifies four resources (Home-School-Community Linkages; Ethical Guidelines and Educational Policy; Education Rights and Advocacy; and Data Based Decision Making) to produce the following outcomes:

- Provide Evidence-based education, behavior, and mental health services through implementation of multi-tiered programs and practices, monitoring progress and evaluating service effectiveness.
- Promote a school climate and culture conducive to student learning and teaching excellence through promotion of effective school policies and administrative procedures, enhancing professional capacity of school personnel, and facilitating engagement between student, family, school, and community.
- Maximize access to school-based and community-based resources through the promotion of a continuum of services, mobilizing resources, promoting assets and providing leadership, interdisciplinary collaboration, systems coordination, and professional consultation.

The SSWAA recommends a ratio of one school social worker to every 250 students depending on the needs of the student population. For those schools with higher needs, the SSWAA recommends a lower ratio. The District's ratio for SY19/20 was 1:1390. The Georgia State Department of Education funds one social worker for every 2475 students. In SY19/20, the District earned 14.6 positions. The District has 25 social workers (190-day employees – 22 supervised by the Director of Student Affairs.; 229-day employees – 3 (These three are school based (Otis J. Brock Elementary School, Building Bridges High School Academy, and Building Bridges Middle Academy. They report to the site administrator.)

Their workday is from 8:00am to 5:00pm each day. In addition, two weeks out of each year they work until 7pm to handle crisis situations outside of school hours. The Director of the Student Affairs is over the District's Student Affairs Support Center (SASSC).

A social worker is eligible for licensure upon meeting one of three requirements, including completion of a Master of School Social Work degree. A Bachelor's degree in Social Work does exist; however, this level is not accepted for licensure. Once the master's degree is completed, fieldwork hours are required before application for state licensure is accepted. There are three designations for social workers:

- Master of Social Work (MSW)- completion of master's degree in social work. No post degree licensure exam or supervised fieldwork.
- Licensed Master Social Worker (LMSW) - Completion of master's degree in social work, completed and successfully passed the Association of Social Work Boards (ASWB), completed application to the Georgia Professional Licensing Board.
- Licensed Clinical Social Worker (LCSW) - completion of degree requirements, ASWB examination, acquire 3,000 of supervised social work within a 3 to 9-year period, and complete 120 documented, social work.

The District employed 13 Master Social Workers, eight Licensed Master Social Workers, and four Licensed Clinical Social Workers during SY19/20. All licensed social workers in the State of Georgia must complete continuing education (CE) requirements to maintain their licenses. They have a two-year period to complete 35 hours of continuing education with five of the 35 specifically appointed for ethics of the social worker profession; No more than ten of the remaining 30 can be obtained online. A minimum of 15 hours must be core hours and not more than 15 shall be related hours. The District's licensed social workers must ensure their CE requirements meet Georgia Board of Professional Social Workers requirements. The Georgia Professional Standards Commission (GaPSC) Rule 505-2-.147 "outlines the requirements and procedures for issuance of the service certificate in School Social Work P-12, which allows individuals certified in this field to assist with mental health and behavioral concerns, provide positive behavioral, academic, and classroom support in consultation with teachers, parents, and administrators to promote student achievement." For a Professional Certificate the GaPSC requires:

"(a) Issuance

1. An individual is eligible for a Standard Professional certificate in the field of School Social Work based on meeting one of the following requirements:
 - (i) Completion of a Master of Social Work (M.S.W.) degree from a GaPSC-accepted accredited institution, and pass or exempt the GACE Program Admission assessment.
 - (ii) Completion of a state-approved certification preparation program in School Social Work at the master's degree level- level five (5) - or higher.
 - (iii) Submission of a valid State of Georgia Master Social Worker's or Clinical Social Worker's license issued by the Professional Licensing Boards Division of the Office of Secretary of State, O.C.G.A. Title 43.
2. Meet Standards of Conduct.

