

Enrollment Verification Process Overview

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Prepared by:



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Overview

The Governor's Office of Student Achievement (GOSA) conducts academic audits and investigations to maximize the integrity of student achievement data and to ensure the LEAs implement Georgia Department of Education (GaDOE) assessment policies and procedures with fidelity, so that achievement data can be utilized in making critical decisions and reporting of student outcomes.

Through an enrollment verification data audit, GOSA reviews school reporting data and other school records reported to the State through the FTE and Student Record (SR) collections to confirm accuracy of those data and to ensure that systems and schools throughout Georgia are funded in line with their actual enrollment. GOSA has the authority to conduct data audits, in cooperation with GaDOE, pursuant its duties as set forth in O.C.G.A. § 20-14-26 (a)(2):

To audit and inspect or cause to be audited or inspected for the purpose of verification, research, analysis, reporting, or for other purposes related to the performance of its powers and duties as provided in this article and for the purposes of auditing pre-kindergarten, elementary, middle grades, and secondary education, postsecondary education, and education work force programs and schools, local school systems, institutes, colleges, universities, regional education service agencies, and other public education programs and entities as defined by the council.

The GaDOE collects enrollment data from all Georgia local education agencies through three main collections: October FTE, March FTE, and Student Record (June). FTE enrollment counts measure how many students are enrolled on the count date and is used to determine state education funding allocations. Student Record includes enrollment information for all students enrolled in a school throughout the current year (July 1 to June 30). Therefore, all students included in an FTE count should also be included in Student Record. When students appear in an FTE count but do not appear in the SR count, the GaDOE data collection system flags the error and notifies the LEA. LEAs are required to enter a comment explaining a reason for errors that are not able to be corrected in the Student Record application. As such, this enrollment verification audit seeks to gain additional information and documentation (where required) to explain these discrepancies. More specifically, the audit has the following goals:

- Verify accuracy of data reported by school systems to the GaDOE,
- Ensure school systems follow GaDOE requirements for data training, reporting, and storage,
- Guard against improper data reporting practices and/or potential fraud,
- Provide additional support to school systems and schools in refining and improving data reporting and storage practices.

Currently, the audit focuses on schools with discrepancies in student enrollment, special education student enrollment, early intervention program (EIP) and remedial education program (REP) enrollment between the FTE and SR enrollment counts. The audit process is conducted in following three phases, as outlined in the remainder of this document:

Phase 1: Data Review and School Determination

Phase 2: Enrollment Verification Inquiry and Review

Phase 3: Audit Report, Communication, and Closeout

Phase 1: Data Review and School Determination

- GaDOE provides FTE/SR Error Code Reports for GOSA review to identify schools that will be subject to an Enrollment Verification Inquiry.
- Schools are chosen based upon number of total errors and students affected by four specific error codes (E057, E874, E262, E327).
 - E057: All students reported as active in FTE-1 or FTE-3 must be reported in the Student Record Data Collection. *Student records should exist for all students counted in FTE-1 or FTE-3. Student records serve to validate a student's active status for funding purposes.*
 - E874: Student reported as an active special education student in FTE but not reported with a PRIMARY AREA in Student Record. *Any student listed as active in special education must have a primary area of concern in their student record. A primary area helps to determine FTE weight and funding for each special education student. Student records serve to validate a student's active status for funding purposes.*
 - E262: A REMEDIAL EDUCATION SUBJECT CODE must be reported for all students with an FTE PROGRAM CODE of 'J'. *To determine FTE weight a subject code must be provided to determine the level of services provided to a student. Student records serve to validate a student's active status for funding purposes.*
 - E327: An EIP SUBJECT CODE must be reported for all students with an FTE PROGRAM CODE of 'E', 'F', or 'G'. (Kindergarten, Primary Grades, 4th and 5th Grades). *To determine FTE weight a subject code must be provided to determine the level of services provided to a student. Student records serve to validate a student's active status for funding purposes.*
- The codes above flag discrepancies in total enrollment, students eligible for special education services, early intervention program (EIP), and students eligible for remedial education services (REP).
- Schools are identified for enrollment verification inquiries based on an analysis of the previous two years' error codes. Schools are selected if they meet one of the following criteria for an error code:¹
 - More than 25 students were affected in FTE 2015,
 - Or more than 10 students were affected in both FTE 2014 and FTE 2015.

¹ Criteria may be adjusted in future years as deemed appropriate.

