# Audit and Verification of Student Enrollment for the 2018-19 School Year

District of Columbia
Office of the State Superintendent of Education

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# Contents

# Introduction

The Office of the State Superintendent of Education (OSSE) is responsible for verifying the enrollment of students in each local education agency (LEA) for the appropriation of public funds to support public education in the District of Columbia. These funds are allocated on a per pupil basis.

In order to fulfill this responsibility, under D.C. Official Code §38-1804.02, OSSE is required to collect annual enrollment data for any District students whose education is supported through District funds. OSSE's Office of Enrollment and Residency (OER) carries out this annual process. In addition, pursuant to D.C. Official Code § 38-2906(d)(1), OER also verifies residency documents, investigates reported tips of non-residency, and administers tuition collection for non-residents.

The enrollment audit determines the total number of students who are DC residents at a school which in turn informs the funding for each LEA using the Uniform Per Student Funding Formula (UPSFF). This funding formula determines the amount of funding an LEA receives each school year based on the grade levels of the enrolled students at each school. The formula also provides additional funding to LEAs based on demographics of the enrolled students, including:

- Special education needs, including residential settings or extended school year services;
- English learners;
- At-risk status (homeless students, Temporary Assistance for Needy Families (TANF)/Supplemental Nutrition Assistance Program (SNAP)-receiving students, students in foster care, students over-age/behind grade level); and
- Students enrolled in a residential school program.

There are a select number of students who are not funded via the UPSFF. These include students placed in non-public schools[1], tuition paying non-resident students, and children enrolled in pre-K 3 and pre-K 4 at community-based organizations (CBOs) that receive PreK Enhancement Funds. Supplemental tables for this report break down the counts of students collected during the enrollment audit in these categories by LEA, school, and CBO; these tables are available for download on OSSE's website under Data and Reports.[2]

The enrollment audit is a point-in-time count of public school enrollment and not a representation of the total universe of students a school serves throughout the school year.

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[1] A non-public school is a privately owned or operated school that maintains or conducts classes for the purposes of offering instruction to students with disabilities.
[2] Office of the State Superintendent. Data & Reports- Enrollment.

# Enrollment Audit Results for SY 2018-19

## District Summary

The table below provides a sector level summary of the enrollment audit key data points. Please note that these data represent enrollment numbers as of Oct. 5, 2018[3].

| Audit Status | Metric | District of Columbia Public Schools | Public Charter Schools | Total |
|---|---|---|---|---|
| Unaudited | Public Enrollment | 49,103 | 43,958 | 92,994 |
| | Public Enrollment (including in-sector duplicative enrollment)[1] | 49,106 | 44,047 | 93,153 |
| Audited | Public October Enrollment | 49,056 | 43,960 | 93,016 |
| | Students included in UPSFF[2] | 48,902 | 43,911 | 92,813 |
| | Unverified resident students[3] | 103 | 49 | 152 |
| | Tuition-paying non-resident students[4] | 51 | 0 | 51 |
| | Non-public placement students[5] | 411 | 257 | 668 |
| | Unverified resident students – Non-public | 22 | 2 | 24 |
| | Total audited public and non-public enrollment | 49,489 | 44,219 | 93,708 |

[1] Duplicative enrollments occur when a student has been reported as enrolled at more than one LEA/school.
[2] Students included in the UPSFF are District residents enrolled in public schools in the District excluding students placed in non-public schools.
[3] Unverified residents are students whose District residency was not confirmed through the enrollment audit and will be investigated further by OSSE.
[4] Tuition-paying nonresidents include students who live outside of the District and pay tuition to attend public school in DC.
[5] Students placed in non-public schools are students with disabilities who are District residents whose placement determination was made in accordance with the Individuals with Disabilities Education Act (IDEA) by DC Public Schools (DCPS) or a public charter school.

## Analysis

### Public Enrollment

Public enrollment is comprised of students enrolled in DC Public Schools (DCPS) and public charter schools who are District residents, tuition-paying non-residents (who have entered into current, non-resident tuition agreements with OSSE), and unverified residents whose residency was inconclusive at the end of the audit and will be investigated further by OSSE. To be considered an enrolled student for the purpose of the enrollment audit, students must be receiving educational services[4], as of Oct. 5, 2018 and must not have been exited/withdrawn from the LEA with a valid exit code. Note, public enrollment does not include students in non-public placements. The unaudited enrollment as of Oct. 5, 2018

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[3] The DC School Report Card and STAR Framework uses a variety of enrollment measures and may differ from the Enrollment Audit Report. More information can be found in the DC School Report Card and STAR Framework Technical guide.
[4] This is determined by the student's enrollment code in the School Information System. Stage 5 enrollment is the final step in which students are coded as receiving educational services, and only students with a Stage 5 enrollment code are counted in the audit.

reported a total of 93,153 students enrolled in both DCPS and public charter schools. Upon completion of the enrollment audit and verification, the final audited enrollment was 93,016.

