



**Office of the Inspector General (OIG)**  
**Quality Assurance Unit – Education Audit Team**

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**Victor Cullen Center School**

Audit Date(s): February 26, 2025

Location: Victor Cullen Center School  
6000 Cullen Drive  
Sabillasville, MD 21780

School Principal: Todd Rasher  
Superintendent: Victor Maldonado

QA Education Audit Team: Ty Blackwell, Lead QA Specialist  
Chasity Leffall, QA Specialist  
Landon Saunders, QA Specialist

*Kevin Hoefs*

Kevin Hoefs  
Director of Quality Assurance

3.25.25

Date

**ENTRANCE CONFERENCE:**

On February 26, 2025, an Entrance Conference was conducted by Landon Saunders, QA Specialist. In attendance was Todd Rasher, Principal. The QA Specialist discussed the audit process and addressed any concerns and questions.

**REVIEW PROCESS:**

- The school was notified 10 business days prior to the actual start of the audit. This timeframe allowed the school to gather the student files and collect requested information.
- Audited the records and information for all students enrolled in the school from November 14, 2025 until January 30, 2025.

**EXIT CONFERENCE:**

On February 26, 2025 an Exit Conference was held between Landon Saunders, QA Specialist and Todd Rasher, Principal. At the meeting preliminary findings were discussed.

NO.	Standard	Data Source	Findings
<b>Assessment and Records</b>			
AR-1	Students will receive an educational assessment upon admission to school within 5 school days of being physically present in the school building	File review	A review of Star reports submitted by the Principal indicated that 10 students received the initial assessment. 10 students received the assessment within 5 business days of admission.
AR-2	Students will be reassessed 90 school days after the initial educational assessment to determine gains in reading and mathematics	File review	There were 0 students during the audited period that reached the 90 day assessment mark.
AR-3	Students will be reassessed in 90 day increments to measure reading and math gains	File review	There were 0 students during the audited period that reached the 90 day assessment mark.
AR-4	Student records are requested upon facility admission	File review	A review of the 17 records during the audit period indicated that 17 of 17 records

NO.	Standard	Data Source	Findings
	from the LEA within 1 JSEP school day		(100%) were requested from the LEA within the first JSEP school day.
AR-5	Student records are received from the LEA within 2 school days of request	File review	A review of the 17 records of students admitted to the school during the audit period indicated that 17 of 17 records (100%) were received from the LEA within 2 days of the request.
AR-6	Record review and credit audit is completed and reviewed with the student within 3 JSEP school days of records being received	<ul style="list-style-type: none"> <li>• File review</li> <li>• Review of Individual Learning Plans</li> </ul>	A review of the 17 files and ILPs of students admitted to the school during the audit period indicated that 17 of 17 records (100%) were reviewed with the student within 3 JSEP school days of records being received.
<b>Schedule of instruction and Attendance</b>			
SA-1	The education program operates at least 220 school days and a minimum of 1,320 school hours during a 12-month period.	<ul style="list-style-type: none"> <li>• Review of School calendar</li> <li>• Review of facility cameras</li> </ul>	A review of school calendar indicated that the education program is scheduled to provide instruction that exceeds the 220 days and 1,320 hours minimum for instruction.
SA-2	There is a written calendar that states the specific days and total number of days for educational programs.	Review of School calendar	The written calendar indicated that during the audited period there were 47 days scheduled for the second quarter. According to logbooks and camera review, school was held on each of those days.
SA-3	There is a written schedule for each school that states the beginning and end of the 6-hour school day and the specific time periods during the school day when	<ul style="list-style-type: none"> <li>• Review of School schedule</li> <li>• Review of the Facility Schedule</li> </ul>	A review of the school schedule indicated that there was a schedule outline for a six hour school day.