3. Apply for certification following procedures outlined in Rule 505-2-.27 Certification and Application Procedures.”

All of the District’s social workers hold a GaPSC Professional Certificate.

V. FINDINGS

FINDING A. Guidance and Adherence to the National Association of Social Workers National Standards.

(DIP/DAS REMI Goal II)

The goals of NASW’s Standards for School Social Work Services “were developed to broadly define the scope of services that school social workers shall provide, that school administrators should support, and that students and families should expect. The standards are designed to enhance awareness of the skills, knowledge, values, methods, and sensitivity school social workers need to work effectively within school systems.” We found multiple areas where the District’s Social Worker program did not follow the NASW standards or there was no written guidance to provide instruction of work processes to ensure adherence to NASW’s standards.

Standard 1. Ethics and Values – “School social workers shall adhere to the ethics and values of the social work profession and shall use the *NASW Code of Ethics* as a guide to ethical decision making, while understanding the unique aspects of school social work practice and the needs of the students, parents, and communities they serve.”

NASW Code of Ethics

Social Workers’ Ethical Responsibilities to Clients

For sections, 1.01 Commitment to Clients, 1.02 Self-Determination, 1.04 Competence, 1.08 Access to Records, 1.09 Sexual Relationships, 1.10 Physical Contact, 1.11 Sexual Harassment, and 1.13 Payment for Services (non-applicable), these areas are addressed in the District’s yearly ethics training or are identified during the Social Worker’s yearly evaluation. Areas of improvement were identified in the sections below.

- **1.03 Informed Consent** – No written guidance is provided to social workers to describe how they are to “provide services to clients in the context of a professional relationship, when appropriate on valid informed consent.” In discussions with Social Workers, we were told this information is verbally expressed to students/parents. However, the social worker that serves at The Front Porch Resource Center does provide a form and requires this information to be completed by their clients.
- **1.05 Cultural Awareness and Social Diversity** – All areas except Section C could be verified. Section C states, “social workers should obtain education about and seek to understand the nature of social diversity and

oppression with respect to race, ethnicity, national origin, color, sex, sexual orientation, gender identity or expression, age, marital status, political belief, religion, immigration status and mental or physical ability.” While training with these concepts occurred across various areas, we found no classes that were solely encompassed on this particular subject within Professional Learning Department’s transcripts for the District’s Social Workers. However, the Director of Student Affairs informed us this content area is provided to all social workers.

- 1.06 Conflicts of Interest – Outside of the District’s Conflict of Interest Form as it pertains to conflicts of interest with employment with the District, there is no other form or monitoring process in place to confirm cases handled by the District’s social workers do not pose a conflict of interest risk; as it pertains to the specific services social workers provide. Social Workers are expected to self-report.
- 1.07 Privacy and Confidentiality - (Clients right to privacy) - We found two areas of concern with this standard. The areas include informing clients (parents) of disclosing information and their rights (No Informed Consent Disclosure Form) and the protection of client information. Social workers are to provide security for client information through the means of two locked areas. As told to the Internal Audit Department, this should entail a lockable filing cabinet and a locked office door. However, many of the District’s social workers do not have a lockable filing cabinet and/or an office of their own. We were also informed by social workers that meetings with parents concerning student information were held in public places (media center) because this is the only area provided to them to use.

The District requires social workers to utilize a paper referral form to document requests for social work services. We found some social workers have converted this form into an electronic form and it is stored on a laptop. Because this information is not entered into a shared database, the individual social worker maintains the information. Not all social workers have laptops that function (obsolete/outdated equipment); therefore, they are using their own personal device. They store the information on a jump drive or bring the District’s computer home at night. Since most of the information obtained by the District’s social workers falls under the Family Educational Rights and Privacy Acts (FERPA) and in some cases Health Insurance Portability And Accountability Act (HIPAA) requirements, the District is at potential risk for violation of these requirements.