The primary difference between the unaudited and audited figures (a difference of 137) is due to duplicative student enrollment, which occurs when a student has been reported as enrolled at more than one LEA/school. Each LEA may use a separate student information system for tracking and reporting enrollment. Since there is no consolidated student information system used to enroll and track all District students, it is possible for a student to be recorded as enrolled at more than one LEA/school. At the beginning of the audit process each year, schools report and validate their unaudited enrollment numbers, which may include these duplicative enrollments. Later in the audit, each student enrolled in more than one school is evaluated against the duplicative enrollment policy (found in the "Student Enrollment Audit and Child Count Handbook Guide for Local Education Agencies")[5] and assigned to one school and removed from the counts of any other schools in which they were originally also enrolled. This process, in addition to the residency verification process described below, are the bases for the difference between the initial unaudited and the final audited enrollment figures.

## Residency

Compliance with District laws and regulations requires that schools maintain documentation verifying residency of each enrolled resident student. Of the 93,016 students determined to be validly enrolled in DCPS and public charter schools, 92,813 students were categorized as residents of the District of Columbia, based on an examination of their records. For each student, examination procedures included a review of the DC Residency Verification (DCRV) form, which is the sworn statement of the person enrolling the student attesting to their residency. Additionally, for a randomly selected 20 percent sample of the eligible student population at each school, procedures included an inspection and assessment of residency supporting documentation. In an effort to alleviate burden on resident families, OSSE has established direct data exchanges with the following government and independent agencies:

- DC Department of Human Services (DHS);
- DC Child and Family Services Agency (CFSA);
- DC Office of Tax and Revenue (OTR); and
- The Community Partnership (TCP) – a nonprofit that coordinates DC's continuum of care.

Families whose residency is verified through these direct data exchanges are not a part of the eligible population for sampling described above. This minimizes burden on families already receiving benefits from the District, as well as on families who grant OSSE permission to access their tax records with the District, and ensures that the auditors are deployed to focus their efforts on populations that are not otherwise validated.

Upon completion of the enrollment audit, there were 152 students attending DCPS or public charter schools whose residency could not be determined during the audit. These students are considered unverified residents, meaning that: (1) the DCRV or supporting residency documentation was not provided; or (2) the DCRV or supporting residency documentation was not in compliance with OSSE requirements. Because adequate documentation was not gathered for these students, they are not included in the student population for which the LEA is paid. Additionally, there were a total of 51

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[5] "Student Enrollment Audit & Child Count Handbook, Guide for Local Education Agencies, School Year 2018-19." Office of the State Superintendent of Education.

students who had non-resident tuition agreements on file with OSSE for the 2018-19 school year. These are self-identified non-resident students who have entered into tuition agreements for the school year in question.

For all enrolled students who are not verified as residents and who do not have applicable non-resident tuition agreements in place for the 2018-19 school year, OSSE will undertake further investigation in order to verify their residency status and if necessary, recoup the non-resident tuition owed to the District.

## Students Attending Non-Public Schools and Surrounding County Schools

A relatively small population of students who are DC residents identified in the audit are those in non-public placements or attending surrounding county schools. These groups consist of District residents who for differing reasons may be placed outside of DCPS or public charter schools and still be funded by the District, but not through the UPSFF.

Non-public placement occurs when District residents with disabilities require services not otherwise available in District public schools. Placement determinations for these students were made in accordance with IDEA by DCPS or a public charter school.

Resident students attending surrounding county schools are wards of the District who have been placed in these the surrounding jurisdiction by CFSA. CFSA provides resources and services to enhance the safety, permanence, and well-being of abused, neglected, and at-risk students who are considered wards of the District. CFSA may place children or youth in temporary settings outside of the District in surrounding jurisdictions. During such placement, children and youth may be enrolled in a school in that jurisdiction but they remain District wards. CFSA directly submitted the enrollment data for students placed by CFSA in surrounding county schools.