NO.	Standard	Data Source	Findings
	the areas of instruction are implemented.		
SA-4	Unit based instruction is provided at a minimum of 6 hours per week to students who are unable to attend the School because of illness or injury.	<ul style="list-style-type: none"> <li>• Review of facility cameras</li> <li>• Review of logbooks</li> <li>• Interview with the school principal</li> </ul>	Unit based instruction was provided to students unable to attend the school because of illness or injury.
SA-5	Students attend class on-time without delay due to residential staffing	<ul style="list-style-type: none"> <li>• Camera Review</li> <li>• Logbook Review</li> <li>• Attendance records</li> </ul>	A review of facility cameras indicated that there were 6 incidents of units being delayed to school due to residential staffing.
SA-6	Students attend class on-time without delay due to safety/security issues	<ul style="list-style-type: none"> <li>• Camera Review</li> <li>• Logbook Review</li> <li>• Attendance records</li> </ul>	A review of facility cameras indicated that there were 24 incidents of units being delayed to school due to safety/security issues.
SA-7	Students attend class on-time without delay due to education staff shortages	<ul style="list-style-type: none"> <li>• Camera Review</li> <li>• Logbook Review</li> <li>• Attendance records</li> </ul>	A review of attendance records indicated students were delayed to class on 0 occasions due to education staff shortages.
<b>Special Education Instruction and Related Services</b>			
<b>IEP</b>			
SE-A-1	The number of students identified as needing/receiving IEP services	<ul style="list-style-type: none"> <li>• MD Online IEP</li> <li>• File Review</li> <li>• Interview with staff</li> </ul>	There were 3 students admitted during the audited period that were identified as needing/receiving IEP services during the audited period.
SE-A-2	The percentage of IEPs that are current (received from LEA)	<ul style="list-style-type: none"> <li>• MD Online IEP</li> <li>• File Review</li> </ul>	During the audit period 3 IEPs were received from the LEA. Three of 3 (100%) IEPs were current.

NO.	Standard	Data Source	Findings
		<ul style="list-style-type: none"> <li>• Interview with staff</li> </ul>	
SE-A-3	The percentage of IEPs that are out of compliance upon JSEP school enrollment	<ul style="list-style-type: none"> <li>• MD Online IEP</li> <li>• File Review</li> <li>• Interview with staff</li> </ul>	During the audit period 3 IEPs were received from the LEA. There were (0%) of the IEPs that were out of compliance.
SE-A-4	The percentage of students who have had an initial review meeting within 45 school days	<ul style="list-style-type: none"> <li>• MD Online IEP</li> <li>• File Review</li> <li>• Interview with staff</li> </ul>	During the audited period 3 out of 3 students (100%) had initial review meetings within 45 days of admission.
SE-A-5	Youth receive instruction as outlined by the IEP	<ul style="list-style-type: none"> <li>• MD Online IEP</li> <li>• File Review</li> <li>• Interview with staff</li> </ul>	A review of 3 IEPs and student files indicated that 3 students were receiving instruction as outlined in their IEPs.
<b>IEP Implementation</b>			
SE-B-1	Youth receive related services as outlined by the IEP	<ul style="list-style-type: none"> <li>• MD Online IEP</li> <li>• File Review</li> </ul>	A review of IEPs indicated that 1 student was to receive related services. IEP documentation showed the student received related services as outlined in the IEP.
SE-B-2	Youth are provided supplementary aides as outlined by the IEP	<ul style="list-style-type: none"> <li>• MD Online IEP</li> <li>• File Review</li> </ul>	A review of IEPs indicated that 1 student was to receive supplementary aids.
<b>IEP Documentation</b>			
SE-C-1	IEPs are current and are reviewed at least annually while in continuous custody/care	<ul style="list-style-type: none"> <li>• MD Online IEP</li> <li>• File Review</li> </ul>	A review of IEPs indicated that 3 of 3 IEPs were current and reviewed annually.
<b>Evaluations</b>			
SE-D-1	Students are evaluated at least triennially.	<ul style="list-style-type: none"> <li>• MD Online IEP</li> <li>• File Review</li> </ul>	A review of Special Education files indicated that 3 of 3 evaluations were evaluated triennially.
<b>Child Find</b>			