- 1.14 Clients Who Lack Decision-Making Capacity - There is no written guidance of the District’s expectations for how to “act on behalf of clients who lack the capacity to make informed decisions.”
- 1.15 Interruption of Services – There is no written guidance from the District describing expectations when “services are interrupted” between the school social worker and student/parent.
- 1.16 Referral for Services – There is no written guidance to outline how a

school social worker should refer a parent/child to other outside professionals and the transfer of responsibility of services.

- 1.17 Termination of Services - There is no written guidance to outline how the District's school social worker should terminate services to students/parents when services are no longer needed.

Social Workers' Ethical Responsibilities to Colleagues

We found the District provides written guidance in all areas of this standard through Board Policies and Regulations.

Social Workers' Ethical Responsibilities in Practice Settings

For sections 3.01 Supervision and Consultation, 3.02 Education and Training, 3.03 Performance Evaluation, 3.05 Billing (non-applicable), 3.09 Commitments to employers, and 3.10 Labor-Management Disputes, we found the District ensures adherence in these areas through the performance evaluation process and the District's hiring processes. Areas of improvement were identified in the areas below:

- 3.04 Client Records - No written guidance is provided to social workers of the District's expectations of what clients' records should have in them, what is considered a timely response to the client, and how the records should be maintained.
- 3.06 Client Transfer – No written guidance is provided to identify “how to minimize confusion and conflict” if multiple agencies are assisting a student/parent.
- 3.07 Administration - “Social work administrators should take reasonable steps to ensure that the working environment for which they are responsible is consistent with and encourages compliance with the *NASW Code of Ethics*. We have found multiple areas of non-adherence with the Code of Ethics and/or lack of written guidance to ensure adherence to the standards.
- 3.08 Continuing Education and Staff Development - The District's social worker manager shares knowledge of any available trainings; however, staff learning opportunities is provided during informational sessions from community resources during monthly staff meetings.

Social Workers' Ethical Responsibilities as Professionals, Social Workers' Ethical Responsibilities to the Social Work Profession & Social Workers' Ethical Responsibilities to the Broader Society – This was not reviewed. These areas were not within the scope of this audit.

Standard 2. Qualifications -” School social workers shall meet the provisions for professional practice set by NASW and their respective state department of education and possess knowledge and understanding basic to the social work profession as well as the local education system.”

The District's social worker program is adhering to this standard.

Standard 3. Assessment - “School social workers shall conduct assessments of individuals, families, and systems/organizations (namely, classrooms, school, neighborhood, district, state) with the goal of improving student social, emotional, behavioral, and academic outcomes. School social workers shall possess skills in systematic assessment, data gathering and interpretation at multiple levels using a variety of methods (for example, direct observation, standardized instruments, interview, surveys, focus groups) to assess the needs, characteristics and interactions of students, families, and school personnel. School social workers shall conduct reliable and valid assessments of students and organizations to inform the design of interventions to remove barriers to learning.”

Social workers expressed that they would like to conduct more of these types of activities to provide better resources to students and their families; however, due to their workload only individual assessments occur as situations arise. The program is adhering to this standard.

Standard 4. Intervention- “School social workers shall understand and use evidence-informed practices in their interventions. School social workers shall remain current with school-based intervention research and use evidence-informed practices in service delivery. Interventions shall be designed to enhance positive educational experiences and involve the student, the family, other team members, school personnel, and community resources as appropriate. Interventions shall be based on assessments relevant to the concerns in the referral and include goals, objectives, methods of evaluation, and outcome criteria. Interventions shall be applied within the multitier framework and address the ecologies (for example, home, school, community) most relevant to the problem being addressed.”

Due to the nature of the information within the referrals and feedback information of outcomes, we did not assess this standard using primary documentation. We were able to identify through interviews with school social workers and with our discussions with principals that the District’s social workers interventions are based on assessing the ecologies and then finding community resources to support the student/family. The program is adhering to this standard.

