

# Withdrawal Code Verification Audit Results

August 24, 2022

Through the Withdrawal Code Verification Audit, the Governor's Office of Student Achievement (GOSA) reviews student withdrawal codes reported to the Georgia Department of Education (GaDOE) to ensure that withdrawal data for districts and schools throughout Georgia are as accurate as possible.

Schools are identified for the Withdrawal Code Verification Audit based on an analysis of withdrawals by grade-level cohort. The scope of this audit includes the 10 withdrawal codes that allow a student to be removed from the graduation rate cohort but cannot be verified with data housed at GaDOE (codes C, D, H, J, K, N, X, 2, 3, 5). GOSA selects schools for audit if they meet one of the following criteria:

- If cohort enrollment is at least 10 students, the percentage of students withdrawn under the audited codes is more than two standard deviations above the mean for all cohorts at all schools:
- If fewer than 20 schools are more than two standard deviations above the mean, GOSA will select cohorts with the next highest percentages of students withdrawn under the audited codes until 20 schools are selected; OR
- If school is randomly selected from the remaining schools with student withdrawal data, regardless of its grade cohort size. The number of randomly selected schools will be 2% of the total number of high schools in the audited year.

GOSA may exempt schools from the Withdrawal Code Verification Audit based on the following exemption criteria:

- The school has successfully completed the Withdrawal Code Verification Audit with acceptable documentation for the most recent two consecutive years;
- The school provides compelling reason(s) with sufficient evidence for why it would have a high incidence of a specific audited code(s), as determined by GOSA staff;
- The school is not otherwise flagged for the audit under a different code after accounting for the exempted code(s) during the flagging process (e.g., if a school is exempt from Code X but is flagged for another non-exempt code, the school will still be audited); and,
- The school's graduation rate has not increased by more than two standard deviations above the state mean in the most recent three years of available data at the time of the audit.<sup>2</sup>

After schools are selected for audit, GOSA requests appropriate documentation for a sample of students withdrawn under the specified codes. This report details the results of the Withdrawal Code Verification Audit inquiry forms submitted by each Local Education Agency (LEA).

GaDOE cannot easily verify these codes with available data.

<sup>&</sup>lt;sup>1</sup> Withdrawal Code C and 5 do not remove students from a graduation cohort, but also require auditing because

<sup>&</sup>lt;sup>2</sup> At the time of the Withdrawal Code Verification Audit, the most current year's graduation rates will not have been released. As such, examining the most recent three years of data allows us to analyze change over time for at least two years.

2020-2021 Schools Flagged for Audit <sup>3</sup>					
School System	School Name (Flagged Cohort[s])	Enrollment in Flagged Cohort(s)	Withdrawals in Flagged Cohort(s)		
Atlanta Public Schools	Hillside Conant School (10)	10	2		
Carroll County	Bowdon High School (10)	108	8		
Carroll County	Mt. Zion High School (10; 12)	103; 93	8; 7		
Carroll County	Villa Rica High School (11)	376	30		
Charlton County	Charlton County High School (9; 11)	124; 115	12; 9		
Chattahoochee County	Chattahoochee County High School (9; 10)	121; 127	12; 13		
Chattooga County	Chattooga High School (9; 10; 11; 12)	207; 178; 162; 140	7; 9; 2; 2		
Dalton Public Schools	Morris Innovative High School (9)	10	1		
Decatur County	New Beginning Learning Center (10)	18	2		
DeKalb County	East DeKalb Special Education Center (9)	14	1		
DeKalb County	Lakeside High School (9; 10; 11; 12)	658; 495; 516; 450	8; 2; 6; 2		
DeKalb County	Margaret Harris Comprehensive School (10)	10	1		
Echols County	Echols County High School (9)	56	4		
Gwinnett County	Berkmar High School (9; 10; 11; 12)	839; 827; 691; 546	11; 14; 10; 6		
Gwinnett County	Gwinnett Intervention Education (GIVE) Center East	53	5		
Gwinnett County	International Transition Center (10)	98	7		
Habersham County	Habersham Central High School (9)	10	1		
Habersham County	Habersham Success Academy (11)	24	6		
Hall County	North Hall High School (9; 10; 11; 12)	316; 330; 250; 231	6; 2; 5; 3		
Haralson County	Haralson County High School (10)	249	19		
Henry County	Luella High School (9; 10; 11; 12)	346; 320; 332; 274	12; 11; 8; 2		
Muscogee County	Spencer High School (9; 10; 11)	295; 225; 212	28; 33; 21		
Polk County	Harpst Academy (10)	11	1		
Quitman County	Quitman County High School (9)	25	2		
Richmond County	Alternative Education Center at Morgan (10)	10	1		
Savannah-Chatham County	Groves High School (9)	340	28		
Savannah-Chatham County	Savannah Classical Academy Charter High School (11)	14	1		
Savannah-Chatham County	Savannah-Chatham E-Learning Academy (9)	122	11		
Savannah-Chatham County	The School of Liberal Studies at Savannah High (9; 10; 11)	285; 198; 81	38; 18; 6		

