

Student Enrollment Audit Handbook

Guide for Community Based Organizations (CBOs)

School Year 2022-23

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1. Definitions for Common Acronyms and Terms

Term/Acronym	Definition			
Вох	Cloud-based collaboration tools to transfer data (residency documentation, requests, etc.)			
СВО	Community-based organization			
CFSA	Child and Family Services Agency			
Data Freeze	The day CBO enrollment data is frozen for use in the annual enrollment audit			
DC	District of Columbia			
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 local			
	education agencies (LEAs) and CBOs in verifying residency			
DE	Duplicative enrollment			
DEL	Division of Early Learning			
Duplicative	The process used to resolve duplicative enrollments between CBOS. In most cases, this			
Enrollment	process is conducted through the Duplicative Enrollment Application.			
resolution process				
e-File	Residency documentation file prepared for a remote audit			
Enrollment Audit	The annual process by which OSSE audits the enrollment of students enrolled in DC public			
and Child Count	schools or seats paid for using District funds. The audit includes verifying residency as well			
(EACC)	as students in individualized education programs (IEPs)			
Enrollment Audit	An OSSE application that displays the enrollment audit and Child Count rosters and student-			
and Child Count	level data to CBOs and facilitates the audit process through recording the result of each			
Application	phase of the audit, including auditor results, CBO appeals and documentation submission			
(EACCA)				
FERPA	Family Educational Rights and Privacy Act			
LEA	Local education agency			
MKV	McKinney-Vento Homeless Assistance Act			
OCFO	Office of the Chief Financial Officer			
OER	Office of Enrollment and Residency			
OSSE	Office of the State Superintendent of Education			
PKEEP	Pre-K Enhancement and Expansion Program			
Pre-K 3	Pre-kindergarten for 3-year-olds			
Pre-K 4	Pre-kindergarten for 4-year-olds			
POC	Point of Contact			
SEA	Subsidy Eligibility Assignment system			
SNAP	Supplemental Nutrition Assistance Program			
SY	School year			
TANF	Temporary Assistance for Needy Families			
UPSFF	Uniform Per Student Funding Formula			
USI	Unique Student Identifier			

2. Overview

2.1. 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 CBO pre-K program is a program providing pre-K education services to pre-K age children operated by a CBO, designated by OSSE through the Pre-K Enhancement and Expansion Program (PKEEP) that meets and maintains 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 enrolled students meet age and residency requirements. OSSE reports the results of the audit to the mayor, the Council of the District of Columbia, and the appropriate congressional committees.

2.2. Applicable Legislation

Sections 102, 106 and 501 of the Pre-K Enhancement and Expansion Amendment Act of 2008 (DC Law 17-202; DC Official Code §§ 38-271.01, et seq.)

Section 3502 of the District of Columbia Municipal Regulations (DCMR) Title 5A, Chapter 5 (5A 35 DMCR § 3502)

2.3. Scope

The enrollment audit for CBOs is an audit of children enrolled in pre-K 3 and pre-K 4 in CBOs receiving PKEEP funds. It includes three components:

- 1. **Residency Verification**: An audit of children enrolled in pre-K 3 and pre-K 4 in CBOs receiving PKEEP funds. Upon completion of the enrollment audit, each CBO receives funding for each enrolled preschool-aged student verified as a District resident.
- 2. **Age Verification**: Confirmation that enrolled 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.

2.4. PKEEP Funding

The PKEEP funding rate for the 2022-23 school year is \$16,641 for 3-year-olds and \$16,145 for 4-year-olds. The supplemental at-risk allocation is \$2,981 for pre-K age students in foster care, who are experiencing homelessness, or receive TANF or SNAP benefits.