Standard 5. Decision Making and Practice Evaluation - “School social workers shall use data to guide service delivery and to evaluate their practice regularly to improve and expand services. School social workers shall collect, analyze, synthesize, and disseminate data related to their practice. School social workers shall conduct ongoing evaluation to determine the level of effectiveness of interventions. Methods used to evaluate social work practice shall be assessed periodically to ensure that objectives, activities, and measured outcomes are aligned with the local educational agency’s goals and social work ethical practice.”

School social workers use a variety of source information to assess the needs of the student. This information is segregated and therefore can be cumbersome to collect depending on the availability. Social workers and principals have both expressed a need for the individual student's information, obtained through the course of work and analyzed, to be located in one accessible location for use by both parties. Both parties believed having all the information in one location would reduce time in retrieving the information as well as providing a "whole child" picture of the academic, mental, and social behavior of the student.

Standard 6. Record Keeping - "School social workers shall maintain accurate data and records that are relevant to planning, implementation, and evaluation of school social work services. School social workers shall maintain timely, accurate, and confidential records that document school social work services, demonstrate outcomes, and promote accountability to the local education agency and community. Records shall be maintained according to federal, state, and local laws."

Staff members request social worker services through a Referral Request Form (paper form). This form includes personal information with an explanation of the concern. The staff completes and either scans the form to the social worker with a copy to the principal or the paper form is provided to the principal. The principal is encouraged to review the referral and sign off on the form as acknowledgement that they are aware of the request. We were informed by principals that they appreciate this process as it informs them of issues staff are experiencing with students. In some cases, principals had determined that the issue with the student did not need social worker services but was a classroom management issue. Once the social worker reviews the referral, the social worker seeks resolution through various intervention methods. The results of the intervention are then documented on the Referral Feedback Form (paper form) and communicated back to the requestor. We were informed by more than half of the social workers that they do not use the feedback form. They email the results to the principal and the person who submitted the referral.

Due to the nature of the information within the referrals and feedback information of outcomes, we did not assess this standard using primary documentation. Through interviews with the Director of Student Affairs and school social workers, we found a supervisory review of records is not conducted to ensure adherence with this standard or to provide feedback to employees concerning the information that should be or should not be included in the referral/feedback information. Based on the type of information within these referrals, FERPA requires for the security of this information. We also found these requirements are not being followed consistently as stated earlier in this report (section 1.07 of the Code of Ethics).

Standard 7. Workload Management - “School social workers shall organize their workloads to fulfill their responsibilities and clarify their critical roles within the educational mission of the school or district in which they work. School social workers shall manage their work in an efficient and effective manner. Priorities for practice shall be developed collaboratively between the social worker and the supervisor. Priorities shall be established on the basis of the needs of students, professional skills of the school social worker, program needs, research, and availability of other resources. School social workers shall perform roles and responsibilities across a multitier framework for service delivery and use technology to enhance communication, obtain and organize information, demonstrate accountability and complete workload assignments.”

Each year, the Director of Student Affairs assigns the District’s social workers to a set of schools. We were informed this was based on the needs of the school and on a principal’s request. Based on our review (This review did not include the grant funded social worker and the two 229-day employees) of the social worker’s yearly number of referrals and services per school, the workload is not proportionate among social workers. In our three-year review of school assignments, we also found multiple changes of multiple employees in the school assignments instead of a replacement of employees when turnover of employees occurred. Therefore, continuity with students were either lost or had not had time to be established. Management informed us the reason for not replacing the employee when turnover occurred was due to the skill level of the person entering the vacant position.

Along with their assigned schools, the social workers are expected to be on-call two weeks out of each year until 7pm and in addition, are expected to spend time throughout the year helping within the SASSC center. We were informed that the goal each week is to spend a day at each assigned school; however, this can be disrupted if a crisis occurs within another assigned school. Communication is provided to the principal of the scheduled school and work is resumed once the crisis is over.

