

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

School Year 2020-21

District of Columbia
Office of the State Superintendent of Education

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State Superintendent

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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 (EACCA)	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 DC Official Code § 38-1804.02, the Office of the State Superintendent of Education (OSSE) is required to annually collect enrollment counts for children in high-quality pre-K 3 (PK3) and pre-K 4 (PK4) programs in community-based organizations (CBOs), as of Oct. 5 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 DC 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 (DC Law 22-0130)(July 31, 2018)

Pre-K Enhancement and Expansion Amendment Act of 2008 effective July 18, 2008 (DC Law 17-202; DC 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 pre-K3 and pre-K4 in CBOs receiving Pre-K Enhancement and Expansion Program (PKEEP) funds. It includes three components:

1. **Residency Verification:** An audit of children enrolled in pre-K 3 and pre-K 4 in community-based organizations 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 student meets 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 Temporary Assistance for Needy Families (TANF), or Supplemental Nutrition Assistance Program (SNAP) benefits) and is eligible for a supplemental funding allocation.

Uniform Per Student Funding Formula (UPSFF)

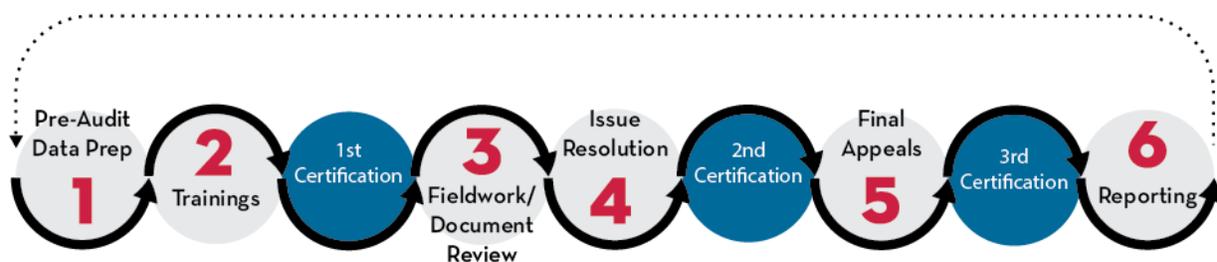
The Uniform Per Student Funding Formula (UPSFF) is used to determine payment amounts using the classification of enrolled students. The UPSFF rate for 2020-21 school year is \$15,155 for 3-year-olds and

\$14,703 for 4-year-olds. The supplemental at-risk allocation is \$2,552 for pre-K age students in foster care, who are experiencing homelessness, or receive TANF or SNAP benefits.

2020-21 ENROLLMENT AUDIT CALENDAR

DATE	ITEM
Aug. 12, 2020	Mandatory enrollment audit and application training
Aug. 14, 2020 – Oct. 5, 2020	Pre-Audit Data Preparation Phase: CBOs enter student information into Enrollment Audit and Child Count Application (EACCA)
Aug. 2020	CBOs receive notification of the Enrollment Audit fieldwork schedule
Oct. 5, 2020	CBOs to ensure all enrolled students are entered in the EACCA roster by 4 p.m.
Oct. 6 – 8, 2020	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. 9, 2020	CBOs submit First Certification (Unaudited Enrollment and Subsidy Recipient Acknowledgement) directly in the EACCA. 9 a.m. – 5 p.m.
Oct. 19 – Nov. 20, 2020	Fieldwork Phase: CBOs prepare materials for auditor document review
On-site review date plus three business days	Issue Resolution Phase: Initial residency determinations from the auditor document review 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 the initial auditor document review
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
Oct. 30, 2020	Final day for CBOs to submit Box requests for Demographic Data updates
Nov. 12, 2020	CBOs shall resolve all demographic errors; CBOs able to view initial decisions for duplicative enrollments
Nov. 13, 2020	CBOs submit the Second Certification (Final Demographic Data Element) in the EACCA. 9 a.m. – 5 p.m.
Dec. 4, 2020	CBOs submit requests with supporting documentation for final appeals for residency issues in the EACCA by 11:59 p.m.
Dec. 7 – 8, 2020	CBOs receive notification of granted final appeals in the EACCA
Dec. 9 – 11, 2020	Final Appeals Phase: OSSE facilitates final appeals for residency and duplicative enrollments
Dec. 15, 2020	CBOs are able to view all final determinations in the EACCA
Dec. 16, 2020	CBOs submit Third certification (Final Audited Enrollment Numbers Certification) directly in the EACCA. 9 a.m. – 5 p.m.