3. Enrollment Audit and Child Count Process Overview



3.1. 2022-23 EACC Calendar

2021 DATE	EVENT/DELIVERABLE		
	Pre-Audit Data Preparation Phase (Prior to Oct. 5)		
April – September	·		
August	CBOs update Enrollment Audit POCs with Division of Early Learning (DEL), at pkeep.osse@dc.gov .		
August	st Mandatory Enrollment Audit Child Count Training		
Ongoing	CBO Pre-K Managers submit changes to CBO name, contact or site directory to DEL		
	Data Freeze (Oct. 5)		
Oct. 5	CBOs ensure all enrolled students are included on the roster by 4 p.m.		
Oct. 6 – 11	CBOs review and make final corrections to data in the EACCA for student inclusion/exclusion on the enrollment roster to ensure annual funding based on the UPSFF; Oct. 11 at 4 p.m. is the final opportunity for CBOs to submit requests for missing students.		
Oct. 11	CBOs must complete all subsidy assignments in the Subsidy Eligibility Assignment (SEA) system		
Oct. 12	CBOs submit First Certification (Unaudited Enrollment and Child Count Anomalies Acknowledgement) in the EACCA. 9 a.m5 p.m.		
	Initial Documentation Review Phase (Oct. 18 – Nov. 12)		
Oct. 12 – 24	Appeal window for duplicative enrollment determinations made during enrollment period one		
Varies by CBO*	E-file submission deadline for CBOs participating in a remote Initial documentation review phase.		
Varies by CBO*	Initial Documentation Review: CBOs prepare for auditors to review e-file binders remotely		
	Issue Resolution Phase (Oct. 20 – Dec. 2)		
Varies by CBO*	Issue Resolution: Initial residency determinations from the remote audit are available for CBO review in the EACCA. CBOs upload supporting documentation to resolve residency determinations found during the emote audit.		
Oct. 28	Final day for CBOs to submit requests for Demographic Data corrections		
Nov. 14	CBOs shall resolve all demographic errors in appropriate source system by 4 p.m.		
Nov. 15 CBOs submit the Second Certification (Final Demographic Data Elements) in the EACCA. 9 p.m.			

Final Appeals Phase (Dec. 2 – Dec. 15)			
Dec. 2 CBOs submit requests with supporting documentation for final appeals for residency issues the EACCA by 11:59 p.m.			
Dec. 5 – 6	CBOs receive notification of granted final appeals via the EACCA		
Dec. 7 – 9	Final Appeals Phase: OSSE facilitates final appeals for residency		
Dec. 14	CBOs can view all final determinations in the EACCA		
Dec. 15	CBOs submit Third Certification (Final Audited Enrollment Numbers Certification) in the EACCA. 9 a.m5 p.m.		

^{*}Phase dates overlap as a collective, but not for individual CBOs. Please see the Enrollment Audit Workflow Schedule in the EACCA for CBO specific dates.

3.2. Enrollment Data Certifications

CBOs shall certify the validity, completeness and accuracy of the CBOs' data and acknowledge final enrollment numbers by completing three enrollment audit certifications within the EACCA.

- 1. 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.
- 2. The second certification certifies that the demographic data (e.g., name, date of birth, address) for each PKEEP student are accurate, valid and complete.
- 3. The third and final certification captures the 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	2022 Due Date	Purpose of Certification
First Certification Unaudited Enrollment and Subsidy Recipient Acknowledgement	Oct. 12 9 a.m5 p.m.	 CBO acknowledges that enrollment data in the EACCA includes all students enrolled at the CBO as of Oct. 5 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, 2022, 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. 15 9 a.m5 p.m.	 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, 2022, (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, 2022, to be accurate, valid and complete through passive approval for the purposes of the enrollment audit
Third Certification Final Audited Enrollment Numbers Acknowledgment	Dec. 15 9 a.m5 p.m.	 Acknowledges the final audited PKEEP enrollment numbers after the final appeals process is complete.

4. Pre-audit Data Preparation



CBOs have from **now until Oct. 5 at 4 p.m.** to input student records (and edit/update records) to student enrollment in the EACCA to ensure all students enrolled on Oct. 5 are identified correctly in the EACCA. CBOs must handle personally identifiable information (PII) of students to complete the Enrollment Audit and Child Count requirements. The CBO shall follow all applicable Family Education Rights and Privacy Act (FERPA) laws accordingly.

4.1. Data Quality Terms

All data shall be valid, complete and accurate. Under federal and local law, CBOs are responsible for maintaining records for data reporting. For the purposes of the enrollment audit, 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.

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 data elements section (4.4) below.

4.2. 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:

- a) 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 5A DCMR § 5000 et seq. and specifically defined in 5A DCMR § 5099, with proper documentation such as a custody order, or an "other" primary caregiver form;
- b) Establish a physical presence in the District, defined as the "actual occupation and inhabitance of a place of abode with the intent to dwell for a continuous period of time"; and
- c) Submit valid and proper documentation that establishes bona fide residency as set forth in 5A DCMR § 5004. The student residency verification process requires CBOs review documentary proof of residency during the enrollment period each year (April 1 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. 12, the first certification date.

See the <u>OER Handbook</u> and training for more information on the required residency documentation and refer to the coronavirus (COVID-19)-related <u>OSSE Guidance Documents</u> for updated guidance on enrollment and residency verification in response to COVID-19.