Standard 8. Professional Development- “School social workers shall pursue continuous enhancement of knowledge and skills to provide the most current, beneficial, and culturally appropriate services to students and their families. School social workers shall adhere to the *NASW Standards for Continuing Professional Education* and follow state professional regulations regarding continuum education requirements. School social workers shall access ongoing supervision and consultation to increase their professional proficiency and competence. School social workers shall participate in professional development activities that enhance their knowledge and skills. School social workers shall also contribute to the development of the profession by educating and supervising school social work interns when possible.”

School social workers,' unless licensed, are not required by the State to have formal professional development. However, it is best practice to ensure knowledge and skills are up to date to address the social needs of the community and improve for verbal and written skills. During monthly staff meetings, community resources are brought in for informational sessions. These sessions cannot be used as continuing education units but serve as vital information for the Social Workers to use during the course of their work. Therefore, any continuing education units are earned through a third party

The District has a Memorandum of Understanding between the Board of Regents of the Institution System of Georgia by and on behalf of Savannah State University to provide supervised field education in school social work. These interns work within the District alongside other licensed social workers within the schools the social worker is assigned to.

Standard 9. Cultural Competence -" School social workers shall ensure that students and their families are provided services within the context of multicultural understanding and competence. School social workers shall demonstrate self-awareness, knowledge, and practice skills consistent with the *NASW Standards for Cultural Competence in School Social Work Practice*. School social workers shall continue to develop specialized knowledge and understanding about client groups they serve and culturally appropriate resources. This understanding shall be allied in a manner that results in a positive school climate that respects and values differences. School social workers shall use evidence-informed practices, skills, and techniques that reflect the worker's understanding of the role of culture in the helping process. School social workers shall recognize barriers to academic progress relating to cultural issues within the local education agency, while supporting an environment that honors and celebrates the cultures of the population within the school."

As identified in review of *NASW Code of Ethics 1.05 Cultural Awareness and Social Diversity*, we could not confirm if the District's school social workers are obtaining continuing education to meet the cultural competence standards.

Standard 10. Interdisciplinary Leadership and Collaboration - "School social workers shall provide leadership in developing a positive school climate and work collaboratively with school administration, school personnel, family members, and community professionals as appropriate to increase accessibility and effectiveness of services. School social workers shall serve as leaders and consultants to facilitate an understanding of factors in the home, school and community that affect students' educational experiences. School social workers shall provide training and engage parents, school personnel, other professional and community members in the removal of barriers to learning. School social workers shall also provide leadership and collaboration in the implementation of comprehensive school-based and school linked programs that promote student well-being and positive academic outcomes."

The District's social workers are following this standard based on the yearly community engagements they are involved in including the SCCPSS Family Health Symposium, Bullying Awareness and Prevention Summit, Promoting Peace: Violence Prevention Conference, and Character Counts!® conference. They also work with principals to develop school-based interventions to address issues that are common among the school's population. Each year, the school's social worker meets with their school's principal to develop goals and strategies to address student social and mental issues. This is conducted in the beginning of the school year and the results are evaluated at the end of the year. In our discussions with principals, all principals complimented on how important the role of their social worker was to the issues within their schools and how valuable they are to handling crisis situations in a prompt, caring, and professional manner.

Standard 11. Advocacy - "School social workers shall engage in advocacy that seeks to ensure that all students have equal access to education and services to enhance their academic progress. School social workers shall advocate for students and their families. This advocacy includes helping them gain access to and effectively use formal and informal community resources that enable families to self-advocate. School social workers, as systems' change agents, shall identify areas of need that are not being addressed by the local education agency and community and shall work to create services that address these needs. School social workers shall be informed about court decisions, mediation, rules and regulations, and policies and procedures that affect school social worker practice, to effectively advocate for students."

This standard was not within the scope of the audit.

