



Office of the



State Superintendent of Education

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## **Response to Independent Accountant's Report for School Year 2011-2012**

Pursuant to District of Columbia laws and regulations, the Office of the State Superintendent of Education (OSSE) has received the Independent Accountant's Report prepared by Thompson, Cobb, Bazilio & Associates, PC (TCBA) for the school year 2011-2012 (Report) for the annual student enrollment audit of the District of Columbia Public Schools (DCPS) and Public Charter Schools (PCS). The Report indicates that this year's student enrollment in the District of Columbia public schools has increased by 2% compared to last year's enrollment. Public charter schools continue to demonstrate growth with an 8% increase over last year's enrollment count. DCPS's enrollment has decreased slightly by 1%. Much of the growth in the public education system is found in the younger grades which are well within the population projection totals for each age in the 2010 census data.

In its Report, TCBA identifies two weaknesses deemed to be material. One involves the current residency verification process and the second involves the form used by local educational agencies (LEAs) to document student residency verification. OSSE has evaluated these findings and has addressed the issues.

In the next school year 2012-2013, all LEAs are required to maintain copies of residency verification documents to ensure data is available during the enrollment audit. In this regard, a school official reviewing the residency verification documentation submitted for a student, will sign a certification confirming residency or non-residency. The auditor also reports a discrepancy between the student enrollment data reported by LEAs and the audited enrollment data, noting that without a consolidated student information system, public school students continue to show up on more than one school register. Although, OSSE is working with DCPS and the PCSB to examine this issue in greater depth, OSSE has already addressed this issue in its student data reconciliation process housed in the State Longitudinal Education Data System (SLED).

SLED tracks student enrollment data. SLED data is shared with the Public Charter School Board (PCSB) and DCPS. OSSE confers with the PCSB and DCPS on a bi-weekly basis to ensure that data errors are resolved in a timely manner. LEAs have a maximum of five (5) business days to enter or update their students' records. This information includes for example:

- Demographic information;
- Enrollment information;
- Withdrawal information;
- Program related information, including information for students with disabilities in The Special Education Data System (SEDS) and related data systems; and
- Information related to transfer students including transactional Data for Students transferring into one LEA from another LEA. The LEA has a maximum of ten (10) business days to enter information related to students who transfer into the LEA from another LEA within the District or from outside of the District.

The Report suggests student attendance records as the sole factor for determining whether a student has “effectively” withdrawn from a school or should continue to be counted as enrolled in the school. OSSE finds this approach too narrow. We agree with the auditor that actual attendance is a factor, but an attendance record is not the sole indicia of bona fide enrollment for the school year. For example, there are often time lags between the filing of an enrollment form at a particular school and actual attendance or transfer into that school. Specifically, this year a number of three (3) and four (4) year old students enrolled prior to the cutoff date, but began to attend school after October 5 enrollment date. Although routine and timely attendance at school is the subject of immediate concern, it is not automatically a reason to disqualify a student from the number of students counted as enrolled in a District of Columbia public school.

The Report identifies 158 students combined, attending DCPS and Public Charter Schools and 118 students attending non-public schools—all without adequate residency verification documented in their files. Based on this information, OSSE has reached out to both DCPS and the PCSB requesting assistance with these cases. DCPS and the PCSB are following up on the residency qualifications for each of these students. Upon receipt of their findings, OSSE will ensure that the necessary action is taken to recoup nonresident tuition for students confirmed to be properly classified as nonresidents. In this regard, OSSE’s General Counsel will refer cases to the Office of the Inspector General and Office of Attorney General as appropriate, in the event nonresident tuition payments are not received.

Finally, the Report identifies discrepancies relating to the number of students who are wards of the District of Columbia attending schools in other jurisdictions, many of whom are located in surrounding counties in Maryland and Virginia. OSSE recognizes there are often difficulties in obtaining proper documentation for these students. These children may move periodically, and are often served by multiple District agencies. Their records are often deemed confidential even among District agencies. OSSE is reviewing these cases and addressing the issues with partner agencies.

OSSE is committed to sustaining improvements in the enrollment process and continues to refine current procedures in collaboration with interested stakeholders in our schools and our community.

Sincerely,

Hosanna Mahaley, State Superintendent of Education