Understanding the Enrollment Verification and Withdrawal Code Audits

Governor's Office of Student Achievement

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THE GOVERNOR'S OFFICE OF STUDENT ACHIEVEMENT

Presentation Overview

- Academic Auditing Overview
- Enrollment Verification Overview
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- Additional Resources
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Academic Auditing Overview

- The Governor's Office of Student Achievement is charged with inspecting academic records of schools to ensure that education institutions are faithful to performance accountability and reporting requirements (O.C.G.A § 20-14-26 and § 20-14-35).
- Since 2009, GOSA has conducted an annual erasure analysis of state assessments to ensure that assessments are administered with fidelity. The results of this analysis are presented to the SBOE each February.

Academic Auditing Overview

- In 2015, GOSA expanded the auditing program in collaboration with GaDOE Data Collections to audit student enrollment records submitted by LEAs.
- In 2016, GOSA will further expand the auditing program to audit student withdrawal record documentation submitted by LEAs.

Enrollment Verification Data Audit

Enrollment Verification Overview

Intent

- Compare school enrollment data reported through FTE and Student Record (SR) collections to confirm consistency of those data since FTE enrollment data are used to determine LEA funding.

Goals

- Verify accuracy of data reported by school systems to the GaDOE,
- Ensure school systems follow GaDOE requirements for data training, reporting, and storage,
- Guard against improper data reporting practices and/or potential fraud, and
- Provide additional support to school systems and schools in refining and improving data reporting and storage practices.

Enrollment Verification Overview

Phase 1: Data Review and School Determination

- GaDOE provides FTE/SR Error Code Reports for GOSA review to identify schools that will be subject to an Enrollment Verification Inquiry.
- Schools are chosen based upon number of total errors and number of students affected from the previous two years' error codes. Schools are selected if they meet one of the following criteria for an error code.
    i. More than 25 students were affected in the prior year, OR
    ii. More than 10 students were affected in the prior two years.

Criteria may be adjusted in future years as deemed appropriate to accomplish goals of the audit.

Enrollment Verification Overview

Phase 2: Inquiry Report, Review, and Response

- Once Phase 1 is complete, GOSA takes the following steps to conduct its inquiry:
  1. Notify Superintendent and District Data Coordinator of inquiry via email.
     i. LEAs are given three weeks to submit answers via GOSA's secure online platform.
     ii. LEAs are required to submit the following:
        i. FTE/SR data collection procedures,
        ii. FTE/SR trainings conducted and/or attended, and
        iii. Explanation for why the error occurred.
  2. GOSA will review the information and respond by email to the superintendent and LEA data coordinator within thirty days of the deadline.

Enrollment Verification Overview

Phase 2.5: Documents/Records Request or On-site Audit

- If the information provided by the LEA in the Enrollment Verification Inquiry Report does not satisfy the State's concerns, then GOSA reserves the right to take one of the following steps:
    1. Request relevant documents or records of students involved, and/or
    2. Conduct an on-site audit that includes records review and interviews.

Enrollment Verification Overview

Phase 2.5: Documents/Records Request or On-site Audit

- If an audit is conducted, GOSA will follow the following protocol:
    1. Notify Superintendent and LEA Data Coordinator(s) of the onsite audit with a minimum of one day's notice.
    2. Audit will be conducted over one day, unless additional time is needed to satisfy concerns, and include:
        i. Interviews with relevant personnel, and
        ii. A data review/collection of all pertinent paperwork/records.
    3. Upon audit completion, GOSA will review all collected records in office and develop a final audit report.

Enrollment Verification Overview

Phase 3: Audit Report and Communication

- The final audit report will be delivered to appropriate LEA and state personnel:
  1. GOSA executive staff,
  2. Designated GaDOE Data Collections and Finance personnel,
  3. LEA superintendent of audit school, school's principal, local school council, and
  4. Any other personnel deemed appropriate by GOSA Executive Director.

Enrollment Verification Overview

Phase 3: Closeout

- If the State's concerns are satisfied after the process above, this matter will be considered closed.
- If an investigation is recommended in the on-site audit report and requested by GOSA's Executive Director, then the audit will remain open until such a time as an investigation can be conducted to satisfy the State's concern.
    1. If an investigation satisfies the State's concerns, then an amended report will be delivered to all appropriate personnel and the matter will be considered closed.
    2. For schools that have not been cleared, GOSA will refer the matter to the appropriate state agency for the given situation (Georgia Professional Standards Commission, the Inspector General, the GaDOE and/or another entity).

Enrollment Verification Overview

Timeline

- Late August/Early September—Superintendents and Data Coordinators Notified in LEAs Identified for Inquiry
- Late September—Inquiry Forms Due to GOSA
- October/November--Further Inquiry and Audit Closeout

Withdrawal Code Verification Data Audit

Withdrawal Code Verification Overview

Intent

- Reviews student withdrawal code documentation maintained in Georgia high schools to ensure that school withdrawal records, and thereby graduation rates, are as accurate as possible.
    - All Georgia local education agencies (LEAs) are required to document reasons for all student withdrawals from Georgia public schools by the State Board of Education Rule 160-5-1-.28 Student Enrollment and Withdrawals.
    - The inquiry focuses on the ten withdrawal codes that allow a student to be removed from the graduation rate cohort (C, D, H, J, K, N, X, 2, 3, 5).

