Withdrawal Code Verification Audit Results March 4, 2019

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 ten 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).¹ GOSA selects schools for audit if they meet one of the following criteria:

- If cohort enrollment is between 10 and 39 students, 10% or more of students were withdrawn during the 2017-2018 school year using one of the ten codes; OR
- If cohort enrollment is greater than or equal to 40 students, 7.5% or more of students enrolled were withdrawn during the 2017-2018 school year using one of the ten codes; OR
- If a school is chosen by random selection from schools that did not meet either of the above criteria.

After schools are selected for audit, GOSA requests appropriate documentation for a sample of students withdrawn under the specified codes.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

2017-2018 Schools Flagged for Audit ²				
School System	School Name (Flagged Cohort[s])	Enrollment in Flagged Cohort(s)	Withdrawals in Flagged Cohort(s)	
Catoosa County	Lakeview-Fort Oglethorpe High School (9)	309	24	
Charlton County	Charlton County High School (10)	118	9	
Chattahoochee County	Chattahoochee County High School (9, 10)	294	26	
Chattooga County	Chattooga Academy (9)	36	4	
Coffee County	Wiregrass Regional College and Career Academy (11)	55	6	
Decatur County	Bainbridge High School	1,549	38	
DeKalb County	Chamblee Charter High School	1,785	21	
DeKalb County	Druid Hills High School	1,430	19	
DeKalb County	Tapestry Public Charter School (10)40		4	
Dublin City	Moore Street Facility (9)	20	2	
Echols County	Echols County High School (12) 47		4	

¹ Withdrawal Code C and 5 do not remove students from a graduation cohort, but also require auditing because GaDOE cannot easily verify these codes with available data.

² Shaded cells denote randomly selected schools; for these schools, the sample population includes all grade levels.

School System	School Name (Flagged Cohort[s])	Enrollment in Flagged Cohort(s)	Withdrawals in Flagged Cohort(s)
Evans County	Second Chance (9)	12	2
Floyd County	Armuchee High School (10)	159	13
Glynn County	Morningstar Treatment Services, Inc. Youth Estate (9)	11	2
Gwinnett County	Duluth High School	2,984	79
Gwinnett County	Gwinnett Intervention Education Center (GIVE) West (11)	65	5
Gwinnett County	Gwinnett Online Campus (9, 10)	134	12
Gwinnett County	Phoenix High School	753	28
Habersham County	Habersham Success Academy (9, 11)	37	7
Haralson County	Haralson County High School (9, 10, 11)	816	87
Lee County	Lee County High School (9)	45	6
McDuffie County	Thomson High School	1,191	30
Mitchell County	Mitchell County High School (11)	88	7
Murray County	Pleasant Valley Innovative School (9, 11, 12)	120	14
Muscogee County	Northside High School (11)	373	29
Muscogee County	Spencer High School (11)	180	17
Seminole County	Seminole County Middle/High School (9)	135	11
State Charter School	Foothills Charter High School	2,399	98
State Charter School	Georgia Connections Academy (9, 10)	967	86
State School	Atlanta Area School for the Deaf (11)	16	2
Sumter County	Americus Sumter High School (9)	75	15
Thomas County	Bishop Hall Charter School 187 (9, 10,11)		25
Thomas County	The Renaissance Center for Academic and Career Development (9, 10, 11)	58	10
Union County	Union County High School	866	7
Valdosta City	Valdosta High School	2,298	95
Ware County	Ware County High School (10)	456	36
Worth County	Vorth County Worth County Achievement Center (9)		3

GOSA provided each school with a sample of Georgia Testing Identifier (GTID) numbers for withdrawn and requested documentation supporting each withdrawal.³

² Shaded cells denote randomly selected schools; for these schools, the sample population includes all grade levels.

³ 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.

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.

- Catoosa County, Lakeview-Fort Oglethorpe High School
- Chattahoochee County, Chattahoochee County High School
- Chattooga County, Chattooga Academy
- Coffee County, Wiregrass Regional College and Career Academy
- Decatur County, Bainbridge High School
- DeKalb County, Druid Hills High School
- Dublin City, Moore Street Facility
- Echols County, Echols County High School
- Evans County, Second Chance
- Floyd County, Armuchee High School
- Glynn County, Morningstar Treatment Services, Inc. Youth Estate
- Habersham County, Habersham Success Academy
- Haralson County, Haralson County High School
- Lee County, Lee County High School
- Mitchell County, Mitchell County High School
- Murray County, Pleasant Valley Innovative School
- Muscogee County, Northside High School
- Muscogee County, Spencer High School
- Seminole County, Seminole County Middle/High School
- State School, Atlanta Area School for the Deaf
- Sumter County, Americus Sumter High School
- Thomas County, Bishop Hall Charter School
- Thomas County, The Renaissance Center for Academic and Career Development
- Union County, Union County High School
- Worth County, Worth County Achievement Center

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.