4.3. 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, 2022, and pre-K 4 students shall by 4 years old by Sept. 30, 2022.

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; or
- 2. A birth certificate in a non-English language with a certified translation.

4.4. Ensuring Accurate, Complete and Valid Student Records

CBOs shall ensure all students enrolled in the PKEEP are accurately reflected in the EACCA. CBOs have until Nov. 14, 2022, 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 content last name given to a person after birth (e.g., birth, baptism or other naming ceremony certificate; or birth verification document) or through legal action (e.g., marriage, divorce, adoptions or legal name change).
First Name	The legal first name of the student. It is the name given to an individual after birth (e.g., birth, baptism or other naming ceremony certificate; or birth verification document) or through legal action (e.g., marriage, divorce, adoption or through legal name change).
Date of Birth (DOB)	The day, month and year on which the student was born documented on an official government certificate.
Street Address	The number and name of the unit and street (and apartment, if applicable) where the student resides.
City	The city where the student resides.
State	The abbreviation for the state (within the United States) or outlying area in which the student resides.
ZIP Code	The number that identifies the postal delivery area in the United States in which the student resides.
Gender	A coded value representing the student's gender. Gender is a person's actual sex or perceived sex and includes a person's perceived identity, appearance or behavior, whether 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 OSSE LEA Data Collection Template for the current school year.
Race	CBOs are required to categorize students in one or more of the five permitted race codes for which race(s) the student most closely identifies. Categories must be mapped by the CBO to the five federal race values. Definitions of these values are found in the OSSE LEA Data Collection Template for the current school year.
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 data elements in Appendix 13.1.
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.

4.5. Enrollment Audit and Child Count Application (EACCA)

The EACCA is the web-based platform for CBOs to enter student enrollment data for the PKEEP classrooms. This application is used for LEAs and 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 initial documentation review, issues resolution and final appeals phases; and
- Enhances OSSE's communication to CBOs throughout the enrollment audit phases.

4.6. Technical Assistance

OSSE has assigned CBOs an OSSE CBO Liaison within OER, who can be contacted at osse.enrollmentaudit@dc.gov. Additionally, the DEL POC can be contacted at pkeep.osse@dc.gov.

4.7. CBO Points of Contact (POCs)

Each CBO is required to have POCs for the annual enrollment audit to handle personal identifiable information of students; therefore, CBOs shall follow all applicable 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 at pkeep.osse@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

4.8. Residency Documentation Preparation

All CBOs are required to complete their initial documentation review remotely using the e-file method of submission through Box. While e-files are due on the e-file due date listed in the EACCA, CBOs will still be assigned an initial documentation review date that initiates the phases of issue resolution. Details on these dates will be released with the audit workflow schedule in the EACCA.

4.8.a. Document Preparation for Remote Document Review

CBOs must complete their initial documentation review through a remote documentation review. A remote document review requires the creation and submission of e-files. For the 2022-23 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.

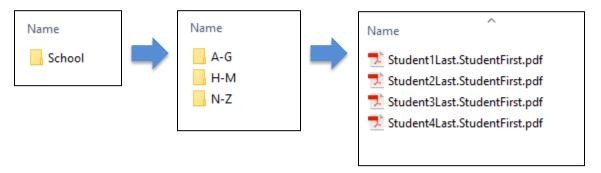
Location of E-file Folder for Upload

- 1. CBOs have several folders within Box, relevant to different purposes with OSSE. The e-file uploads should be uploaded to the CBOs Box folder named "Enrollment Audit E-file."
- 2. Box access will be based on the CBO Enrollment Audit POC role. CBOs must ensure the appropriate staff member(s) are assigned as the CBO Enrollment Audit POC provided by DEL in the Pre-Audit Phase.

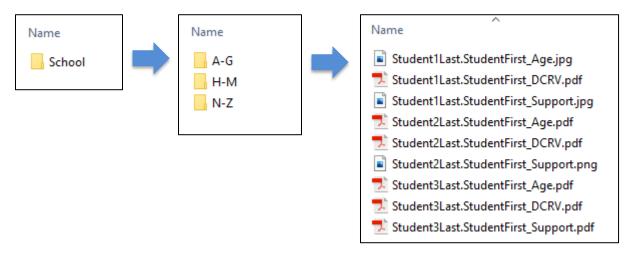
File Organization

- 1. Organize the DCRV form and all applicable residency verification forms and supporting residency documentation (i.e., OPC Form) into 15 GB (max) .pdf files.
- 2. Folders and files should be created and loaded into the Enrollment Audit Box folder in the following order:

- School folder
- Group by last name folder
- Student last name, student first name file(s)
- 3. The document uploads can be either a single document containing both residency forms supporting residency documents, and age verification documents; or



Three separate documents - one for the residency forms, one for supporting residency documents, one for age verification.