Withdrawal Code Verification Overview

Goals

- Verify the accuracy of LEA reported withdrawal codes for high schools,
- Ensure school systems follow GaDOE requirements for data training, reporting, and storage,
- Aid school systems in detecting and correcting errors in data reported to GaDOE, and
- Provide additional support to school systems and high schools in refining and improving data reporting and storage practices.

Withdrawal Code Verification Overview

Phase 1: Data Review and School Determination

- GaDOE provides withdrawal code reports for GOSA review to identify high schools that will be subject to a Withdrawal Code Verification.
- Grade level cohorts with at least 10 students enrolled are identified for further inquiry using the following criteria:
  i. If cohort enrollment is between 10 and 40 students, 10% or more of students were withdrawn during the 2015-2016 school year using one of the ten codes,
  ii. If cohort enrollment is greater than or equal to 40 students, 7.5% or more of students enrolled were withdrawn during the 2015-2016 school year using one of the ten codes, <u>OR</u>
  iii. School is randomly selected for inquiry.

Criteria may be adjusted in future years as deemed appropriate to accomplish goals of the audit.

Withdrawal Code Verification Overview

Phase 1: Data Review and School Determination

Preliminarily flagged schools are also examined for patterns and groupings of withdrawals by month.

i. Special attention is given to large groupings of withdrawals occurring within the same month and/or consecutive months.

ii. Where the reason for withdrawals can be explained by the examination of data alone, a high school may require no further inquiry. (Example: Some schools routinely remove students for excessive absences at set dates throughout the school year.)

Withdrawal Code Verification Overview

Phase 2: Inquiry Report, Review, and Response

Once Phase 1 is complete, GOSA will take the following inquiry steps:

1. Notify Superintendent and LEA Data Coordinator of inquiry via email.
2. LEAs will be given three weeks to upload the following information via GOSA's secure FTP site:
   i. Inquiry Cover Sheet
      - Contact information
      - Brief overview of school process for maintaining withdrawal documentation and reporting withdrawal codes.
      - Brief description of training provided to school staff responsible for maintaining documentation and reporting withdrawal codes.
   ii. Student withdrawal documentation for students designated by GOSA (may be all withdrawals or a subset of them).

Withdrawal Code Verification Overview

Phase 2: Inquiry Report, Review, and Response

Withdrawal documentation aligns with the required documentation outlined in Guidance for SBOE Rule 160-5-1-.28.

Examples:

Withdrawal Code	Withdrawal Type	Acceptable Documentation
H	Attend Home Study	A document signed by the parent, guardian, or "other person" declaring their intent to utilize a home study program
K, X	Transferred to Private School or Transferred Out of State	The private school, or out-of-state school's request for transcript or student records.

Withdrawal Code Verification Overview

Phase 2: Inquiry Report, Review, and Response

3. GOSA will review the information and respond by email to the superintendent and LEA data coordinator within 30 days of the deadline.

Phase 2.5: Documents/Records Request or On-site Audit

- If the information provided by the LEA does not satisfy the State's concerns, then GOSA reserves the right to take one of the following steps:
    1. Request additional relevant documents or records of students involved, or
    2. Conduct an on-site audit that includes records review and interviews.

Withdrawal Code Verification Overview

Phase 2.5: Documents/Records Request or On-site Audit

- If an audit is conducted, GOSA will follow the following protocol:
  1. Notify Superintendent and LEA Data Coordinator(s) of the onsite audit with a minimum of one day's notice.
  2. Audit will be conducted over one day, unless additional time is required to sufficiently satisfy concerns, and include:
     i. Interviews with relevant personnel, and/or
     ii. A data review/collection of all pertinent paperwork/records.
  3. Upon audit completion GOSA will review all collected records in office before delivering a final audit report to the LEA.

Withdrawal Code Verification Overview

Phase 3: Audit Report and Communication

- Report will be delivered to appropriate LEA and state personnel:
  1. GOSA executive staff,
  2. Designated GaDOE Data Collections and Accountability personnel,
  3. LEA superintendent of audit school, school's principal, local school council, and
  4. Any other personnel deemed appropriate by GOSA Executive Director.

Withdrawal Code Verification Overview

Phase 3: Closeout

- If the State's concerns are satisfied after the process above, this matter will be considered closed.
- If an investigation is recommended in the on-site audit report and requested by GOSA's Executive Director, then the audit will remain open until such a time as an investigation can be conducted to satisfy the State's concern.
    1. If an investigation satisfies the State's concerns, then an amended report will be delivered to all appropriate personnel and the matter will be considered closed.
    2. For schools that have not been cleared, GOSA will refer the matter to the appropriate state agency for the given situation (Georgia Professional Standards Commission, the Inspector General, the GaDOE and/or another entity).

Withdrawal Code Verification Overview

Timeline

- Mid-September—Superintendents and Data Coordinators Notified in LEAs Identified for Inquiry
- Early October—Required Documentation Due to GOSA
- October/November—Further Inquiry and Audit Closeout

Additional Resources

Additional information can be found under Academic Auditing Resources by clicking the following link:

http://gosa.georgia.gov/academic-auditing

Questions and Contact Information

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