

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- if cohort enrollment is at least 10 students, the percentage of students withdrawn under the audited codes is more than two standard deviations above the mean for all cohorts at all schools; OR
- 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than two standard deviations above the mean, GOSA will select cohorts with the next highest percentages of students withdrawn under the audited codes until 20 schools are selected; OR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 a school is randomly selected from the remaining schools in the audit, regardless of cohort size. *Note: 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 successfully completed the Withdrawal Code Verification Audit with acceptable documentation for the two most recent consecutive years;
- The school provides a compelling reason(s) with sufficient evidence for why it has a high incidence of a specific audited code(s), as determined by GOSA staff based on guidance provided in State Board of Education (SBOE) Board Rule 160-5-1.28;
- 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.²

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.

 $^{^{2}}$ 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.

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 review of the withdrawal code verification inquiry forms submitted by each Local Education Agency (LEA).

The chart below lists all schools flagged for further inquiry during the 2020 Withdrawal Code Verification Audit.

| 2019-2020 Schools Flagged for Audit ³ | | | | |
|--|--|---------------------------------------|--|--|
| School System | School Name (Flagged Grade Cohort[s]) | Enrollment in Flagged Cohort(s) | Withdrawals in Flagged Cohort(s) | |
| Atlanta Public Schools | Booker T. Washington High School | 741 | 9 | |
| Baker County | Baker County K-12 School (10)18 | | 2 | |
| Banks County | Banks County High School859 | | 19 | |
| Berrien County | Berrien Academy Performance Learning Center (9) | 22 | 3 | |
| Bleckley County | Bleckley County Success Academy (11) | 17 | 3 | |
| Brooks County | Delta Innovative School (11) | 16 | 2 | |
| Clarke County | Cedar Shoals High School | 1,376 | 16 | |
| Clarke County | Classic City High School (9) | 13 | 2 | |
| Clayton County | Lovejoy High School | 1,839 | 40 | |
| DeKalb County | Miller Grove High School | 1,253 | 31 | |
| DeKalb County | DeKalb Alternative School (10) | 31 | 7 | |
| Dodge County | DAC (Dodge County Achievement Center) (10) | 12 | 3 | |
| Emanuel County | Swainsboro High School | 727 | 12 | |
| Floyd County | Pepperell High School (9) | 227 | 33 | |
| Fulton County | McClarin High School (10) | 25 | 3 | |
| Jefferson City | Jefferson High School | 890 | 6 | |
| Murray County | Pleasant Valley Innovative School (11, 12) 35 | | 10 | |
| Troup County | The Hope Academy School (10)10 | | 2 | |
| Webster County | Webster County High School | 56 | 4 | |
| State Charter School | Georgia Cyber Academy (9) | 1,143 | 129 | |
| State Charter School | Statesboro STEAM Academy (11) | 18 | 2 | |

Figure 1. All schools flagged for Withdrawal Code Verification Audit

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

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

³ Shaded cells denote randomly selected schools; for these schools, the sample population includes all grade levels.

⁴ 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

The following 11 schools provided appropriate documentation for all students in accordance with the SBOE Rule 160-5-1-.28. No further action was required.

- Atlanta Public Schools, Booker T. Washington High School
- Baker County, Baker County K-12 School
- Berrien County, Berrien Academy Performance Learning Center
- Bleckley County, Bleckley County Success Academy
- Brooks County, Delta Innovative School
- Fulton County, McLarin High School
- Jefferson City, Jefferson City High School
- Murray County, Pleasant Valley Innovative School
- State Charter School, Georgia Cyber Academy
- State Charter School, Statesboro STEAM Academy
- Webster County, Webster County High School

Initially, the following 10 schools 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 subsequently 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's submission of documentation.

- Banks County, Banks County High School (p.4)
- Clarke County, Cedar Shoals High School (p.5)
- Clarke County, Classic City High School (p.6)
- Clayton County, Lovejoy High School (p.7)
- DeKalb County, DeKalb Alternative School (p.8)
- DeKalb County, Miller Grove High School (p.9-10)
- Dodge County, Dodge County Achievement Center (p. 11)
- Emanuel County, Swainsboro High School (p. 12)
- Floyd County, Pepperell High School (p.13)
- Troup County, The Hope Academy School (p. 14)

The remainder of this report provides more detailed information about the submissions for each school that was required to produce additional documentation. They are listed in alphabetical order by district name and school name. The appendix on page 15 includes a list of the audited error codes and acceptable documentation. More information on the audit methodology is available in the <u>Withdrawal Code</u> <u>Verification Audit Process Overview</u>.

