



District of Columbia
Office of the State Superintendent of Education



STUDENT ENROLLMENT AUDIT HANDBOOK

Guide for Community-Based Organizations (CBOs) Participating in the
Pre-K Enhancement and Expansion Funding Program

2019-20 School Year

Hanseul Kang
State Superintendent



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LETTER TO CBO PARTNERS



August 2019,

Dear Community-Based Organization Leaders and Staff:

The Office of the State Superintendent of Education (OSSE) is pleased to present the CBO Enrollment Audit Handbook for the 2019-20 school year. As part of our continued commitment to the accurate count and residency verification of students, the following key changes have been implemented to streamline the enrollment audit process:

- **OSSE Residency Verified students in CBOs:** OSSE has created a process to verify residency for students participating in the subsidized child care program. Students whose residency has been verified through the subsidized child care program are only required to have a DC Residency Verification form for review during the on-site document review.
- **Key enhancements to the Enrollment Audit and Child Count Application:** OSSE continues to listen to the feedback received from CBOs to help create a more user-friendly Enrollment Audit and Child Count application. This year, CBOs will see user enhancements that make the application easier to use including removing ambiguity during the issue resolution phase and providing easily identifiable components during each phase of the enrollment audit.

We are excited about the improvements made for this year's enrollment audit and look forward to working with each CBO to ensure the best enrollment audit yet.

In partnership and service,

A handwritten signature in black ink, appearing to read 'Hanseul Kang', followed by a large, stylized flourish.

Hanseul Kang
State Superintendent of Education

DEFINITION FOR COMMON ACRONYMS AND TERMS

TERM/ACRONYM	DEFINITION
CBO	Community-based organization
CFSA	Child and Family Services Agency
DCMR	District of Columbia Municipal Regulations
DCPS	District of Columbia Public Schools
DCRV	District of Columbia residency verification form issued by OSSE annually for use by enrolling families and CBOs in verifying residency
DE	Duplicative enrollment
DME	Office of the Deputy Mayor for Education
Enrollment Audit and Child Count Application	An OSSE application that displays the enrollment audit rosters and student-level data to CBOs, which facilitates the audit process through recording the result of each phase of the audit, including auditor results, CBO appeals, and documentation submission
FERPA	Family Educational Rights and Privacy Act
LEA	Local education agency
MKV	McKinney-Vento Homeless Assistance Act
OCFO	Office of the Chief Financial Officer
OSSE	Office of the State Superintendent of Education
OTR	Office of Tax and Revenue (a District government agency located within the OCFO)
PCSB	Public Charter School Board
PKEEP	Pre-K Enhancement and Expansion Program
PK3	Pre-Kindergarten for 3-year-olds
PK4	Pre-Kindergarten for 4-year-olds
SEA	State education agency
SNAP	Supplemental Nutrition Assistance Program
SY	School Year
TANF	Temporary Assistance for Needy Families
UPSFF	Uniform Per Student Funding Formula
USI	Unique Student Identifier

OVERVIEW

Purpose

Under 5A DCMR § 3504.3 and D.C. Official Code § 38-1804.02, OSSE is required to annually collect enrollment counts for children in high-quality pre-K3 (PK3) and pre-K4 (PK4) programs in community based organizations (CBOs), as of Oct. 5¹ of each school year. A high-quality pre-K program is a program providing pre-K education services to pre-K age children operated by a CBO, designated by OSSE, as a program meeting and maintaining the high-quality standards and eligibility criteria pursuant to D.C. Official Code § 38-272.01 or as provided 5A DCMR §3500 *et seq.* OSSE is then required to conduct an annual audit to verify the accuracy of the enrollment counts, as well as to identify any material weaknesses, if any, in the enrollment systems, procedures, or methodology at the CBO level. OSSE reports the results of the audit to the mayor, the Council of the District of Columbia, and the appropriate Congressional committees.

Applicable Legislation

Per Capita District of Columbia Public School and Public Charter School Funding Amendment Act of 2018 (D.C. Law 22-0130)(July 31, 2018)

Pre-K Enhancement and Expansion Amendment Act of 2008 effective July 18, 2008 (D.C. Law 17-202; D.C. Official Code §§ 38-271.01, *et seq.*)

5A DCMR Chapter 35 (Pre-K Enhancement and Expansion Funding)

Scope

The enrollment audit for CBOs is an audit of children enrolled in PK3 and PK4 in CBOs receiving Pre-K Enhancement and Expansion Program (PKEEP) funds. It includes three components:

1. **Residency Verification:** An audit of children enrolled in PK3 and PK4 in CBOs receiving PKEEP funds. Upon completion of the enrollment audit, each CBO receives funding for each enrolled preschool-aged student verified as a District resident.
2. **Age Verification:** Confirmation that enrolled students meet the age requirements under the PKEEP regulations.
3. **Verification of At-Risk Status:** Determination of whether a pre-K student qualifies as at-risk (students in foster care, who are experiencing homelessness or receive TANF or SNAP benefits) and is eligible for a supplemental funding allocation (see Appendix C).

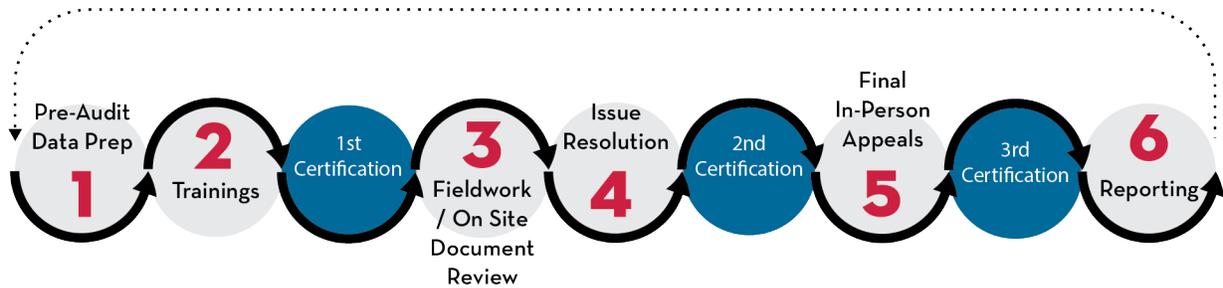
1 For the 2019-2020 school year enrollment audit, the enrollment date is on Oct. 7, because Oct. 5 is a Saturday in 2019.