Alternatives for E-file Preparation

CBOs may request an alternative folder or file structure to the e-file preparation requirements. To initiate this process, the CBO should reach out to osse.enrollmentaudit@dc.gov. Any request for change to the e-file preparation shall be done in consultation with the CBO and auditor and only approved if OSSE and the auditor are able to support the change.

4.9. Box Folder Preparation

Box folders are used annually, so they may contain empty folders of students from prior enrollment audits. CBOs shall remove student folders from prior years. Removing the folders ensures an auditor reviews the correct folders for the correct student.

If a CBO experiences issues while uploading documents or experiences file and folder constraints, they may review <u>Appendix C: Box Constraints and Troubleshooting</u> for additional guidance.

4.10. CBO E-file Submission

CBOs shall upload *all* residency forms and supporting residency documents to Box by their CBO e-file deadline. The e-file deadline can be found in the <u>audit workflow table</u> at the bottom of each CBOs EACCA dashboard. CBOs can access Box Enrollment Audit folders by logging into Box directly or selecting the e-file submission button in the EACCA. Uploads shall be compliant with <u>residency documentation guidance</u> outlined in this handbook.

Failure to upload residency forms and documents by the e-file deadline may result in the CBO having to appeal all students through the issue resolution process - a manual upload for each individual student.

E-file is *only* used during the initial documentation review phase. Subsequent actions and appeals are completed directly in the EACCA, at the student level.

4.11. Audit Workflow Scheduling

The audit workflow lays out each CBO's timeline for completing the enrollment audit. Audit workflow schedules are uploaded into the EACCA in August. The CBO is responsible for reviewing the dates listed in the audit workflow table and ensuring all deadlines are met.



*Note: This is an example and not real dates for the audit.

5. Enrollment Audit Trainings



To ensure that CBO Enrollment Audit POCs have a strong understanding of any policy or process changes regarding the yearly enrollment audit, OSSE hosts several trainings in advance of the initial documentation review phase targeted toward the CBOs' Enrollment Audit Point of Contact (POC). CBOs shall send at least one participant for EACCA trainings. OSSE may inform the Pre-K Manager if no representative from their CBO attends the training.

5.1. Enrollment Audit Child Count Application Training

The EACC portion of the training aims to inform CBO Enrollment Audit POCs on the enrollment audit, its web-based application, purpose, and timeline. The EACCA portion of the training aims to inform CBO Enrollment Audit POCs on the key application relevant to the enrollment audit. The training is a collaborative effort between OER and the Office of the Chief Information Officer (OCIO). The training involves technical guidance and processes necessary to successfully navigate the enrollment audit. The training will include Box functionality, guidance to avoid errors when uploading student records and steps to troubleshoot prior to submitting a request for technical support from OSSE. All enrollment audit POC's are encouraged to attend the training session each school year.

6. First Certification: Unaudited Enrollment Certification



The first certification of data is crucial to each CBO's success in the enrollment audit. It is the best time to flag any data issues and ensure all PKEEP students are accurately listed in the EACCA. The key dates and actions are:

Oct. 5 at 4 p.m.

OSSE freezes enrollment data submitted by CBOs.

Oct. 6 through Oct. 11 at 4 p.m.

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

- Resolving duplicative enrollment with another CBO or LEA;
- 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.

After Oct. 11

CBOs cannot add additional students to the enrollment audit roster under any circumstances after 4 p.m. on Oct. 11, 2022. It is critical that the CBO ensures that **all students for whom the CBO seeks PKEEP funding**, based on the fiscal year 2023 projected enrollment (i.e., attending as of Oct. 5) are on the enrollment audit roster in the EACCA.

Oct. 12 at 5 p.m.

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

6.1. Amending the Unaudited Enrollment Roster after First Certification

CBOs are responsible for certifying accurate, complete and valid student data. In the event the data certified is incorrect, the CBO shall complete the following steps to resolve.

Adding a Student

If a CBO determines that a student should be added to the PKEEP student roster in the enrollment audit Child Count application, the CBO should complete the below steps.

