



DISTRICT OF COLUMBIA

OFFICE OF THE STATE SUPERINTENDENT OF

**EDUCATION**

## Duplicative Enrollment Resolution Policy

Last Updated May 2023

### 1. Introduction

This policy serves to clarify and communicate the expectations of the Office of the State Superintendent of Education (OSSE), regarding duplicative enrollments for students enrolled in DC public, public charter, and non-public local education agencies (LEAs) within the District.

The enrolling school in a duplicative enrollment is determined by a hierarchy defined in detail in this document, which reflects the approach previously used during data validation. The hierarchy is applied automatically on a daily basis through the [Duplicate Enrollment Application \(DEA\)](#), and LEAs are notified of these automated determinations. If the LEA believes that the determination is incorrect, the LEA must:

- appeal the determination; AND
- submit documentation to support their claim within a defined time frame.

If not appealed within the defined timeframe, the automated determination is final for the purposes of the Enrollment Audit and Data Validation based reporting (e.g., Accountability).

The rationale for this policy is that it resolves duplicative enrollments more quickly, ensuring greater data accuracy and access by the appropriate LEA to critical records in a timelier way, and reduces the burden on LEA staff.

### 2. Purpose

Duplicative enrollments must be resolved for accurate funding based on the Uniform per Student Funding Formula (UPSFF), federal and local reporting and accountability metrics. The resolution for the duplicative enrollment determines the student's authoritative enrollment for the identified period. This policy seeks to provide LEAs and schools with clear guidance on the duplicative enrollment resolution policy. Should you have any questions pertaining to the contents of this document, or recommendations for future topics for inclusion, please contact [OSSE.EnrollmentAudit@dc.gov](mailto:OSSE.EnrollmentAudit@dc.gov).

### 3. Stages of Enrollment

Based on the definition for the stages of enrollment per 5A DCMR 2199, there are two enrollment stages which can result in a duplicative enrollment for a student. As defined in the DCMR, a Stage 4 enrollment is the registration of a student in the Student Information System (SIS) upon receipt of required enrollment forms and letter of enrollment agreement. A Stage 5 enrollment is the receipt of educational services that are deemed to begin on the first official school day. Below are the three types of duplicative enrollments.

- Stage 4 to Stage 4
- Stage 4 to Stage 5
- Stage 5 to Stage 5

#### Stage 4 to Stage 4

In instances of a duplicative enrollment where the student is Stage 4 enrolled at two or more LEAs and/or schools, neither school receives enrollment credit for the purposes of the Enrollment Audit or Data Validation based reporting (e.g., Accountability). Neither school is providing educational services to the student. For this reason, the student is not identified for school funding, federal reporting, or accountability metrics.

#### Stage 4 to Stage 5

In the instance where a student is Stage 4 enrolled in School A and Stage 5 enrolled in School B, the school with the Stage 5 enrollment receives the enrollment credit. School B is providing educational services to the student; therefore, school B receives the enrollment credit for the student.

#### Stage 5 to Stage 5

The final type of duplicative enrollment is where a student is Stage 5 enrolled at two or more LEAs and/or schools. There are three different variations of Stage 5 to Stage 5 duplicative enrollments:

- Enrollment in two or more different schools within the same LEA;
- Enrollment in two or more schools in different LEAs; or
- Enrollment in the same school within the same LEA

In the last case above, when multiple enrollments for a student exist within the same school within the same LEA for the same enrollment period, the LEA must correct this issue within the LEA's own SIS. The deduplication resolution process is *not* applied to this type of duplicative enrollment as the school can correct the issue.

For the other two remaining variations of duplicative enrollments above, Stage 5 enrollment for the same student in two or more different schools within the same LEA and Stage 5 enrollment of the same student in two or more schools in different LEAs, the deduplication resolution process as described herein is applied to determine which school receives enrollment credit for the student. The appeals process only applies to duplicative enrollments between two schools at two different LEAs.

## 4. Deduplication Resolution Process

To eliminate the administrative burden on LEAs/schools, OSSE initiates a daily-automated deduplication resolution process to resolve, rectify, and remove instances of duplicative enrollments using the duplicative hierarchy determinations described herein. The student's authoritative enrollment record only identifies enrollment at one school on each day during the school year.<sup>1</sup>

If a school does not agree with the determination, the school must request an appeal, within the defined timeframe, using the process described in this policy.

*Exceptions for Adult LEAs:* The daily-automated deduplication resolution process is **not** applied to students in

---

<sup>1</sup> Although the deduplication resolution process resolves duplicate enrollments displayed within OSSE data systems, LEAs are still required to maintain accurate student data and update the data within the timeline set forth in the [LEA Data Management Policy](#).

adult education programs/schools. It is acceptable for an adult student to be enrolled in more than one LEA and in a variety of adult education programs. Students enrolled in adult education programs/schools can maintain multiple Stage 5 enrollments across two or more different LEAs/schools. For this reason, duplicative enrollments between a traditional LEA and adult LEA as well as between two adult LEAs are not covered by this process. One adult LEA is determined as the “primary” over the other LEA. Adult LEAs appeal primary determinations within the application. The DEA is a year-round process requiring participation by LEAs 4 times throughout the enrollment year.