<sup>&</sup>lt;sup>3</sup> Shaded cells denote randomly selected schools; for these schools, the sample population includes all grade levels.

2020-2021 Schools Flagged for Audit <sup>3</sup>					
School System	School Name (Flagged Cohort[s])	Enrollment in Flagged Cohort(s)	Withdrawals in Flagged Cohort(s)		
Savannah-Chatham County	Windsor Forest High School (9)	324	26		
State Charter Schools II- Fulton Leadership Academy	Fulton Leadership Academy (12)	12	1		
State Charter Schools II- Genesis Innovation Academy for Girls	Genesis Innovation Academy for Girls (9)	12	1		
Stewart County	Stewart County High School (10)	25	2		
Sumter County	Americus Sumter 9th Grade Academy (9)	294	24		
Taliaferro County	Taliaferro County School (11)	13	1		
Troup County	Bradfield Center - Ault Academy (10)	12	1		
Wheeler County	Wheeler County High School (100	69	5		

GOSA provided each school with a sample of Georgia Testing Identifier (GTID) numbers for withdrawn and requested documentation supporting each withdrawal.<sup>4</sup>

The following 25 schools provided appropriate documentation for all students in accordance with the guidance rules set forth by the State Board of Education (SBOE). No further action is required.

- Atlanta Public Schools, Hillside Conant School
- Carroll County, Bowdon High School
- Carroll County, Mt. Zion High School
- Carroll County, Villa Rica High School
- Charlton County, Charlton County High School
- Chattahoochee County, Chattahoochee County High School
- Dalton Public Schools, Morris Innovative High School
- Decatur County, New Beginning Learning Center
- DeKalb County, East DeKalb Special Education Center
- Echols County, Echols County High School
- Habersham County, Habersham Central High School
- Hall County, North Hall High School
- Henry County, Luella High School
- Polk County, Harpst Academy
- Richmond County, Alternative Education Center at Morgan
- Savannah-Chatham County, Groves High School
- Savannah-Chatham County, Savannah Classical Academy Charter High School

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<sup>&</sup>lt;sup>4</sup> Shaded cells denote randomly selected schools; for these schools, the sample population includes all grade levels. GOSA requested documentation for all withdrawn students if the number of withdrawals in the grade(s) of interest was fewer than 10. GOSA requested documentation for 10 students if the number of withdrawals was between 10 and 49, and 15 students if the number of withdrawals was 50 or more. GOSA randomly selected a representative sample of students based on their withdrawal codes.

- Savannah-Chatham County, Savannah-Chatham E-Learning Academy
- Savannah-Chatham County, The School of Liberal Studies at Savannah High
- State Charter Schools, Fulton Leadership Academy
- State Charter Schools. Genesis Innovation Academy for Girls
- Stewart County, Stewart County High School
- Wheeler County, Wheeler County High School

The following 12 schools either provided documentation that did not meet the requirements set forth in SBOE Rule 160-5-1-.28, provided documentation that did not match the designated withdrawal code, or were missing documentation. However, the respective LEAs and/or schools have provided sufficient explanation or action to satisfy GOSA's concerns. No further action is required at this time. The following pages provide specific details for each school.