- Charlton County, Charlton County High School (p. 5)
- DeKalb County, Chamblee Charter High School (p. 6)
- DeKalb County, Tapestry Public Charter School (p. 7)
- Gwinnett County, Duluth High School (p. 8)
- Gwinnett County, Gwinnett Intervention Education Center (GIVE) West (p. 9)
- Gwinnett County, Gwinnett Online Campus (p. 10)
- Gwinnett County, Phoenix High School (p. 11)
- McDuffie County, Thomson High School (p. 12)
- State Charter School, Foothills Charter High School (p. 13)
- State Charter School, Georgia Connections Academy (p. 14)
- Valdosta City, Valdosta High School (p. 15)
- Ware County, Ware County High School (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 <u>Withdrawal Code Verification Audit Process Overview</u>.

Charlton County, Charlton County High School

Reason for Audit Selection

• Tenth-grade enrollment was greater than or equal to 40 students and had at least 7.5% of students withdrawn under audited codes.

Audit Observations/Concerns

• One student was withdrawn under *Code K – Transferred to Private School*, but the school did not receive a records request. A school withdrawal form indicated parent intent to enroll the student in private school. However, per SBOE Rule 160-5-1-.28, Code K requires a records request from the private 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 the withdrawing student's new school.
- District leadership, principals, and school information specialists will dedicate time in monthly meetings to discuss all transfers, public or private, and the documentation needed to prevent similar errors in the future.

GOSA Response

DeKalb County, Chamblee Charter High School

Reason for Audit Selection

• GOSA randomly selected Chamblee Charter High School for audit participation.

Audit Observations/Concerns

• One student was reported withdrawn under *Code C – Court or Legal*. The LEA provided an email from an assistant principal instructing staff to withdraw the student due to age, as well as an official legal document including the student's birthday. At the time of the email, the student was 20-years-old. Per SBOE Rule 160-5-1-.28, students are eligible for enrollment "unless they attain the age of 21 by September 1 or they have received a high school diploma or the equivalent."

School/LEA Steps Taken to Address Concerns

- The school will contact the parent by phone and mail to inform the parent of the error made in the withdrawal process, check the enrollment status of the student, and offer school alternatives and General Educational Development (GED) programs to the student.
- School administrators will provide all staff members with a copy of SBOE Rule 160-5-1-.28 and review the guidelines of enrollment eligibility and withdrawal procedures at a faculty meeting. School administrators will provide agenda and sign-in sheets from this meeting to the Regional Superintendent as confirmation.
- School administrators will conduct random compliance checks of withdrawals and provide audit details to the regional office.

GOSA Response

• After reviewing the audit findings, GOSA required the school and LEA to submit a Corrective Action Plan detailing the above steps to remedy the error for this student and avoid similar errors in the future. The superintendent and school administrators have reviewed and certified this plan, and GOSA accepts the steps described in the Corrective Action Plan. GOSA will monitor the school's withdrawals next year to ensure that protocols put in place have been effective. Future errors may warrant additional investigation, which may include an on-site audit.

DeKalb County, Tapestry Public Charter School

Reason for Audit Selection

• Tenth-grade enrollment was greater than or equal to 40 students and had at least 7.5% of students withdrawn under audited codes.

Audit Observations/Concerns

• One student was reported withdrawn under *Code H – Attend Home Study*. A school withdrawal form indicated parent intent to enroll student in private school, but the school did not receive a records request. Per SBOE Rule 160-5-1-.28, Code H requires a document signed by the parent, guardian, or "other person" declaring intent to home school.

School/LEA Steps Taken to Address Concerns

- The school will implement additional checks and balances, such as the registrar confirming parent-stated reasons on school withdrawal forms with the school database and records requests from other schools. School staff will verify withdrawal data before Student Record submissions. These checks and balances aim to improve the accuracy of data entry and ensure that student withdrawal codes match the supporting documentation available to prevent similar errors in the future.
- The district will continue to provide annual refresher training, as well as in-depth training to registrars and data clerks as needed, on the student enrollment and withdrawal processes.
- The district's state reporting unit will also provide ongoing reminders to schools to double check the accuracy of data prior to sign-off.