<b>NO.</b>	<b>Standard</b>	<b>Data Source</b>	<b>Findings</b>
SE-E-1	Procedures are implemented to identify students who are currently identified as students who require special education services	<ul style="list-style-type: none"> <li>• MD Online IEP</li> <li>• File Review</li> </ul>	A review of Child Find procedures indicate a process for identifying students admitted to the school who required special education services. A review of student records found no students who were receiving special education services prior to admission that were not identified by the school.
SE-E-2	Procedures are implemented to identify students who may be in need of special education services.	<ul style="list-style-type: none"> <li>• MD Online IEP</li> <li>• File Review</li> <li>• Interview with staff</li> </ul>	A review of Child Find procedures indicate a process for identifying students who may be in need of special education. During the audited period no students were identified.
SE-E-3	The number of students identified who qualify for special education services not previously identified	<ul style="list-style-type: none"> <li>• MD Online IEP</li> <li>• File Review</li> <li>• Interview with staff</li> </ul>	A review of Child Find procedures outline a process to identify previously unidentified students who may qualify for special education services. During the audited period 0 students were identified.
<b>Teacher Certification</b>			
TC-1	All Education staff have valid certifications	Review information from the Superintendent and DJS HR Certification Manager	A review of certifications indicated that all education staff held valid certifications.
<b>Instruction</b>			
I-1	Instruction is provided to students to achieve credit requirements and assessments necessary to progress towards the standards for graduation from a public high school in Maryland	<ul style="list-style-type: none"> <li>• File review</li> <li>• Review of Monthly Reports</li> <li>• Interview with the principal</li> </ul>	A review of grade reports and transcripts indicated the students earned credits and assessments that allow the students to progress toward graduation.

<b>NO.</b>	<b>Standard</b>	<b>Data Source</b>	<b>Findings</b>
I-2a	The number of core credits issued towards graduation requirements versus attempted during the semester	<ul style="list-style-type: none"> <li>• Powerschool</li> <li>• File review</li> </ul>	During the auditing period student's attempted 88 core credits. Of those credits 87.5 were issued.
I-2b	The number of elective credits issued towards graduation requirements versus attempted during the semester	<ul style="list-style-type: none"> <li>• Powerschool</li> <li>• File review</li> </ul>	During the auditing period student's attempted 24 elective credits. Of those credits 24 were issued.
I-3	The number of students who completed their course of study and were issued a MD High School Diploma	<ul style="list-style-type: none"> <li>• Powerschool</li> <li>• File review</li> </ul>	There were 2 students issued a High School Diploma while enrolled at the school.
I-4	The number of students who obtained a GED waiver	<ul style="list-style-type: none"> <li>• Powerschool</li> <li>• File review</li> </ul>	A review of student files and school Principal information provided indicated that 3 students obtained GED waivers during the 2 <sup>nd</sup> quarter.
I-5	The program offers students preparation courses for the GED examination	<ul style="list-style-type: none"> <li>• Review of education policy and procedures</li> <li>• Interview with Principal</li> </ul>	A review of the program and information provided by the Principal indicates that the school does provide GED preparation courses.
I-6	The number of GED sections passed per student versus The number attempted	<ul style="list-style-type: none"> <li>• File review</li> <li>• Review of Monthly Reports</li> <li>• Interview with the principal</li> </ul>	During the 2 <sup>nd</sup> quarter students attempted to pass 17 GED sections. Twelve GED sections (70%) were passed by the students.
I-7	The number of GEDs obtained	<ul style="list-style-type: none"> <li>• File review</li> </ul>	A review of student files and information provided by the Principal indicated 0 students obtained a GED.

NO.	Standard	Data Source	Findings
		<ul style="list-style-type: none"> <li>Review of Monthly Reports</li> <li>Interview with the principal</li> </ul>	
I-8	The program offers vocational education programs	Review of school schedule and class offerings	<p>A review of program materials indicate that the school offered the following vocational programs:</p> <ul style="list-style-type: none"> <li>Flagger Certification</li> <li>Serve Safe</li> <li>OSHA-10, OSHA-30</li> <li>CPR/First Aid</li> <li>Frederick Community College courses</li> <li>Anne Arundel Community College courses</li> <li>Noncredit bearing courses</li> <li>Service Learning project opportunities</li> <li>YOLO graduate work program (partnered with DNR)</li> </ul>
I-9	The number of youth enrolled in vocational program	<ul style="list-style-type: none"> <li>File review</li> <li>Review of Monthly Reports</li> <li>Interview with the principal</li> </ul>	A review of student files and information provided by the Principal indicated 4 students were enrolled in a vocational program during the audited period.
I-10	The number of youth obtaining certification versus attempt	<ul style="list-style-type: none"> <li>File review</li> <li>Review of Monthly Reports</li> <li>Interview with the principal</li> </ul>	A review of student files and information provided by the Principal indicated that 1 student obtained certification during the audited period.
I-11	The percentage of youth passing their courses upon	<ul style="list-style-type: none"> <li>File review</li> <li>Review of Monthly Reports</li> </ul>	Per information provided by JSEP, there were (75%) of the students who passed their courses during the first quarter upon discharge and returning to the community.