Adult LEAs are encouraged to resolve duplicative enrollments directly and without the use of the DEA appeal process. Please note that adult LEAs that resolve without the need to utilize the DEA must still update their SIS to reflect the resolution. If two adult LEAs or a traditional LEA and an adult LEA can resolve a duplicative enrolled student, they can update their SIS and see the reflected change in the DEA. However, if adult LEAs are unable to resolve directly, they must utilize the DEA for OSSE to determine the “primary” enrollment. Determining the primary enrollment allows the LEA to utilize the Demographic Conflicts Management and the Characteristics Conflict Management module in Statewide Longitudinal Education Data (SLED) to resolve demographic and English learner conflicts and removes duplicative enrollments from the Unified Data Error Qlik application.

There are three document types an adult LEA must submit in DEA when resolving a duplicative enrollment and they are considered in the following order:

1. Student-signed affidavit
2. Attendance
3. Schoolwork

**Example 1:**

	Adult LEA A	Adult LEA B
<b>Student Affidavit</b>	<b>Yes</b>	<b>No</b>
<b>Attendance</b>	<b>Yes</b>	<b>Yes</b>
<b>Schoolwork</b>	<b>Yes</b>	<b>Yes</b>

In this instance, Adult LEA A submitted documentation for each level of the hierarchy and LEA B failed to submit the student’s affidavit. For this reason, Adult LEA A would receive the primary credit.

**Example 2:**

	Adult LEA A	Adult LEA B
<b>Student Affidavit</b>	<b>No</b>	<b>No</b>
<b>Attendance</b>	<b>Yes</b>	<b>Yes</b>
<b>Schoolwork</b>	<b>Yes</b>	<b>No</b>

In this instance, while both Adult LEA A and Adult LEA B did not submit the signed student affidavit but did submit the attendance record, only Adult LEA A submitted the schoolwork. For this reason, Adult LEA A would receive the primary credit.

### **Student-signed affidavit**

The LEA shall have the adult student sign an affidavit attesting that the student is enrolled in the LEA program and weekly credit hours in order to make a proper appeal. A completed student-signed affidavit must include the following items:

- Student name
- Enrolled program
- Number of contact hours
- Adult student signature and date
- School official signature and date

### **Attendance Records**

OSSE reviews attendance records for the dates of the enrollment period that the student appears as duplicative enrolled. Attendance must be demonstrated for each class during the day or night sessions.

### **Schoolwork**

Either two pieces of schoolwork or exam documentation (including student's name and the date of the work) between the dates of enrollment periods as outlined in this document can be provided. Electronically submitted work or exams with a date stamp that show the student's name or USI are acceptable.

Please note that during the appeals process, the documentation submission for each level is essential when making the final determination.

*Exceptions for Community Based Organizations (CBO):* For students identified as enrolled in both a Pre-Kindergarten Enhancement and Expansion Program (PKEEP) CBO and an LEA, the same duplicative hierarchy is applied in the duplicative determinations; however, the deduplication resolution process is not automatically performed for this student population. If a duplication determination is made and the CBO disagrees, the CBO is able to submit appeals through the Enrollment Audit and Child Count Application (EACCA).

If there is a duplicative enrollment between two CBOs, both CBOs are required to upload documentation in the EACCA for OSSE review. Once a determination is made, OSSE updates the status in the EACCA. If there is a duplicative enrollment between a CBO and an LEA, the CBO uploads documents in the EACCA and the LEA uploads documents in the DEA. OSSE reviews documents uploaded by the CBO and the LEA in order to make a determination.