ENROLLMENT AUDIT PROCESS OVERVIEW



Enrollment Audit Process

Pre-Audit Data Preparation: Aug. 14 – Oct. 5, 2020

Overview: CBOs work to ensure demographic and enrollment data are error-free in advance of the Oct. 5 enrollment roster data freeze.

Results: CBOs capture an accurate roster of student enrollment in the EACCA.

Trainings: Various dates during the summer

Overview: OSSE hosts multiple trainings throughout the school year to prepare CBOs for the enrollment audit. CBOs are required to attend the following trainings: Enrollment and Residency (July 2020), Enrollment Audit Process (August 2020), Enrollment Audit and Child Count Application (August 2020), Pre-K Manager Certification Training (September-October 2020).

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

First Certification: Oct. 9, 2020, 9 a.m. – 5 p.m.

Overview: CBOs are required to confirm that all students are accounted for in the EACCA and all subsidy recipients are correctly identified. The Pre-K Manager certifies that the rosters and subsidy information is correct.

Results: Ensures that CBOs receive the full funding for which they are eligible and non-subsidy students are correctly reviewed by OSSE auditors.

Fieldwork: Oct. 19 – Nov. 20, 2020

Overview: CBOs are required to prepare residency documentation for auditor review. OSSE auditors, depending on CBO selection, will visit each site to review residency documentation for all students enrolled by the CBO or review prepared e-file remotely. 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 CBO location. Any students whose residency was not confirmed during the fieldwork phase shall be resolved during the issue resolution phase.

Issue Resolution: Oct. 26 – Dec. 4, 2020

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

Second Certification: Nov. 13, 2020, 9 a.m. – 5 p.m.

Overview: CBOs confirm the demographic data for each PKEEP enrolled student as of Oct. 5, 2020.

Results: Ensures that CBOs receive accurate funding for the pre-K educational services they provide in the CBO’s PKEEP classroom(s).

Final Appeals: Dec. 5 – 15, 2020

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.

Third Certification: Dec. 16, 2020, 9 a.m. – 5 p.m.

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

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

Reporting: January 2021

Overview: OSSE releases the final audited enrollment numbers.

Results: CBOs can view their final audited enrollment numbers which determines 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 shall be addressed in the next school year.

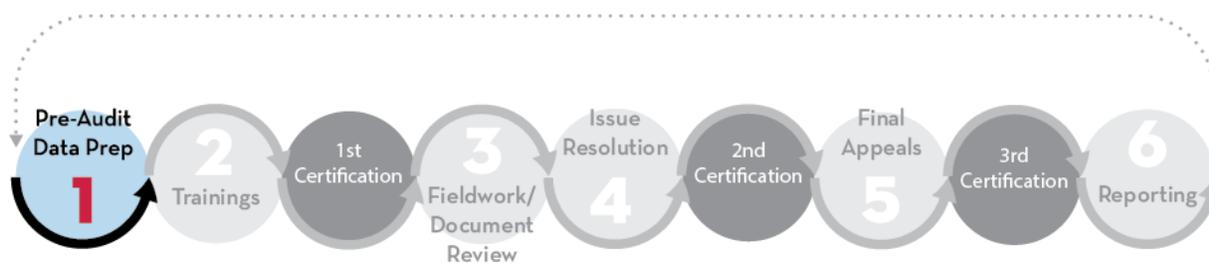
Enrollment Data Certifications

For the 2020-21 school year enrollment audit, CBOs shall certify the validity, completeness, and accuracy of the CBO’s data and acknowledge final enrollment numbers by completing three enrollment audit certifications within the EACCA. The first certification captures the universe of students enrolled in the CBO’s PKEEP classroom, each of whom should be included in the enrollment audit. The first certification also confirms that the correct subsidy status is marked for each enrolled student. The second certification certifies that the demographic data (e.g., name, date of birth, address) for each PKEEP student 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 shall be made by the Pre-K Manager via electronic signature in the EACCA.**