NO.	Standard	Data Source	Findings
	discharge and return to the community	<ul style="list-style-type: none"> <li>Interview with the principal</li> </ul>	
<b>Post-Secondary Education</b>			
PE-1	The program offers students with diplomas or GED to take college courses	<ul style="list-style-type: none"> <li>Review of Monthly Reports</li> <li>Interview with the principal</li> </ul>	<p>Program information provided by the Principal indicated that the school offers the following college options:</p> <ul style="list-style-type: none"> <li>Online College courses through Frederick Community College or other Maryland Community Colleges</li> <li>Online College courses through Anne Arundel Community College</li> </ul>
PE-2	Course offerings are a minimum of 2.5 hours per school day	<ul style="list-style-type: none"> <li>Review of Monthly Reports</li> <li>Interview with the principal</li> </ul>	A review of a list of post-secondary options provided by the JSEP Superintendent indicates that there are a combination of offerings from local colleges and online certification classes to provide at least 2.5 hours of classes per day.
PE-3	The number of students enrolled in credit bearing college courses	<ul style="list-style-type: none"> <li>Review of Monthly Reports</li> <li>Interview with the principal</li> </ul>	There were 3 students taking credit bearing college courses during 2 <sup>nd</sup> quarter.
PE-4	The number of college credits obtained while in placement versus those attempted	<ul style="list-style-type: none"> <li>Review of Monthly Reports</li> <li>Interview with the principal</li> </ul>	There was 1 student who obtained college credits while in the placement.
<b>Re-Entry</b>			
RE-1	The number of students who had a re-entry/transition meeting (Committed Only)	<ul style="list-style-type: none"> <li>Review of the Re-entry Committed or Detention Youth Log</li> <li>Review of ASSIST</li> <li>Student file review</li> </ul>	A review of the Committed Youth Log indicated 9 students had a Re-entry/Transition meeting.

<b>NO.</b>	<b>Standard</b>	<b>Data Source</b>	<b>Findings</b>
RE-2	The number of students whose re-entry meeting was held prior to release from commitment. (Committed Only)	<ul style="list-style-type: none"> <li>• Review of the Re-entry Committed or Detention Youth Log</li> <li>• Review of ASSIST</li> <li>• Student file review</li> </ul>	A review of the Re-entry Committed Youth Log indicated that 7 students had a Re-entry/Transition meetings prior to their release from commitment.
RE-3	The number of eligible students who returned to their “home school” within their LEA	<ul style="list-style-type: none"> <li>• Review of the Re-entry Committed or Detention Youth Log</li> <li>• Review of ASSIST</li> <li>• Student file review</li> </ul>	A review of the Re-entry Committed Youth Log indicated that 0 students returned to their ‘home school’ within their LEA.
RE-4	The number of students enrolled in an alternative educational placement	<ul style="list-style-type: none"> <li>• Review of the Re-entry Committed or Detention Youth Log</li> <li>• Review of ASSIST</li> <li>• Student file review</li> </ul>	A review of the Re-entry Committed Youth Log indicated that 0 students were enrolled in an alternative education placement.
RE-5	The number of students who remained engaged with their LEA 90 days post release	<ul style="list-style-type: none"> <li>• Review of the Re-entry Committed or Detention Youth Log</li> <li>• Review of ASSIST</li> <li>• Student file review</li> </ul>	A review of the Re-entry Committed Youth Log indicated there were 0 students who remained engaged with their LEA 90 days post release.
RE-6	The number of credits obtained when transfer occurred mid-quarter or mid-semester	<ul style="list-style-type: none"> <li>• Review of the Re-entry Committed or Detention Youth Log</li> </ul>	A review of the Re-entry Committed Youth Log indicated that 1 student transferred mid-quarter or mid semester. In total, 16 credits were obtained.

NO.	Standard	Data Source	Findings
		<ul style="list-style-type: none"> <li>• Review of ASSIST</li> <li>• Student file review</li> </ul>	