- 1. CBO submits request to DEL POC, pkeep.osse@dc.gov, to add missing student(s) into the EACCA
- 2. DEL POC acknowledges receipt of the request, and the COB submits the below data elements for the requested students through the CBOs Box portal
- 3. The request should include:

- a. The date the student enrolled in the PKEEP classroom
- b. Explanation for why the student was not included in the data capture
- c. Student information first name, last name, USI and DOB
- d. Submitted in a .pdf format
- 4. CBO contacts the DEL PKEEP POC at pkeep.osse@dc.gov to confirm that the student record(s) was submitted in Box
- 5. OSSE sends CBO notification indicating that the request is accepted, rejected, or to request additional information

Removing a Student

If a CBO determines that a student should be removed from the PKEEP student roster in the enrollment audit child count application, the CBO should complete the steps below. Please note that OSSE's OCIO team will process requests.

- 1. CBO submits request to DEL POC, <u>pkeep.osse@dc.gov</u>, to remove student(s) from the EACCA
- 2. Once the DEL POC acknowledges receipt of the request, the CBO will submit the data elements below for the requested students through the CBO's Box portal in a pdf.
- 3. The request should include:
 - a. The date the student unenrolled from the PKEEP classroom
 - b. Student information first name, last name, USI and DOB
 - c. Submitted in a .pdf format
- 4. CBO contacts the DEL PKEEP POC at pkeep.osse@dc.gov to confirm that the student record(s) was submitted in Box
- 5. OSSE sends CBO notification indicating that the request is accepted, rejected, or to request additional information

7. Initial Documentation Review



The initial documentation review phase of the enrollment audit is the process wherein OSSE auditors review residency documentation remotely. All CBOs will be assigned an initial documentation review date. This date is when the auditors will begin remote review of documentation and recording of determinations. It is also the start date for all subsequent follow-up requirements to be completed by the CBO. At the conclusion of the remote document review, the CBO will be able to view initial documentation review determinations in the EACCA.

7.1. Enrollment Audit Initial Documentation Review 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.). OSSE's review of supporting residency documentation will depend on whether an individual PKEEP student participates in the District's subsidized child care program.

Non-Subsidy Students

Students who do not participate in the District's subsidized child care program shall have a completed DCRV form, valid supporting residency and age verification documentation. Information on valid supporting documentation can be found in the Residency Verification section of this handbook and on the OSSE Enrollment Audit website. If the supporting documentation is 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 will only need a completed DCRV form and do not need to provide valid supporting residency documentation. These students must be accurately identified by the CBO. The CBO must complete all subsidy assignments in the SEA system by **Oct. 11**.

8. Issue Resolution



During the issue resolution phase, CBOs shall respond to auditor rejections from the initial document review phase. Depending on the issue or rejection, CBOs shall respond to auditors and OSSE as promptly as possible during this period to ensure timeliness of data reconciliation through Box, phone, email and the EACCA.

8.1. Issue Resolution Response

The timeline for responding to an issue is CBO-specific and outlined in the EACCA Audit Workflow Table. Each CBO shall be responsible for reviewing their issue resolution timeline and ensuring all deadlines are met. CBOs can review the residency and age verification status of each student in the EACCA at the start of their issue resolution phase. The issue resolution timeline will not follow the strict business day counts used in prior enrollment audits. The auditor review time may be different depending on CBO enrollment size and the enrollment sizes of other CBOs scheduled on the same day. However, CBOs will have **five business days** during issue resolution to respond to all auditor determinations from the initial document review phase.

When responding to the auditor findings, the uploaded documentation must demonstrate the student's bona fide District residency. See the <u>OER Handbook</u> for information on required residency documentation.

The documents are then reviewed by OSSE auditors and a second determination is rendered and documented in the EACCA. If the CBO does not agree with determinations rendered during the issue resolution phase, a request for a final appeal must be made using the EACCA by **Dec. 2, 2022, 11:59 p.m**. If appealing, CBOs must upload documentation to resolve the student's residency status directly in the EACCA **by Dec. 2, 2022.**

If a CBO fails to respond to a student's non-residency status by the close of the issue resolution response period, the CBO cannot submit a final appeal for the student's residency determination. OSSE considers the residency determination final for students without an issue resolution response from the CBO as acceptance of the auditors' decision.

If the CBO fails to attempt to resolve the student's residency status during the issue resolution phase, a letter of exception must be submitted to OSSE documenting the missed resolution period within five business days of the missed resolution period. Even if a letter is submitted, the decision to allow the exception remains with OSSE. The letter can be sent via email to osse.enrollmentaudit@dc.gov.

8.2. Duplicative Enrollments

If 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. 24, 2022. OSSE will evaluate the documents using the hierarchy order identified below to make a determination.

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.

Hierarchy order for Duplicative Enrollment 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 (UIR) for this stated time period.	
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.	

