



**DISTRICT OF COLUMBIA  
PUBLIC SCHOOLS AND  
PUBLIC CHARTER SCHOOLS  
ENROLLMENT CENSUS**

**OCTOBER 5, 2007**

**TCBA**

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# Enrollment Census Summary

Thompson, Cobb, Bazilio & Associates, PC (TCBA) was retained by the Office of the State Superintendent of Education (OSSE) to conduct a full census-type audit of the October 5, 2007, student enrollment for the District of Columbia Public Schools (DCPS) and public charter schools. In addition to the enrollment verification, TCBA reviewed each student file to ensure that it contained proper documentation to support residency, special education, and English language proficiency designations. The contract also required TCBA to identify, assess, and make recommendations to the District of Columbia Public Schools and the public charter schools to improve, correct, or address weaknesses in the systems, methodologies, or procedures. All abbreviated terms are defined in the Glossary.

This report includes both quantitative enrollment data as well as qualitative observations. Only those students who have proven District residency, or pay tuition, are considered properly enrolled. Therefore, the enrollment data are presented in two ways — enrollment without regard to residency and enrollment only for students who have properly proven residency or who pay tuition. The detailed quantitative data are presented in the attachments; this section summarizes the key enrollment data.

DCPS issues an annual Membership Report detailing the number of students reported by each school to be enrolled at October 5<sup>th</sup>. Each public charter school submits an enrollment roster annually to the DC Budget Office detailing the students enrolled at October 5<sup>th</sup>, which TCBA uses as the basis for the audit of each charter school. Collectively, the data in the Membership Report and the rosters submitted by each public charter school are referred to as the Reported Enrollment throughout this report. Table 1 summarizes the Reported and Audited enrollment. The Attachments provide a breakdown of total enrollment by grade.

**Table 1: Enrollment Comparison**

	<b>DCPS</b>	<b>Public Charters</b>	<b>Contracted</b>
<b>Students enrolled in pre-school, pre-kindergarten, kindergarten, grades 1 through 12, non-grade level and adult programs</b>	<b>49,422</b>	<b>21,947</b>	<b>75</b>
<b>Students with Unverified Residency</b>	(421)	(81)	-
<b>Enrollment with Verified Residency</b>	<b>49,001</b>	<b>21,866</b>	<b>75</b>
<b>Reported Enrollment</b>	50,257	22,205	87
<b>Difference</b>	<b>(1,256)</b>	<b>(339)</b>	<b>(12)</b>
<b>Students who have current IEPs to receive special education services (without regard to residency)</b>	6,557	2,307	24
<b>English Language Learners (without regard to residency)</b>	4,130	1,242	-

The audit of enrollment was based primarily on verification of the student’s presence in the school. For students who were not present on the day of the count, we relied on the enrollment and attendance records provided by the school and assumed those documents to be accurate and complete. We found numerous inconsistencies between the system and manual attendance records, as well as some evidence that the attendance records did not accurately reflect attendance. In an exception-based system, it is not possible to determine whether the inconsistencies are intentional or unintentional misrecordings.

Absences are consistently high at certain schools. The high absences coupled with poor attendance records caused these schools to be unable to count these students as enrolled. In total, there were over 9,000 students absent on the days that we did the classroom audits; that is over roughly 13% of students.

The audit continues to reveal deficiencies that have been cited in previous reports, which are discussed in detail in the Observations and Findings section of this report. These include:

- Hundreds of students being claimed as enrolled in more than one school
- Inaccurate data in STARS and ENCORE
- Incomplete and inaccurate attendance records
- Noncompliance with residency verification procedures
- Inefficient enrollment and residency verification processes
- A questionably large number of students withdrawing or transferring within days after the October 5 membership date

While the pattern of deficiencies is seen every year, there are always certain schools that stand out, indicating good administrative practices and cooperation with the census process. We would like to commend those schools below that had no enrollment or residency issues remaining after the resolution process, particularly those schools in red, which had no differences two or more years running.

DCPS Schools			
<b>Aiton</b>	<b>Garrison</b>	Meyer	Savoy
Browne Center	<b>Hearst</b>	Miner	<b>SWS @ Peabody</b>
<b>Burroughs</b>	Hine	<b>Montgomery</b>	Seaton
Choice @ Taft	<b>Houston</b>	<b>Murch</b>	Slowe
Cleveland	<b>Janney</b>	Orr	<b>Smothers</b>
Cook, JF	<b>Jefferson</b>	Oyster-Adams	<b>Stevens</b>
Cooke, HD	Key	Payne	Thomas
Davis-Adelaide	<b>Kimball</b>	<b>Peabody</b>	Truesdell
Dunbar Pre-Eng	<b>Lafayette</b>	Powell	<b>Turner</b>
Eaton	<b>Lee, Mamie D</b>	Prospect	<b>West</b>
Eliot	Ludlow-Taylor	Randle Highlands	Whittier
<b>Gage-Eckington</b>	MacFarland	<b>Reed</b>	Wilkinson
Garnet-Patterson	Malcolm X	<b>Ross</b>	Wilson
Public Charter Schools			
<b>Appletree Early Learning PCS</b>		Booker T Washington	IDEA
Arts & Technology Academy		Bridges	<b>KIPP</b>
Friendship - Chamberlain		Capital City	Paul
<b>Howard Road Academy</b>		E.L. Haynes	<b>St. Coletta</b>
Mary Mcleod Bethune – Slowe campus		<b>Elsie Whitlow Stokes</b>	SAIL

## Current Year Changes

There were some key developments over the past year which impacted the information reported in this audit.

1. Oakhill Academy Contract – Oakhill Academy has, until the current year, operated under and been funded through DCPS and been reported as a DCPS school. In 2007, the educational component of Oakhill was contracted to a third party, so it is no longer considered a DCPS school. We continue to include Oakhill in the enrollment audit because 1) it is still funded by the District, and 2) many duplicate student enrollments arise between Oakhill and other schools.
2. Elimination of the BOE Chartering Authority – Since the inception of charter schools, there had been two active charter authorities, the DC Board of Education (BOE) and the Public Charter School Board (PCSB). In 2007, the BOE Chartering Authority was eliminated and all public charter schools were transferred to be under the purview of PCSB.
3. Elimination of Junior High Schools – DCPS discontinued the classification of schools as Junior High Schools. The schools were migrated to Middle Schools with grades shifted accordingly.
4. Hope Academy PCS was a new charter school that opened in 2007; however, it closed shortly after October 5, 2007. Given the unique circumstances, the students who were displaced when Hope Academy closed were counted as enrolled at the school to which they transferred even though the transfer occurred after October 5.

Table 2 compares the enrollment count by type of school for the current and previous school years.

**Table 2: Comparison to Prior Year**

	2006 – 2007		2007 – 2008	
	Audited Enrollment with Verified Residency	Audit as a Percentage of Reported	Audited Enrollment with Verified Residency	Audit as a Percentage of Reported
Alternative DCPS Charter (a)	194	94%	113 363	92% 98%
Elementary	31,137	99%	29,069	99%
Middle	3,878	96%	5,389	98%
Junior High (b)	3,413	98%		
Senior High	12,514	90%	13,631	94%
Special Education	949	92%	799	92%
Public Charters	19,659	98%	21,503	98%
Contracted (c)			75	86%

(a) Alternative Charter schools were not shown separately last year.