The total unaudited and audited figures for these populations are shown below.

| Category | Unaudited | Audited |
|---|---|---|
| Non-public placements: students placed in non-public schools or programs by DCPS or public charter schools. | 703 | 668 |
| Surrounding county placements: students identified as wards of the District attending schools in surrounding counties (placed by CFSA) | 370 | 176 |

# Appendices

## Appendix A: Supplemental Schedules for Student Enrollment

The following table lists the datasets available for download in machine-readable formats. These may be found under Data and Reports on the OSSE website. [6]

| Table Name | Description | Tab Label in machine-readable format |
|---|---|---|
| District Summary | Sector-level view of the enrollment audit including unaudited. | District Summary |
| LEA Summary | The LEA Summary provides an LEA-level view of the enrollments by key data points. Audited Enrollments in this table include UPSFF, non-public, non-residents, and unverified residents. | LEA Summary |
| School Summary | The School Summary provides a school-level view of the enrollments by key data points. | School Summary |
| District Audited Enrollments by Grade | This table provides the number of audited enrollments by grade for each District sector. Please note that these numbers include UPSFF, non-publics, and nonresidents. | District Audited Enr by Grade |
| LEA Audited Enrollments by Grade | This table provides the total number of audited enrolled students by each grade offered at the LEA. | LEA Audited Enr by Grade |
| School Audited Enrollments by Grade | This table provides the total number of audited enrolled students by the grades offered at the school. | School Audited Enr by Grade |
| District UPSFF Enrollments by Grade | This table provides the number of UPSFF enrolled students by sector and by grade. | District UPSFF Enr by Grade |
| LEA UPSFF Enrollments by Grade | This table provides the number of UPSFF enrolled students by LEA and by grade. | LEA UPSFF Enr by Grade |
| School UPSFF Enrollments by Grade | This table provides the number of UPSFF enrolled students by school and by grade. | School UPSFF Enr by Grade |
| CBO Enrollments by Grade | The CBO Enrollments by Grade provides the number of  enrolled students by school and by grade that are funded by PreK Enhancement Funds. | CBO Enrollments by Grade |
| CBO Residency | The CBO Residency provides the total number enrollments with a breakdown of total residents compared to the number of total non-residents by CBO. | CBO Residency |

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[6] "Student Enrollment Audit & Child Count Handbook, Guide for Local Education Agencies, School Year 2018-19." Office of the State Superintendent of Education.

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|---|---|---|
| Student Enrollment in Surrounding County Schools | Student Enrollment in Surrounding County Schools provides the total number of students under CFSA enrolled in a surrounding county public school by grade. These data are provided by CFSA. | Student Enr in Surr County Sch |
| Enrollment of Students in Non-Public Schools | The Enrollment of Students in Non-Public Schools provides the total number of students enrolled in each non-public school including unverified residents. | Enr of Student in Non-Public |
| Non-Resident Tuition Assessed, Owed, and Collected | The Non-Resident Tuition Assessed, Owed and Collected provides the total number of students who are non-residents and tuition payment has been established. This report provides the total tuition assessed, the amount owed as of Jan. 25, 2019 based on the tuition payment plans, and the amount collected as of Jan. 25, 2019 - by LEA and school. | Non-Res Tuition Assessed & Coll |
| District UPSFF Enrollments by Special Need Categories | This table provides the total number of UPSFF enrolled students who have additional special need identifications and the LEA is provided funding to serve their needs. These students include English learners (EL), at-risk students, and Students with Disabilities (SWD). | District UPSFF Enr by Spl Need |
| LEA UPSFF Enrollments by Special Need Categories | The LEA UPSFF Enrollments by Special Need Categories provides the total number of UPSFF enrolled students by LEA who have additional special need identifications. | LEA UPSFF Enr by Spl Need |
| School UPSFF Enrollments by Special Need Categories | School UPSFF Enrollments by Special Need Categories provides the total number of UPSFF enrolled students who have additional special need identifications.<br>DS = double suppression | School UPSFF Enr by Spl Need |

## Appendix B: Data Definitions

The following table defines the key metrics used in the data tables above and throughout this report.