- Chattooga County, Chattooga County High School (p. 5)
- DeKalb County, Lakeside High School (p. 6)
- DeKalb County, Margaret Harris Comprehensive School (p. 7)
- Gwinnett County, Berkmar High School (p. 8)
- Habersham County, Habersham Success Academy (p. 9)
- Haralson County, Haralson County High School (p. 10)
- Muscogee County, Spencer High School (p. 11)
- Quitman County, Quitman County High School (p. 12)
- Savannah-Chatham County, Windsor Forest High School (p. 13)
- Sumter County, Americus-Sumter Ninth Grade Academy (p. 14)
- Taliaferro County, Taliaferro County School (p. 15)
- Troup County, Bradfield Center Ault Academy (p.16)

The remainder of the report provides more detailed information about each of these schools, listed in alphabetical order by district name and school name. The appendix on page 17 includes a list of the audited error codes and acceptable documentation. More information on the audit methodology is available in the <a href="Withdrawal Code Verification Audit Process Overview.">Withdrawal Code Verification Audit Process Overview.</a>

## Chattooga County, Chattooga County High School

## Reason for Audit Selection

GOSA randomly selected Chattooga County High School for audit participation.

#### Audit Observations/Concerns

• One student was reported withdrawn under *Code X – Transferred Out of State*. The school provided documentation indicating the student transferred to another district within the state of Georgia. Per SBOE Rule 160-5-1-.28, Code X requires a records request from an out- of-state school. The student's withdrawal to another public-school system in Georgia does not reflect the rationale for using Code "X."

# School/LEA Steps Taken to Address Concerns

- The school/LEA will use a Code "T" (transferred to another public-school system in Georgia) in the future when it receives a request for records from a withdrawing student's new school in another Georgia district.
- The school/LEA will update the student's withdrawal code in the data reporting system to be Code "T" instead of "X."
- School leaders will review withdrawal codes and their supporting documentation on a monthly basis.

## GOSA Response

## **DeKalb County, Lakeside High School**

## Reason for Audit Selection

• GOSA randomly selected Lakeside High School for audit participation.

#### Audit Observations/Concerns

- One student was reported withdrawn under *Code X Transferred Out of State*. For this student, the school provided a records request from another Georgia public school system. This is not sufficient documentation for reporting Code X. Per SBOE Rule 160-5-1-.28, each Code X withdrawal requires a records request from an out-of-state school.
- One student was reported withdrawn under *Code N Transferred to a Department of Defense School*. For this student, the school provided a records request from another Georgia public school system. This is not sufficient documentation for reporting Code N. Per SBOE Rule 160-5-1-.28, each Code N withdrawal requires a records request from a Department of Defense school.

#### School/LEA Steps Taken to Address Concerns

- The school/LEA will use a Code "T" (transferred to another public-school system in Georgia) in
  the future when it receives a request for records from a withdrawing student's new school in
  another Georgia district.
- The school/LEA will update the student's withdrawal code in the data reporting system to be Code "T" instead of "X."
- School leaders will review withdrawal codes and their supporting documentation on a monthly basis.

#### GOSA Response

#### **DeKalb County, Margaret Harris Comprehensive School**

## Reason for Audit Selection

• The percentage of students at Margaret Harris Comprehensive School withdrawn under the audited codes is more than two standard deviations above the mean.

#### Audit Observations/Concerns

• One selected student was withdrawn under *Code H – Attend Home* Study. For that student, the school did not upload the proper documentation to sufficiently address what is needed for Code H per SBOE Rule 160-5-1-.28. Code "H" must be proven by a document signed by the parent, guardian, or "other person" declaring their intent to utilize a home study program or documentation that the parent completed GaDOE's online Declaration of Intent for Home Study (even if not signed), or confirmation from the Statewide Longitudinal Data System that the Declaration of intent for Home Study form was completed. The school submitted a note from the parent stating their intent to withdraw their student, but the note did not indicate they would be homeschooling. This documentation was insufficient for the purposes of reporting Code "H."

#### School/LEA Steps Taken to Address Concerns

- The school/LEA will review proper procedures for collecting records requests prior to marking a student as any code other than "U" at monthly registrar meetings.
- School leaders will review withdrawal codes and their supporting documentation on a monthly basis.

#### GOSA Response

#### **Gwinnett County, Berkmar High School**

## Reason for Audit Selection

• GOSA randomly selected Berkmar High School for audit participation.