(b) Junior High Schools were eliminated in SY 07-08

(c) Oakhill was a DCPS Alternative School last year

## Residency Verification and Tuition Assessment

During the initial review, we identified students for whom we had not seen adequate residency documentation. Principals were given an opportunity to provide the missing information. Table 3

summarizes the final results of the residency review. The “Not Verified” column includes students for whom we were not provided the necessary documentation to make a determination of residency status.

**Table 3: Residency**

	<b>Resident and/or District Ward</b>	<b>Nonresident Paying Tuition</b>	<b>Nonresident Not Paying Tuition</b>	<b>Not Verified</b>	<b>Total</b>
<b>DCPS Schools</b>	<b>48,943</b>	<b>58</b>	<b>4</b>	<b>417</b>	<b>49,422</b>
<b>Public Charters</b>	<b>21,859</b>	<b>7</b>	<b>10</b>	<b>71</b>	<b>21,947</b>

There are at least 14 DCPS students in STARS with addresses in Virginia and Maryland who have not been assessed tuition and, according to the DC Child and Family Services Agency (CFSA), are not wards. For most, the principals claim that the students are wards, but CFSA has no record of an active case. For purposes of the audit, we have classified these students as residents based on information from the principals, but we have forwarded the list to the Office of Residency for further investigation.

The DCPS Office of Residency assesses tuition for students enrolled in DCPS schools who are known to live outside of the District. Individual public charter schools are responsible for assessing tuition to nonresident students enrolled in those schools. The following table summarizes the SY '07-08 tuition assessments as of October 5, 2007.

**Table 4: Tuition Assessments**

<b>Grade</b>	<b>Number of Students</b>	<b>Tuition Assessed (per DCPS)</b>
<b>DCPS</b>		
Pre-K	1	\$ 9,282
Kindergarten	1	9,282
1 <sup>st</sup>	1	8,242
2 <sup>nd</sup>	1	8,242
3 <sup>rd</sup>	1	8,242
4 <sup>th</sup>	1	8,002
7 <sup>th</sup>	1	8,002
8 <sup>th</sup>	1	8,002
9 <sup>th</sup>	6	56,172
10 <sup>th</sup>	18	168,516
11 <sup>th</sup>	15	140,430
12 <sup>th</sup>	11	102,982
<b>DCPS Total</b>	<b>58</b>	<b>\$ 535,396</b>

Grade	Number of Students	Tuition Assessed (per DCPS)
<b>PUBLIC CHARTER</b>		
Howard University 7 <sup>th</sup>	1	\$ 7,527
Hope Community PK	2	18,564
1 <sup>st</sup>	1	8,242
4 <sup>th</sup>	1	8,002
DC Preparatory PS	1	9,282
The Washington Latin 6 <sup>th</sup>	1	8,002
<b>Charter Total</b>	<b>7</b>	<b>\$ 59,619</b>

The above table reports the tuition amounts assessed by each school. A schedule of tuition rates by grade is developed each year to be used by every District school. The tuition amount being charged by Howard University is less than the established rate of \$8,002 for a seventh grade student. In addition, one charter school granted tuition exemptions to two nonresident students who are children of employees.

In addition to the 58 students shown above who were assessed tuition by DCPS, two students were assessed tuition at the start of the year who had withdrawn or stopped attending prior to October 5, 2007. Conversely, there are four students found to be nonresidents attending DCPS schools who have not been assessed tuition. There are eight nonresident students attending charter schools, in addition to the two granted tuition exemptions, who have not been assessed tuition.

### Students in Private Placement and Surrounding County Schools

There are special education students who attend private day and residential programs for whom DCPS pays tuition. There are also wards of the District, both special and regular education students, who attend schools in surrounding counties. The majority of these students attend schools in Prince George's County, but some attend schools in other local school systems. Using school information provided by the DCPS Division of Special Education, TCBA sent letters to non-DCPS schools requesting enrollment information as of October 5, 2007. Throughout the audit period, TCBA provided DCPS and CFSA with discrepancies between the STARS data and the information reported by schools and worked with them to resolve the discrepancies. DCPS and CFSA are in agreement with the remaining differences. Table 5 summarizes the results.

**Table 5: Nonpublic and County Confirmation Results**

	Regular Education		Special Education	
	County Schools	Private Placement *	County Schools	Private Placement
Students at October 5, 2007:				
Total in data provided from STARS	280	6	161	2,241
Students in STARS not attending designated school	(52)	(3)	(24)	(89)
Students in STARS confirmed by schools	<b>228</b>	<b>3</b>	<b>137</b>	<b>2,152</b>
Students confirmed by schools but who were not in STARS	31		10	70
Special Education students reported by the schools to be Regular Education	5	10	(5)	(10)
Regular Education students reported by the schools to be Special Education	(5)		5	
<b>Total Students Enrolled</b>	<b>259</b>	<b>13</b>	<b>147</b>	<b>2,212</b>
Students for whom residency was not verified	–	(1)	–	(406)
<b>Total Enrolled Students with Verified Residency</b>	<b>259</b>	<b>12</b>	<b>147</b>	<b>1,806</b>
<b>Per the DCPS Membership Report</b>	<b>280</b>	<b>6</b>	<b>161</b>	<b>2,241</b>
<b>Difference</b>	<b>(21)</b>	<b>6</b>	<b>(14)</b>	<b>(435)</b>

Note: See Attachments 15 and 16 for totals by school.

\* OSSE assumed responsibility for private placements of regular education students as of October 1, 2007.

The differences between the total number of students reported in STARS and the total number of students confirmed by the schools does not appear significant in the absolute (without considering residency verification); however, this is a net difference. Across all private and county schools, there were 168 students in STARS who were not attending the schools designated and 111 students who were not in STARS but attending schools for whom DCPS is obligated to pay tuition.

For purposes of the audit, a student is not counted as enrolled if he or she quit attending prior to October 5, 2007. This standard is applied to all schools. However, because DCPS has entered into contracts with the nonpublic schools to pay tuition for each student placed, DCPS may be required to pay tuition for a



month in which a student stopped attending. Depending on when during the month the student stopped attending, DCPS may be required to pay tuition for the subsequent month until action can be taken to return the student to DCPS. Therefore, for funding purposes, the audited enrollment number for nonpublic students as of October 5, 2007, may need to be adjusted for specific contractual requirements.



# Observations and Findings

## Student Information Systems

Prior audit reports have discussed that there are two primary obstacles to achieving the goal of being able to eliminate the need for an enrollment audit in order to determine an accurate count of students attending schools funded by the District: 1) there is no comprehensive District-wide student information system, and 2) there is no standard followed by all District schools for accurate enrollment and attendance reporting. This year's report maintains many of the same recommendations.

There is no one system that tracks all key information for all DCPS and charter school students, nor is there a single system of record within DCPS. There are, currently, at least three systems of record for DCPS. In addition to STARS, the Office of Special Education maintains ENCORE and the Office of Bilingual Education (OBE) maintains a separate system to track language services (the OBE System). Although there is a daily upload between STARS and ENCORE, these systems do not directly interface. Therefore, there is no one system from which to obtain and report student information for even DCPS. These three systems track only DCPS students. Because there is no comprehensive system incorporating the public charter school students, the District has no means to track and monitor all of the students served by the District. As such, the District is unable to determine a true enrollment number, including special and bilingual education students, and will, therefore, be unable to accurately report and forecast enrollment without some form of audit. The database created in the audit is the only comprehensive database of all District students and the only means for identifying students being counted as enrolled by more than one school ("duplicate students").