GOSA Response

Gwinnett County, Duluth High School

Reason for Audit Selection

• GOSA randomly selected Duluth High School for audit participation.

Audit Observations/Concerns

- One student was reported withdrawn under *Code J Transferred Out of Country*. This student withdrew but reenrolled the next day. The student withdrew again the next month to attend another school in Gwinnett County; the school provided the records request from the new school for this second withdrawal. Per SBOE Rule 160-5-1-.28, Code J requires written confirmation that the student has emigrated to another country.
- One student was reported withdrawn under *Code X Transferred Out of State*. The student withdrew but reenrolled two days later. The student withdrew again the next month under Code X; the school provided the records request from the out-of-state school for the second withdrawal. 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 X Transferred Out of State*, but the school did not receive a records request. Per SBOE Rule 160-5-1-.28, Code X 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 make sure any and all changes to student withdrawal codes are updated in Student Record before signoff.
- The LEA will review the Withdrawal Code Verification Audit findings with principals and assistant principals during November administrative meetings and with clerical staff during their December meeting.
- The LEA is in the process of designing a report that will alert schools 30 days after a withdrawal code has been entered. Schools will be required to scan in documents for audited withdrawal codes. If the school has not scanned documents after 30 days, the student will appear on this report. The report will serve as a reminder to scan the documents or to change the withdrawal to an appropriate code.

GOSA Response

Gwinnett County, Gwinnett Intervention Education Center (GIVE) West

Reason for Audit Selection

• Eleventh-grade enrollment was greater than or equal to 40 students and had at least 7.5% of students withdrawn under audited codes.

Audit Observations/Concerns

- Two students were reported withdrawn under *Code K Transferred to Private School.* These students withdrew to obtain their General Education Diplomas (GED), which does not align with the use of Code K. Per SBOE Rule 160-5-1-.28, Code K requires a records request from a private school.
- One student was reported withdrawn under *Code K Transferred to Private School*. The school provided a records request from Rockdale County High School. Rockdale County High School is a public school in Rockdale County, Georgia. Per SBOE Rule 160-5-1-.28, Code K requires a records request from a private school.

School/LEA Steps Taken to Address Concerns

- The LEA will review the Withdrawal Code Verification Audit findings with principals and assistant principals during November administrative meetings, and with clerical staff during their December meeting.
- The LEA is in the process of designing a report that will alert schools 30 days after a withdrawal code has been entered. Schools will be required to scan in documents for audited withdrawal codes. If the school has not scanned documents after 30 days, the student will appear on this report. The report will serve as a reminder to scan the documents or to change the withdrawal to an appropriate code.

GOSA Response

Gwinnett County, Gwinnett Online Campus

Reason for Audit Selection

• Ninth- and tenth-grade enrollment counts were both greater than or equal to 40 students and had at least 7.5% of students withdrawn under audited codes.

Audit Observations/Concerns

• One student was reported withdrawn under *Code X – Transferred Out of State*. The school provided email correspondence with the student's mother indicating intent to home school, but no request for records. Per SBOE Rule 160-5-1-.28, Code X requires a records request from an out-of-state school.

School/LEA Steps Taken to Address Concerns

- The LEA will review the Withdrawal Code Verification Audit findings with principals and assistant principals during November administrative meetings, and with clerical staff during their December meeting.
- The LEA is in the process of designing a report that will alert schools 30 days after a withdrawal code has been entered. Schools will be required to scan in documents for audited withdrawal codes. If the school has not scanned documents after 30 days, the student will appear on this report. The report will serve as a reminder to scan the documents or to change the withdrawal to an appropriate code.

GOSA Response

Gwinnett County, Phoenix High School

Reason for Audit Selection

• GOSA randomly selected Phoenix High School for audit participation.

Audit Observations/Concerns

- One student was reported withdrawn under *Code K Transferred to Private School*. This student withdrew to obtain a GED, which does not align with the use of Code K. Per SBOE Rule 160-5-1-.28, Code K requires a records request from a private school.
- Two students were reported withdrawn under *Code K Transferred to Private School*, but no records requests were received. Per SBOE Rule 160-5-1-.28, Code K requires a records request from a private 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 LEA will review the Withdrawal Code Verification Audit findings with principals and assistant principals during November administrative meetings, and with clerical staff during their December meeting.
- The LEA is in the process of designing a report that will alert schools 30 days after a withdrawal code has been entered. Schools will be required to scan in documents for audited withdrawal codes. If the school has not scanned documents after 30 days, the student will appear on this report. The report will serve as a reminder to scan the documents or to change the withdrawal to an appropriate code.