Phase 2: Enrollment Verification Inquiry Report, Review, and Response

Once Phase 1 is complete, GOSA will take the following steps to conduct its inquiry:

- Notify Superintendent and District Data Coordinator(s) of enrollment verification inquiry via email. (See appendix I for email template.)
 - LEAs are given three weeks to submit answers via GOSA's online platform. (See appendix II for inquiry form questions.)
 - LEAs are required to submit any and all policies and procedures pertaining to FTE and SR data collection and reporting.
- GOSA will review the information and respond by email to the superintendent and LEA data coordinator within thirty days from the receipt of LEA inquiry form. (See Appendix III for response template.)

Phase 2.5: Documents/Records Request or On-site Audit

(If the information provided in the inquiry satisfies the State's concern, then skip this phase, and move to Phase 3 Closeout.)

If the information provided by the LEA in the Enrollment Verification Inquiry Report does not satisfy the State's concerns, then GOSA reserves the right to take one of the following steps:

- Request relevant documents or records for students involved
- Conduct an on-site audit that includes records review and interviews

If an audit is conducted, GOSA will follow the following protocol:

- Notify Superintendent and LEA Data Coordinator(s) of the onsite audit with a minimum of one day's notice. (See appendix IV for email template)
 - Audit will be conducted over one day.
 - LEA Data Coordinator interview that covers the following:
 1. Reason for visit,
 2. Training received from the state,
 3. Job duties as they relate to FTE/SR,
 4. Specific issues/problems that may have arisen for the year(s) in question, and
 5. Discuss audit school.
 - Who is the data coordinator at the identified school?
 - How was this person trained?
 - Do you have anything to share about the school and/or data person?
 - Request paperwork/records (student records, training documents, etc.) for affected students (GOSA will provide list of GTIDs).
 - Conversation with school principal on the following topics:
 1. Reason for being there,
 2. Data collection and submission protocol,
 3. Knowledge of prior year FTE and SR data collection,
 4. Location to set up for further interviews and record review, and
 5. Ask to speak with school's Data Coordinator
 - School Data Coordinator interview that covers the following:
 1. Reason for visit,
 2. Training received from District Data Coordinator,

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3. Job duties that relate to FTE/SR,
 4. Specific issues/problems that may have arisen for the year(s) in question,
 5. Reason for the high number of errors for the specific code in question,
 6. Whether anyone else involved in data reporting should be interviewed,
and
 7. Request any additional pertinent paperwork (training documents, district
and/or state documents that pertain to FTE/SR, etc.).
- Return to GOSA office.
 - Analyze student records to verify accuracy of error codes initially reported to GaDOE. Make note of any discrepancies discovered during analysis.

Phase 3: Audit Report, Communication, and Closeout

- Audit report will include the following elements:
 - Background for audit,
 - Authority to conduct audit,
 - Audit objective and methodology,
 - Audit findings, and
 - Audit conclusion and recommendations.
- Audit report template can be found in the *Appendix V*.
- Report will be delivered to appropriate LEA and state personnel.
 - GOSA executive staff.
 - Designated GaDOE Data Collections personnel
 - LEA superintendent of audit school, school's principal, and local school council.
 - Any other personnel deemed appropriate by GOSA Executive Director.
- Enrollment Verification Closeout.
 - If the State's concerns are satisfied after the process above, this matter will be considered closed.
 - If an investigation is recommended in the on-site audit report and requested by GOSA's Executive Director, then the audit will remain open until such a time as an investigation can be conducted to satisfy the State's concern.
 - If an investigation satisfies the State's concerns, then an amended report will be delivered to all appropriate personnel and the matter will be considered closed.
 - For schools that have not been cleared, GOSA will refer the matter to the Georgia Professional Standards Commission and/or the Inspector General for further action.

Appendix I: Sample First Contact Inquiry Email

Dear Superintendent <<Name>>,

The Governor's Office of Student Achievement (GOSA) conducts data inquiries and audits to maximize the accuracy of data that local education agencies (LEAs) report to the Georgia Department of Education (GaDOE), pursuant to its statutory charge in O.C.G.A § 20-14-26. Accurate and consistent data are critical for state-level accountability and funding determinations.

Our agency has flagged schools of concern through an analysis of discrepancies between student counts reported in the FTE and Student Record collections for the previous two years. Errors in FTE enrollment reporting result in inaccurate funding allotments through the Quality Basic Education funding formula.