2019-20 ENROLLMENT AUDIT CALENDAR

Key CBO deadlines in **bold**; all deadlines are 5 p.m.

DATE	ITEM	BEGINS ON PAGE
Pre-Audit Data Preparation Phase (Prior to Oct. 7)		
Aug. 14 - Sept. 2019	Mandatory enrollment audit and application training	p. 12
Aug. 14, 2019	Pre-Audit Data Preparation Phase: CBOs enter student information into Enrollment Audit and Child Count Application (EACCA)	
Aug. 2019	CBOs receive notification of the enrollment audit fieldwork schedule	
Data Freeze (Oct. 7)		
Oct. 7, 2019	CBOs to ensure all enrolled students are entered in the EACCA roster by 5 p.m.	p. 16
Oct. 8 - 10, 2019	CBOs review and make final corrections to data in the EACCA for student inclusion on the enrollment roster to ensure funding; final opportunity for CBOs to submit corrected/updated rosters via Box to include missing students prior to First Certification.	
Oct. 11, 2019	CBOs submit First Certification (Unaudited Enrollment and Child Count Anomalies Acknowledgement) directly in the EACCA	
Fieldwork & Issue Resolution Phase (Oct. 17 - Dec. 3)		
Oct. 17 – Nov. 15, 2019	Fieldwork Phase: CBOs prepare materials for the on-site review	p. 18
On-site review date plus three business days	Issue Resolution Phase: Initial residency determinations from the on-site audit are available for CBO/school review in the EACCA	
On-site review date plus eight business days	Issue Resolution Phase: CBOs upload supporting documentation to resolve residency determinations found during fieldwork/on-site visit	
On-site review date plus 10 business days	Issue Resolution Phase: CBOs/schools can view the updated residency determinations from the auditor in the EACCA	
Nov. 1, 2019	Final day for CBOs to submit Box requests for Demographic Data updates	
Nov. 14, 2019	CBOs must resolve all demographic errors via Box submissions; CBOs able to view initial decisions for duplicative enrollments	
Nov. 15, 2019	CBOs submit the Second Certification (Final Demographic Data Elements and Child Count Certification) in the EACCA	
Final Appeals Phase (Dec. 6 - 18)		
Dec. 6, 2019	CBOs submit requests with supporting documentation for final in-person appeals for residency issues in the EACCA	p. 25
Dec. 9 – 10, 2019	CBOs receive notification of granted final in-person appeals via the EACCA	
Dec. 11 – 13, 2019	Final In-Person Appeals Phase: OSSE facilitates final in-person appeals for residency and duplicative enrollments	
Dec. 16, 2019	CBOs are able to view all final determinations in the EACCA	
Dec. 18, 2019	CBOs submit Third Certification (Final Audited Enrollment Numbers Certification) directly in the EACCA	

ENROLLMENT AUDIT PROCESS OVERVIEW



ENROLLMENT AUDIT PROCESS

I. [Pre-Audit Data Preparation](#)

Time Period: Aug. 1 – Oct. 6, 2019

Overview: CBOs work to ensure demographic and enrollment data are error-free in advance of the Oct. 7 enrollment roster data freeze.

Results: CBOs capture an accurate roster of student enrollment in the Enrollment Audit and Child Count Application (EACCA).

II. [Trainings](#)

Time Period: various dates beginning in spring through late summer

Overview: OSSE hosts multiple trainings throughout the school year to assist in preparation for the enrollment audit. CBOs are required to attend the following trainings: Enrollment and Residency (June 2019), Enrollment Audit Process (August 2019), Enrollment Audit and Child Count Application (August 2019), Head of School Certification Training (September-October 2019).

Results: CBOs are equipped with the knowledge of residency and enrollment requirements; how to prepare and what to expect during the enrollment audit; how to use the EACCA; and, how to certify student data during the enrollment audit.

III. [First Certification](#)

Time Period: Oct. 11, 2019

Overview: CBOs are required to confirm that all students are accounted for in the EACCA and the Pre-K Manager certifies that the rosters are correct.

Results: Ensures that CBOs receive the full funding for which they are eligible.

IV. [Fieldwork](#)

Time Period: Oct. 17 – Nov. 15, 2019

Overview: CBOs are required to prepare residency documentation for auditor review. OSSE auditors visit each school site to review the residency documentation for all students enrolled by the CBO. All information related to student residency verification is captured in the EACCA.

Results: CBOs are able to view the initial residency determination for all enrolled students three business days after the completion of fieldwork at the school location. Any students whose residency was not confirmed during the fieldwork phase must be resolved during the issue resolution phase.

V. [Issue Resolution](#)

Time Period: Oct. 31 – Dec. 3, 2019

Overview: CBOs view and respond to the residency determinations as a result of the fieldwork at each school site. CBOs must upload the corrected residency documentation in the EACCA. If residency documentation is not submitted, a CBO cannot proceed to final in-person appeals.

Results: For any student not identified as a resident, CBOs can provide corrected documentation to ensure all students are identified as District residents. If a response is not uploaded into the EACCA within five business days of receiving the results, the student's residency is not confirmed as a District resident and the CBO forfeits receiving funding for the student.

VI. [Second Certification](#)

Time Period: Nov. 15, 2019

Overview: CBOs confirm the demographic data for each PKEEP enrolled student as of Oct. 7, 2019.

Results: Ensures that CBOs receive accurate funding for the pre-K educational services they provide.

VII. [Final In-Person Appeals](#)

Time Period: Dec. 6 – 18, 2019

Overview: CBOs have one final opportunity to confirm to OSSE the District residency status for any student whose residency was not confirmed during fieldwork.

Results: OSSE reviews residency documentation submitted during fieldwork, issue resolution and final appeals, to make a final decision regarding a student's residency status. The final determination of verified or unverified residency is updated in the EACCA.

VIII. [Third Certification](#)

Time Period: Dec. 18, 2019

Overview: CBOs must confirm in the EACCA the final audited enrollment numbers no later than 5 p.m.

Results: Ensures that CBOs have received the final outcome of the enrollment audit.

IX. [Reporting](#)

Time Period: January 2020

Overview: OSSE releases the final audited enrollment numbers.

Results: CBOs can view their final audited enrollment numbers which determine their funding for the current program/fiscal year. OSSE may follow up directly with CBOs regarding any anomalies discovered in enrollment or residency verification practices during the enrollment audit process that must be addressed in the next school year.