Administrative Structure and Support -

Qualifications and Title - "An MSW degree is the recommended entry-level qualification for school social workers. Local education agencies should ensure that school social workers have an MSW degree from a program accredited by CSWE. However, should the local education agency employ school social workers whose highest degree is a BSW, an MSW-level social worker should provide supervision for the BSW-level social worker. All social workers in school settings should adhere to the *NASW Standards for School Social Work Services*." The District follows the recommendations for qualifications and title. Improvements are needed to ensure adherence with NASW standards.

Roles of Local Education Agencies

Administrative Support- "The administrative structure of the local education agency should delineate clear lines of support and accountability for the school social work program and provide for optimum use of the school social workers' knowledge and skills. Realistic job descriptions, working conditions, and workload standards are essential for effective practice. Regular review of goals,

objectives, accomplishments, and accountability procedures of the school social work program is also necessary. Designation of a lead social worker to help promote appropriate support and accountability is recommended.”

The District’s social workers report to the Director of Student Affairs. Each year, the social workers establish goals for the year with their assigned school’s principals. These goals are not referred to in the end of the year evaluation tool; however, they are communicated to the Director of Student Affairs. The evaluation tool for the District’s school social workers is not designed specifically to the social worker goal outcomes. The tool is divided into two areas; Duties and Responsibilities (examples: maintains accurate and confidential case records, collaborates with local schools regarding school attendance and files truancy complains in a timely manner, etc.) and Personal Qualities (Observes departmental and organization hierarchy, as well as professional lines of communication inside and outside of the school system, observes professional dress code in accordance with school system and departmental policy, etc.) with either a Satisfactory or Needs Improvement rating scale. Formally, there is not a lead social worker; however, the Director of Student Affairs serves as that function.

Supervision - “The administrative structure established by the local education agency should provide for appropriate school social work supervision. The local education agency is responsible for administrative and professional supervision to ensure high quality services. Supervision of school social work programs should be provided by credentialed and experienced MSW-level school social workers.” The District is in adherence with this area.

Job Tasks - “The goals, objectives, and tasks of a school social work program should be clearly and related to the mission of the local education agency and the education process. School social workers are expected to support and help facilitate educational reforms and initiatives. Some examples are those that emphasize multi-tier prevention, early intervention, parent education and involvement, service integration, partnerships, and support for student transitions. The local education agency should have positive descriptions that appropriately describe the roles and responsibilities of school social workers and should use a performance evaluation tool that is specific to the practice of school social work.”

There are no written procedures that identifies the goals, objectives, and tasks expected of the District’s social workers. Because the practice model or intervention methods can vary from school district to school district, industry to industry, many of the District’s social workers referenced that having a handbook and a more defined onboarding program would have helped them to adapt to the District’s social worker program more productively. The onboarding of the District’s social workers was not consistent for all newly hired social workers based on time available for shadowing and the information provided to the new

hires. The District has appointed a social worker that serves as mentor to new social workers. This social worker conducts quarterly meetings and is available for questions as her workload permits.

Work Setting- “The local education agency should provide a professional work setting that allows school social workers to practice effectively. School social workers require basic work resources to ensure privacy and confidentiality for students and families. These basic resources include office, clerical support, current information technology, and an adequate budget for professional materials, supplies, and activities. Adequate, confidential space at each school site for meeting with students, families, and local educational agency personnel is essential.”

We reviewed FY18 and FY19 expenditures for social workers. We found multiple areas of which funds were used to aid in the social worker program for the District. From our review of the funds designated for social workers (organization specific for social workers), we found an average of \$14,000 went unspent in the non-salary funds in both years. Supplies and local travel were the most common expenditure for non-salary funds. Between the two years of expenditures, we found only three computers were purchased. In our review of the computer inventory as maintained by the Student and Family Center, we found only 10 District computers were used within the last year by social workers.

As noted in section 1.07 of the Code of Ethics, an adequate confidential space is not always provided at the school site for meetings with students and families.