The following schools in your LEA were identified as schools of concern:

<<*Insert School Name*>>

Error Code E057

80 errors reported

<<*Insert Error Code and Description of Error*>>

As a first step in responding to our inquiry, the LEA Data Coordinator should fill out the ten-question form below to explain data collection and verification processes as well as provide a rationale for discrepancies in data reported (link below).

[Enrollment Verification Inquiry Form](#)

Forms must be submitted by <<Insert Date>> at 5:00 PM. Once received, GOSA will review this information in conjunction with relevant state-level student data to determine whether the inquiry can be closed or if further information is required. If further inquiry is necessary, it may include a document/records request or an on-site audit. GOSA will notify the LEA superintendent and data coordinator by email of closure or next steps within 30 days of the deadline. The attached Enrollment Verification Audit Overview and Procedures Document provides more details on the process that will be followed for this audit.

If you should have any questions or require clarification, please contact:

Dave Greenstein
Academic Auditor
404-844-8534
dgreenstein@georgia.gov

The Governor's Office of Student Achievement would like to thank you and your personnel in advance for your cooperation in this matter.

Sincerely,

Martha Ann Todd
Executive Director



Appendix II: School Enrollment Verification Inquiry Form

School Enrollment Verification Inquiry Form

(Please fill out a separate form for each school)

The Governor's Office of Student Achievement has identified schools of concern through analysis of error codes that flagged differences between the number of students that local education agencies (LEAs) reported in the FTE and Student Record Georgia Department of Education collections. Errors in FTE enrollment reporting result in inaccurate funding allotments through the Quality Basic Education funding formula. This form provides LEAs with schools of concern an opportunity to explain data collection and verification processes as well as provide a rationale for discrepancies in data reported. The form should be filled out and submitted by the LEA data coordinator.

Forms must be submitted by <<Insert Date>> at 5:00 PM. Please fill out a separate form for each identified school. All answers must be entered in one session, so it is recommended that the data coordinator gather answers to all questions prior to entering information into the form.

Once received, GOSA will review it in conjunction with relevant state-level student data to determine whether the inquiry can be closed or if further information is required, which may include a document/records request or an on-site audit. GOSA will notify the LEA superintendent and data coordinator by email of closure or next steps within 30 days of form submission.

Form responses are confidential. Only GOSA Academic Auditing and GaDOE Data Collections staff are able to view submissions.

LEA Number:

LEA Name:

School Name:

District Data Coordinator Name:

District Data Coordinator Phone Number:

District Data Coordinator Email:

School Data Coordinator Name:

LEA Data Collections Procedures

1. Describe the process for how your LEA collects, verifies, and submits data to the GaDOE for the FTE and Student Record collections, beginning with school-level data entry and ending with superintendent sign-off.
2. If available, upload your LEA's data collections policy/procedures document. Please make sure to click the "upload" button after selecting the file.
3. Did your LEA participate in the GaDOE's training on FTE and Student Record data collections?

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If so, who participated?

4. If available, upload any documentation verifying participation in the training. Please make sure to click the "upload" button after selecting the file.
5. Describe how your LEA trains school data personnel to ensure accurate and timely data entry and validation.
6. How long does the LEA maintain student enrollment records?

School Error Code Explanation

7. Were you aware of this reporting error prior to receiving this inquiry form?
8. (a) Describe the discrepancies between the FTE and Student Record collections for the school in question. Please provide as much detail as possible on the errors, but do not include any personally identifiable information.

(b) Please describe why the error(s) occurred and why they were not able to be corrected in the Student Record application.
9. What procedural changes have been or will be implemented to reduce the likelihood of similar errors in future data collections?
10. I certify to the best of my knowledge that I am authorized to submit this form on behalf of my LEA and that the information provided is accurate.

Name:*

Title:*

Appendix III: Sample School Enrollment Verification Inquiry Feedback Form

<<Date>>

Dear Superintendent <<Name>>:

Thank you for your district's work to determine the reason for the significant errors that occurred during the 2014-2015 FTE counts at <<School Name>>.

The Governor's Office of Student Achievement (GOSA) has reviewed your enrollment verification inquiry responses in relation to the guidelines established by the Georgia Department of Education (GaDOE) for the collection and reporting of data for FTE and SR. The following information summarizes the explanation you provided in the inquiry as well as GOSA's response.

School Name was flagged for error code <<error code number>> (Brief error code definition). In 2015, <<number of students>> students were affected by the error.

Reason(s) Reported for Errors

- Reason(s).

School/LEA Steps Taken to Address Concerns

- Steps taken.