| Audit Status | Metric | Definition |
|---|---|---|
| Unaudited | Unaudited enrollment | The initial number reported by schools/LEAs as "Stage 5" enrolled students as of Oct. 5. This figure may include duplicative enrollments. |
| Audited | Audited enrollment | The final, audited number of students reported by schools/LEAs as "Stage 5" enrolled as of Oct. 5, after resolving any duplicative enrollments. |
| | Public enrollment | The final, audited number of students reported by schools/LEAs as "Stage 5" enrolled as of Oct. 5 at DCPS or public charter schools in the District. This metric excludes students in non-public placements. |
| | Non-public enrollment | The final, audited number of students reported by schools/LEAs of "Stage 5" enrolled as of Oct. 5 in non-public placements. |
| | Uniform Per Student Funding Formula (USPFF) | The final, audited number of students reported by schools/LEAs of "Stage 5" enrolled as of Oct. 5, for which the schools will be paid the UPSFF. This figure excludes non-residents with tuition agreements as well as students whose residency is unverified at the conclusion of the audit. |
| | Unverified residency | The final audited number of students reported by schools/LEAs of "Stage 5" enrolled as of Oct. 5 for which the residency could not be verified during the audit and for which the school/LEA will not be paid the UPSFF. |
| | Non-resident enrollment | The final audited number of students reported by schools/LEAs of "Stage 5" enrolled as of Oct. 5, who have a tuition agreement in place for the school year. These students are not included in UPSFF. |

## Appendix C: Enrollment Audit in Context

This section offers a comprehensive view of the work of the Office of Enrollment and Residency (OER) and puts the annual enrollment audit in context.

### Residency

In addition to leading the work of the enrollment audit, OSSE is also responsible for setting and enforcing residency policy throughout the year. District regulations (5-A DCMR § 5001.5) provide a definition of residency for the purposes of school enrollment that requires the following to be a bona fide resident of DC:

(a) the person enrolling the child is the parent, or legal guardian, custodian or Other Primary Caregiver[7], and
(b) the person has established a physical presence[8] in the District of Columbia; and
(c) the person has submitted valid and proper documentation in accordance with District laws and regulations.

To confirm that these three criteria are met, each public school in the District is required to collect a minimum set of documents from students at the time of enrollment, each year. Schools collect a set of documents to help verify the physical presence one needs to be a resident. The set of documents must be easily accessible so the process does not disenfranchise the District's most vulnerable populations, but strict enough to prevent non-resident students from accessing educational services for which they are not eligible. This is a hard balance to maintain and is further supported by residency investigations.

This table outlines the minimum required documents the parent, legal guardian, or other primary care giver needed to provide at enrollment in order to verify DC residency for the 2018-19 school year.

| One of the following: | | Two of the following: |
|---|---|---|
| Recent pay stub showing DC tax withholdings and not those of any other state | **OR** | Unexpired DC motor vehicle registration |
| Unexpired official documentation of financial assistance from the Government of the District of Columbia | | Unexpired DC motor vehicle operator's permit or official government issued non-driver identification |

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[7] An Other Primary Caregiver is defined as "The person other than a parent or court appointed custodian or guardian who is the primary provider of care and support to a child who resides with him or her, and whose parent, custodian, or guardian is unable to supply such care and support and submits evidence that he or she is the primary caregiver of the student in the manner provided in D.C. Official Code § 38-310 and this Chapter" and must submit documentation demonstrating such status in accordance with 5-A DCMR § 5005.

[8] Physical presence is defined as the actual occupation and inhabitance of a place of abode with the intent to dwell for a continuous period of time. (5-A DCMR § 5099)

| Certified copy of Form D40 | Unexpired lease or rental agreement with a separate proof of payment of rent |
| Current Military housing orders | One utility bill with separate proof of payment |
| Embassy letter | |

In addition, for families that are unable to provide these documents, a home visit may be conducted by a school official. While OSSE sets the overarching policy and standards, it is the responsibility of the school to collect, review, and ultimately accept or reject the documentation submitted to establish residency of a student at the time of enrollment. Beyond District-wide policy, OSSE's primary role with regard to residency is oversight, via the annual audit, as well as through residency investigations.

## Investigations

To further support the correct allocation of funds, and to ensure that District schools are available first and foremost to District residents, OSSE collects tips on potential non-resident students and conducts investigations into allegations of non-residency.

When a tip is received, or when a student's residency is unable to be verified during the enrollment audit, OSSE examines the residency documents submitted by the enrolling person to the school, performs an administrative audit of public records, contacts the families for additional documentation and when necessary, conducts field investigations.

If sufficient evidence is found that indicates a student's circumstances does not meet the criteria described above (the enrolling person is not the parent or legal Other Primary Caregiver, the documentation submitted does not meet the requirements, or there is demonstrable evidence of a physical presence outside of the district), OSSE may issue a notice of finding of non-residency.