Accurate information can only be achieved through the implementation and maintenance of one system of record to include DCPS and public charter schools and incorporates all users, including OSE and OBE. If separate systems are maintained for specific purposes, *i.e.*, OSE and OBE, these feeder systems should interface with the primary system and have safeguards in place to ensure that they reconcile and that the data being fed is accurate and complete. The systems currently in place have too many deficiencies to allow for a clean merger of the data for use in the audit. As a result, a significant amount of data cleansing and matching must be performed during the course of the audit. Following are examples of some of the data errors and inconsistencies found in the data provided to TCBA from some of the primary systems.

## STARS and Charter School Data

Our analysis of the data from STARS indicates that key fields lack validation and do not require mandatory input. The charter school data are provided in Excel format, which we have assumed to be an accurate reflection of the data in each school's student information system. This data also shows validation and input errors. Following are some of the weaknesses noted with regard to data integrity.

### Unique Identification Numbers

STARS has the ability to generate unique student IDs but it has minimal internal controls to ensure that unique numbers are assigned. All DCPS and all but three charter schools are required to obtain DCPS IDs for enrolling students. Although student IDs are generated automatically in STARS, the human element is an integral part of the procedure and consequently creates the potential for problems with duplicates. When school personnel describe the enrollment process, they all state that the first thing they do is a query in STARS to determine if the student has previously been assigned an ID number. This query is done by entering the student's name into STARS. When this is done, a screen showing ID

numbers, names, date of birth, sex and last school attended appears for all students with that name. If the student's name does not appear after the query, the basic demographic information is entered and STARS assigns a new ID number.

This initial procedure is the major weakness in the enrollment process. School officials readily admit that it is possible to circumvent the initial query and enroll the student without first checking to see if he is already in the system. In doing so, the school runs the risk of the same student having two ID numbers. Also, slight alterations in the spelling of names or name changes can result in a student receiving two ID numbers.

Because the query can be done with just a minimal amount of data, such as last name alone, the schools may receive hundreds of names to choose from and select the wrong one, resulting in two different students having the same ID number. In addition, a school can use an ID number obtained from the parent, student, or other documentation, without doing the query, which could be the wrong number and also result in two different students having the same number. Theoretically, an enrollment of this type should not be allowed to happen because STARS is not supposed to allow a student (ID) to enroll in one school unless he has been released from the previous school. This works relatively well for the DCPS schools using STARS; however, there is a flaw in the design of the interface with charter schools. Because charter schools are not on STARS, there has to be a way for STARS to track IDs that have been assigned to charter school students. This is done by establishing a "dummy" school number in STARS for charter schools, from which students can be transferred in and out. Most, if not all, charter schools have been given the school number 998, essentially treating all of charter school students as attending one school in STARS. Therefore, the transfer in/out controls are ineffective if the student is transferring from one charter school to another because the system sees them as the same school. We interviewed a number of charter schools to understand the reason for so many pairs of different students having the same ID, and the conclusion was that the use of 998 for all charters is part of the problem. After combining the DCPS and charter school data, we found 527 students with at least two different students having the same ID. While some could be attributed to typographical errors in the charter school rosters, this is not likely the primary cause.

STARS is not supposed to allow an ID number to be used twice within the same school. In the October 5<sup>th</sup> download provided by DCPS, there were 6 students who appeared twice in the same school. We also found duplicate ID numbers within the same school for over two dozen charter schools. Because the charter schools provide their enrollment data on Excel spreadsheets, we do not know if the duplicate IDs resulted from typographical errors or the schools are truly using duplicate IDs.

STARS, or whichever system will be used to assign unique identifiers, should have an automated system lookup rather than a voluntary query. The school should be required to enter all key fields – name, date of birth, etc – and the system will run an internal query to generate a list of all students matching those key fields within a defined set of parameters and combinations. New IDs should be issued only for those students without a match, and reports of new ID numbers should be run and reviewed regularly.

#### Date of Birth

The date of birth is a critical data field for determining if a student is eligible for enrollment and special education and language services as well as identifying duplicate students. However, there is no logic check within STARS or the charter school systems to determine if a date of birth is reasonable, and apparently, little review to determine if it is accurate. As a result, there are many questionable dates in the data provided by DCPS and the charter schools. Therefore, TCBA was unable to determine if students should be excluded from enrollment, special education, and language services based on age, because there is no reliability in the dates of birth.

Table 6 shows the range of birth dates by grade for students in the STARS and charter downloads, excluding dates in the far extremes. Clearly many of the dates, particularly on the outside ranges, are in error, but the table highlights the degree of error in such a key field as the date of birth. These errors were found in both the STARS data and the charter school data.

**Table 6: Birth date ranges by grade**

Grade	Range of Birth Dates	
	DCPS	Charter
Preschool	10/23/2002 - 7/30/2007	9/18/2002 - 1/2/2005
Pre-K	8/18/1993 - 8/21/2007	3/2/2000 - 9/18/2007
Kindergarten	4/13/2000 - 7/7/2007	5/26/1977 - 12/8/2004
1st	6/1/1998 - 12/20/2002	12/1/1996 - 10/23/2007
2nd	3/14/1997 - 11/11/2006	1/18/1997 - 1/6/2007
3 <sup>rd</sup>	4/20/1996 - 9/1/2000	1/11/1991 - 11/27/2001
4 <sup>th</sup>	2/9/1995 - 1/13/2007	4/15/1988 - 9/28/2000
5 <sup>th</sup>	1/23/1994 - 2/26/1999	12/9/1991 - 8/23/2007
6 <sup>th</sup>	7/17/1993 - 12/24/1997	8/27/1991 - 7/11/2007
7 <sup>th</sup>	4/18/1959 - 5/1/1999	1/9/1990 - 9/17/2007
8 <sup>th</sup>	2/11/1991 - 8/6/1996	12/16/1989 - 9/2/2007
9 <sup>th</sup>	9/24/1978 - 7/2/1999	8/24/1988 - 9/12/2005
10 <sup>th</sup>	5/22/1987 - 10/5/1993	2/21/1985 - 12/9/1993
11 <sup>th</sup>	2/27/1985 - 9/15/1993	3/29/1981 - 8/14/1995
12 <sup>th</sup>	5/3/1981 - 4/5/1992	6/28/1981 - 6/30/1994
Ungraded	8/8/1937 - 6/3/2004	9/28/1985 - 8/21/2004
Adult		1/8/1928 - 12/15/2004

Even given advanced and delayed students, it is highly unlikely that there are age variances of more than 2 or 3 years in any grade level, particularly at the lower levels. Without an accurate date of birth, there is no way to determine eligibility or even appropriate grade. It is possible that for some of these students the date of birth is correct but the grade is the bad data. For purposes of the audit, we relied on the grade data as being accurate in order to report students by grade.

While the majority of students have birthdates within acceptable ranges, this table demonstrates the lack of built-in field validation. Any comprehensive system would have to be able to flag dates outside of a reasonable range for the grade level. Additional controls would need to be established to ensure that the dates are not just reasonable but accurate.