Professional Development- “The local education agency should provide opportunities for school social workers to engage in professional development activities that support school social work practice and continues licensure/certification. Funding support and an adequate number of professional leave days enable school social workers to strengthen and broaden skills required to better serve students, families, the local education agency, and the community.”

As found in Standard 8 – Professional Development - not all social workers seek professional development unless needed to maintain certification. In discussions with the Professional Learning Department, we shared the types of training that social workers could benefit from and it was determined that the training needed for social workers could also be relevant for other school staff. The Professional Learning Department would be able to assist and develop a training platform for social workers in support of content areas that will benefit their professional needs.

Leadership -” The local education agency should involve school social workers in developing and coordinating partnerships with community mental health, and social service providers linked with or based at school sites to ensure that the

services promote student educational success. Because of their extensive knowledge of community resources, school social workers play a critical role in facilitating the provision of community services in the local education agency and help orient community providers to school climate, culture, and structure and to the laws and regulations governing practice in educational settings.”

In addition to holding community-wide conferences that are held for networking and providing resources to the community, the District has teamed up with other community agencies such as Chatham County Safety Net Planning Council, Gateway Community Service Board, Mediation Center of the Coastal Empire, Inc., and State of Georgia Division of Family and Children Services within the City of Savannah’s Front Porch Resource Center. The Front Porch Resource Center was established “as a community-based risk reduction program designed to identify children and families who are at risk of becoming involved with the Court for delinquency, dependency, and children in need of services, and to utilize available community resources for the purpose of developing and implementing intervention actions or plans to divert the children and their families from becoming involved in future cases in Court.” Also, the Director of Student Affairs and an appointed school social worker also serve on the Student Attendance Protocol Committee as required in State Board Rule 160-5-1-.10 as well as providing a role in the development of the District’s Code of Conduct with other community resources.

Ratios - “The local education agency should establish and implement a school social worker-to-student population ratio to ensure reasonable workload expectations. Each local or state education agency should establish adequate levels and types of school social work services on the basis of comprehensive needs assessment data.” We were informed that a needs assessment is conducted; however, we found no evidence to support how it was utilized to ensure adherence with ratio requirements or the types of school work services.

Improvements in the District’s social worker program is needed to align with the National Association of Social Workers standards for school social workers.

Recommendations for Finding A

Based on our findings, the Internal Audit Department recommends the following to the Division of Academic Affairs:

1. Develop written standard of operating procedures for the District’s social worker program. The procedures at a minimum should include the following:
 - The mission and objectives of the social worker program for the District and the performance expectations for adherence to all applicable areas within the NASW’s Code of Ethics/NASW’s Standards for School Social Work Services (broken down for each section of the standards to provide clarity and transparency of

- expectations).
- Administrative expectations – reporting structure, expectations of professionalism within the school environment (principals, parent, and students), work hours, additional responsibilities, extended hours, etc.
 - Section for Principals to understand their role within the social worker program as it pertains to adherence with standards, lines of communication, evaluation, and how social workers can be utilized within a school setting as defined by the National Association of School Social Workers.
 - Leadership monitoring expectations to ensure leadership requirements as established by the NASW are followed. These expectations should also be designed to provide transparency to the social worker of the expected outcomes they should be providing as defined in the operating procedures.
2. Develop a yearlong onboarding program specific to social workers. The program should include first year milestones to ensure information provided is consistent and is being internalized by the new hire. This onboarding program should also be aligned with the standard operating procedures.
 3. Reevaluate the District's evaluation tool for school social workers to ensure the tool is in line with industry standard evaluations for social workers and connected to their yearly outcomes. This should be completed in conjunction with the Division of Human Resources.
 4. Evaluate all funding sources utilized by the social work program and establish clear and defined area/agencies to ensure funds are spent in accordance to the goals and objectives established by the standard operating procedures.