#### Audit Observations/Concerns

• The school/LEA did not provide proper documentation for six students withdrawn under *Code H*- Attend Home Study. Three students' documentation indicated a records request from an out-ofstate school, two students' documentation indicated a records request from a distance learning
school, and one students' documentation indicated a records request from a Georgia state charter
school. This documentation was insufficient for the purposes of reporting Code "H."

# School/LEA Steps Taken to Address Concerns

- The school/LEA will review proper procedures for collecting records requests prior to marking a student as any code other than "U" at monthly registrar meetings.
- The school/LEA will recode students without proper withdrawal codes (Code "U" or Code "T") in their records system in order to reflects the documentation provided to GOSA.
- School leaders will review withdrawal codes and their supporting documentation on a monthly basis.

#### GOSA Response

## **Habersham County, Habersham Success Academy**

## Reason for Audit Selection

• The percentage of students at Habersham Success Academy withdrawn under the audited codes is more than two standard deviations above the mean.

#### Audit Observations/Concerns

• The school/LEA did not provide proper documentation for one student withdrawn under *Code H* – *Attend Home Study*. The documentation provided indicated the student was transferring to a new school, but did not indicate that the school was a home study program. This documentation was insufficient for the purposes of reporting Code "H."

# School/LEA Steps Taken to Address Concerns

- The school/LEA will review proper procedures for collecting records requests prior to marking a student as any code other than "U" at monthly registrar meetings.
- The school/LEA will recode student without proper withdrawal codes in their records system in order to reflects the documentation provided to GOSA.
- School leaders will review withdrawal codes and their supporting documentation on a monthly basis.

#### GOSA Response

## Haralson County, Haralson County High School

## Reason for Audit Selection

• The percentage of students withdrawn under the audited codes at Haralson County High School is more than two standard deviations above the mean.

#### Audit Observations/Concerns

- The school/LEA did not provide proper documentation for two students withdrawn under *Code H* Attend Home Study. One student's provided documentation was illegible, and the other student's provided documentation indicated both a record request from a DJJ school and a parent's home study withdrawal form. Additional documentation is needed to clarify whether this student should be withdrawn under Code "H" or Code "T." The documentation provided for both students was insufficient for the purposes of reporting Code "H."
- The school/LEA did not provide documentation for one student withdrawn under *Code X Transferred Out of State*. The documentation provided was both a homeschool intent form and an out-of-state school's records request, and it is unclear if the student should be withdrawn under Code "X" or Code "H." Additional documentation is needed to clarify this.

## School/LEA Steps Taken to Address Concerns

- The school/LEA will use a "U" code in the future until it receives a request for records from a withdrawing student's new school.
- The school/LEA will review proper procedures for collecting records requests prior to marking a student as any code other than "U" at monthly registrar meetings.

#### GOSA Response

## Muscogee County, Spencer High School

## Reason for Audit Selection

• The percentage of students at Spencer High School withdrawn under the audited codes is more than two standard deviations above the mean.

#### Audit Observations/Concerns

The school/LEA did not provide proper documentation for one student withdrawn under *Code K* 
 Transferred to Private School or Transferred Out of State. The documentation provided indicated a records request from a Georgia public school. The school/LEA also provided documentation for the student enrolling in a home study program. The documentation provided was insufficient for the purposes of reporting Code "K."

## School/LEA Steps Taken to Address Concerns

- The school/LEA will use a "U" code in the future until it receives a request for records from a withdrawing student's new school.
- The school/LEA will recode (Code "U" or Code "T") the student in question within the records system in order to reflect the withdrawal documentation provided to GOSA.
- The school/LEA will review proper procedures for collecting records requests prior to marking a student as any code other than "U" at monthly registrar meetings.

## GOSA Response

## **Quitman County, Quitman County High School**

## Reason for Audit Selection

 The percentage of students withdrawn under the audited codes at Quitman County High School is more than two standard deviations above the mean.

#### Audit Observations/Concerns

• The school/LEA did not provide documentation for one student withdrawn under *Code X* – *Transferred Out of State*. Two students were reported withdrawn under *Code X* – *Transferred Out of State*. The documentation provided is a withdrawal form stating each respective student moved out-of-state, but there are no records requests from the respective students' new out-of-state schools. This is not sufficient documentation for reporting Code X. Per SBOE Rule 160-5-1-.28, as each Code "X" withdrawal requires a records request from an out-of-state school.