ENROLLMENT DATA CERTIFICATIONS

For the 2019-20 school year enrollment audit, CBOs must certify the validity, completeness, and accuracy of the CBO's data and acknowledge final enrollment numbers by completing three enrollment audit certifications within the Enrollment Audit and Child Count Application. The first certification captures the universe of students who should be included in the enrollment audit. The second certification certifies that all demographic data are accurate, valid and complete. The third and final certification captures the CBO's acknowledgment of final enrollment numbers and demographic information used for funding. **All certifications must be made by the Pre-K Manager via electronic signature in the Enrollment Audit and Child Count Application.**

CERTIFICATION NAME	DUE DATE	PURPOSE OF CERTIFICATION
First Certification - Unaudited Enrollment and Child Count Anomalies Acknowledgement	Oct. 11, 2019 at 5 p.m.	<ul style="list-style-type: none"> CBO acknowledges that enrollment data includes all students enrolled at the CBO as of Oct. 7, 2019 Failure to complete this certification means that OSSE will consider the CBO's Oct. 7, 2019 data to be accurate through passive approval for the purposes of the enrollment audit and will utilize that enrollment roster, as is, for the audit
Second Certification - Final Demographic Data Elements and Child Count Certification	Nov. 15, 2019 at 5 p.m.	<ul style="list-style-type: none"> CBO acknowledges that the enrollment audit data in the Enrollment Audit and Child Count Application are accurate, valid and complete for all students enrolled at the CBO as of Oct. 7, 2019 (outside of residency and duplicative enrollments) Failure to complete this certification means that OSSE will consider the CBO's enrollment audit data elements for all students enrolled at the CBO as of Oct. 7, 2019 to be accurate, valid, and complete through passive approval for the purposes of the enrollment audit
Third Certification- Final Audited Enrollment Numbers Acknowledgment	Dec. 18, 2019 at 5 p.m.	<ul style="list-style-type: none"> Acknowledges the final audited enrollment numbers after the final in-person appeals process is complete.

PRE-AUDIT DATA PREPARATION



Achieving and maintaining data quality for CBOs in the EACCA is vital to a successful enrollment audit. CBOs have from **now until Oct. 7 at 5 p.m.** to make enter student data and make corrections to student enrollment records in the EACCA to ensure all students enrolled on Oct. 7 are correctly identified.

DATA QUALITY TERMS

Under local law, CBOs are responsible for maintaining records for data reporting. OSSE defines maintenance of records as: a) entering accurate data; b) updating data promptly and accurately upon notification of any changes; and c) ensuring accuracy so the system of record correctly reflects all students and their environments under the purview of the CBO. Data from the enrollment audit are used to determine funding levels in accordance with the Uniform Per Student Funding Formula (see Appendix C).

TERM	DEFINITION
Accurate	The data correctly represents reality
Valid	All values entered conform to OSSE-permitted values*
Complete	All required data elements contain values

*OSSE-permitted values can be found in the OSSE SY19-20 CBO Data Collection Template.

ENSURING ACCURATE, COMPLETE AND VALID STUDENT RECORDS

CBOs must ensure all enrolled students are accurately reflected in the EACCA. CBOs have until Friday, Nov. 14, 2019 to make changes in the EACCA to the data elements listed below. This ensures the student data were entered correctly in the application.

DATA ELEMENT	DEFINITION
Last Name	The legal last name of the student. It is the name carried in common by members of a person’s family, or the last name recognized as the formal and consistent last name given to a person after birth (e.g., birth, baptism or other naming ceremony certificate; or birth verification document) or through legal action (e.g., marriage, divorce, adoptions or legal name change).
First Name	The legal first name of the student. It is the name given to an individual after birth (e.g., birth, baptism or other naming ceremony certificate; or birth verification document) or through legal action (e.g., marriage, divorce, adoption or through legal name change).
Date of Birth (DOB)	The day, month and year on which the student was born documented on an official government certificate.
Street Address	The number and name of the unit and street (and apartment, if applicable) where the student resides.
City	The city where the student resides.
State	The abbreviation for the state (within the United States) or outlying area in which the student resides.
Zip Code	The number that identifies the postal delivery area in the United States in which the student resides.
Gender	A coded value representing the student’s gender. Gender is a person’s actual sex or perceived sex and includes a person’s perceived identity, appearance or behavior, whether or not that identity, appearance, or behavior is different from that traditionally associated with a person’s sex at birth.
Ethnicity	CBOs are required to categorize student ethnicity as “Yes – Hispanic or Latino” or “No – Not Hispanic or Latino” for the ethnicity with which the student most closely identifies. The complete definition of Hispanic and Latino is found in the DC OSSE Data Collection template .
Race	CBOs are required to categorize students in one or more of the five permitted race codes for which race(s) the student most closely identifies. Categories must be mapped by the CBO to the five federal race categories: American Indian and Alaska Native – Non Hispanic/Latino, Asian – Non Hispanic/Latino, Black or African American – Non Hispanic/Latino, Native Hawaiian or Other Pacific Islander – Non Hispanic/Latino, White – Non Hispanic Latino. More complete definitions of these race classifications are found in the DC OSSE Data Collection template .
Grade Level	The grade level or primary instructional level at which a student enters and receives services in a school or an educational institution during a given academic session, as permitted via the EACCA, and aligned to the DC OSSE Data Collection template .
Residency Status	The CBO’s determination that the student is or is not a resident of the District of Columbia based on provided documents to support residency claim.
Homeless	Individuals who lack a fixed (permanent), regular, and adequate (acceptable) nighttime residence; or as defined in McKinney-Vento.

RESIDENCY VERIFICATION

All PK3 and PK4 students for whom a CBO receives Pre-K Enhancement and Expansion funds must be residents of the District of Columbia. To establish bona fide residency, the person enrolling the student shall demonstrate compliance with all three of the following requirements, annually:

1. If anyone other than the parent is enrolling the student, **establish that they are the valid guardian, custodian, or other primary caregiver**, as set forth in 5-A DCMR § 5000 et seq. and specifically defined in 5-A DCMR § 5099, with proper documentation such as a custody order, or an “other” primary caregiver form;
2. **Establish a physical presence** in the District, defined as the “actual occupation and inhabitation of a place of abode with the intent to dwell for a continuous period of time”; and
3. **Submit valid and proper documentation** that establishes bona fide residency as set forth in 5-A DCMR § 5004.