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.

Banks County, Banks County High School

Reason for Audit Selection

• GOSA randomly selected Banks 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 of a legal release indicating the school system has the authority to speak with the student's legal representation, but the school did not provide a 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 school/LEA will use a "U" code in the future until it receives a request for records from a withdrawing student's new school.
- School leaders will review withdrawal codes and their supporting documentation on a monthly basis.

GOSA Response

Clarke County, Cedar Shoals High School

Reason for Audit Selection

• GOSA randomly selected Cedar Shoals 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 Clarke County withdrawal form indicating the student had withdrawn. 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 "X" Transferred Out of State*. For this student, the school provided a Clarke County records request indicating the student had enrolled in the high school rather than having withdrawn. 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 "X" Transferred Out of State*. For this student, the school provided a transfer verification form indicating the student had transferred out of the high school. 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.

School/LEA Steps Taken to Address Concerns

- The school/LEA uploaded a revised cover letter describing their lack of documentation beyond what was provided for the students reported under Code "X."
- 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.
- School leaders will review withdrawal codes and their supporting documentation on a monthly basis.

GOSA Response

Clarke County, Classic City High School

Reason for Audit Selection

Classic City High School included cohorts with the next highest percentages of students
withdrawn under the audited codes and was included to obtain a necessary sample size of schools.
lit Observations/Concerns

Audit Observations/Concerns

- One student was withdrawn under *Code "K"- Transferred to Private School.* For this student, the school provided a Clarke County withdrawal form, indicating the student had withdrawn from the high school. The documentation the school uploaded did not 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.
- One student was reported withdrawn under *Code "X" Transferred Out of State*. For this student, the school provided a Clarke County withdrawal form indicating the student had withdrawn. 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.

School/LEA Steps Taken to Address Concerns

- The school/LEA uploaded a revised cover letter describing their lack of documentation beyond what was provided for the students reported under Codes "X" and Code "K."
- The school/LEA will make sure any and all changes to student withdrawal codes are updated in Student Record before signoff in order to account for re-enrollment.
- 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.
- School leaders will review withdrawal codes and their supporting documentation on a monthly basis.

GOSA Response

Clayton County, Lovejoy High School

Reason for Audit Selection

GOSA randomly selected Lovejoy High School for audit participation.

Audit Observations/Concerns

• The school/LEA did not provide documentation for two students: both withdrawn under *Code* "X" – *Transferred Out of State*.

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

DeKalb County, DeKalb Alternative School

Reason for Audit Selection

• The percentage of students withdrawn under the audited codes 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.*
- One student was reported withdrawn under *Code "X" Transferred Out of State*. For this student, the school first provided a DeKalb County enrollment verification form indicating the student had enrolled in the high school and then withdrawn. They then provided a county confirmation of records sent on behalf of the student. These uploads were 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 DeKalb County enrollment verification form indicating the student had enrolled in the high school and then withdrawn. 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 "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

DeKalb County, Miller Grove School

Reason for Audit Selection

• GOSA randomly selected Miller Grove High School for audit participation.

Audit Observations/Concerns

- One selected student was withdrawn under *Code "H" Attend Home Study*. For this 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 first submitted a confirmation that they had sent records for the student and then submitted an enrollment history upon a request for data clarification. Both documentation uploads were insufficient for the purposes of reporting Code "H."
- One student was withdrawn under *Code "K"- Transferred to Private School.* For that student, 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. The school provided a W2 form for the student, which is insufficient for the purposes of reporting Code "K."
- One student was withdrawn under *Code "K"- Transferred to Private School.* For that student, 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. The school provided a confirmation of records sent for the student, which is insufficient for the purposes of reporting Code "K."
- One student was reported withdrawn under *Code "N" Transferred to a Department of Defense School.* For this student, the school provided a DeKalb County record request verification form indicating the school had received a records request. 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.
- One student was reported withdrawn under *Code "X" Transferred Out of State*. For this student, the school provided a DeKalb County confirmation of sending records, indicating the school has received a request for records. 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 "X" Transferred Out of State*. For this student, the school provided an enrollment verification form indicating the student had enrolled in a different high school. 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 "X"- Transferred Out of State*. For this student, the school provided an out of state registration verification form indicating the student had enrolled in a different school. 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 "X" Transferred Out of State*. For this student, the school provided an enrollment history form. 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.