### Residency Codes

The October 5<sup>th</sup> download from STARS included the field for residency code, signifying whether residency had been verified. Of the 50,270 in the DCPS download, 5,270 students, over 10% had no residency code recorded indicating that either residency had not been verified or the data in STARS were

not maintained. Attachment 9 shows that 421 DCPS enrolled students did not adequately verify residency. Either Residency Forms were missing or were on file but missing vital information.

Fourteen students show addresses in STARS that are not in DC, but they had residency codes indicating ward or resident. CFSA has no record of them currently being wards.

### Withdrawal Dates

The withdrawal date in STARS is generally the day that the withdrawal was input and not the student's actual last day. Because the District does not maintain a comprehensive student system that includes charter schools, recording accurate withdrawal dates is critical to minimize the risk of reporting students at multiple schools. In addition, the Withdrawal Record printed from STARS often has a blank withdrawal date. In order to eliminate any confusion over the definition of withdrawal date, we recommend adding a field in STARS and the charter school systems to capture the last day physically present.

### Other Data Anomalies in the STARS and ENCORE Downloads of DCPS Students

Following are some of the inconsistencies and incomplete data found in the downloads from STARS and ENCORE provided by DCPS.

- Different students can have the same social security number in STARS.
- Students in ENCORE who show a Special Education Status in STARS of Exited, Regular Education, or Not Eligible; however most of these had current IEPs. The principals provided the IEPs as evidence that services are being provided, which may be in error if the data in STARS is correct.
- The STARS field for parent name was blank for over 10,000 students. We are unable to know if this is a deficiency in STARS or the download provided to TCBA. These data are often important in determining if students who appear to be duplicates are, in fact, different people.
- The STARS field for phone number was blank for over 700 students, a critical piece of information for contacting the parent.
- The Office of Special Education establishes a school designation number in STARS for each nonpublic school at which special education students are enrolled. OSSE will assign the same school a different number in STARS in order to enroll regular education students. Assigning a different school identifier is not done for the County schools, so it is inconsistent that it is done for private schools.

## **ENCORE**

If ENCORE is to be considered the system of record for monitoring and reporting special education students, accuracy is paramount. Monthly reconciliations should be performed to ensure that data integrity is maintained. These reconciliations should include basic data checks, such as duplicate students, differences with STARS, and service level and hour anomalies. In addition, principals should be held accountable for the data in ENCORE. School staff, *i.e.*, principals and special education coordinators, do not take responsibility for the accuracy of special education data and seem surprised when the audit identifies discrepancies between the data in ENCORE and the information on the IEP.

Table 7 highlights the degree to which data in ENCORE misreports funding levels and services for special education students

**Table 7: Reconciliation to ENCORE**

	<b>ENCORE</b>	<b>AUDIT*</b>
Null	397	
Level 1	1,645	1,350
Level 2	2,214	2,464
Level 3	889	916
Level 4	1,690	1,827
TOTAL	6,835	6,557

\* Based on students counted as enrolled for the audit, without regard to residency verification

## **FACES**

FACES is the CFSA system used to track children who are wards of the District. Typically, FACES is outside of the scope of the audit. However, in order to improve efficiency between CFSA and DCPS, OSSE requested that we use FACES for the current audit as the basis for determining the residency status of wards attending nonpublic and county schools rather than CFSA providing court orders to DCPS. Therefore, we obtained a download of FACES as of October 5<sup>th</sup> listing wards of the District with a currently active case. The download was first provided by CFSA to DCPS in order for DCPS to attach the DCPS student ID number to enable TCBA to match the CFSA file with the STARS file. In attempting to perform the matches for verifying the residency status of wards, we became aware of numerous data errors in the CFSA file.

CFSA relies on the social workers to provide tuition contracts and update FACES. STARS can be accurate only to the extent that the social workers are updating FACES timely and accurately. It appears that they are not. The analytics below displays the degree to which FACES is incorrect or incomplete with regard to education information. Aside from simply the data discrepancies, DCPS and CFSA should reconcile the lists to determine why there are 801 students in FACES as wards who could not be matched to a student in DCPS, charter schools, nonpublic school, or surrounding counties.

The FACES file provided to TCBA contained 2,255 wards. Following are some of the analytics which raise questions about the accuracy and reliability of FACES. Of the 2,255 students:

- 551 did not have a DCPS ID number assigned.
- Only 1,454 could be matched to a student in DCPS or charter schools using ID, name, and DOB combinations, leaving 801 unmatched to any student. Of the 1,454 matched, only 1,252 had the same student ID, of which 80 had different dates of birth, 10 had different last names, and 18 had different first names.
- Of the 1,454 students in FACES with a match found in DCPS, charter, nonpublic, or counties:
  - 228 students had an Education Status in FACES of something other than “Attending”, of which 151 showed a status of “Unknown” or “No Education Status Information”. Of the 228, 164 were found to be enrolled.

112 students who were found not to be enrolled had an Education Status of “Attending”

- Of the 801 students in FACES with no match found in DCPS, charter, nonpublic, or counties, 298 were shown as having a status of “Attending” in FACES.
- 308 students had a school listed in FACES other than the one being attended, 28 of which showed “No School Information.”
- 14 students in STARS with addresses in Virginia and Maryland who are not in FACES.

## Data Format Consistency

With a consolidated system needing to receive data from feeder systems, each of the feeder systems will need to establish compatible data formats. One of the difficulties in consolidating data for the audit and being able to merge and match data files, is the varying formats and data entry errors and inconsistencies. Automated data analysis can only be effective if data can be matched on common fields. As an example of the data variances, following are the number of different ways that one school name was listed in FACES.

Charles Herbert Flowers High School  
 C. Herbert Flowers  
 Charles Flowers HS  
 CharlesFlowersHighSchool  
 Charles Flowers  
 Flower High School  
 C.Herbert Flowers  
 Charles H. Flowers High  
 Charles H. Flowers High School  
 Flowers High School  
 FlowersHighSchool  
 Charles Herbert Flowers  
 Charles H. Flowers HS

This is just one of many examples of data errors seen across all systems. Names are misspelled, dates of birth are incorrect, address fields are not defined, etc. To the extent possible, all fields, where appropriate, should use drop down boxes to eliminate the human error and inconsistency.

## Duplicate Students

A duplicate student is defined as the same student included on the roster of two or more different schools or on the roster of the same school more than once. Each year, the audit identifies several hundred potential duplicate students. The SY 2006 – 2007 audit identified 240 pairs of students reported as enrolled in two different schools. This year, the number has grown to 287. We found that many of the duplicates this year were cited as duplicates last year and prior years, indicating that these discrepancies were not corrected after last year’s audit.

Using this year as the example, without a comprehensive system or an audit that identifies and eliminates duplicates, the enrollment as reported by schools would be overstated in total by 287 students. Assuming average tuition of \$9,000 per student, this equates to nearly \$2.6 million of potential over-funding by the District for over-reported enrollment without regard to special needs add-ons.