Certification Name	Due Date	Purpose of Certification
First Certification - Unaudited Enrollment and Subsidy Recipient Acknowledgement	Oct. 9, 2020, 9 a.m. -5 p.m.	<ul style="list-style-type: none"> • CBO acknowledges that enrollment data includes all students enrolled in the CBO’s PKEEP classroom(s) as of Oct. 5, 2020 • CBO acknowledges that enrollment data includes accurate identification of subsidy recipient students • Failure to complete this certification means that OSSE will consider the CBO’s Oct. 5, 2020 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	Nov. 13, 2020, 9 a.m. - 5 p.m.	<ul style="list-style-type: none"> • CBO acknowledges that the demographic data for each PKEEP student in the EACCA are accurate, valid and complete for all students enrolled at the CBO as of Oct. 5, 2020 (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. 5, 2020 to be accurate, valid, and complete through passive approval for the purposes of the enrollment audit
Third Certification- Final Audited Enrollment Numbers Acknowledgment	Dec. 16, 2020, 9 a.m.-5 p.m.	<ul style="list-style-type: none"> • Acknowledges the final audited PKEEP enrollment numbers after the final 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. 5 at 4 p.m.** to enter student data and make corrections to student enrollment records in the EACCA to ensure all students enrolled on Oct. 5 are identified correctly.

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.

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 SY20-21 CBO Data Collection Template.

Ensuring Accurate, Complete and Valid Student Records

CBOs shall ensure all students enrolled in the Pre-K Enhancement and Expansion Program (PKEEP) are accurately reflected in the EACCA. CBOs have until Nov. 12, 2020, 4 p.m. to make changes in the EACCA to the data elements listed below. This ensures 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).

Data element	Definition
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 shall 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 in the EACCA, and aligned to the DC OSSE Data Collection template .
Residency Status	The CBOs 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 pre-K 3 and pre-K 4 students for whom a CBO receives PKEEP funds shall be residents of the District of Columbia. To establish bona fide residency, the person enrolling the students 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 review documentary proof of residency during the enrollment period each year (Summer 2020 through Oct. 5). CBOs are required to review each students’ residency documentation and verify that all documentation and verification forms are complete, legible, and valid prior to Oct. 19, the fieldwork start date.

See the [OER Handbook](#) and [SY20-21 Enrollment and Residency](#) training for more information on the required residency documentation and refer to the [COVID-19 related OSSE Guidance Documents](#) for updated guidance on enrollment and residency verification in response to coronavirus (COVID-19).

Students experiencing homelessness

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

Non-resident students

Students who are not bona fide residents of the District are not eligible for PKEEP funding.

Age Verification

CBOs are required to collect documentation that verifies the student’s date of birth. Pre-K 3 students shall be 3 years old by Sept. 30, 2020, and pre-K 4 students shall be 4 years old by Sept. 30, 2020.

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

1. A full size original birth certificate. The birth certificate shall 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.

Enrollment Audit and Child Count Application

The Enrollment Audit and Child Count Application (EACCA) is the web-based platform for CBOs to enter student enrollment data for the Pre-K Enhancement and Expansion Program classrooms. This application is used for both Local Education Agencies (LEAs) as well as CBOs. “Child Count” only applies to LEAs and is a federally mandated activity that serves as the official special education enrollment number for the District of Columbia.

The application allows OSSE to view the individual student records and enrollment rosters throughout each phase of the audit. Student rosters are created from data pulled from the data the CBO enters directly into the EACCA. The EACCA:

- 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 Appeals phases; and
- Enhances OSSE's communication to CBOs throughout the enrollment audit phases.