8.3. Demographic Data Elements

Demographic data entries for students must be entered directly into the EACCA. For resolving issues with demographic data elements, CBOs must confirm all student demographic data is correct in the EACCA.

If a CBO is unable to fix a demographic issue, an email request should be sent to osse.enrollmentaudit@dc.gov describing the technical issue the CBO has incurred. All enrollment audit

technical issue requests must be submitted by CBOs **no later than Oct. 28, 2022** to ensure adequate time for OSSE to respond before the end of the issue resolution phase.

CBOs have **until Nov. 14, 2022 at 4 p.m.** 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 <u>Appendix A</u> 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
Duplicative Enrollment Across CBOs and LEAs	Duplicative Enrollment	OSSE determination after receiving documentation from CBOs, if applicable prior to or on Oct. 24, 2022	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	No appeal - data corrected through EACCA by Nov. 14, 2022
At-risk	Homeless	CBO entry of homeless at-risk indicator	No appeal— data corrected through EACCA during issue resolution phase by Nov. 14, 2022
	SNAP/TANF	DC Department of Human Services (DHS) feed	No appeal – CBO submits Box request to resolve inconsistencies by Oct. 28, 2022
	Under the care of CFSA	DC CFSA feed	No appeal – CBO submits Box request to resolve inconsistencies by Oct. 28, 2022

In the event a CBO has completed all the steps in the table above and has been unable to fix the demographic issue(s) after second certification, a request must be submitted via Box, including the CBO
Data Template with the relevant data fields completed.

After the request is submitted, the CBO must email pkeep.osse@dc.gov and osse.enrollmentaudit@dc.gov to provide notification of the request.

9. 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. 15, 2022**.

Through the second certification, the CBO acknowledges that the Nov. 14 student demographic data entered in 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.

10. Final Appeals



If the CBO disagrees with OSSE's determination of residency, the CBO can request a final appeal through the EACCA. All requests for final appeals for residency status must be received by 11:59 p.m. on Dec. 2, 2022. Technical instructions can be found in the EACCA CBO User Guide located under the EACCA menu.

If the CBO does not respond to an auditor's decision during issue resolution, the auditor's decision is final and the opportunity for a final appeal is forfeited. If the CBO does respond to an auditor's decision during issue resolution, but is not successful in resolving, a final appeal can be submitted.

10.1. Final Appeal Submission

Final appeal submissions are processed through the EACCA. To submit a final appeal to resolve residency determinations, CBOs must have:

- 1. Attempted to resolve the residency determination during the issue resolution phase;
- 2. Submitted additional supporting documentation that verifies the student's District residency status by 11:59 p.m. Dec. 2, 2022; and
- 3. Uploaded compliant residency documentation for review. It is strongly suggested that CBOs submit documentation as soon as corrected/updated documentation is available for upload in the EACCA.

OSSE reviews all documentation submitted for the student during initial documentation review, issue resolution and final appeal. If upon review, the student's documentation is approved, the status is updated in the EACCA. If OSSE cannot approve the documentation provided, OSSE may follow-up with the CBO or schedule a meeting to review unique cases. If time allows, OSSE may provide instructive comments on the student record on how the CBO may resolve any outstanding issues. CBOs should review the student-level comments section regularly.

The outcomes of final appeals are updated in the EACCA prior to the final certification. The decision from the final appeal is irrevocable. CBOs are able to view all final determinations by **Dec. 14, 2022**.

11. Third Certification: Final Audited Enrollment Numbers Acknowledgement



The third certification shall be completed by the CBO Pre-K Manager POC via electronic signature in the EACCA. The CBO Pre-K Manager shall confirm the final audited enrollment numbers no later than **5 p.m. on Dec. 15, 2022**. This certification ensures that CBOs have received and reviewed the outcome of the 2022-23 school year enrollment audit.

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

12. Reporting



After receipt of the third and final audited enrollment certification, OSSE produces and disseminates the final enrollment audit report in January 2023.