GOSA Response

The school has provided sufficient information to fully resolve discrepancies, and no further action is needed at this time.

Regards,

Martha Ann Todd
Executive Director
Governor's Office of Student Achievement

Appendix IV: On-Site Visit Email Template

Dear Superintendent Person,

The Governor's Office of Student Achievement will be conducting an on-site enrollment verification audit at <<Insert School Name>> on <<Date>>. This audit was deemed necessary to gain further information regarding the discrepancies found between FTE and Student Record counts beyond what was provided in the inquiry form that your data coordinator provided on <<Insert Date>>. We will begin the visit at the district central office to speak with the district's data coordinator, before moving on to the school where we will speak with appropriate personnel regarding data elements collected by the school and reported to the State.

The Governor's Office of Student Achievement would like to thank you and your personnel in advance for your cooperation in this matter.

Sincerely,
Martha Ann Todd
Executive Director
Governor's Office of Student Achievement

Appendix V: Sample On-Site Audit Report Format

Conducted by:

Dave Greenstein, Academic Auditor

Governor's Office of Student Achievement

Background:

The Governor's Office of Student Achievement (GOSA) conducts academic audits and investigations to maximize the integrity of student achievement data and to ensure the LEAs implement Georgia Department of Education (GaDOE) assessment policies and procedures with fidelity, so that achievement data can be utilized in making critical decisions and reporting of student outcomes.

Through an enrollment verification audit, GOSA reviews school reporting data and other school records reported to the State to confirm accuracy of that data and to ensure that systems and schools throughout Georgia are funded appropriately.

Authority:

GOSA conducts FTE/SR data audits in cooperation with the Georgia Department of Education (GaDOE), pursuant to the Official Code of Georgia Annotated as set forth in Section 20-14-26 (a)(2):

To audit and inspect or cause to be audited or inspected for the purpose of verification, research, analysis, reporting, or for other purposes related to the performance of its powers and duties as provided in this article and for the purposes of auditing pre-kindergarten, elementary, middle grades, and secondary education, postsecondary education, and education work force programs and schools, local school systems, institutes, colleges, universities, regional education service agencies, and other public education programs and entities as defined by the council.

Audit Objective and Methodology:

The Georgia Department of Education flagged a high number of discrepancies between FTE and Student Record reporting at <<School Name>> for the <<School Year>>. <<School Name>> had the highest number of errors (<<Insert Number>>) and students affected (<<Insert Number>>) under the <<Insert Error Code>> error code.

E057: All students reported as active in FTE-1 or FTE-3 must be reported in the Student Record Data Collection. See SR071 FTE/SR Exceptions Report for a list of students reported in FTE but not in Student Record. *Student records should exist for all students counted in FTE-1 or FTE-3. Student records serve to validate a student's active status. This is necessary for ensuring proper weight and funding in FTE.*

Due to the number of students affected by these errors relative to other schools in the state, GOSA initially requested information on district data collection policy and information related to these errors through an online inquiry form. <LEA Name> submitted this form on <<Date>>.

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After review of the form, GOSA determined it was necessary to make a site visit to <<School Name>> in <<LEA Name>> to gain more information through an enrollment verification audit. The intent of this audit is to determine the reason for the errors and gain insight into how data is collected, reported, and stored at the school and district office.

On <<Insert Date>>, GOSA visited <<School Name>> to collect information via interviews of administrators at the district and school level. In addition, student records were collected regarding the students affected by the errors reported to GaDOE. GOSA has reviewed the information collected during this audit in conjunction with state-level data and the LEA's inquiry form. It has the following findings:

Findings:

- Bulleted points will lay out the factual findings of the audit.
- All findings will be factual in nature.

Conclusion and Recommendations:

After the findings section, the conclusion section will detail what was learned from the findings. Either one of two things will be concluded.

1. Based upon a review of the personnel interviews, student records, and documentation, the reasons for the errors are easily explained and occurred because of <<Insert Reason>>. No further action is required by <<School Name>> or <<LEA Name>>.

For future FTE counts, it is recommended that <<School Name>> take the following steps....

The State's concern has been satisfied and this audit is considered closed.

2. Based upon a review of the personnel interviews, student records, and documentation provided by <<School Name>> the audit team recommends that an investigation be conducted into the data reporting procedures utilized by <<School Name>> for the following reasons (e.g., potential fraud, incomplete student records, missing student records, information relayed in interviews, etc.):

GOSA Point of Contact:

David Greenstein
Academic Auditor
404-844-8534
dgreenstein@georgia.gov