School/LEA Steps Taken to Address Concerns

- The school/LEA uploaded a revised cover letter describing their lack of documentation beyond what was provided for the students. Additionally, the school/LEA corrected two students reported under Code "K" and Code "N" to Code "T", and corrected two students reported under Code "N" and Code "K" to Code "U." The school also corrected the student reported under Code "H" to code "T."
- 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

Dodge County, Dodge County Achievement Center

Reason for Audit Selection

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

Audit Observations/Concerns

• One 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 an enrollment confirmation letter from the private distance learning/home bound school the student transferred to. This documentation was insufficient for the purposes of reporting Code "H."

School/LEA Steps Taken to Address Concerns

- The school/LEA uploaded a revised cover letter describing their lack of documentation beyond what was provided for the student reported under Code "H." The school/LEA has also communicated that they have been unsuccessful in obtaining a Declaration of Intent for Home Study form for the student.
- The school/LEA will use a "U" code in the future until it receives a Declaration of Intent for Home Study or a school's 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.

GOSA Response

Emanuel County, Swainsboro High School

Reason for Audit Selection

• GOSA randomly selected Swainsboro High School for audit participation.

Audit Observations/Concerns

- Three students were withdrawn under *Code "H" Attend Home Study*. For one student, the school did not upload documentation. For the other two students, the documentation the school provided did not sufficiently address what is needed for Code "H" per SBOE Rule 160-5-1-.28, which requires 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.
- One student was withdrawn under *Code "K"- Transferred to Private School.* The documentation the school uploaded did not 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.

School/LEA Steps Taken to Address Concerns

- The school/LEA uploaded the three students' documentation required for Code "H."
- The school/ LEA found the student coded with "K" should have been coded as "T" (transferred to another public-school system in Georgia) and appropriate personnel updated the student's withdrawal code in the data reporting system.

GOSA Response

Floyd County, Pepperell High School

Reason for Audit Selection

• Pepperrell High School included cohorts with the next highest percentages of students withdrawn under the audited codes and was included to obtain a necessary sample size of schools.

Audit Observations/Concerns

• One student was reported withdrawn under *Code "H" – Attend Home Study*. The documentation the school provided did not sufficiently address what is needed for Code "H" per SBOE Rule 160-5-1-.28, which requires 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.

School/LEA Steps Taken to Address Concerns

- School staff will verify withdrawal data before Student Record submissions and meet more regularly 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 school/LEA found the student coded with "H" should have been coded as "T" (transferred to another public-school system in Georgia) and appropriate personnel updated the student's withdrawal code in the data reporting system.

GOSA Response

Troup County, The Hope Academy School

Reason for Audit Selection

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

Audit Observations/Concerns

- One student was withdrawn under *Code "H" Attend Home* Study. The school/LEA did not provide documentation for the student withdrawn under "*H" Attend Home Study*. Code "H," per SBOE Rule 160-5-1-.28, requires 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.
- One student was reported withdrawn under *Code "K" Transferred to Private School.* This student withdrew and returned to their primary school, 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.

School/LEA Steps Taken to Address Concerns

- The school/LEA updated the Cover Letter and provided clarification for the student withdrawn under Code "H." The parent scheduled a time to come in to sign the paperwork needed for Code "H," but the parent did not make the scheduled appointment.
- The school/LEA will use a "U" code in the future until it receives a Declaration of Intent for Home Study.
- The school/LEA updated the Cover Letter and provided clarification for the student withdrawn under Code "K." The student withdrew and returned to their primary school, and the school/LEA corrected the code in the system from "K" to "W," as the student transferred to another school within the district.
- School staff will verify withdrawal data before Student Record submissions and meet more regularly 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.

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.** |
| С* | 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> 160-5-1-.28 STUDENT ENROLLMENT AND WITHDRAWAL)