Data Snapshot of Enrollment Data as of Oct. 5

OSSE takes a snapshot of enrollment data on Oct. 6 using data entered by Oct. 5. Again, CBOs have **until Oct. 5 at 4 p.m.** to enter student enrollment data in the EACCA to ensure all students enrolled in the CBO's PKEEP classroom(s) are identified correctly.

ENROLLMENT AUDIT TRAININGS



To ensure the enrollment audit Points of Contact (POCs) have a strong understanding of any policy or process changes regarding the yearly Enrollment Audit, OSSE hosts trainings in advance of the Fieldwork phase targeted towards the enrollment audit POC. OSSE distributes - via e-mail - all enrollment audit training notices to the CBO’s Pre-K Manager.

For EACCA trainings, participants may be asked to bring laptops to allow for an interactive hands-on training. Attendance is 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 annual enrollment audit. Each POC plays a critical role in the enrollment audit (see chart below).

Participating in the enrollment audit requires CBO POCs to handle personal identifiable information of students; therefore, CBOs shall 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. Changes throughout the school year shall be communicated to OSSE. The Pre-K Manager shall contact the OSSE CBO POC, Christina.crayton@dc.gov, to submit changes to site information. CBOs should also include osse.enrollmentaudit@dc.gov on all enrollment audit communications to ensure all relevant staff receive necessary updates.

POC Type	Description
Pre-K Manager	Responsible for overall management and administration; completes all certifications for the enrollment audit
CBO 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. The first certification student counts are used to complete the fiscal year 2021 enrollment reconciliation and confirm the CBOs Pre-K Enhancement and Expansion Program funding for the current/fiscal year. The first certification student 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. 5 at 4 p.m.

OSSE freezes enrollment data submitted by CBOs.

Oct. 6 through Oct. 8 at 4 p.m.

CBOs review their data in the EACCA to ensure that all students enrolled in the Pre-K Enhancement and Expansion classroom(s) as of Oct. 5 are accounted for on the roster. This includes:

- Resolving duplicative enrollment with another CBO or local education agency (LEA);
 - Resolving duplicates should be conducted between CBOs, notify OSSE if unable to resolve
- Making corrections to student records in the EACCA to ensure all demographic data for students enrolled in PKEEP are accurate; and
- Reviewing and confirming that all subsidy recipients are correctly identified.

Requirements for Identifying Missing Students

If a CBO determines that a student or students enrolled in the PKEEP classroom(s) were not captured in the first data capture the CBO is required to complete the below steps. This process is available for students who were enrolled and attending the CBO as of Oct. 5.

1. CBO submits request to add missing student into the EACCA
 - a. The request must be submitted through the CBOs Box portal
 - b. The request must include the following elements
 - i. The date the student enrolled into the PKEEP classroom
 - ii. Explanation for why the student was not included in the data capture
 - iii. Student information (first name, middle, last name, ISU and DOB)
2. CBO contacts Christina Crayton at Christina.Crayton@dc.gov to notify OSSE of the missing student(s)
3. OSSE sends CBO notification indicating that the request is accepted, rejected, or to request additional information