## **5. Policy for Duplicative Enrolled Students**

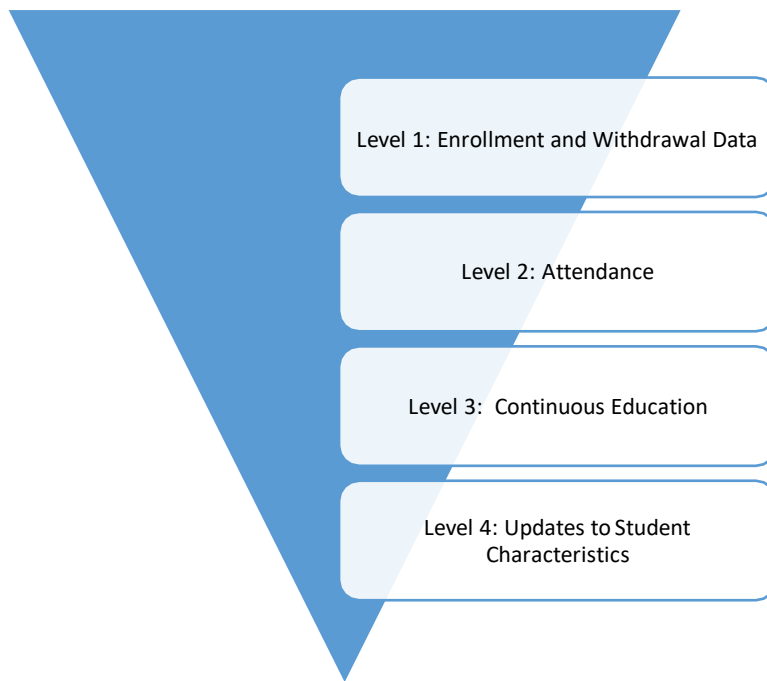
Beginning the first Monday following the Labor Day holiday, the deduplication resolution process runs daily to correct instances of duplicative enrollment for students enrolled in pre-K through grade 12 at DC public and public charter schools. The deduplication resolution process outlines how OSSE makes enrollment determinations when more than one LEA and/or school lists a student as Stage 5 enrolled. If the determination is correct, the school that does not receive enrollment credit must update the student's enrollment record to align with the duplicative determination. If the determination is incorrect, then they must initiate an appeal of that determination.

## **6. Summary of Duplicative Hierarchy**

The deduplication resolution process automatically ascends the duplicative hierarchy described below, from Level One through Level Four, using enrollment data from the two or more schools where a student is Stage 5 enrolled. If a determination cannot be made at one level of the duplicative hierarchy, then identifiers in the next

level are reviewed to make an enrollment determination. The specific data reviewed at each level are summarized in the table below and described in detail in the following sections.

Level	Name	Description
<b>Level One</b>	Enrollment and Withdrawal	A review of the overlapping enrollment and fully contained enrollment to correct the withdrawal so that it does not overlap with the entry date of the student's enrollment in another school.
<b>Level Two</b>	Attendance	A review of the student's active attendance percentage to provide enrollment credit to the school with the highest percentage.
<b>Level Three</b>	Continuous Education	A review of the student's prior school and/or LEA of attendance to provide enrollment credit to the school that continues to educate the student from the previous school year.
<b>Level Four</b>	Updates to Special Characteristics	A review of updates to the student's demographic record to identify the school with an active engagement in the student record, which receives the enrollment credit.



The four levels within the duplicative hierarchy act as sequential tiebreakers. If all items are true for both schools, then it moves to the next level to see if that tie can be broken.

## 7. Duplicative Hierarchy Levels

The following section examines each level in more detail. These levels are all analyzed, in order, on a nightly basis to determine the enrollment of a student. This process does not require active participation from the LEA, but instead uses the data already being sent through the LEA SIS to make the enrollment determination. It is important to remember that this hierarchy is run nightly, and the data sent each day could change previous determinations. In the examples below, the enrollment entry date and enrollment end date correspond to the first and last day the LEA is given enrollment credit for the student.

### Level One: Enrollment and Withdrawal Data

Many duplicative enrollments do not start at the first level, since most LEAs have the same start of school date,

and a withdrawal/exit can come after many days of duplicative enrollment. However, it is the ranking tiebreaker, and if the relevant data change, that could adjust previous deduplication determinations that were made using levels two-four of the hierarchy.

**Fully Contained Enrollment**

If a student is identified with a continuous enrollment in School A, and has an enrollment and then withdrawal in School B, this is a fully contained enrollment in School A. The school that has the earlier instance of enrollment, and is not fully contained, receives the enrollment credit. A record with no exit date uses the final day of the school year (ex. June 30, 2023) as the exit date to evaluate if a record is fully contained.

**Example (fully contained):** School A provided enrollment data from Sept. 9, 2022-Oct. 15, 2022 and School B provided enrollment data from Sept. 15, 2022-Oct. 3, 2022.

	SIS Entry Data	SIS Exit Date
School A	9/9/2022	10/15/2022
School B	9/15/2022	10/3/2022

As of Sept. 15, 2022 (when the student enters School B), the enrollment record from School B becomes “fully contained” by the School A enrollment as School A has an earlier entry date and neither school yet has an exit date for the student. Once School B exits the student on Oct. 2, 2022, the records remain “full contained” and therefore excluded from the deduplicated enrollment records.

	Enrollment Credit Entry Date	Enrollment Credit End Date
School A	9/9/2022	10/15/2022
School B	No enrollment credit	

If an enrollment instance was fully contained within another enrollment instance from another LEA, the fully contained enrollment instance and its corresponding attendance values is removed.