Duplicate students occur for a number of reasons:

- There is no consolidated student information system for DCPS and the charter schools to identify duplicate students.
- There is not an effective process for students transferring between schools, primarily between DCPS and charter or between two charter schools, to ensure that 1) the withdrawing school is notified timely and 2) the students are withdrawn in the system as of the last date of attendance. The withdrawal date in STARS is usually the date that the parent officially withdraws the student or the date that the withdrawal was input. Because the last day of attendance is not used, a student can be enrolled and attending another school prior to the withdrawal date in STARS.
- While STARS will supposedly not allow the same student ID within DCPS to be used twice and requires the withdrawing school to transfer the student record to the admitting school, this is easily circumvented by simply setting up a new student record if the record is not transferred on a timely basis. Therefore the same student can be in STARS with two different ID numbers.
- There are many students who “withdraw” within days after the official membership date. Since funding is based on membership at that date, students are not removed from the system until afterward although they may have stopped attending prior.

Even in a consolidated system, identifying duplicates is not simple. The combined Enrollment Data provided by DCPS and the public charter schools contained the following (not mutually exclusive):

- 486 students with matching student ID numbers who are the same people
- 527 students with matching student ID numbers who are different people
- 88 students with different ID numbers who are the same people
- 7,218 students with matching names, i.e., at least 2 students have exactly the same name
- 65 duplicate students involving a nonpublic school

After scrubbing the above populations, we identified 287 pairs of students being reported as enrolled in two different schools or twice within the same school.

The number of students with matching ID numbers who are, in fact, different people as well as the number of students who are at two schools under different ID numbers indicates a weakness in the processes for assigning DCPS ID numbers to students enrolling in public charter schools or for transferring the correct ID number when a student transfers between schools. The number of students with the exact same name contributes to the assignment of incorrect student IDs.

The search for duplicate students is further complicated by inconsistencies and errors in the system data, e.g., misspelled names, incorrect birthdates, etc. as discussed previously. This could be somewhat mitigated by requiring the social security number for all students as a basis for periodic comparison; however, there would need to be system controls to eliminate the use of a SSN twice.

## Dual Enrollment

Prior audit reports have recommended that the District re-evaluate the funding for students cross-enrolled in evening programs, such as the STAY high schools. This recommendation was addressed in the District of Columbia Public Schools Budget Amendment Act of 2007, which established as Student Funding Formula Committee to review and revise the formula currently used, including whether a weighting should be provided for any student dually enrolled in a regular full-time senior high school program and an evening program (Sec 203).



We noted in the current year audit that the issue of dually enrolled students has extended beyond the STAY high schools, and we recommend that the Committee consider all situations of dual enrollment. With the chartering of more schools that are not K-12 and the development by those schools of programs outside of a K-12 curriculum, there are more opportunities being created every year for dual enrollment. This is particularly true in the Adult and nongraded programs. For instance, a student may take a morning ESL course at one school and an evening vocational or GED course at another. We found nothing in the DC Code or DCMR that would prohibit dual enrollments. However, the policy has always been that a single student is to be counted only once and funded at only one school, which is why the STAY schools have not received funding for cross-enrolled, or dual enrolled, students.

In addition to considering the funding implications of dual enrollment, OSSE should seek clarity as to whether a student should be allowed, by law or policy, to enroll in multiple schools.

There is another circumstance of dual enrollment that should be considered as it may be seen more frequently in the future. Special education students in nonpublic placement are being cross-enrolled with DCPS schools in effort to mainstream or allow the students to learn in a less restrictive environment. As long as the student is enrolled in the nonpublic school, DCPS will be paying tuition. Therefore, the Committee should consider whether the DCPS school should also be funded in some manner.

## Minimum and Maximum Age for Enrollment

Eliminating the apparent errors in the dates of birth, there are some 2-year olds enrolled in preschool. The DC School Reform Act of 1995 defines a DC public school as a school offering “any grade levels from prekindergarten through grade 12...” While other legislation refers to preschool, the definition of a public school does not. Also, the definitions for minimum enrollment age do not include preschool. This should be amended.

DC law defines minimum ages for students to enroll in adult education programs; however, there is no maximum age. Also, DC Code does not define a maximum age for 12<sup>th</sup> graders after which they must transfer to adult education. According to the dates of birth in the enrollment data, there are students as old as 79 attending school. Because there are currently no fees charged to students who attend adult classes through DCPS or the charter schools, OSSE should consider establishing and codifying additional parameters for adult education, such as maximum age or income levels. In addition, OSSE should consider codifying the maximum age for K-12.

Without the minimum and maximum ages and cut-off dates codified for all students, TCBA is not able to determine whether the audited enrollment count should be adjusted for students outside of the allowed age ranges.

## Residency Verification

DC Code 38-806 requires that all students enrolled in DCPS or a public charter school provide proof of residency annually and states that the methods used should be consistent across DCPS and charter schools. DCMR chapter 20 governs the admission of students. It states that the parent or custodian shall have 10 days after enrollment to prove residency, after which arrangements must be made to assess nonresident tuition. Failure to provide proof of residency or pay tuition will result in expulsion of the student. Schools do not comply with this rule, as indicated by the 502 students found to be enrolled who had not proven residency. Certain DCPS schools indicated that they received a directive instructing them not to expel students who had not proven residency.

## Headstart and Preschool

Headstart is a federally funded program. As such, it may not be appropriate to include Headstart students in computing the funding for a school under the Per Pupil Funding Formula. However, DCPS does not categorize Headstart students separately. There are two stand-alone Headstart programs, which are reported separately. However, there are Headstart programs within elementary schools that are included with the student count for the school. These programs are run separately within the school, without oversight by the school principal, yet the students are not segregated in STARS to identify which students may be covered by federal funding. Because the students are not classified separately, the audit could not segregate these students for reporting. Therefore, preschool and prekindergarten students within certain elementary schools may be in Headstart programs.

The Headstart programs include students funded by both DCPS and DHS. When auditing the stand-alone Headstart schools, TCBA makes an effort to distinguish the funding source and report only DCPS funded students. However, it is possible that some of the Headstart students commingled in DCPS schools and reported as DCPS students may be funded by DHS.

## Nonpublic and County Enrollment

### Relationship Between DCPS and CFSA

There is a Memorandum of Understanding (MOU) between DCPS and DC Child and Family Services Agency (CFSA) transferring to DCPS the responsibility for funding regular education students who are wards of the District attending schools in surrounding counties. A process was put in place for CFSA and DCPS to share information regarding these students; however, this process is dysfunctional. SY 2004-2005 was the first year that the regular education students in county schools were included in the audit. Being the first year for the new process, the process did not work smoothly. The second and third years saw little improvement. By year four, the process should be running smoothly to ensure that DCPS and CFSA have synchronized records regarding student enrollment for regular education wards attending school in surrounding counties. This is not happening.

DCPS, through the Office of Residency, creates a record in STARS for the regular education wards based upon tuition contracts provided by CFSA. These records are supposed to be updated by DCPS based upon monthly reports received from CFSA and tuition contracts for students placed or moved. This process results in no one being responsible for the data. DCPS relies on CFSA data to be accurate and timely, and CFSA has no relationship with STARS. The CFSA system, FACES, does not interface or reconcile with STARS. The outcome is inter-agency finger pointing.

In last year's report, we noted that DCPS and CFSA were in discussions to improve the process for identifying and tracking students in surrounding counties because the MOU in place was not effective because it placed the responsibility for funding on DCPS yet gave no authority to DCPS over placement or invoicing. DCPS was to be working toward developing MOU's with the counties which would provide a direct relationship between DCPS and the County school systems whereby the County school systems would directly notify DCPS of any students placed in their schools for which DCPS would be responsible for funding. This direct relationship would eliminate the currently ineffective process between CFSA and DCPS in which CFSA can place students without notifying DCPS.