The student residency verification process requires CBOs/ programs to review documentary proof of residency during the enrollment period each year (March 29 through Oct. 7²) or within 10 days of the initial enrollment, whichever occurs later. CBOs are required to review their students’ residency documentation and verify that all documentation and verification forms are complete, legible, and valid prior to Oct. 17³.

Programs may require that parents or guardians of prospective students furnish proof of District residency and/or age prior to enrollment, except for any children and youths who are considered homeless under the federal McKinney-Vento Homeless Assistance Act. Requests for documentation also must not discriminate, or have an effect of discriminating, on the basis of race, color, national origin, citizenship, or immigration status.

See [Appendix A](#) for more information on the required residency documentation and refer to the [SY19-20 Enrollment and Residency training](#) for more guidance on policies and processes.

AGE VERIFICATION

CBOs are required to collect documentation that verifies the student’s date of birth. PK3 students must be 3 years old by Sept. 30, 2019, and PK4 students must be 4 years old by Sept. 30, 2019.

See [Appendix A](#) for more information on required age documentation.

² For the 19-20 school year enrollment audit, the enrollment date is on Oct. 7, because Oct. 5 is a Saturday in 2019.

³ Due to the Oct. 7 extended enrollment date, the date for verifying residency is also extended from Oct. 15 to Oct. 17.

ENROLLMENT AUDIT AND CHILD COUNT APPLICATION

The Enrollment Audit and Child Count Application is the web-based platform for CBOs to enter student enrollment data for the Pre-K Enhancement and Expansion high-quality classrooms. The application allows OSSE to view the enrollment audit and student rosters throughout each phase of the audit. Student rosters are created from data pulled from the data the CBO enters directly into the Enrollment Audit and Child Count Application.

The Enrollment Audit and Child Count Application:

- Provides a secure method to upload student residency and age verification documentation for appeals, eliminating the need to upload multiple versions of excel spreadsheets;
- Allows CBOs to view in near-real time, enrollment student counts as they relate to the enrollment audit;
- Allows CBOs to view in near-real time, enrollment and residency determinations throughout the Fieldwork, Issues Resolution and Final In-Person Appeals phases; and
- Enhances OSSE’s communication to CBOs throughout the audit phases.

DATA SNAPSHOT OF ENROLLMENT DATA AS OF OCT. 7

OSSE takes a snapshot of enrollment data on Oct. 8 using data entered by Oct. 7. Again, CBOs have **until Oct. 7 at 5 p.m.** to enter student enrollment data in the Enrollment Audit and Child Count Application to ensure all enrolled students are identified correctly.



ENROLLMENT AUDIT AND CHILD COUNT TRAININGS



To ensure that enrollment audit POCs have a strong understanding of any policy or process changes regarding the yearly enrollment audit, OSSE hosts several trainings in advance of the Fieldwork phase targeted towards the enrollment audit point of contact (POC). Trainings are provided to CBOs via direct emails to the Pre-K Manager.

For EACCA trainings, participants are required to bring laptops to allow for a hands-on training. Attendance will be taken at the trainings and Pre-K Managers will be informed if no one from their CBO was in attendance.

CBO POINTS OF CONTACT (POCS) AND COORDINATION

Each CBO is required to have POCs for the Pre-K Manager. Each POC plays a critical role in the enrollment audit and Child Count (see chart below).

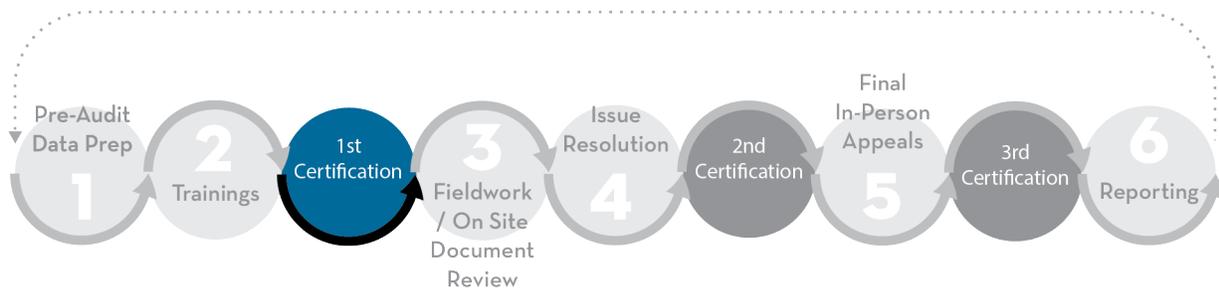
Participating in the enrollment audit and Child Count requires CBO POCs to handle personal identifiable information of students; therefore, CBOs must follow all applicable Family Education Rights and Privacy Act (FERPA) laws accordingly.

OSSE will not contact or communicate with CBO staff members beyond the Pre-K Manager and the designated enrollment audit POC for the enrollment audit. CBOs with multiple staff working on the enrollment audit are advised to develop a plan for sharing enrollment audit information among their respective staff members as necessary.

The current list of POCs is available for CBOs to review with the designated OSSE POC. The Pre-K Manager must contact the OSSE POC to submit changes to the school, or site information. Changes throughout the school year must be communicated to OSSE. CBOs should also email osse.enrollmentaudit@dc.gov to ensure all relevant staff receive necessary updates.

POC TYPE	DESCRIPTION
Pre-K Manager	Responsible for overall management and administration leadership; makes all certifications for the enrollment audit
LEA Enrollment Audit POC	Coordinates and manages the enrollment audit, including ensuring deadlines are met, reviewing data for accuracy and completeness, preparing for site visits, coordinating documentation, and uploading documents

FIRST CERTIFICATION: UNAUDITED ENROLLMENT CERTIFICATION



The first certification of data is crucial to each CBO's success in the enrollment audit. It is the best time to flag any data issues and ensure that the CBO receives the full amount of per pupil funding for which they are eligible. The first certification pupil counts are used to determine the CBOs Pre-K Enhancement and Expansion award amount for the current fiscal/program year. The important dates and actions are:

Oct. 7 at 5 p.m.

OSSE freezes enrollment data submitted by CBOs.

Oct. 8 through Oct. 10

CBOs review their data in the EACCA to ensure that all enrolled students as of Oct. 7 are accounted for on the roster, including those that may have a duplicative enrollment with another CBO or LEA. CBOs must make corrections to student records in the EACCA to ensure all enrolled students are accurate.