There is one exception to this rule - when the fully contained enrollment instance is at the assessment school (i.e. the school to which a student’s assessment participation and performance is counted, for the assessment date). Fully contained duplicative enrollments covering the assessment period are valid for the day the student participated in the statewide assessment. Enrollment at an assessment school is preserved for both fully and partially overlapping instances of duplicative enrollment. See the examples below for more detail.

**Example (fully contained with missing exit date):** School A provided enrollment data from Sept. 9, 2022 with no exit date (still an active enrollment) and School B provided enrollment data from Sept. 15, 2022- Oct. 3, 2022.

	SIS Entry Data	SIS Exit Date
School A	9/9/2022	-
School B	9/15/2022	10/3/2022

As of Sept. 15, 2022 (when the student enters School B), the enrollment record from School B becomes “fully contained” by the School A enrollment as School A has an earlier entry date and neither school yet has an exit date for the student. Once School B exits the student on Oct. 3, 2022, the records remain “fully contained” (as the School A exit date is considered to be June 30, 2022 for the basis of comparison) and therefore excluded from the deduplicated enrollment records.

	Enrollment Credit Entry Date	Enrollment Credit End Date
School A	9/9/2022	06/30/2023
School B	No enrollment credit	

**Example (fully contained, assessment school):** School A provided enrollment data from Sept. 9, 2022- June 15, 2023 and school B provided enrollment data from April 20, 2023-June 1, 2023 (assessment school). Student took the Partnership for Assessment of Readiness for College and Careers (PARCC) assessment on April 30, 2023; enrollment from school B is included in the analysis.

	SIS Entry Data	SIS Exit Date
School A	9/9/2022	6/15/2023
School B (Assessment School)	4/20/2023	6/1/2023

The “fully contained” process, ignoring the assessment record, results in an enrollment credit of:

	Enrollment Credit Start Date	Enrollment Credit End Date
School A	9/9/2022	6/15/2023
School B (Assessment School)	No enrollment credit	

Once corrected for the assessment record, the final deduplicated enrollment record reflects:

	Enrollment Credit Start Date	Enrollment Credit End Date
School A	9/9/2022	4/29/2023
School B (Assessment School)	4/30/2023	4/30/2023
School A	5/1/2023	6/15/2023

### Overlapping Enrollments

This section examines “overlapping enrollments.” An overlapping enrollment is when a student has an enrollment instance with an exit date at one LEA, and simultaneously an earlier or same entry date at another school (within the same or a different LEA). This results in enrollment periods that “overlap.” The deduplication resolution process and hierarchy are applied to both active enrollments as described above and overlapping enrollments. An active enrollment is defined as a student enrollment record that does not have a valid exit date.

Overlapping enrollments should be prevented by ensuring that schools are meeting their requirement to document the date the student begins to receive educational services and the last date of the student’s attendance at the school prior to enrolling in another educational institution. This means that each student record must have a valid entry code and date, and as applicable, a valid withdrawal date and code. However, the automated deduplication resolution process makes a determination of the student’s enrollment even if a school has not properly documented these dates. In most cases of overlapping enrollment, the first enrollment instance is assumed to have ended when the second enrollment instance began; this is described in more detail through the examples and exceptions below.

**Example of Overlapping Enrollment:** School A provided enrollment data from Sept. 9, 2022-Dec. 14, 2022 and school B provided enrollment data from Nov. 15, 2022-Jan. 15, 2023. The table below displays the enrollment period provided by each school from the SIS.

	SIS Entry Date	SIS Exit Date
School A	9/9/2022	12/14/2022
School B	11/15/2022	1/15/2023

According to the table above, the student has a duplicative enrollment at both schools between Nov. 15 – Dec. 14, 2023.

Based on the deduplication resolution process logic, enrollment credit is provided based on the table below. As School A entered Dec. 14, 2022 as the exit date for the student, School B receives enrollment credit starting on Nov. 15, 2022. However, until School A entered Dec. 14, 2022 as the exit date, this is a fully contained enrollment and School A receives credit for the student.

*From Nov. 15-Dec. 14, 2022 (fully contained enrollment):*

	Enrollment Credit Start Date	Enrollment Credit End Date
School A	9/9/2022	current day of enrollment
School B	No enrollment credit	

*On and after Dec. 15, 2022 (overlapping enrollment):*

	Enrollment Credit Start Date	Enrollment Credit End Date
School A	9/9/2022	11/14/2022
School B	11/15/2022	Current day of enrollment up until a maximum of 1/15/2023

If School A entered an exit date of June 15, 2023, enrollment credit goes to School A, as the school’s enrollment date was prior to School B. The student has a fully contained enrollment and school B does not receive enrollment credit. Many duplicative enrollments may not be resolved at the first level, since most LEAs have the same start of school date and a withdrawal/exit can come after many days of duplicative enrollment. However, it is the ranking tiebreaker, and as such, a relevant data change could adjust previous de-duplication determinations that were made using levels two-four of the hierarchy.