13. Appendices

13.1. Appendix A: 2022-23 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.	OSSE Authoritative	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	AS – Asian BL – Black/African American AM – American Indian/Alaskan Native PI – Pacific

				Islander/Native Hawaiian WH – 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 CBO reported Student Street Address, Student City, Student State and Student ZIP Code	1, 2, 3, 4, 5, 6, 7, 8
Program information	Ward of State Indicator	An indication that the student is under DC foster care.	Populated by OSSE using data provided by CFSA	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	Derived by OSSE based a student having at	Yes – the student is considered at-risk No – the student is not considered at-risk

Program information	Homeless Indicator	or SNAP, or that the high school student is one or more years older, than the expected age for the CBO-identified grade level. An indication that the student is experiencing homelessness.	least one indicator Enrollment Audit and Child Count Application and populated by OSSE based on data received through homeless data feeds (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 services in a school or an educational institution during a given academic session.	Enrollment Audit and Child Count Application	PK3 – Pre-kindergarten (3-year-olds) PK4 - Pre-kindergarten (4-year-olds)
Student Enrollment	UPSFF Grade Level	The translation of the student's CBO-identified grade level to the UPSFF weighting according to the student's CBO-identified grade level.	Derived by OSSE using CBO identified grade level and special program designations; students with missing or invalid CBO identified grade levels	PK3 – Pre-kindergarten (3 years old by Sept. 30) PK4 – Pre-kindergarten (4 years old by Sept. 30)

			are placed into age- appropriate grades	
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.	СВО	Numeric - mm/dd/yyyy
Student Enrollment	Duplicative Enrollment Indicator	An indication that the student is enrolled at more than one school and/or CBO.	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

13.2. Appendix B: Additional Resources

Title	Location
Enrollment Audit and Child	Email: Osse.enrollmentaudit@dc.gov
Count policy questions	Pkeep.osse@dc.gov
Office of Enrollment and	osse.dc.gov/node/1525206
Residency Handbook	
EACCA Credential Support	To request access or reset your EACCA password, email sled.osse.dc.gov

13.3. Appendix C: Box Constraints and Troubleshooting

The following guidance is for CBOs experiencing upload or file format issues when utilizing Box for their e-file upload.

File Type Constraints

Box Drive will not sync files that the program ignores or blocks. Ignored files include those that are invisible in Windows Explorer or Finder, such as temporary or system files. Blocked files include file types that Box Sync or Box Drive does not recognize. Box Sync still requires read permissions on these files in order to determine if the file should be blocked or ignored during the scanning process. Preferred File Types:

- .pdf
- .jpeg
- .jpg
- .png

Box Drive ignores or deletes the following file types and shortcuts which can also cause an error:

- Temporary files and folders (.tmp and files starting with the ~ character)
- Backup copies of files (.bak)
- System and hidden files (hidden folders are synced but hidden files are not synced: such as . dstore, desktop.ini, thumbs.db)
- File names that start with a dot "." are considered hidden files
- Hiding any file or folder in Sync also deletes that content
- Shortcuts created via Windows Explorer or Finder
- Hard links (a file that has multiple directory entries associated with it will not be synced)
- Symbolic links
- Shortcuts created via Windows Explorer or Finder (.lnk)
- File names that are exactly eight uppercase hexadecimal digits (0,1,2,3,4,5,6,7,8,9,A,B,C,D,E, or F) with no extension for example: 1234AD38 or ABE32BD0
- File names containing special characters
- Web based documents (such as .gdoc, .gsheet, and bookmarks) will not sync to the Box Drive folder
- .qbi files

While the following file types can be uploaded and stored in Box via the Box website, Box Sync will not recognize them. They will not be synced even if they are in a synced folder. Box Drive blocks the following file types:

- .pst
- .qbw
- .nd
- .qbw.tlg
- .tlg
- .des
- .qba
- .qba.tlg
- .qbr
- .qby
- .qdt

.pdx

Due to the saving behavior of Microsoft Access, it's likely that Box Drive will create duplicate copies of .accdb and .mdb files. Even one user working on a file can cause conflicting copies due to how frequently Access makes changes to the database file. Box Drive users can copy the file out of the Box folder and copy the file back into the Box folder after the changes are made to upload the changes to Box.

Box Drive does not support (.app) Mac package files. You will see an error from Finder if you attempt to copy a package file into Box Drive. Package files uploaded by Box Sync will appear as problem items in Box Drive.

Folder Name Constraints

Some operating systems do not support item names containing some special characters. If you attempt to sync files or folders names containing these characters, Box Sync prompts you to rename the item using the underscore character.

Box does not support "/" and "\" anywhere in a file or folder name or whitespaces at the beginning or end of a file or folder name.

Windows OS has additional restrictions. The following won't be supported:

- < (less than)</p>
- > (greater than)
- : (colon)
- " (double quote)
- / (forward slash)
- \ (backslash)
- | (vertical bar or pipe)
- ? (question mark)
- (asterisk)

In addition, Windows does not support folder names that end with a . (period) character. If Windows does not support certain characters in file or folder names, Box marks them as problem files.

