



**Governor's Office of
Student Achievement**

Withdrawal Code Verification Audit Results

January 31, 2024

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).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- If cohort enrollment is at least 10 students, the percentage of students withdrawn under the audited codes is more than two standard deviations above the mean for all cohorts at all schools; OR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than two standard deviations above the mean, GOSA will select cohorts with the next highest percentages of students withdrawn under the audited codes until 20 schools are selected; OR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 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.²

After schools are selected for audit, GOSA requests appropriate documentation for a sample of students withdrawn under the specified codes.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).

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.

2020-2021 Schools Flagged for Audit³

School System	School Name (Flagged Cohort[s])	Enrollment in Flagged Cohort(s)	Withdrawals in Flagged Cohort(s)
Berrien County	Berrien Academy Performance Learning Center (11)	16	2
Brantley County	Brantley County High School (11)	226	10
Carroll County	Temple High School (11)	151	10
Clinch County	Clinch High School (10)	87	7
Coffee County	Wiregrass Regional College and Career Academy (9; 10)	72;50	7;5
Dublin City	Moore Street Facility (12)	44	9
Floyd County	Coosa High School (10)	165	10
Floyd County	Model High School (9)	242	10
Fulton County	Skyview High School (9; 10; 11; 12)	49;94;104;169	2; 6; 10; 9
Lee County	Lee County High School (9)	21	2
Marion County	Marion County Middle-High School (10)	102	8
McIntosh County	McIntosh Academy (9; 11)	153; 94	10; 10
Muscogee County	Jordan Vocational High School (9)	362	10
Muscogee County	Kendrick High School (9; 10; 11; 12)	421; 291;185;207	10; 15;11;5
Muscogee County	Shaw High School (9)	429	9
Savannah-Chatham County	Islands High (9; 10)	275;254	10; 10
Seminole County	Seminole County Middle-High School (10)	110	8
State Charter Schools	Mountain Education Charter High School (9)	825	10
Thomas County	Bishop Hall Charter School (9; 10; 11; 12)	58;85;38;92	8; 10; 8; 6
Thomas County	The Renaissance Center for Academic and Career Development (11)	15	2
Whitfield County	Phoenix High School (10)	31	2

GOSA provided each school with a sample of Georgia Testing Identifier (GTID) numbers for withdrawn students and requested documentation supporting each withdrawal.⁴

³ Shaded cells denote randomly selected schools; for these schools, the sample population includes all grade levels.
⁴⁴ 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.

The following 19 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.

- Berrien County, Berrien Academy Performance Learning Center
- Brantley County, Brantley County High School
- Carroll County, Temple High School
- Clinch County, Clinch County High School
- Coffee County, Wiregrass Regional College and Career Academy
- Dublin City, Moore Street Facility
- Floyd County, Coosa High School
- Floyd County, Model High School
- Fulton County, Skyview High School
- Lee County, Lee County High School
- Marion County, Marion County Middle-High School
- McIntosh County, McIntosh Academy
- Muscogee County, Jordan Vocational High School
- Muscogee County, Kendrick High School
- Muscogee County, Shaw High School
- Savannah-Chatham County, Islands High School
- Thomas County, Bishop Hill Charter School
- Thomas County, The Renaissance Center for Academic and Career Development
- Whitfield County, Phoenix High School

The following school 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.

- State Charter Schools, Mountain Education Charter High School (p. 4)

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 [Withdrawal Code Verification Audit Process Overview](#).

State Charter Schools, Mountain Education Charter High School

Reason for Audit Selection

- GOSA randomly selected Mountain Education Charter High School for audit participation.

Audit Observations/Concerns

- One student was reported withdrawn under *Code X - Transferred Out of State*. The school noted that the student had transferred to Texas Can Academy, but was unable to provide documentation indicating the student transferred to a school out of the state. Per SBOE Rule 160-5-1-.28, Code J requires written confirmation that a student has moved out of the country. The notation provided by the school does not reflect the rationale for using Code “X.”

School/LEA Steps Taken to Address Concerns

- The school/LEA will update the student’s withdrawal code in the data reporting system to be Code “U” instead of “J.”

GOSA Response

- GaDOE guidance for withdrawal codes requires that withdrawn students be coded “U” if documentation cannot be provided that a student transferred out of state. In the future, the school and LEA should follow SBOE guidance and rules for student transfer documentation. No further action is needed at this time.

Seminole County, Seminole County Middle-High School

Reason for Audit Selection

- GOSA randomly selected Seminole County Middle-High School for audit participation.

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

- GaDOE guidance for withdrawal codes requires that withdrawn students be coded “U” until the school receives a request for records or a letter from an official in the receiving school acknowledging enrollment, or the parent/guardian signs an intent to home school form. Once the school receives acceptable documentation, the school can then recode a withdrawn student to the appropriate withdrawal code. Requests for records and intent to home school forms should be kept on file along with other records for withdrawn students. In the future, the school and LEA should follow SBOE guidance and rules for student transfer documentation. No further action is needed at this time.

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
H	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.)	<p>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.</p> <p>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.**</p>
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.
<p>*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.</p> <p>**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.</p>		

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