V. OTHER MATTERS

During the course of this audit, we determined an additional area of risk that may impact school social workers. In our review of the contract of the Memorandum of Understanding between the Board of Regents of the Institution System of Georgia by and on behalf of Savannah State University, we found not all designated parties of Savannah State University, as required per the contract, had signed the contract. The District's Purchasing Department is responsible to ensure all contract signatures are completed prior to start of the contract services. We recommend all contracts have the required signatures from the vendor prior to the District's approval of the contract.

MANAGEMENT ACTION PLAN
Audit of School Social Workers #20-03
Management's Response and Action Plan

Comment or Condition Description	Recommendation	Responsible Area(s)	Action	Current Estimated Completion
Condition A. Guidance and Adherence to the National Association of Social Workers National Standards				
A.1	1. Develop written standard of operating procedures for the District's social worker program. The procedures at a minimum should include the following:	Associate Superintendent of Learning Support Services; Student Affairs Director	A comprehensive Operations Manual will be developed and shared with all social workers and principals.	April 2021
	The mission and objectives of the social worker program for the District and the performance expectations for adherence to all applicable areas within the NASW's Code of Ethics/NASW's Standards for School Social Work Services (broken down for each section of the standards to provide clarity and transparency of expectations).	Associate Superintendent of Learning Support Services; Student Affairs Director	In accordance with NASW's Code of Ethics/NASW's Standards for School Social Work Services, the comprehensive Operations Manual will include the mission and objectives of the school social work program and will be shared with the district.	April 2021
	Administrative expectations – reporting structure, expectations of professionalism within the school environment (principals, parent, and students), work hours, additional responsibilities, extended hours, etc.	Associate Superintendent of Learning Support Services; Student Affairs Director	A comprehensive Operations Manual will be developed. It will include all standard operating procedures including administrative expectations, professionalism, work hours, responsibilities, extended hours, etc.	April 2021
	Section for Principals to understand their role within the social worker program as it pertains to adherence with standards, lines of communication, evaluation, and how social workers can be utilized within a school setting as defined by the National Association of School Social Workers.	Associate Superintendent of Learning Support Services; Student Affairs Director	The comprehensive Operations Manual will include all standard operating procedures for leadership monitoring. The manual will be available electronically and shared at a principal's meeting annually.	April 2021
	Leadership monitoring expectations to ensure leadership requirements as established by the NASW are followed. These expectations should also be designed to provide transparency to the social worker of the expected outcomes they should be providing as defined in the operating procedures.	Associate Superintendent of Learning Support Services; Student Affairs Director	The comprehensive Operations Manual will include all standard operating procedures and standards as defined by the National Association of School Social Workers (NASW). It will be available electronically and shared with staff.	April 2021
A.2	Develop a yearlong onboarding program specific to social workers. The program should include first year milestones to ensure information provided is consistent and is being internalized by the new hire. This onboarding program should also be aligned with the standard operating procedures.	Associate Superintendent of Learning Support Services, Student Affairs Director	Each social worker will be assigned a mentor upon hire. Additionally, a comprehensive Operations Manual will be provided to each new hire. There will be periodic written and verbal check-ins throughout the year. Quarterly meetings will be held with all new Social workers.	April 2021
A.3	Reevaluate the District's evaluation tool for school social workers to ensure the tool is in line with industry standard evaluations for social workers and connected to their yearly outcomes. This should be completed in conjunction with the Division of Human Resources.	Associate Superintendent of Learning Support Services, Student Affairs Director, Chief of Human Resources, Director of Human Resources	The Associate Superintendent and Director will collaborate with Human Resources to review the school social worker evaluation tool. Revisions may occur based on the approval of Human Resources and the Superintendent.	April 2021
A.4	Evaluate all funding sources utilized by the social work program and establish clear and defined area/agencies to ensure funds are spent in accordance to the goals and objectives established by the standard operating procedures.	Associate Superintendent of Learning Support Services, Student Affairs Director	Review of funding sources and expenditures will occur monthly to ensure compliance with established goals and objectives for the social work program.	February 2021