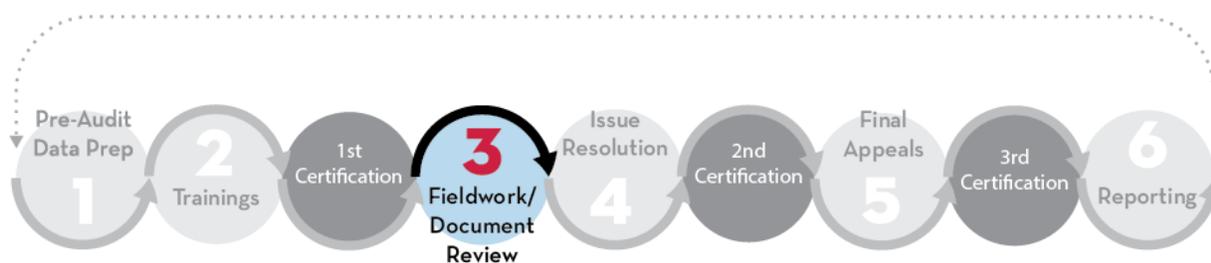
After Oct. 8

CBOs cannot add additional students to the enrollment audit roster under any circumstances after 4 p.m. on Thursday, Oct. 8, 2020. It is critical that the CBO ensure that all students for whom the CBO seeks Pre-K Enhancement and Expansion funding (i.e., attending as of Oct. 5) are on the enrollment audit roster in the EACCA.

Oct. 9

Pre-K Managers shall complete the first certification in the EACCA between 9 a.m. and 5 p.m.

FIELDWORK / DOCUMENT REVIEW



The Fieldwork phase of the enrollment audit is the process wherein OSSE auditors review age and residency documentation collected by CBOs. This phase begins on Monday, Oct. 19, 2020 and ends on Friday, Nov. 20, 2020. CBOs receive notification of their scheduled fieldwork date. During fieldwork, auditors review residency documentation for all students enrolled in the CBO’s Pre-K Enhancement and Expansion classroom(s). CBOs receive the results of the review within three business days of the fieldwork date. This phase helps to ensure that there are no anomalies in the residency verification process.

Enrollment Audit Fieldwork Scope

OSSE auditors will review **every** student’s DC Residency Verification form (DCRV) as well as any supporting residency forms when applicable (Other Primary Caregiver Form, Sworn statement, etc.). However, the review of valid supporting residency documentation depends on the student’s participation in subsidized child care programs. If OSSE does not verify subsidy status, the CBO will be required to provide an updated DCRV and the supporting documentation to confirm residency

Non-subsidy students

Students who do not participate in the subsidized child care program shall have a completed DCRV form, valid supporting residency documentation and age verification documentation. Information on valid supporting documentation can be found in the [Residency Verification](#) section of this handbook. If the supporting documentation ultimately rejected by the auditor, that student will be counted as an unverified resident or flagged for an age error and the CBO will not receive funding for that student.

Subsidy students

Students who participate in the District of Columbia’s subsidized child care program shall have a completed DCRV form but do not need to provide valid supporting residency documentation. **These students must be accurately identified by the CBO by Oct 8.** CBOs that incorrectly identify a student as subsidy, but are actually non-subsidy, may 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:

Identify and Reserve Space

The space identified and reserved shall 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.

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, shall have supporting documentation for non-subsidy students immediately following the DCRV for that student. Do not staple any documents.
3. Ensure that the age verification documents are immediately following the residency verification documentation for non-subsidy students.
4. Binders shall be located in the space reserved for the auditors on the day of the visit.

Document Preparation for Remote Document Review

CBOs may elect to complete their fieldwork through a remote document review. A remote document review requires the creation and submission of e-files. For the 2020-21 school year, OSSE will use BOX as the platform for providing the e-files. The EACCA will have a link directly to the school folder in BOX for uploading enrollment audit e-files. The e-files must contain the required documentation for all enrolled students. CBOs should confirm participation in remote document review by Aug. 26, 2020.

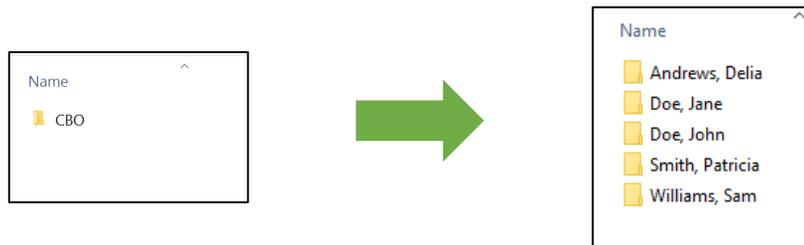
Prepare Student e-files for Remote Review