## School/LEA Steps Taken to Address Concerns

- The school/LEA will use a "U" code in the future until it receives a request for records from a withdrawing student's new school.
- The school/LEA will recode (Code "U") the student in question within the records system in order to reflect the withdrawal documentation provided to GOSA.
- The school/LEA will review proper procedures for collecting records requests prior to marking a student as any code other than "U" at monthly registrar meetings.

#### GOSA Response

#### Savannah-Chatham County, Windsor Forest High School

## Reason for Audit Selection

• The percentage of students withdrawn under the audited codes at Windsor Forest High School is more than two standard deviations above the mean.

#### Audit Observations/Concerns

• The school/LEA did not provide documentation for one student withdrawn under *Code H – Attend Home* Study. For that student, the school did not upload the proper documentation to sufficiently address what is needed for Code H per SBOE Rule 160-5-1-.28. Code "H" must be proven by a document signed by the parent, guardian, or "other person" declaring their intent to utilize a home study program or documentation that the parent completed GaDOE's online Declaration of Intent for Home Study (even if not signed), or confirmation from the Statewide Longitudinal Data System that the Declaration of intent for Home Study form was completed. The school submitted a records request from another public school in Georgia. This documentation was insufficient for the purposes of reporting Code "H."

## School/LEA Steps Taken to Address Concerns

- The school/LEA will use a "U" code in the future until it receives a request for records from a withdrawing student's new school.
- The school/LEA will recode (Code "U" or "T") the student in question within the records system in order to reflect the withdrawal documentation provided to GOSA.
- The school/LEA will review proper procedures for collecting records requests prior to marking a student as any code other than "U" at monthly registrar meetings.

#### GOSA Response

## **Sumter County, Americus Sumter 9th Grade Academy**

## Reason for Audit Selection

• The percentage of students withdrawn under the audited codes at Americus Sumter 9th Grade Academy is more than two standard deviations above the mean.

#### Audit Observations/Concerns

- The school/LEA did not provide documentation for one student withdrawn under *Code X Transferred Out of State*. The documentation provided is a withdrawal form stating the student moved out-of-state, but there are no records requests from the student's new out-of-state schools. This is not sufficient documentation for reporting Code X. Per SBOE Rule 160-5-1-.28, as each Code "X" withdrawal requires a records request from an out-of-state school.
- The school/LEA did not provide documentation for four students withdrawn under *Code K-Transferred to Private School*. For these students, the school did not upload the proper documentation to sufficiently address what is needed for Code "K" per SBOE Rule 160-5-1-.28, which requires the private school's request for transcript or student records.<sup>5</sup> The school provided only withdrawal forms stating the students were moving to private schools, which are not sufficient for the purposes of reporting Code "K."

## School/LEA Steps Taken to Address Concerns

- The school/LEA will use a "U" code in the future until it receives a request for records from a withdrawing student's new school.
- The school/LEA will recode (Code "U") the student in question within the records system in order to reflect the withdrawal documentation provided to GOSA.
- The school/LEA will review proper procedures for collecting records requests prior to marking a student as any code other than "U" at monthly registrar meetings.

#### GOSA Response

<sup>&</sup>lt;sup>5</sup> Upon further communication with Americus Sumter 9<sup>th</sup> Grade Academy, GOSA learned the four students were already enrolled in classes at the alternative school associated with the private institute that the students ultimately enrolled in full time. Therefore the alternative school did not request the students' records from Americus Sumter 9<sup>th</sup> Grade Academy when making the decision to recommend the students enroll in the private institute, as the alternative school already had the students' records from their current enrolled classes. Therefore, when the alternative school made a recommendation to enroll the four students in the private institute, the alternative school did not need to request the students' transcripts. This resulted in Americus Sumter 9<sup>th</sup> Grade Academy not having the documentation needed to reflect the nature of the four students' Code "K" withdrawal, which is a request for records/transcript from the private school. Despite the lack of documentation, GOSA determined it was correct for Americus Sumter 9<sup>th</sup> Grade Academy to keep the four students withdrawn under Code "K." In the future, if a student is enrolled in an alternative program, and that program recommends the student to its private institution, then the original school and alternative school need to keep documentation that would suffice for Code "K" reporting.

#### Taliaferro County, Taliaferro County School

## Reason for Audit Selection

• The percentage of students withdrawn under the audited codes at Taliaferro County School is more than two standard deviations above the mean.