There are a few exceptions to the guidance provided above.

### *Exceptions*

If an enrollment instance overlapped with another enrollment instance at two different schools, the first enrollment instance was assumed to end when the second enrollment instance began, unless the first enrollment instance is at the assessment school during the assessment period. The assessment school receives enrollment credit for the day the student participated in the statewide assessment.

**Exception Example: (overlapped, assessment at first enrollment):** School A (assessment school) provided enrollment data from Sept. 11, 2022-June 1, 2023, and School B provided enrollment data from May 1, 2023-June 15, 2023. Student took the PARCC assessment on May 23, 2023 at school A; enrollment was counted as follows:



	Enrollment Credit Start Date	Enrollment Credit End Date
School A (Assessment school)	9/9/2022	4/30/2023
School B	5/1/2023	5/1/2023
School A (Assessment school)	5/2/2023	5/2/2023
School B	5/3/2023	6/15/2023

In instances where the enrollment for both schools have the same entry date, active enrollment continues and there is no withdrawal date, then the next level of the deduplication resolution process is used to determine the student’s enrollment.

### Level Two: Attendance

Given that many duplicative enrollment circumstances have inconclusive data at level one, as a practical matter, most initial determinations start at level two and are reassessed as additional information about withdrawals is collected. When there are no withdrawal dates and multiple student records identify the student as stage 5 enrolled on the same day, the deduplication resolution process reviews the attendance of the student throughout the 15 school days prior to each day of the duplicative enrollment. These 15 days are a sliding window that moves with each new day of the duplicative enrollment. The 15-day window was selected to provide an appropriate amount of time for the LEA to report attendance – longer than the data management policy window, but not so long as to be ineffective in the duplicative hierarchy.

In review of attendance records, the purpose is to determine which school has an active student attendance record. An active attendance record is identified by reviewing 15 consecutive school days of a student’s attendance record and there is evidence that the school is actively engaged with the student’s record. Active engagement in a student record is seen as an attendance record with at least one “active” attendance code for the specified 15-day review period. An inactive attendance record is identified when an absent full unexcused attendance code is entered consecutively for the 15-day review period, or when a negative attendance LEA lists Present Full for a 15-day straight period.

In the below example, where School A has a higher percentage of active student attendance records for the period in question than School B, the deduplication resolution process determines that enrollment is at School A, which receives enrollment credit for the student. School B updates the student’s enrollment record in the SIS to align with the duplicative determination.

Calculation of Enrollment Credit (based on attendance data above)		
Measurement	School A	School B
Total Number of Active Attendance Days	10	5
Total Number of Student School Days	15	15
Active Attendance Percentage (Active/Total)	66.67 percent	33.33 percent
Determination	School A receives enrollment credit	School B does NOT receive enrollment credit

In instances where the active attendance percentage for both schools is the same, then the next level of the deduplication resolution process is used to determine the student’s enrollment.

### Level Three: Continuous Education

If the deduplication resolution process is unable to determine the student’s enrollment using the previous levels, the student’s Data Validation Certified Enrollment at the end of the previous school year is reviewed as a potential determining factor. This is only available if the student is *not* newly enrolling into either DC public or public charter school systems.

**Continuous Education Example:** The student shows an end of year enrollment at one of the identified duplicative schools and/or LEAs. The school that is continuously educating the student receives the enrollment credit. LEA A and LEA B stage 5 enrolled the same student for the current year and the deduplication resolution process logic for the previous levels did not resolve the duplicative enrollment. The deduplication resolution process logic looks at where the student attended the previous year based on Data Validation certification. Based on the table below, LEA A receives the enrollment credit, as the student was enrolled at the LEA previously. This accounts for students who are promoted to a new school within the same LEA.

	LEA A	LEA B
<b>2021-22 School Year Data Validation Certified Enrollment</b>	<b>Yes</b>	<b>No</b>
<b>Determination</b>	<b>Enrollment credit</b>	No enrollment credit

In instances where there is no continuous enrollment for the student at the identified duplicative schools, the next level of the deduplication resolution process is used to determine the student’s enrollment.

### Level Four: Updates to Student Characteristics

If the deduplication resolution process is unable to determine the student’s enrollment using the previous levels, then the process moves to reviewing updates to the student’s characteristics for the current school year. While both LEAs/schools are not able to directly update characteristics in OSSE data systems, OSSE is able to see submitted changes and record the actions for the purpose of this deduplication resolution process level.

The deduplication resolution process views updates in the data systems below for student characteristics.