The confirmations received from the surrounding county schools identified 73 regular education students who were not included in the records created in STARS by DCPS. Of these, DCPS and CFSA could verify only 20 as validly enrolled. While DCPS has responsibility for maintaining the data, it is not responsible for placement or ensuring that Tuition Contracts are in place; CFSA has that responsibility.

It is the nature of this student population to relocate frequently, often changing schools. A process needs to be established to ensure that DCPS is notified of student placements, transfers, and adoptions; receives the tuition contracts; and maintains an accurate accounting of students for whom DCPS is responsible for funding. One of the flaws in the current process between CFSA and DCPS is that it establishes a record in STARS upon placement of a student, but CFSA may not effectively notify DCPS of changes in placement or ward status.

#### Payment for Non-Attending Students

DCPS has a 20-day attendance policy which applies to students in nonpublic schools. Essentially, DCPS has the right to negate a nonpublic placement if the student has not attended for 20 consecutive days. There are processes in place to allow DCPS to return the student to a public school; however, these processes cannot be initiated unless DCPS is notified by the school of the excessive absences. We requested that the schools provide the last date of attendance. Of those that provided the information, over 40 students had stopped attending before October 5, 2007.

#### Regular Education Students in Nonpublic Placement

There is a long history that has led to the large number of nonpublic placements. Essentially, students are placed in nonpublic schools as an effort to meet special education needs that cannot, or have not, been met by DCPS. In our letters to the schools to verify student enrollment, we requested that they include the weekly service hours for each student. Some schools included this information in their response and some did not. Of those that did, several schools reported that students did not receive special education services, which we confirmed with OSE. For residential schools, this is possible since not all residential placements are based on special education needs. However, all students in day schools should be receiving services, as well as those placed in residential for special ed needs. If they are not, DCPS should take the necessary steps to have them return to a public school. In order to quantify the impact of the students reported not to be receiving services, we estimated the monthly cost based on invoice information available from 2006. For residential students, we reviewed the ENCORE record to determine if they were classified as special ed. Of those schools that responded, the approximate monthly tuition being paid for students who are placed in nonpublic schools but not receiving special education services is \$17,000. Since many of the schools did not report whether or not services were provided, it is possible that this number is higher.

#### Invoices May be Overstated

Some schools, particularly in the surrounding counties, report students as being enrolled who are not in STARS. TCBA and DCPS complete a reconciliation process to determine whether these additional students should be funded by DCPS. In some instances, STARS was not updated, so the student is added to the audit count. In other instances, the school reported students who are not actually attending or who were placed through an inappropriate method and should not be funded by DCPS. These students are not added to the audit count. However, the fact that the school reported the student as enrolled in response to the audit request indicates that the student may also be included on the invoices from the schools. This is a significant issue at Prince George's County Schools (PGCPS). PGCPS has a practice of rolling over students from the prior year and carrying them as enrolled regardless of whether a current tuition contract is in place. Schools may also not change the status of a student when the student has been adopted.

Nonpublic and county schools reported 24 and 73 students, respectively, who DCPS determined should not be funded. DCPS and CFSA should:

- Reconcile with each other and PGCPs at the start of each school year to ensure that only currently enrolled students who are active wards are being carried as enrolled and invoiced, and
- Continue to be diligent in the review of invoices to ensure that only students attending and properly placed are invoiced each month.

### Residency

Residency verification is required for students in nonpublic and county schools. The DC Office of Residency has responsibility for collecting and verifying proof of residency for special education students; the OSSE is responsible for regular education students. As discussed earlier, TCBA used the ward list from CFSA to verify the residency status of wards. Even with this efficiency, we saw a significant increase in the number of students who had not proven residency as of October 5th. Based upon our initial review of residency files, there were over 700 nonpublic students without residency verification forms on file. We allowed DCPS to continue to obtain proof of residency until the end of January – over two and half months after the point when residency should have been verified. After the push by DCPS, there were still 407 nonpublic students without residency verified.

In order to show the progress that was being made in collecting residency verification during December and January, DCPS provided TCBA with reports from STARS detailing the students which were coded with and without residency verification. We compared the STARS status of residency verification against the residency verification forms on file in the Office of Residency and the wards identified from FACES. The results further support the level of inaccuracy in STARS data, as shown in Table 8.

**Table 8: STARS Residency Verification Status**

	<b>STARS</b>	<b>AUDIT</b>
Nonpublic Students with Verified Residency	Verified – 1,761 Not Verified - 54	1,815
Nonpublic Students Without Verified Residency	Verified – 121 Not Verified - 286	407

Based on students classified as Enrolled

### **ENCORE Reconciliation**

DCPS uses ENCORE to track special education services. These schools also use this system to produce the IEPs for special education students. Theoretically then, there should be no differences between the information on the IEPs and the data in ENCORE. However, during the course of this audit, it was noted that the hours stated on many IEPs that were produced by ENCORE did not match the hours that were provided to TCBA in the data download for October 5<sup>th</sup>. According to several special education coordinators who spoke to us, ENCORE is not very user friendly and has some “glitches” which causes discrepancies between the hours in the system and hours printed on the IEP. The failure to complete input data on multiple screens and changes to a service provider may cause discrepancies.

Some of the integrity issues noted in the ENCORE download from DCPS include:

- 278 students with “0” service hours
- 341 students with a blank field for service hours
- 73 students with over 32 weekly service hours

Of the 619 with zero or no services recorded in ENCORE, we found 410 to have valid IEPs. As the special education system of record, ENCORE must provide accurate information to determine which students require services and the services required. When a student transfers between schools, ENCORE is often used to determine the needs of the student. If the ENCORE data is not reliable, neither will be the decisions based on that data. One of the critical decisions is budgeting. We had several principals express that they have had to lose special education personnel because of budget cuts. If the budget office relies on information from ENCORE to determine the needs at each school, the budget may be based on faulty data.

**Table 9: Reconciliation of ENCORE to Audit**

	<b>DCPS</b>
Students in ENCORE Download	6,835
Students in ENCORE with no service hours	(619)
Students with service hours listed more than once in ENCORE	(47)
<b>Students with special education service hours in the ENCORE download with a match in STARS</b>	<b>6,169</b>
Students not counted as enrolled	(182)
Enrolled students with no IEP, outdated IEP, or do not receive services	(130)
Students with current IEP but no level reported in ENCORE	700
<b>TOTAL PER AUDIT</b>	<b>6,557</b>

### Inconsistencies Between DCPS and Charter Schools

By law, each public charter school is its own LEA. The DC School Reform Act states that “a public charter school shall be exempt from DC statutes, policies, rules, and regulations established for the DCPS....., except as otherwise provided in the school’s charter or this subchapter (38-1802.04).” As a result, there are inconsistencies between DCPS and charter schools that create inconsistencies in the audit parameters. OSSE should consider addressing these as state policy.