#### Audit Observations/Concerns

• The school/LEA did not provide documentation for one student withdrawn under *Code X* – *Transferred Out of State*. The school does not have a record on file that would adequately satisfy the requirements for Code "X," since the student's method of withdrawal was a telephone call to the school stating they moved out of state and would not be returning. This is not sufficient documentation for reporting Code X. Per SBOE Rule 160-5-1-.28, as each Code "X" withdrawal requires a records request from an out-of-state school.

#### School/LEA Steps Taken to Address Concerns

- The school/LEA will use a "U" code in the future until it receives a request for records from a withdrawing student's new school.
- The school/LEA will recode (Code "U") the student in question within the records system in order to reflect the withdrawal documentation provided to GOSA.
- The school/LEA will review proper procedures for collecting records requests prior to marking a student as any code other than "U" at monthly registrar meetings.

# GOSA Response

## **Troup County, Bradfield Center Ault Academy**

## Reason for Audit Selection

• The percentage of students withdrawn under the audited codes at Bradfield Center Ault Academy is more than two standard deviations above the mean.

#### Audit Observations/Concerns

• The school/LEA did not provide documentation for one student withdrawn under *Code X* – *Transferred Out of State*. The school does not have a record on file that would adequately satisfy the requirements for Code "X," which SBOE Rule 160-5-1-.28 stipulates as each Code "X" withdrawal requiring a records request from an out-of-state school.

# School/LEA Steps Taken to Address Concerns

- The school/LEA will use a "U" code in the future until it receives a request for records from a withdrawing student's new school.
- The school/LEA will recode (Code "U") the student in question within the records system in order to reflect the withdrawal documentation provided to GOSA.
- The school/LEA will review proper procedures for collecting records requests prior to marking a student as any code other than "U" at monthly registrar meetings.

## GOSA Response

# Appendix: Withdrawal Codes and Acceptable Documentation

Concerning Withdrawal Codes "C", "D", "H", "J"," K", "N", "X" "2", "3", or "5", the following are acceptable forms of documentation for an LEA to submit as proof of appropriate withdrawal code usage:

Withdrawal Code	Withdrawal Type	Acceptable Documentation
Н	Attend Home Study	A document signed by the parent, guardian, or "other person" declaring their intent to utilize a home study program.
J	Transferred Out of Country	Written confirmation that a student has emigrated to another country but it need not be official.
K, X	Transferred to Private School or Transferred Out of State	The private school, or out-of-state school's request for transcript or student records.
2, 3	School Choice Transfer (Title I School Choice) or USCO transfer	The receiving school's request for transcript, student records, or verification of student transfer through the Georgia Testing ID (GTID) system.
5	Not Subject to Compulsory School Attendance (This code should be used only for students under age 6.)	If student is an unemancipated minor older than the age of mandatory attendance as required in O.C.G.A. § 20-2-690.1, written permission of a parent, guardian, grandparent, or other person and a record of a school-based conference that was held with the principal (or principal's designee) and the parent, guardian, grandparent, or other person.  If student is an emancipated minor older than the age of mandatory attendance as required in O.C.G.A. § 20-2-690.1, written documentation from the student of his/her intent to withdraw and a record of a school-based conference that was held with the principal (or principal's designee) and the student.**
C*	Court or Legal	Official legal document notifying school of withdrawal for said reason.  Code can also be used for special education students that legally age out of system.
D*	Death	Written notification from parent/guardian, an obituary, or a newspaper article confirming death.
N*	Transferred to a Department of Defense School	The Dept. of Defense school's request for transcript or student records.

<sup>\*</sup>The type of documentation for these codes are either not listed or not listed in full in the GaDOE Guidance document. However, in compliance with the SBOE Rule 160-5-1-.28, schools must document the reasons to support student withdrawal.

(The language in this table is taken directly from GaDOE Guidance for <u>State Board of Education Rule</u> 160-5-1-.28 STUDENT ENROLLMENT AND WITHDRAWAL)

<sup>\*\*</sup>Emancipated minors not subject to compulsory attendance are not directly addressed in the SBOE rule. However, in compliance with the SBOE Rule 160-5-1-.28, schools must document the reasons to support student withdrawal.