Student Characteristic	Data System
First or Last name	SLED
Address	SLED
Date of Birth	SLED
Gender	SLED
Race	SLED
Ethnicity	SLED
English Learner Status	Screeener records
Student With Disability Status	Special Education Data System (SEDS)
First Ninth Grade Year	SLED

These characteristics were selected for duplicative determinations because the school that makes adjustments needs to provide supporting documentation in order to change the student’s demographic record. This active engagement with the family mostly likely means that the student is attending that school and should receive enrollment credit.

## 8. LEA/School Responsibility

It is the responsibility of the LEA and/or school to review the deduplication resolution determinations as the process makes determinations throughout the school year in the Duplicative Enrollment Resolution application.

Upon determination of the deduplication resolution process, LEAs/schools are required to update the student's enrollment record with both entry and exit dates that align with the duplicative determination. Duplicative enrollments between two schools within the same LEA should be resolved by the LEA updating their school SIS to reflect the correct enrollment dates.

In most cases, the deduplication process makes the initial determination, and the LEA must update their SIS to reflect the outcome. However, if the LEA/school disagrees with the enrollment determination, the LEA does not update their SIS, but must initiate an appeal of the duplicative determination within the approved timeframe. Steps for an appeal are outlined in the next section.

## 9. Appeals Process

The appeals process is a period that allows an LEA to appeal the initial determination made by the application. During the appeal window, an LEA that disagrees with the determination can submit documentation that would justify enrollment for the duplicate student. Appeals can be submitted between the following:

- LEA and LEA;
- LEA and adult LEA;
- LEA and CBO;
- Adult LEA and adult LEA;
- CBO and CBO

**LEA and LEA appeal.** The LEA that disagrees with the initial determination must initiate the appeal in the DEA. Once the deadline for appeals has passed, the LEA that was initially awarded credit must respond through the DEA in the allotted amount of time. OSSE will then review and make a final determination. If neither LEA appeals, the initial DEA determination will be the final determination.

**LEA and adult LEA appeal.** The LEA or adult LEA that disagrees with the initial determination must initiate the appeal in the DEA. Once the deadline for appeals has passed the LEA/adult LEA that was initially awarded credit must respond through the DEA in the allotted amount of time. OSSE will then review and make a final determination. If neither LEA/adult LEA appeals, the initial DEA determination will be the final determination.

**LEA and CBO appeal.** The LEA that disagrees with the initial determination must initiate the appeal in the DEA. If the CBO disagrees with the initial determination, it must initiate an appeal in the EACCA. Once the deadline for appeals has passed, if the LEA was initially awarded credit it must respond through the DEA in the allotted amount of time. If the CBO was initially awarded credit, it must respond in the EACCA. OSSE will then review and make a final determination. If neither LEA/CBO appeals, the initial DEA determination will be the final determination.

**Adult LEA and adult LEA appeal.** The adult LEA that disagrees with the initial determination must initiate the appeal in the DEA. Once the deadline for appeals has passed, the adult LEA that was initially awarded credit must respond through the DEA in the allotted amount of time. OSSE will then review and make a final determination. If neither adult LEA appeals, the initial DEA determination will be the final determination.

**CBO and CBO appeal.** If the CBO disagrees with the initial determination, it must initiate an appeal in the EACCA. The CBO that was initially awarded credit must respond in the EACCA. OSSE will then review and make a final determination. If neither CBO appeals, the initial DEA determination will be the final determination.

Appeals occur at four points throughout the school year: which can be found on the OSSE OER Webpage [Enrollment Season: Supporting LEAs & Schools | osse \(dc.gov\)](#) under Addendum A and is updated annually for

each school year.

For each of these periods, the LEA/school may appeal the enrollment determination. The appeal is only initiated during the appeal window and cannot be done before the start of that window. Since the deduplication resolution process runs nightly and updates daily based on new data, enrollment could be awarded to a school on one day, and then changed the next day because of new data that is sent through the SIS. In most cases, an appeal cannot be initiated after the appeal deadline date has passed. The one exception is for backdated enrollments that create a duplicative enrollment in a prior enrollment period.

After the appeal deadline has passed, all duplicative enrollment decisions for the previous period become permanent, and the LEA is expected to update their SIS to match. The one exception is for student addition requests after the first Enrollment Audit certification<sup>2</sup> or backdated enrollments in periods two-four. Students that are added to the enrollment audit after the first enrollment audit certification must submit all required documents, as outlined in the Enrollment Audit and Child Count Handbook. Backdated enrollments can initiate duplicative enrollments and can be appealed, even when outside the appeal window. Duplicative enrollments that are the result of a backdated enrollment still must be appealed by the final day of the period four appeal window deadline. All duplicative enrollments must be appealed during their enrollment phase period.