1. Collect and Organize the [DC Residency Verification \(DCRV\) forms](#) and all supporting residency documentation (i.e. copies of driver's licenses, utility bills, etc.)
2. Transform each DCRV and supporting residency documentation paper documents into electronic files (e-files).
 - a. Note: Each document/e-file should be converted to .pdf files (maximum file size is (15 GB)
3. Create a folder for each PKEEP enrolled student and transfer all e-files into the student's folder
 - a. Note: For students that receive child care subsidies, the student folder will only include one file, a legible, completed, signed DCRV form
 - b. For students that do not receive child care subsidies, the student folder will include the following forms. Please organize the e-files in the below format.
 - i. Document One – DCRV Form
 - ii. Document(s) Two - Supporting residency documentation
 - iii. Document Three - Age verification documents

Submit Student Folders into the Enrollment Audit Box Folder

4. Log into the Enrollment Audit and Child Count Application (EACCA)
5. Select the "Upload e-file Documentation" icon link located on the CBO dashboard
 - a. Note: The link will take the user directly to the CBO's EACCA Box Account

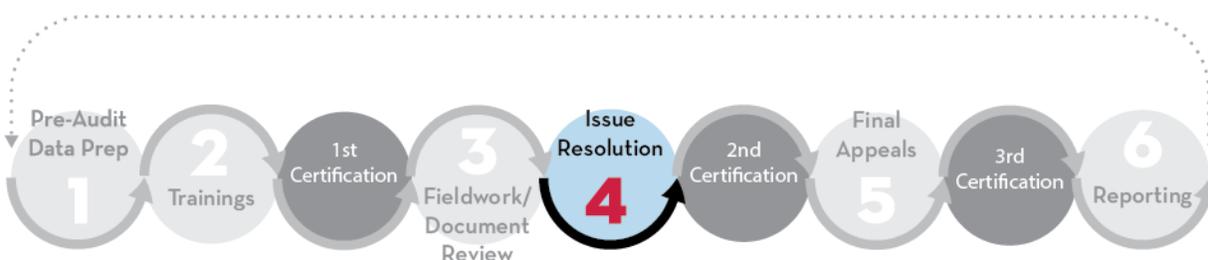
6. Create a student folder for each PKEEP enrollment student (see below image)



- a. Note: Folders should be created and loaded into the Enrollment Audit BOX folder in the following order:
 - b. Student last name, student first name
 - i. Student names shall align with spellings as displayed in the EACCA
 - ii. Include student date of birth if more than one student has the same first and last name
7. Upload each student's electronic folder into the CBO's EACCA Box folder completed in Step 6 above
 - a. If the CBO's EACCA BOX folder exceeds the file size limits, please separate the student folders into groups, alphabetically by last name (Ex. A-M, N-Z)
8. **All student e-files should be submitted via the EACCA Box link by Thursday, October 15, 2020.** CBOs will have access to the folders up through this date to change as needed.

While e-files are due on Oct. 15, CBOs will still be assigned an "auditor review" day that initiates the phases of issue resolution. Details on these dates will be released with the larger fieldwork schedule.

ISSUE RESOLUTION



The issue resolution phase runs concurrently with the Fieldwork/ Document Review phase and is intended to resolve discrepancies or disagreements between the CBO student information and the auditor determinations.

Residency Determinations

All corrections of the OSSE auditor residency determinations shall follow the following response timeline.

Issue Resolution Response Timeline

- On-site review date plus three business days = Auditors post determination in the EACCA
- On-site review date plus 8 business days = Final day for CBO to respond to all auditor determinations
- On-site review date plus 10 business days = Auditors review second round of the CBO appeal information/documents submitted in the EACCA

Three business days after the document review 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 updated documentation for OSSE review in the EACCA to verify the student(s) residency status. The uploaded documentation shall demonstrate the student's District residency under the verification guidelines set forth in the [OER Handbook](#), the [SY20-21 CBO Enrollment and Residency Training](#), and the [COVID-19 related OSSE Guidance Documents](#).