[Requirements for Identifying Missing Students](#)

If a CBO determines that a student, or students, are not represented in the first data capture, the CBO is required to submit a request via Box that states the actual start date of the student, provides a reason for why the student was not include in the data capture, and identifies the student – name, Unique Student Identifier (USI), and DOB. If an email is not submitted, the student cannot be added.

OSSE will follow up with CBOs individually on next steps, which will include additional requirements to be fulfilled by the CBO such as an official request for an appeal from the Pre-K Manager and an email request or submission via Box.

After October 10

CBOs cannot add additional students to the enrollment audit roster under any circumstances after 5 p.m. on Thursday, Oct. 10, 2019. It is critical that the CBO ensure that all students for whom the CBO seeks funding (i.e., attending as of Oct. 7) are on the enrollment audit roster in the EACCA.

October 11

Pre-K Managers must complete the first certification in the EACCA by 5 p.m.

FIELDWORK / ON-SITE DOCUMENT REVIEW



The fieldwork phase of the enrollment audit is the process wherein OSSE auditors review age and residency documentation at CBO sites, beginning on Thursday, Oct. 17, 2019 and ending on Friday, Nov. 15, 2019. CBOs receive a scheduled visit date in late August. Auditors review residency documentation for all students enrolled in the CBO's Pre-K Enhancement and Expansion high-quality classrooms. CBOs receive the results of the on-site review within three business days of the site visit. This phase helps to ensure that there are no anomalies in the residency verification process.

ENROLLMENT AUDIT FIELDWORK SCOPE

The Fieldwork phase helps ensure that there are no anomalies in the age and residency verification process at the CBO. OSSE auditors will review every student's record to determine residency status.

Students who participate in the subsidized childcare program must have a completed DC Residency Verification (DCRV) form; these students do not need to provide additional supporting documentation. Students who do not participate in the subsidized child care program must have a completed DCRV form, with applicable documents, supporting documentation, and age verification documentation.

If the supporting documentation is deemed inadequate for a student, that student will be counted as non-resident or flagged for an age error and the CBO will not receive funding for that student.

DOCUMENT PREPARATION FOR ON-SITE DOCUMENT REVIEW

CBOs are advised to prepare for on-site visits by completing the following actions:

I. Identify and Reserve Space

1. The space identified and reserved must comfortably accommodate the size of the audit team assigned to the site. The size of the audit team will vary based on the size of the enrolled student population eligible to be included in the random sample. CBOs will be notified of the anticipated size of the audit team in the scheduling notice.

II. Prepare Student Binders for Review

1. Organize the DCRV forms and any applicable residency forms in binders alphabetically by student last name (each binder should contain no more than 100 records).
2. The DCRV Form, with applicable residency forms, must have supporting documentation for non-subsidy students (see [Appendix A](#) for list of supporting documents) immediately following the DCRV for that student. Do not staple any documents.
3. Ensure that the age verification documents immediately follow the residency verification documentation for non-subsidy students.
4. Binders must be located in the space reserved for the auditors on the day of the visit.

ISSUE RESOLUTION



The issue resolution phase runs concurrently with the Fieldwork/On-Site Document Review phase and is intended to resolve discrepancies or disagreements between CBOs and the auditors.

RESIDENCY DETERMINATIONS

All corrections for OSSE auditor residency determinations must follow the following response timeline.

Issue Resolution Response Timeline

- On-site review date plus three business days = Auditors response posted in the EACCA
- On-site review date plus 8 business days = Final day for LEA to respond to all auditor decisions
- On-site review date plus 10 business days = Auditors review second round of responses posted in EACCA

Three business days after the on-site visit by the auditors, CBOs are able to review the status of each student in the EACCA. CBOs have five business days from that point to submit documentation for OSSE review in the EACCA for corrected residency status. The uploaded documentation must demonstrate the student’s District residency under the verification guidelines in [Appendix A](#).

The documents are reviewed by OSSE auditors within two business days of the issue resolution end date. A determination is rendered and documented in the EACCA. If the CBO does not agree with determinations rendered during the issue resolution phase, a request for a Final In-Person Appeal must be made using the EACCA. If a CBO disagrees with the determination, the CBO can request an in-person appeal in the EACCA by **Dec. 6, 2019**.

If a CBO disagrees with OSSE’s initial determination of residency or has further information that would change the determination, documentation must be uploaded directly in the EACCA to resolve the student’s residency status.

If a CBO fails to respond to a student’s non-residency status by the close of the issue resolution response period, the program cannot submit a final appeal for the student’s residency determination. OSSE considers the on-site residency determination final and classifies the student as an unverified resident.

Example Issue Resolution Timeline

ISSUE RESOLUTION STAGE	TIMELINE	EXAMPLE 1	EXAMPLE 2
On-site review date	Start date	Monday, Nov. 4	Friday, Nov. 15
Auditors response posted in EACCA	+3 business days	Wednesday, Nov. 6	Tuesday, Nov. 19
Final day for LEA to respond to all auditor decisions	+8 business days	Thursday, Nov. 14 ¹	Tuesday, Nov. 26
Auditors review second round of responses posted in EACCA	+10 business days	Monday, Nov. 18 ¹	Tuesday, Dec. 3 ²
Final In-person appeal submissions		Friday, Dec. 6	Friday, Dec. 6

¹Monday, Nov. 11 was not included in the eight-day or 10-day count – Veterans Holiday

²Wednesday, Nov. 27, Thursday, Nov. 28, and Friday, Nov. 29 are not included in the 10-day count – Thanksgiving Holiday

DUPLICATIVE ENROLLMENT ACROSS CBOs AND CBOs - HIERARCHY AND DETERMINATIONS

In the event that a student is enrolled in more than one CBO or LEA, OSSE will use documentation from the CBOs and attendance records to make an enrollment determination. To resolve a duplicative enrollment, CBOs are required to submit as much of the documentation listed in the hierarchy tables below as possible through the Enrollment Audit and Child Count Application by **Nov. 1, 2019**. OSSE will evaluate the documents using the hierarchy order identified below to make a determination by **Nov. 14, 2019**.

OSSE will first consider the documentation shared within the first level of the hierarchy identified below. If this documentation does not provide clear and convincing evidence of the student’s enrollment for the current school year, then OSSE will consider the totality of the documentation shared in the first and second levels of the hierarchy. If this documentation does not provide clear and convincing evidence of the student’s enrollment for the current school year, then OSSE will consider the totality of the documentation shared in the first, second, and third levels of the hierarchy and make a final determination.