**Enrollment Age** – Eligibility for enrollment and services is based on age. Some of the age requirements are mandated by Federal law and some by DC municipal regulations. However, there is inconsistency

between the DCPS policies and the charter policies, and no one seems to be aware of the actual definitions to be used. In July 2006, the DC Board of Education adopted Resolution R06-98 defining age eligibility for registration and moved the cut-off from December 31 to September 30, to be phased in. The resolution states that a student who is at least 4 years old is eligible for pre-kindergarten; however, no age is established for preschool. This rule applies only to DCPS. Charter schools do not have a defined minimum age or defined cut-off date for determining age; however, they are moving to adopt the DCPS guideline of using the September 30 cut-off date.

**Age to Receive Language and Special Education Services** – A DCPS student must be 4 years old to be funded as an English Language Learner; charters assess, and are funded for, 3 year olds. Federal law requires that special education services be provided to students between ages 3 and 22; however, there are no definitions for age cut-offs and whether students under 22 attending classes considered to be adult education in charter schools are eligible. We are not suggesting that the schools are not following applicable Federal law. We do recommend that, although each charter school is its own LEA, there be standard age policies defined for services and funding that apply to all schools in the District.

**Transfers** - Within DCPS, a student cannot transfer to one school without being withdrawn by the other school – STARS won't allow it. Therefore, there is a mechanism that forces the old school to do the transfer to the new school. There is no mechanism between charter and DCPS or charter to charter, giving rise to the duplicate problem. This allows charter schools to enroll students who have not been properly withdrawn from the previous school.

**Residency** – DCPS has a central office authorized to grant waivers for residency verification but charters do not. Therefore, charters have no recourse but home visits, which some have expressed presents a danger to the staff. In addition, some charters have developed their own residency verification form allowing them to accept documentation outside of the rules established by OSSE. This has been done where PCSB has deemed the OSSE process to be unsuited to the charter schools' population, and the alternative requirements were approved by PCSB.

**Student ID numbers** – A student who enrolls in DCPS, and most charter schools, must have, or obtain, a DCPS assigned student identification number. However, certain charter schools, primarily those offering adult education, are not required to obtain unique ID numbers.

## Repeated Findings

Many of the observations reported in previous years persist. Following are issues discussed at length in previous years that continue in the current year and have not been discussed earlier in this report.

### Accurate Attendance Reporting for DCPS

Most DCPS schools continue to use the manual Attendance Record Card as well as the manual Homeroom/Class Attendance Collection (HRAC). The manual HRAC is used to enter attendance data into STARS and produce automated attendance reports. As reported in previous years, the attendance card, manual HRAC, and automated records frequently showed differing attendance history for the same student, and there is no consistency as to which one is considered the most accurate. Some principals believe that the Attendance Card is considered the official record and spend substantial time reconciling the Card with the HRAC and STARS while others do not use the Attendance Card at all. Some principals had teachers complete Attendance Cards after the fact to provide as audit support, which did not reconcile to the HRAC. There is no standardization in how attendance is taken, making it difficult for the data to be input efficiently and correctly. Some teachers use the accepted standard of A for absent, T for tardy, etc. while others use checkmarks, x's, dots, times, and so forth. Until such time as all schools use on-line attendance taking, DCPS should:



Similar to DCPS, some charter schools may use the date that the enrollment form was initially created as the enrollment date rather than the first day of school and the date of the withdrawal form rather than the last day of school.

#### Withdrawal and Enrollment Dates

Schools are continuing to input the withdrawal date as the day that the withdrawal was requested or the day that the information was input in STARS or the charter school system rather than the last day of attendance. Conversely, some schools use the date that the enrollment form was signed as the enrollment date rather than the first day of attendance. As a result, students who effectively withdrew prior to or started after October 5 are shown in the system as enrolled, creating duplicate students. Any comprehensive system will continue to show duplicates when combining enrollment data unless the withdrawal date reflects the last day that the student was in attendance and the enrollment, or entry, date reflects the first day of attendance.

#### Manual Enrollment

There continues to be duplication of effort particularly surrounding the enrollment and residency verification processes, creating additional work for the school staff. The 4-part enrollment and residency verification form is still completed manually each year rather than using the capabilities of STARS to rollover student enrollments and produce automated enrollment forms.

#### Funding Should Follow the Student

Under the Budget Support Act, funding is based upon audited enrollment as of October 5<sup>th</sup> each year. Enrollment in any school system is fluid. This is particularly true in the District where students move in and out of charter schools. Having a static funding date provides an incentive for holding students until after October 5<sup>th</sup> as well as a disincentive for admitting new students. Every year, the auditors hear complaints that charter schools “dump” students back into DCPS right after the 5<sup>th</sup> and vice versa, particularly special education. There are rumors of schools convincing parents to delay transferring students until after October 5<sup>th</sup>. There is no direct evidence to support these allegations, but we do see a number of withdrawals within days after October 5<sup>th</sup>. Some charter schools admitted to refusing new enrollments after October 5<sup>th</sup> because there would be no funding.

The District does not currently have a system in place that would facilitate funding following the student. The theory underlying static funding is that the movements in and out of a given school during the year will roughly balance out so that related costs do not significantly change.

We recommend that the District conduct an analysis of student movement for a given period of time to 1) determine if there is any validity to the claim that schools hold students creating a disproportionate number of withdrawals and transfers shortly after October 5<sup>th</sup> and 2) provide support for the assumption that movement balances out, thereby making the funding issue less critical. We also recommend that an analysis be done of the withdrawals and transfers for the week or two after October 5 to discern if the allegations of “dumping” or “holding” students may have merit.

#### Automated Residency Verification

As observed in prior years, the current process for verifying residency is burdensome to the school staff and the parents. It can easily be circumvented and is not strictly adhered to by all schools. We have recommended in previous years that the objectives of residency verification can be achieved more efficiently and thoroughly through automated matching to files available in systems throughout the District, such as the Office of Tax and Revenue, the Department of Human Services, or the Department of Motor Vehicles, and we repeat that recommendation.



The first pass at residency verification should be the automated match, which should capture a majority of students. The remaining students would have residency verified through the current process; however, someone independent of the school should perform the verification.

### Compliance with Residency Rules

DCPS issued a directive on May 25, 2001, stating that the schools were not to keep copies of the documents submitted to prove residency. Therefore, because schools do not maintain copies of the proof of residency provided by parents, the scope of the audit was limited to reviewing the District Residency Verification Form (Residency Form). The audit process included reviewing the Residency Form for every student; however, there was no form on file for some students. For purposes of the audit, a properly completed and signed Residency Form was considered to have been completed in accordance with the applicable rules. However, there was no evidence to support that they had been completed in accordance with the acceptable procedures.

In order to resolve initial residency discrepancies, schools had to provide copies of the proof of residency for each student in question. Noncompliance included:

- Not obtaining receipts for utility bills and leases;
- Accepting bills other than gas, electric and water as utilities;
- Accepting documentation that does not show the current address;
- Accepting alternate documentation, such as mortgage payments, social security cards, DC employee ID cards, birth certificates, pay stubs that do not identify the state, tax returns, etc.

Given the frequency with which we observed the lack of compliance for the fraction for which we saw the proof documents, we can only surmise that many of the Residency Forms that appeared to be properly completed may have also not followed the prescribed procedures.

### Additional Residency Guidelines Needed

The OSSE develops the residency rules and guidelines and has revised them each year to clarify or modify requirements. The residency rules as written are applicable to the majority of students. However, with the diversity of the student population in the District, additional guidance is needed for unusual, but not uncommon, situations. Following are some of the situations that should be considered for additional guidance for both residency verification and enrollment.