The documents are reviewed by OSSE auditors within two business days of the issue resolution end date. An updated determination is rendered and documented in the EACCA. If the CBO does not agree with determinations rendered during the Issue Resolution phase, the CBO shall request a Final Appeal using the EACCA by **Dec. 6, 2020**.

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. 2	Tuesday, Oct. 27
Auditors response posted in EACCA	+3 business days	Thursday, Nov. 5	Friday, Oct. 30
Final day for LEA to respond to all auditor decisions	+8 business days	Friday, Nov. 13 ¹	Friday, Nov. 6
Auditors review second round of responses posted in EACCA	+10 business days	Wednesday, Nov. 18	Thursday, Nov. 10
Final appeal submissions		Friday, Dec 4	Friday, Dec 4

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

Duplicative Enrollment - 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 all applicable documentation listed in the hierarchy tables below through the EACCA by **Oct. 30, 2020**. OSSE will evaluate the documents using the hierarchy order identified below to make a determination by **Nov. 13, 2020**.

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 EACCA by **Dec. 4, 2020**.

Hierarchy order for Duplicatively Enrolled in a CBO and an LEA	Acceptable Documentation

1. Enrollment/Withdrawal Forms	The CBO shall 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. 28 through Oct. 26. 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 and/or Unusual Incident Report for this.
3. Schoolwork	The CBO shall 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. 28 through Oct. 26.

Demographic Data Elements

For resolving issues with demographic data elements, CBOs shall submit updates/corrected information using an OSSE approved format through the CBOs Box portal. All enrollment audit Box submissions shall be submitted by CBOs **no later than Oct. 30, 2020** to ensure adequate time for OSSE to respond before the end of the Issue Resolution phase.

CBOs have **until Nov. 12, 2020** 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 A](#) 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 CBO
DC Residency	Residency status	OSSE auditor via site visit	Provide corrected residency documents through issue resolution and final appeals process
Duplicative Enrollment Across CBOs and LEAs	Duplicative Enrollment	OSSE determination after receiving documentation from CBOs, if applicable prior to or on Oct. 30, 2020	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 EACCA	If CBO incorrectly inputs data it can be corrected through EACCA by Nov. 12, 2020 If data is in conflict with data OSSE inputs, then the CBO must submit documentation via Box by Oct. 30
At-risk	Homeless	CBO entry of homeless at-risk indicator Data is also received from TCP	Data corrected by CBO through EACCA during issue resolution phase by Nov. 12, 2020 (if identified by CBO, only)
	SNAP/TANF	DC Department of Human Services (DHS) feed	CBO submits Box request to resolve inconsistencies by Oct. 30, 2020
	Under the care of CFSA	DC Child and Family Services Agency (CFSA) feed	CBO submits Box request to resolve inconsistencies by Oct. 30, 2020

SECOND CERTIFICATION: FINAL DEMOGRAPHIC DATA ELEMENTS CERTIFICATION



CBOs shall submit the Second Certification (Final Demographic Data Elements Certification) directly in the EACCA no later than 5 p.m. (EST) on Nov. 13, 2020.

Through the second certification, the CBO acknowledges that the Oct. 5 student 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.

The outcomes of Final Appeals are updated in the EACCA within one business day. The decision from the final appeal is final. CBOs are able to view all final determinations by **Dec. 15, 2020**.

THIRD CERTIFICATION: FINAL AUDITED ENROLLMENT NUMBERS ACKNOWLEDGEMENT



CBOs shall confirm in the EACCA the final audited enrollment numbers no later than **5 p.m. on Dec. 16, 2020**. This certification ensures that CBOs have reviewed the final enrollment audit rosters confirmed during the enrollment audit.

If a CBO does not confirm the final audited enrollment numbers by the deadline, OSSE will contact the Pre-K Manager to complete this last step.

REPORTING



After receipt of the third and final Audited Enrollment Certification, OSSE will produce and disseminate the final enrollment audit report in January 2021.

APPENDICES

Appendix A: 2020-21 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 X – non-binary
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
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 (SIS and TCP)	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 community-based organization 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)
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