## Tuition Administration

There are some circumstances in which non-resident students are permitted to attend District public schools. In order to attend as a non-DC resident there must be a seat available and no eligible DC resident student on the school's waitlist. If this criteria is met, and the school chooses to enroll a non-DC resident, that student must enter into a tuition agreement commensurate with the services the student will be provided. This amount is calculated using the same UPSFF funding allocation that would be used to provide student-level public funding to the school.

Non-DC resident students who are eligible to attend a public school in the District of Columbia and enter into a tuition agreement create an account through an online portal and pay tuition electronically. Tuition payments are collected monthly and must be kept current in order for a student to continue attending a public school in DC. Accounts that become more than 90 days

delinquent are subject to exclusion from school. Furthermore, non-resident students who do not pay in full by July 15 of a given school year are not eligible to re-enroll in the school without re-application. If a non-resident student is excluded for any reason, that student is required to pay the outstanding debt, reapply to the school under the same eligibility conditions (i.e. that no DC resident students were on a waitlist), and sign a new tuition agreement in order to re-enroll.

## OER Improvements in 2018 and Beyond

The Office of Enrollment and Residency continues to make improvements to enrollment and residency policies in the District. In September, OER reviewed and updated several key internal policies and will provide additional clarification on existing regulations before the start of the 2019-20 school year. The office also expanded its capacity with three new personnel hires.

Specific to investigations, OER is currently working on an updated standard operating procedures document and is utilizing newly added investigators. OER will also be investing in a case management system to better track submitted tips, ongoing investigations, and the referral of cases to relevant agencies when a non-resident determination is made.

For tuition collection, OSSE has a new online payment portal to more easily collect tuition from non-residents. This portal will also be supported by a new tuition payment application that will automate notifications and tracking.

Finally, OER is continuing its public information campaign to assist District residents with understanding the enrollment and residency process by providing materials at EdFEST, updating the DCRV form in collaboration with the The Lab @ DC, and continuing an outreach campaign that notifies the general public on how to report potential non-residents.

Designing a residency verification process that is easy for families and LEAs to use, adequately enforces District regulations so that District families have primary access to a free, public education, and does not disenfranchise our most vulnerable residents is an ongoing challenge. However, OSSE is committed to ensuring that DC residents have priority access to public schools across the District and that LEAs receive the appropriate funding needed to support the District students they serve.

## Appendix D: Enrollment Audit Process

In order to distribute public school funds accurately, the District must know the total number of students at each school, as well as their grade and any additional education services they receive. In the past, a manual student-by-student physical headcount was conducted at each public school in the District. Since OSSE took over the enrollment audit in 2014, and through recent legislative changes, system-to-system data interfaces are now used to verify enrollment at each public school in DC. These data systems and effective LEA coordination support timely and accurate collection of data for each student, removing the need to conduct a census-style physical headcount.

The process starts with the unaudited number of students enrolled as of Oct. 5 of each school year submitted by the LEA. Then, OSSE and the LEA go through a series of certifications before ultimately settling on an audited number of students attending public schools in DC or occupying a publicly funded pre-K seat. At the same time, LEAs are also validating the special education needs of the student – referred to as the Child Count. This final set of audited students is what OSSE uses to determine the funding each LEA receives using the UPSFF.

While relying on system-to-system data interfaces to confirm the total number of resident students attending public schools, the annual audit process still includes an on-site review of supporting residency documentation. LEAs and CBOs collect supporting residency documents for each student attending a public school in DC or publicly funded pre-K seat. During the audit, OSSE contracts with a third-party auditor to review a sample of supporting residency documents collected at each school. The sample size is 20 percent of a school's enrolled student body, after removing those students whose residency was verified through direct data feeds from other District agencies. If a school's sample fails to show adequate supporting residency documentation, auditors begin a 100 percent review of all student residency records that were not included in the sample. After that, any students who are flagged as having insufficient residency documents go through an iterative process between OSSE and the LEA until a final enrollment audit residency determination can be made. This process can take several weeks to complete. Any student whose supporting residency documentation is unable to be verified will not be included in the school's final UPSFF funding and will be internally referred for further investigation.

At the end of the audit, the total number of students found to be residents enrolled in public schools (i.e., the total UPSFF counts) is published (in this report). These figures then form the basis for the funding allocations for public and public charter schools in the District for that school year.

Comprehensive details describing the enrollment audit process can be found in the 2018-19 Enrollment Audit and Child Count Handbook[9].

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[9] "Student Enrollment Audit & Child Count Handbook, Guide for Local Education Agencies, School Year 2018-19." Office of the State Superintendent of Education.