If a CBO disagrees with OSSE’s determination, the CBO can request an in-person appeal in the Enrollment Audit and Child Count Application by **Dec. 6, 2019**.

HIERARCHY ORDER FOR DUPLICATIVELY ENROLLED IN A CBO AND AN LEA	ACCEPTABLE DOCUMENTATION
1. Enrollment/Withdrawal Forms	The CBO must provide current school year enrollment or withdrawal documentation signed by the parent/guardian. The documentation should identify the date the student entered or exited the program and include signatures from the enrolling parent/guardian and a program official. Additionally, if available, the program should provide the Request for Student Records or confirmation from the receiving CBO verifying enrollment or withdrawal.
2. Attendance/Discipline Records	OSSE will review attendance records from Sept. 30 through Oct. 28. For CBOs with an intersession break scheduled during the specified time period, an equivalent number of days for in-school attendance will be added to the end of the stated time. Additionally, if available, the CBO should submit discipline records for this stated time period.
3. Schoolwork	The CBO must submit two pieces of schoolwork or exam documentation that include the student’s name, in the student’s handwriting where possible, and the date of the work from Sept. 30 through Oct. 28.

DEMOGRAPHIC DATA ELEMENTS

For resolving issues with demographic data elements, a Box submission is required. All enrollment audit Box submissions must be submitted by CBOs **no later than Nov. 1, 2019** to ensure adequate time for OSSE to respond before the end of the Issue Resolution phase.

CBOs have **until Nov. 14, 2019** to resolve and correct data directly in the EACCA. CBOs may submit questions about data values for specific students and request support from OSSE on resolving data errors and anomalies through the Box request, particularly for data elements that come from other District agencies.

The following table lays out the data elements tested during the audit and the pathways for resolving errors in the student record during the Issue Resolution phase. (Please also see [Appendix C](#) for a full list of all data elements used in the enrollment audit and their source systems.) OSSE recommends resolving errors as quickly as possible within the Issue Resolution period to make sure all necessary changes from the source system to the EACCA are accurately reflected.

AUDIT CATEGORY	AUDITED DATA ELEMENT	INITIAL ENROLLMENT AUDIT DETERMINATION	RESOLUTION PATH FOR LEA
DC Residency	Residency status	OSSE auditor via site visit	Provide corrected residency documents
Duplicative Enrollment Across CBOs and LEAs	Duplicative Enrollment	OSSE determination after receiving documentation from CBOs and LEAs, if applicable prior to or on Nov. 1, 2019	Provide required duplicative hierarchy documentation to claim the student as enrolled
Student Demographic Information	Name; Date of Birth; Address; Gender; Ethnicity; Race; Grade	CBO uploads into Enrollment Audit and Child Count Application	No appeal - data corrected through Enrollment Audit and Child Count Application by Nov. 14, 2019
At-risk	Homeless	LEA entry of homeless info into LEA SIS and The Community Partnership (TCP) feed managed by OSSE	No appeal - data corrected through Enrollment Audit and Child Count Application during issue resolution phase by Nov. 14, 2019
	SNAP/TANF	DC Department of Human Services (DHS) feed	No appeal – CBO submits Box request to resolve inconsistencies by Nov. 1, 2019
	Overage	LEA SIS (date of birth and grade)	No appeal - data corrected through Enrollment Audit and Child Count Application during resolution period by Nov. 14, 2019
	Under the care of CFSA	DC Child and Family Services Agency (CFSA) feed	No appeal – CBO submits Box request to resolve inconsistencies by Nov. 1, 2019

SECOND CERTIFICATION: FINAL DEMOGRAPHIC DATA ELEMENTS CERTIFICATION



CBOs must submit the Second Certification (Final Demographic Data Elements Certification) directly in the Enrollment Audit and Child Count Application no later than 5 p.m. (EST) on Nov. 15, 2019.

Through the second certification, the CBO acknowledges that the Oct. 7 demographic data entered into the EACCA are accurate, valid and complete (outside of residency and duplicative enrollment).

Failure to complete this certification means that OSSE will consider the CBO's data to be accurate through passive approval for the purposes of demographic data (excluding disputed residency and duplicative enrollment determinations) for the enrollment audit and will utilize that enrollment roster, as is, for the audit.



FINAL IN-PERSON APPEALS



If the CBO disagrees with OSSE’s determination of residency or duplicative enrollment, the CBO can request a final in-person appeal through EACCA. **All requests for final in-person appeals for residency status must be received by 5 p.m., Dec. 6, 2019.** CBOs will receive the scheduled date and time of the requested final in-person appeal by Dec. 10, 2019.

REQUESTING A FINAL APPEAL

Final appeal requests are processed through the EACCA. To request a final in-person appeal to resolve residency determinations or duplicative enrollments, CBOs must have:

- 1) Attempted to resolve the residency determination or duplicative enrollment during the issue resolution phase; and
- 2) Submitted additional supporting documentation that verifies the student’s District residency status or confirms enrollment at a duplicative enrolled school.

If the CBO fails to attempt to resolve the student’s residency status during the issue resolution phase, a letter of exception must be submitted to OSSE documenting the missed resolution period. The letter must be sent via email to osse.enrollmentaudit@dc.gov.

At the time of request for appeal, the CBO must upload the residency documentation for review. It is strongly suggested that CBOs request an appeal as soon as corrected documentation is available for upload in the EACCA.

FINAL APPEAL SCHEDULING

Prior to scheduling final in-person appeals, OSSE will review all documentation submitted for the student during fieldwork, issue resolution and final appeal. If upon review, the student’s documentation is approved, the status is updated in the EACCA and no final in-person appeal is scheduled. If OSSE cannot approve the documentation provided, an in-person appeal is scheduled.

Final In-Person Appeals are held from Dec. 11 through Dec. 13. CBOs must upload additional and/or new documentation at the time the request for final appeal is made. **All final appeals must be requested by Dec. 6, 2019.**

Final In-Person Appeals are conducted face-to-face with a panel of OSSE officials who make the final determination regarding the status of a student. CBO representatives are assigned a time with the panel to review submitted documentation and engage in a focused discussion toward a final determination.