For example, the enrollment determinations made for the enrollment audit are not eligible for appeal after the final day of the period one appeal window deadline. At the time of the appeal, LEA A, the school requesting an appeal, must provide supporting enrollment documentation as identified in the list below. LEA B has 10 business days after notification of the appeal to respond to the requests in the DEA. At this time, LEA B can choose to concede enrollment and properly withdraw the student from the school's SIS or provide supporting enrollment documentation as identified below. If a response is not received from the identified duplicate school, OSSE notifies the Head of School before the deadline for submission. If no response is received by the deadline, then the appealing school receives the enrollment determination if they submitted valid documentation.

Once all documentation is received from all identified duplicate schools, OSSE shall review the documentation provided and make a determination within the allotted time for each enrollment period.

Below is the list of required documents that must be submitted in the appeals process to verify student enrollment. In addition to the required documents, LEAs should submit all available records to accompany the required documents. All records must contain the following:

Documents required upon appeal of duplicative enrollment	
Required Document	Required Information
<b>Enrollment Forms</b>	<ul style="list-style-type: none"><li>• Student name</li><li>• Enrolling person's name</li><li>• Enrolling person's phone number</li><li>• Enrolling person's email (if applicable)</li></ul>

---

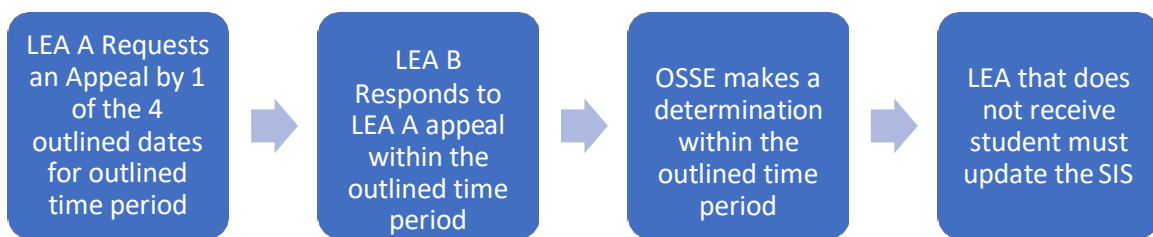
<sup>2</sup> LEAs must follow the process to Amend Unaudited Enrollment Roster as stated in the Enrollment Audit and Child Count Handbook when requesting a student be added after the first enrollment audit

<b>Residency Forms</b>	<ul style="list-style-type: none"> <li>• Student name</li> <li>• Enrolling person's name</li> <li>• Enrolling person's phone number</li> <li>• Enrolling person's email (if applicable)</li> </ul>
<b>Documents to accompany required documents for review (at least one per day appealing)</b>	
<b>Discipline Records (if applicable)</b>	<ul style="list-style-type: none"> <li>• Student name</li> <li>• Date of discipline</li> </ul>
<b>Schoolwork</b>	<ul style="list-style-type: none"> <li>• Student name</li> <li>• Date of submission</li> </ul>
<b>Quarterly Exam records</b>	<ul style="list-style-type: none"> <li>• Student name</li> <li>• Date of exam</li> </ul>
<b>Student Affidavit (Adult LEA only)</b>	<ul style="list-style-type: none"> <li>• Adult student name</li> <li>• Enrolled program</li> <li>• Number of contact hours</li> <li>• Adult student signature and date</li> <li>• School official signature and date.</li> </ul>

In addition, if the deduplication resolution process is unable to determine the student's enrollment after reviewing the above-mentioned documentation submitted during the appeals, OSSE may contact the enrolling person(s) to verify enrollment. If the determination is made by this process, OSSE makes note inside the application in the notes section.

## 10. Appeals Process Flow

If neither LEA disagrees with the original duplicative enrollment determination, then the LEA that does not receive the student must update their SIS. If an LEA disagrees with the original duplicative enrollment determination, the following steps are taken:



### Appeals Outcome

Once OSSE has made a determination for the appeal, the student's enrollment is considered final and authoritative for the identified enrollment period. LEAs/schools do not have the ability to appeal after the appeals decisions for the period are complete. LEAs/schools must update the enrollment data in the SIS.

*Appealed determination example:* School A provided enrollment data from Sept. 9, 2022-Oct. 15, 2022 and School B provided enrollment data from Sept. 15, 2022-Oct. 3, 2022.

School A	9/9/2022	10/15/2022
School B	9/15/2022	10/3/2022

As discussed earlier in this policy document, the final determination for a fully contained enrollment results in an enrollment credit of:

	Enrollment Credit Entry Date	Enrollment Credit End Date
School A	9/9/2022	10/15/2022
School B	No enrollment credit	

However, let us assume School B appeals this determination and submits documentation showing that the student was enrolled on Sept. 16, 2022-Oct. 1, 2022, as evidenced by completed schoolwork. As part of the appeals resolution process, School A submits a record of disciplinary action which occurred on Oct. 2, 2022. These records and supporting documentation results in a final determination of:

	Enrollment Credit Entry Date	Enrollment Credit End Date
School A	9/9/2022	9/14/2022
School B	9/16/2022	10/1/2022
School A	10/2/2022	10/15/2022

Once an appeal has been resolved, the associated enrollment dates are locked and are not subject to further appeal by the LEA, and both LEAs must update their SIS to reflect the determination.