Similarly, Mac OS has additional restrictions. The following won't be supported:

- opening spaces
- Mac's character conversion in file names (for example, Mac changes any occurrence of/to in file names).

If Mac does not support certain characters in file or folder names, Box marks them as problem files. Contact Apple support for recommendations on renaming files, folders or disks.

If the item on Box has an unsupported name, rename the item on Box and Box Drive will re-process the download. If the local file has an unsupported name, rename the file locally.

File Size Constraints

The maximum file size limit for individual uploads to Box Enterprise is 15 GB. To confirm the file size limit for your account, log into Box. In the upper – right hand corner, click your account icon. From the menu that displays, click Account Settings. On the page that displays, scroll down to the Account Details section. Your max file size is listed in this section. You will have an Enterprise file size, with respect to OSSEs Box account, which is an Enterprise Account.

Troubleshooting Uploads to Box

If you are having trouble uploading files or folders, please try the following troubleshooting steps:

- Ensure your web browser is the latest version of Internet Explorer, Safari, Firefox or Chrome.
- Try clearing your browser's cache.
- Verify that you are using one of the recommended operating systems.
- Verify that the file's name is valid. Box only supports file or folder names that are 255 characters or less. File names containing non-printable ascii, "/" or "\" names with leading or trailing spaces, and the special names "." and ".." are also unsupported. Box supports only Unicode Basic Multilingual Plane (BMP) characters in file and folder names.
- Verify that the file or folder's path on Windows machines is under the 255-character Windows limitation. Folder paths that exceed 255 characters may truncate the content's name before uploading to Box.
- Make sure you are uploading files smaller than the maximum for your account type.
- Try uploading using the Upload Files method instead of Upload Folders, or vice versa.
- Internet Explorer *does not* support Upload Folder, only Upload Files. If you need to upload folders, use a different web browser.
- Check your network connection to Box. If connected to the internet with a wireless card, check to see if the connection to the internet drops intermittently. If this is the case, it's recommended to use the Upload Folders method.
- Try temporarily disabling or configuring your firewall to allow Box as a trusted site. You may find that your anti-virus software includes a built-in firewall. If you are attempting to access Box from an office setting and experience upload issues, contact your IT administrator or internal Help Desk.
- Proxy servers may sometimes cause failed uploads. If you see the error message: An error occurred with the upload. Refresh the page and try again. Contact your IT department or Help Desk and ask them to check your proxy configuration.
- Box Accelerator is a global data transfer network that improves the speed of your uploads. If you are having issues with uploads, try turning this off temporarily:
 - Go to Account Settings and click the Sharing tab along the top. Select/deselect the Enable Box Accelerator option under Uploading Content. Click Save.
 - o It's recommended to leave the Enable Box Accelerator option checked since slowness is usually a temporary network condition that will clear itself.

Potential Causes of Slow Uploads:

Slow upload speeds can have a variety of causes. Box does not limit, throttle, cap or shape upload bandwidth for individual files. Box does perform processing on each file which can impact the total time it takes to complete an upload, particularly when uploading multiple files. But this does not limit the bits/second of your machine's connection to Box. If you find that your upload is taking longer than it should, we have listed a few reasons that may affect upload speeds.

- Firewalls can slow down or block the upload process. If you use third-party software, try temporarily turning off firewalls, like the built-in Windows or Mac firewall, or any others. Try configuring your firewall to allow the Box domains and this may solve the issue.
- Users accessing Box from an office setting may find that their IT department has blocked or slowed down connections to Box. Try consulting your IT department on restrictions they may have placed on uploads or unapproved websites. You can determine this by leaving your company network (e.g., try a coffee shop with Wi-Fi) and seeing if the issue persists.
- VPNs may cause your IP address to be misplaced and inadvertently place your computer in another geographic location other than your actual location. This can affect your upload speeds. Ask your network/IT department if a VPN could be changing your actual location on the internet.
- Try a different browser or computer. Users may find that their upload speeds increase on alternative browsers.
- Try a different computer to help isolate the issue. If your upload speed increases on another computer, then you will know that the first computer itself was causing the slower speed. If your speed does not increase, then this is most likely an issue with your internet connection.
- Sometimes slow upload speeds are the fault of your Internet Service Provider. Try a high-speed internet connection with high upload speeds. Often with Cable and DSL, the upload speed is significantly slower than the download speed. This will result in fast loading times for most websites and file downloads, but slow uploads. Bandwidth allowance determines the amount of data that can pass from the Internet to your web browser in a given amount of time. A smaller bandwidth results in a longer time that it takes Internet data to transfer on your web browser.