The outcomes of Final In-Person Appeals are updated in the EACCA within one business day. The decision from the final in-person appeal is final. CBOs are able to view all final determinations by **Dec. 16, 2019.**

THIRD CERTIFICATION: FINAL AUDITED ENROLLMENT NUMBERS ACKNOWLEDGEMENT



CBOs must confirm in the EACCA the final audited enrollment numbers no later than **5 p.m. on Dec. 18, 2019**. This certification ensures that CBOs have received the final outcome of the enrollment audit.

If a CBO does not confirm the final audited enrollment numbers by the deadline, additional follow up is conducted directly with the Pre-K Manager.

REPORTING



After receipt of the third and final Audited Enrollment Certification, OSSE will produce and disseminate the final enrollment audit report in January 2020.

APPENDICES

APPENDIX A: 2019-20 RESIDENCY VERIFICATION GUIDELINES AND FORMS

Required Residency Documentation

During the enrollment period, all enrolling families that do not participate in the subsidized child care program are required to submit a DCRV form and the required supporting documentation. Below is a list of the acceptable forms of supporting documentation to confirm bona fide DC residency:

ONE OF THE FOLLOWING	OR TWO OF THE FOLLOWING
<ul style="list-style-type: none">• A valid pay stub issued within 45 days of providing proof of residency. Must contain the name of person enrolling the student or the name of the adult student showing his/her current DC home address, and withholding of only DC personal income tax for the current tax year and no other states listed.• Unexpired official documentation of financial assistance from the Government of the District of Columbia, issued to the person enrolling the student or the adult student and current at the time presented to the school, including, but not limited to, Temporary Assistance for Needy Families (TANF), Medicaid, the State Child Health Insurance Program (SCHIP), Supplemental Security Income, housing assistance or other programs.• Certified copy of Form D40 by the DC Office of Tax and Revenue, with the name of person enrolling the student or the name of the adult student as evidence of payment of DC taxes for the current or most recent tax year.• Current military housing orders or statement on military letterhead, both of which shall include the name of the person enrolling the student or the name of the adult student, and the residing District address.• Embassy letter issued within the past 12 months. Must contain the name of the person enrolling the student or the adult student and an official embassy seal. Must indicate that the caregiver and the dependent student or the adult student currently live on embassy property in DC or will reside on DC property during the relevant school year.	<ul style="list-style-type: none">• Valid and unexpired DC motor vehicle registration showing the name of the person enrolling the student or the name of the adult student and his/her current District home address.• Valid and unexpired lease or rental agreement with a separate proof of payment of rent, in the name of the person enrolling the student or the name of the adult student, for a period within two months immediately preceding of the submission of this form, for the current DC address at which the person enrolling the student actually resides.• Valid and unexpired DC motor vehicle operator's permit or official government issued non-driver identification in the name of the person enrolling the student or the name of the adult student showing his/her current DC home address.• Utility bill (only gas, electric, and water bills are acceptable) with a separate paid receipt showing payment of the bill, from a period within the two months immediately preceding the submission of this form, listing the name of the person enrolling the student or the name of the adult student and his/her current DC home address.

Residency Proven Through Home Visitation

There may be extenuating circumstances that prevent a parent/guardian or adult student from producing approved residency verification documents. In such cases, the school should conduct a home visit pursuant to DC Code § 38-309(d), complete and retain a copy of the [Home Visitation Form](#) to demonstrate due diligence in verifying a student's District residency. If a person seeking to enroll a student cannot establish residency by providing the necessary documentation or through a home visit, the school must refer that student to OSSE's residency office. Finally, these procedures must be submitted to OSSE no later than 30 calendar days before the first day of school for approval.

If an CBO believes that a student is a DC resident but is unable to prove residency through one of the means outlined in DC Code § 38-309, the LEA must retain all documentation that could support a finding of residency and contact OSSE's Office of Enrollment and Residency for further guidance.

Residency Proven for Homeless Students

Pursuant to the McKinney-Vento (MKV) Homeless Assistance Act, schools may not require verification or proof of residency for homeless students as a condition of enrollment. However, each LEA is required to have an LEA Homeless Liaison responsible for identifying and ensuring that these students receive services entitled to them. McKinney-Vento defines homeless children as “individuals who lack a fixed (permanent), regular, and adequate (acceptable) nighttime residence.” The act gives examples of children who would fall under this definition:

- Children and youths who are sharing the housing of other persons due to loss of housing, economic (financial) hardship, or a similar reason; are living in motels, hotels, trailer parks or camping grounds because they do not have any other choices at the present time; are living in emergency or temporary shelter (including DC transitional housing); or are abandoned in hospitals;
- Children and youths who are living in cars, parks, private or public places not meant for human beings, abandoned buildings, bus or train stations, or places that are not safe;
- Migratory children who qualify as homeless because they are living in circumstances described above; and
- Unaccompanied youths, including youths who are not in the physical custody of a parent or guardian, who qualify as homeless because they live in circumstances described above.

Residency Proven for Undocumented Immigrant Children and Youth

Immigrant children have the right to attend school full-time as long as they meet the age and residency requirements established by District law. The U.S. Supreme Court recognized that children who are undocumented immigrants cannot be denied a free public education if they are residents of a school district (*Plyler v. Doe*, 457 U.S. 202).

At the time of enrollment, CBOs shall avoid asking questions that may reveal a child’s immigrant status, such as asking for a Social Security Number. Schools can lawfully request documentation from students and families to verify residency status but are prohibited from denying enrollment on the basis of failure to submit a birth certificate, visa, green card, DC driver’s license, a state identification card, or other documents that require a Social Security Number. To avoid discouraging enrollment, CBOs are encouraged to enroll any child and ask for documentation after the child is enrolled.

Residency Forms

Residency forms for the 2019-20 school year can be found at this link: <https://osse.dc.gov/service/2019-20-school-year-residency-verification-webinar>. They include:

- [DC Residency Verification Forms](#)
- [Other Primary Caregiver Forms](#)
- [Home Visitation Forms](#)

Required Age Verification Documentation

Acceptable documents for verification of a child’s age include one of the following:

- (1) **A full size original birth certificate.** The birth certificate must include the name of the parent(s) or guardian(s) requesting services;
- (2) **A birth certificate in a non-English language with a certified translation.**

APPENDIX B: UNIFORM PER STUDENT FUNDING FORMULA (UPSFF) GUIDANCE

The Uniform Per Student Funding Formula (UPSFF) is used to determine payment amounts using the classification of enrolled students. The UPSFF rate for 2019-20 school year is \$14,713 for 3-year-olds and \$14,274 for 4-year-olds. The supplemental at-risk allocation is \$2,471 for pre-K age students in foster care, who are experiencing homelessness, or receive TANF or SNAP benefits.