1. The current residency rules require that proof of residency be provided by the person enrolling the student. Must the person enrolling the student be the custodial parent/legal guardian or other primary caregiver?
2. Is the person enrolling the student required to prove that he or she is the custodial parent or legal guardian? Schools we spoke with do not require the person enrolling the student to prove relationship.
3. If a family lives with another relative, e.g. grandparent, uncle, etc., can the relative enroll the student and thus be allowed to be the person proving residency?
4. Is the student required to live with the person enrolling/proving residency? For instance, if one parent lives in Maryland and one parent lives in the District, can the parent in the District enroll the student if the student lives with the parent in Maryland? Does it matter whether there is a legal custody agreement, shared custody, or informal agreement?
5. Which shelters qualify as District housing assistance?
6. What constitutes a receipt for leases and utility bills?
7. Does a student over 18 who lives with his parents have to prove residency for himself as an adult?
8. What are the guidelines for performing home visits?

### Home Visits

At present, home visits are the only alternative for charter schools when parents cannot provide the documents shown on the Residency Form. However, there is little guidance on conducting a home visit. OSSE and PCSB should establish parameters under which home visits are acceptable to prove residency, guidelines for conducting a home visit, and training.

### Alternative Process Needed for Charter Schools

As discussed above, charter schools must perform home visits if parents cannot provide the required proofs of residency. Several principals communicated that they do not want to require school staff to conduct home visits because they are invasive and, in some circumstances, potentially dangerous. DCPS has the Office of Residency, which has the authority to review alternative documentation and grant a variance establishing residency. DC Code states that if a person cannot establish residency, he or she shall be referred to “the DCPS student residency office or the appropriate chartering authorities, and procedures established by them pursuant to 38-311 shall be followed.” PCSB should consider establishing a process similar to that of DCPS whereby a central authority can review alternative documentation and issue a variance. The same central authority should be responsible for investigating claims of nonresident students.

### English as Second Language

DCPS and several of the charter schools converted, or are in the process of converting, to a new system for assessment and evaluation of English Language Learners. The new system, ACCESS, has eliminated, for the most part, the former classification of Limited English Proficiency (LEP) and No English Proficiency (NEP). ACCESS assigns an ELL level 1 – 4. Students Kindergarten and younger are assigned simply ELL with no level. The current Budget Support Act provides additional funding for students classified as LEP or NEP. Therefore, a revision to the Act is necessary to incorporate the new ELL levels as well as LEP/NEP for schools that have not converted. Attachments 11 and 13 report LEP and NEP levels in order to be consistent with the Budget Support Act. The conversion from ELL to LEP/NEP was based on the following definition:

ELL and ELL1 = NEP  
ELL 2 – ELL 4 = LEP



# Glossary

**Absent** – Not in attendance on the day of the count. Students arriving during the physical count were not recorded as absent.

**Audit Period** – The census-type audit was conducted between October 17, 2007, and December 15, 2007, including the resolution period.

**Census-type Audit** – Determination of: the number of students enrolled in pre-school, pre-kindergarten, kindergarten, grades 1 through 12, and non-grade level programs in DCPS and public charter schools and special education students whose tuition for enrollment in other schools is paid with funds available to DCPS; the number of students who are District residents; the number of tuition-paying non-resident students; and the number of special education and English minority students as of October 5, 2007, based upon a physical headcount of students and review of applicable student records. This was not an audit conducted in accordance with generally accepted auditing standards.

**Enrollment Classifications** – For purpose of the audit, students were classified as:

Enrolled – A student was included in the enrollment count if he or she was:

- In the October 5, 2007, data and present during the physical count
- In the October 5, 2007, data and absent on the day of the physical count but documentation provided evidence of enrollment and attendance
- Not in the October 5, 2007, data but present during the count and documentation provided evidence of enrollment on October 5.

Not Enrolled – A student was in the October 5, 2007, data, but documentation provided showed evidence that the student had withdrawn or stopped attending or adequate documentation was not provided.

**Enrollment Date** – All data presented in this report are as of October 5, 2007.

**LEP/NEP** – Limited English Proficiency/No English Proficiency

**Membership Report** – Report issued by DCPS detailing student count entitled “SY 2007– 08 Official Membership Report October 5, 2007”.

**Residency Classifications** –

Verified – During the initial on-site file review, the school had a completed District Residency Verification Form, or applicable waiver, on file that had been properly approved. Otherwise, adequate proof of residency was provided during the resolution period.

Not Verified – There was no District Residency Verification Form on file or the form was incomplete, and adequate proof was not provided during the resolution period.

**Resident Student** – A student enrolled in a District school who is 1) a minor whose parent, guardian, or other primary caregiver resides in the District of Columbia or 2) an adult who resides in the District of Columbia.

**Residency Verification Rules** – Rules for establishing residency verification requirements for public schools and public charter schools, as issued by OSSE.

**Resolution Period** – Period after completion of the headcount and file reviews during which principals were provided an opportunity to resolve any outstanding issues.

**School Types** –

- Alternative: Special educational program that provides instruction to students under court supervision or on short- and long-term suspension from a regular DCPS academic program.
- Elementary – Preschool through grade 8
- Middle – Grades 5 through 8
- Senior High – Grades 9 through 12
- Special Education: separate school providing specialized services for students identified as having disabilities, as defined by law.

**ENCORE** – System of record for placement and services provided to special education students.

**STARS** – Student Tracking and Reporting System

**Tuition Grant** - Special education students whose tuition for enrollment in other schools is paid with funds available to DCPS. These schools include non-public day and residential programs as well as public schools in surrounding counties serving District children under the care of D.C. Child and Family Services.

**Uniform Per Student Funding Formula** – Formula used to determine annual operating funding for DCPS pursuant to the School Reform Act of 1995, as amended, and the Uniform Per Student Funding Formula for Public Schools and Public Charter School Act of 1998.

**Weekly Service Hours** – The number of hours of specialized education provided to a student each week in accordance with the Individual Education Plan (IEP).



# Attachments

1. Summary of Audited Enrollment by School Type and Grade.
2. Audited Enrollment by School and Grade
3. Summary by School Type and Grade: Audited Enrollment vs. Reported Enrollment
4. Summary by School and Grade: Audited Enrollment vs. Reported Enrollment
5. Summary of Students for Whom Enrollment and Residency were Verified By School Type and Grade
6. Summary of Students for Whom Enrollment and Residency were Verified By School and Grade
7. Summary of Students for Whom Enrollment and Residency were Verified by School Type and Grade: Audited Enrollment vs. Reported Enrollment
8. Summary of Students for Whom Enrollment and Residency were Verified by School and Grade: Audited Enrollment vs. Reported Enrollment
9. Summary of Residency Verification by School
10. Summary of Students with IEPs, Including Students for Whom Residency was not Verified
11. Summary of LEP/NEP Students by School, including Students for Whom Residency was not Verified
12. Summary of Students with IEPs for Whom Enrollment and Residency were Verified
13. Summary of LEP/NEP Students with Verified Residency
14. Ethnicity and Sex by School

## DCPS Only

15. Summary of Special Education Students in Private Placement
16. Summary of Students Enrolled in Surrounding County Schools