GOSA Response

McDuffie County, Thomson High School

Reason for Audit Selection

• GOSA randomly selected Thomson High School for audit participation.

Audit Observations/Concerns

• One student was reported withdrawn under *Code H – Attend Home Study*, but the provided reason for withdrawal on the school form signed by parent indicates "GA Connections Academy on line" as reason for withdrawal. Per SBOE Rule 160-5-1-.28, Code H requires a document signed by the parent, guardian, or "other person" declaring intent to home school.

School/LEA Steps Taken to Address Concerns

- The school registrar will, at all times, refer to the acceptable documentation for withdrawal codes table included in this audit.
- Each month, the district student information system (SIS) coordinator will verify the monthly report of students who have withdrawn and their reasons for withdrawal.

GOSA Response

State Charter School, Foothills Charter High School

Reason for Audit Selection

• GOSA randomly selected Foothills Charter High School for audit participation.

Audit Observations/Concerns

• The school/LEA did not provide documentation for four students: one withdrawn *under Code H* – *Attend Home Study*, one withdrawn under *Code J* – *Transferred Out of the Country*, and two withdrawn under *Code X* – *Transferred Out of State*.

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.
- School leaders will review withdrawal codes and their supporting documentation on a monthly basis.

GOSA Response

State Charter School, Georgia Connections Academy

Reason for Audit Selection

• Ninth- and tenth-grade enrollment counts were both greater than or equal to 40 students and had at least 7.5% of students withdrawn under audited codes.

Audit Observations/Concerns

- One student was reported withdrawn under *Code K Transferred to Private School*. The school provided a records request from the Youth Villages at Inner Harbour. Youth Villages at Inner Harbour is a public school in Douglas County, Georgia. Per SBOE Rule 160-5-1-.28, Code K requires a records request from a private school.
- One student was reported withdrawn under *Code X Transferred Out of State*, but a request for records was not received. The parent completed the GaDOE Declaration of Intent to Home School Form online. Per SBOE Rule 160-5-1-.28, Code X requires a records request from an out-of-state school.

School/LEA Steps Taken to Address Concerns

- Georgia Connections Academy will implement quarterly internal withdrawal audits to ensure that codes accurately reflect the most current status of withdrawn students.
- Beginning in January, the district will train the enrollment team twice per year to use Power BI software to update and track documentation for withdrawn students.

GOSA Response

Valdosta City, Valdosta High School

Reason for Audit Selection

• GOSA randomly selected Valdosta High School for audit participation.

Audit Observations/Concerns

• One student was reported withdrawn under *Code K – Transferred to Private School*, but the school did not receive a records request. Per SBOE Rule 160-5-1-.28, Code K requires a records request from a private school.

School/LEA Steps Taken to Address Concerns

- The school/LEA will use a "U" code in the future until they receive a request for records from a withdrawing student's new school.
- The school/LEA will ensure that the documentation received from the receiving school meets SBOE requirements.

GOSA Response

Ware County, Ware County High School

Reason for Audit Selection

• Tenth-grade enrollment was between 10 and 39 students and had at least 10% of students withdrawn under audited codes.

Audit Observations/Concerns

• One student was reported withdrawn under *Code K – Transferred to Private School*, but the school did not receive a records request. The parent completed the GaDOE Declaration of Intent to Home School Form online. Per SBOE Rule 160-5-1-.28, Code K requires a records request from a private school.

School/LEA Steps Taken to Address Concerns

- The principal met with the secretary responsible for student withdrawals. In the future, a counselor and administrator will sign the withdrawal form to ensure all checks and balances are in place, including correct withdrawal codes.
- A paper copy of the withdrawal form will be placed in the withdrawing student's file and in a notebook of withdrawals for that calendar year. A note in the student's Infinite Campus enrollment tab will indicate the change in enrollment along with the correct withdrawal code.
- During cohort cleanup and at other times throughout the year, the school will work with district personnel to make sure all withdrawals are coded correctly and include all necessary documentation before sign-off.

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.
К, Х	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 <u>and</u> 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 <u>and</u> 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.

*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.

**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.

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