The UPSFF is used to determine payment amounts using the classification of enrolled students identified on the chart below. Information about the funding formula weights, dates of public charter school payments and supplemental payments for the 2019-20 school year can be found [here](#).

APPENDIX C: 2019-20 ENROLLMENT AUDIT DATA ELEMENTS

CATEGORY	DATA ELEMENT	DEFINITION	SOURCE SYSTEM	PERMITTED VALUES
Student Demographic	USI	The official state identifier for all students attending a District of Columbia high-quality pre-K program; assigned by OSSE.	Enrollment Audit and Child Count Application	10-digit numeric
Student Demographic	Local ID	A unique number of alphanumeric codes assigned to a student by the CBO.	Enrollment Audit and Child Count Application	Alphanumeric
Student Demographic	Last Name	The legal last name of the student.	Enrollment Audit and Child Count Application	Alpha
Student Demographic	Middle Name	The legal middle name of the student.	Enrollment Audit and Child Count Application	Alpha
Student Demographic	First Name	The legal first name of the student.	Enrollment Audit and Child Count Application	Alpha
Student Demographic	Date of Birth	The day, month, and year on which the student was born.	Enrollment Audit and Child Count Application	Numeric - mm/dd/yyyy
Student Demographic	Gender	A coded value representing the student's gender; gender is a person's actual sex or perceived sex.	Enrollment Audit and Child Count Application	F – female M – male
Student Demographic	Ethnicity	An indication that a student identifies as Hispanic or Latino.	Enrollment Audit and Child Count Application	H – Hispanic/Latino; N – not Hispanic/ Latino
Student Demographic	Race	CBOs are required to categorize students in one or more of the permitted race categories.	Enrollment Audit and Child Count Application	A – Asian B – Black/African American I – American Indian/Alaskan Native M – Multiple P – Pacific Islander/Native Hawaiian W – White/Caucasian
Student Demographic	Student Street Address	The number and name of the unit and street (and apartment, if applicable) where the student resides.	Enrollment Audit and Child Count Application	Alphanumeric
Student Demographic	Student City	The city where the student resides.	Enrollment Audit and Child Count Application	Alpha
Student Demographic	Student State	The abbreviation for the state (within the United States) or outlying area in which the student resides.	Enrollment Audit and Child Count Application	Two-letter standard state abbreviation
Student Demographic	Student ZIP Code	The number that identifies the postal delivery area in the United States in which the student resides.	Enrollment Audit and Child Count Application	5-digit or 5+4-digit numeric

CATEGORY	DATA ELEMENT	DEFINITION	SOURCE SYSTEM	PERMITTED VALUES
Student Demographic	Student Ward	Student's ward of residence for students residing within the District of Columbia.	Generated by the DC Master Address Repository (MAR) based on LEA reported Student Street Address, Student City, Student State, and Student ZIP Code	1, 2, 3, 4, 5, 6, 7, 8
Program Information	OSSE Verified Residency	An indication that the student's residence was verified through a source that requires proof of residence to be provided.	Subsidized child care, DHS, TCP, MKV, OTR, CFSA	Yes – the student qualifies as an OSSE Verified Residency student No- the student does not qualify as an OSSE Verified Residency student
Program information	Ward of State Indicator	An indication that the student is under DC foster care.	Populated by OSSE using data provided by the Children and Family Services Agency	Yes – the student is under the care of the District's foster care system No – the student is not under the care of the District's foster care system
Program information	At-Risk Indicator	An indication that the student is homeless, in the District's foster care system, qualifies for TANF or SNAP, or that the high school student is one or more years older, than the expected age for the LEA-identified grade level.	Derived by OSSE based a student having at least one indicator	Yes – the student is considered at-risk No – the student is not considered at-risk
Program information	Homeless Indicator	An indication that the student is homeless.	Enrollment Audit and Child Count Application and populated by OSSE based on data received through homeless data feeds	Yes – the student has been identified as homeless No – the student has not been identified as homeless
Student Enrollment	CBO-identified Grade Level	The grade level or primary instructional level at which a student enters and receives education services in a CBO during a given academic session.	Enrollment Audit and Child Count Application	PK3 - PreKindergarten (3-year-olds) PK4 - PreKindergarten (4-year-olds)
Student Enrollment	UPSFF Grade Level/Special Program	The translation of the student's CBO-identified grade level to the UPSFF weighting according to the student's CBO-identified grade level and at-risk designation.	Derived by OSSE using CBO identified grade level and special program designations; students with missing or invalid CBO identified grade levels are placed into age-appropriate grades	PK3 - PreKindergarten (3-year-olds) PK4 - PreKindergarten (4-year-olds)

CATEGORY	DATA ELEMENT	DEFINITION	SOURCE SYSTEM	PERMITTED VALUES
Student Enrollment	Residency Indicator	The CBO's determination that the student is or is not a resident of the District of Columbia.	Enrollment Audit and Child Count Application, after CBO Residency Site Review, the field is based on audit outcome	Yes – the student is a resident of DC No – the student is not a resident of DC
Student Enrollment	Entry Date	The month, day, and year on which the student enters and begins to receive instructional services in a school or an institution during a given school year.	Enrollment Audit and Child Count Application	Numeric - mm/dd/yyyy
Student Enrollment	Entry Code	The process by which a student enters a school during a given academic session (school year), mapped to the permitted enrollment code values.	Enrollment Audit and Child Count Application	Enrollment codes
Student Enrollment	Exit date	The month, day, and year of the first day after the date of an individual's last attendance in school (if known), the day on which an individual graduated, or the date on which it becomes known officially that an individual left school.	Enrollment Audit and Child Count Application	Numeric - mm/dd/yyyy
Student Enrollment	Exit Code	The circumstances under which the student exited from membership in an educational institution, mapped to the permitted exit/withdrawal type code values.	Enrollment Audit and Child Count Application	The complete list of exit/withdrawal codes can be found on the OSSE website at https://osse.dc.gov/service/office-data-management-and-applications
Student Enrollment	Duplicative Enrollment Indicator	An indication that the student is enrolled at more than one CBO and/or school.	Derived by OSSE based on the student's school of enrollment and USI in the daily data feeds	Yes - the student is currently enrolled at multiple schools No - enrolled at only one school



District of Columbia
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