*Appealed determination example with active enrollments:* School A provided enrollment data beginning Sept. 9, 2022 and School B provided enrollment data beginning Sept. 15, 2022, neither with exit dates entered (active enrollments).

	SIS Entry Data	SIS Exit Date
School A	9/9/2022	-
School B	9/15/2022	-

As discussed earlier in this policy document, the final determination for a fully contained enrollment results in an enrollment credit of:

	Enrollment Credit Entry Date	Enrollment Credit End Date
School A	9/9/2022	Current day of enrollment
School B	No enrollment credit	

However, let us assume School B appeals this determination and submits documentation showing that the student was enrolled on Sept. 15, 2022-Oct.1, 2022 as evidenced by completed schoolwork. As part of the appeals resolution process, School A submits a record of a test that occurred on Sept. 13, 2022. These records and supporting documentation results in a final determination of:

	Enrollment Credit Entry Date	Enrollment Credit End Date
School A	9/9/2022	9/14/2022
School B	9/15/2022	Current day of enrollment

As School A cannot present evidence of serving the student after School B begins to provide services, School B gains enrollment credit on Sept. 15, 2022 and School A must exit the student from their SIS. If the student goes back to School A, they are re-enrolled in a new enrollment instance which causes a new series of duplicative enrollment days which begins the Duplicative Enrollment Resolution Process at level one again.

## 11. Duplicative Enrollment Resolution Application

The implementation of the Duplicative Enrollment Resolution policy is conducted through the DEA. This application assists LEAs and OSSE in determining the enrollment credit for students for an enrollment period and replaces the duplicative enrollment module in the Enrollment Audit/Child Count application for LEAs. All actions are conducted through the application, from the notification of a duplicative enrollment through the resolution of any appeal. The application is supported by an application user guide as well as application specific trainings for LEAs.

## 12. Key Takeaways

- Application
  - The DEA is designed to resolve duplicative enrollments on a rolling basis.
  - CBOs do not have access to the DEA and should continue to appeal a duplicative enrollment through the enrollment audit child count application.
  - Duplicative enrollments within the same LEA should be resolved by the LEA when updating their SIS.
- Appeal Process
  - If an LEA disagrees with the determination from the duplicative hierarchy logic, the LEA must appeal through the duplicative enrollment resolution application during the appeal window.
  - LEAs must submit all documents as outlined as a part of the appeals process.
  - Adult LEA must submit signed affidavit with all required information.
- LEA Responsibility
  - LEAs must review the determination.
  - LEAs must initiate an appeal including all required documents.
  - LEA must respond to appeal including all required documents.
  - LEAs must update their SIS to align with the determinations from the application,

## 13. Questions

For questions about this policy, please reach out to [osse.enrollmentaudit@dc.gov](mailto:osse.enrollmentaudit@dc.gov). For technical assistance with the DEA, contact your Data liaison.

## 14. Definitions

The following definitions will help LEAs understand terminology used in the explanation of how duplicative enrollments will be identified, addressed, and resolved.

### Active Enrollment

An active enrollment is defined as a student enrollment record that does not have a valid exit date.

### Audit School

An audit school is the school at which the student was counted in the Enrollment Audit.

### Assessment School

An assessment school is the school at which the student participated in a statewide assessment such as PARCC or Multi-State Alternate Assessment (MSAA).

### Deduplication Process

The deduplication Process is the series of logical determinations and associated appeals process to reach a state-wide consensus on the unique, daily enrollment record for each student.

### Duplicative Enrollment

A Duplicative Enrollment is an instance where a student has more than one stage 5 enrollment coinciding for one or more days.

### Enrollment Credit

The term enrollment credit is used for Enrollment Audit and Accountability; however, for purposes of the Duplicative Enrollment policy, it shall mean the LEA/school that will be identified as the school of record for the student.

### Enrollment Instance

The term is used to define when an LEA reports through their SIS that a student was enrolled.

### Full Academic Year (FAY) Status

The geographic level at which the student was enrolled for 85 percent or more of the instructional days between the official Enrollment Audit date (Oct. 5, or the following business day, annually) and the first day of the school, LEA or state assessment window. Possible FAY levels include school, LEA, state or none (for students who were enrolled in the district fewer than 85 percent of the applicable instructional days).

### Fully Contained Enrollment

When a student is enrolled in two separate schools but the enrollment date at one school begins before the other school and ends after the other school.

### Overlapping Enrollment

An overlapping enrollment is when a student has enrollment records with entry and exit dates overlapping at the same or different LEA in the District of Columbia. The deduplication process is applied to both active enrollments and overlapping enrollments.