

# Withdrawal Code Verification Audit Process Overview

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*September 9, 2016*

Prepared by:



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## Overview

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

Through a withdrawal code verification audit, GOSA reviews student withdrawal codes reported to the GaDOE to confirm accuracy of those data and to ensure that withdrawal data for systems and schools throughout Georgia are as accurate as possible. GOSA has the authority to conduct data audits, in cooperation with GaDOE, pursuant to 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.*

All Georgia local education agencies (LEAs) are required to document reasons for all student withdrawals from Georgia public schools by the State Board of Education Rule 160-5-1-.28 Student Enrollment and Withdrawal. LEAs that do not comply with this requirement will be reported to the State Board of Education and the Georgia Department of Education shall request the Governor's Office of Student Achievement (GOSA) to conduct an in-depth audit of the LEAs student records documentation, procedures, and processes. As such, the withdrawal code verification audit seeks to gain additional information and documentation (where required) to ensure LEAs are in compliance with State Board of Education Rule 160-5-1-.28. More specifically, the audit has the following goals:

- Verify the accuracy of LEA reported withdrawal codes (codes C, D, H, J, K, N, X, 2, 3, 5),
- Ensure school systems follow GaDOE requirements for data training, reporting, and storage,
- Aid school systems in detecting and correcting errors in data reported to GaDOE, and
- Provide additional support to school systems and schools in refining and improving data reporting and storage practices.

The withdrawal code verification inquiry reviews withdrawal codes reported to GaDOE for grades nine through twelve. The inquiry focuses on schools with a meaningful number of withdrawals reported for individual grade level cohorts. In addition, some schools will be selected at random for inquiry each year. Errors in withdrawal code reporting may result in inaccurate graduation rates, which affects the perception of school performance and the College and Career Readiness Performance Index (CCRPI):

Phase 1: Data Review and School Determination

Phase 2: Withdrawal Code Inquiry and Review

Phase 3: Audit Report, Communication, and Closeout

## **Phase 1: Data Review and School Determination**

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The GaDOE provides withdrawal code reports by grade level and school for GOSA review to identify high schools that will be subject to a Withdrawal Code Verification Inquiry. The inquiry focuses on the ten withdrawal codes that allow a student to be removed from the graduation rate cohort (C, D, H, J, K, N, X, 2, 3, 5).

1. Grade level cohorts with at least 10 students enrolled are identified for further inquiry using the following criteria:<sup>1</sup>
  - i. If cohort enrollment is between 10 and 40 students, 10% or more of students were withdrawn during the 2015-2016 school year using one of the ten codes, OR
  - ii. If cohort enrollment is greater than or equal to 40 students, 7.5% or more of students enrolled were withdrawn during the 2015-2016 school year using one of the ten codes.
2. These identified schools are also examined for patterns and groupings of withdrawals by month.
  - i. Special attention is given to large groupings of withdrawals occurring within the same month and/or consecutive months.
  - ii. Where the reason for withdrawals can be explained by the examination of data alone, a high school may be removed from the inquiry list. (Example: Some schools routinely remove students for excessive absences at set dates throughout the school year.)
  - iii. Where the reason for withdrawals cannot be explained by examination of data, further inquiry into grade levels identified during the desktop audit will be required.
3. Random Component – A subset of schools is chosen annually using random selection software.

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<sup>1</sup> Criteria may be adjusted in future years as deemed appropriate.

## Phase 2: Withdrawal Code Inquiry Report, Review, and Response

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

- Notify Superintendent and District Data Coordinator(s) of withdrawal code verification inquiry via email. (See appendix I for email template.)
  - LEAs are given three weeks to submit answers via GOSA's secure ftp site. (See appendix II for inquiry form questions.)
  - LEAs are required to submit any and all policies and procedures pertaining to withdrawal code documentation and reporting.
  - LEAs are required to submit documentation demonstrating compliance with State Board of Education Rule 160-5-1-.28. for all identified grade level cohort withdrawals or a randomly selected subset of those withdrawals.
  - Refer to Appendix III for guidelines on required documentation for withdrawal codes.
- GOSA will review the information and respond by email to the superintendent and LEA data coordinator within thirty days of the deadline date for the receipt of LEA inquiry form. (See Appendix IV 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 Withdrawal Code Verification Inquiry does not satisfy the State's concerns, then GOSA reserves the right to take one of the following steps:

- Request additional relevant documents or records for students involved, or
- 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 V for email template)
  - Audit will be conducted over one day, unless additional time is required to satisfy concerns.
    - 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 withdrawal documentation and reporting,
      4. Specific issues/problems that may have arisen for the year(s) in question, and
      5. Discussion of audit school.
        - Who is responsible for withdrawal documentation and reporting at the identified school?
        - How was this person trained?
        - Do you have anything to share about the school?
        - Request paperwork/records (student records, training documents, etc.) for affected students (GOSA will provide list of GTIDs).

## *Withdrawal Code Verification Audit Process Overview*

- Conversation with school principal on the following topics:
  1. Reason for visit,
  2. Withdrawal protocol,
  3. Knowledge of missing withdrawal documentation,
  4. Reason(s) for missing withdrawal documentation at school,
  5. How errors in withdrawal documentation are handled and addressed at school,
  6. Location to set up for further interviews and record review, and
  7. Request to speak with anyone else involved with withdrawal documentation.
- Additional personnel interviews that cover the following:
  1. Reason for visit,
  2. Training received to conduct duties regarding withdrawal documentation and reporting,
  3. Job duties that relate to withdrawal documentation and reporting, and
  4. Specific issues/problems that may have arisen for the year(s) in question,
- Return to GOSA office.
  - Analyze documents provided by LEA and school to determine next step for moving forward. Make note of any discrepancies discovered during analysis.

### Phase 3: Audit Report, Communication, and Closeout

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- 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 VI*.
- Report will be delivered to appropriate LEA and state personnel.
  - GOSA executive staff,
  - Designated GaDOE Data Collections and Accountability personnel,
  - LEA superintendent of audit school, school's principal, and local school council, and
  - Any other personnel deemed appropriate by GOSA Executive Director.
- Withdrawal Code Verification Audit 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, the Inspector General, and/or any other agency deemed appropriate for further action.

## Appendix I: Sample First Contact Inquiry Email

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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 identified schools for further inquiry through an analysis of withdrawal codes reported to the GaDOE for the 2015-2016 school year. All Georgia local education agencies (LEAs) are required to document reasons for all student withdrawals from Georgia public schools by the State Board of Education Rule 160-5-1-.28 Student Enrollment and Withdrawal. LEAs that do not comply with this requirement will be reported to the State Board of Education and the Georgia Department of Education shall request the Governor's Office of Student Achievement (GOSA) to conduct an in-depth audit of the LEAs student records documentation, procedures, and processes. Errors in withdrawal code reporting may result in inaccurate graduation rates which can affect the standings and measurements of schools, and the College and Career Readiness Performance Index (CCRPI).

Identified schools have a high percentage of withdrawals using the 10 withdrawal codes that remove students from the graduation cohort but the GaDOE does not currently have a mechanism to track. In addition, a subset of high schools was randomly selected for the audit. The following schools in your LEA were identified as schools requiring further inquiry for the 2015-2016 school year:

<<School Name>>

<<Grade level(s), Number of students affected for grade level(s) for the 2015-2016 year>>

As a first step in responding to our inquiry, the LEA Data Coordinator should read through the [Withdrawal Code Verification Process Overview](#), giving special attention to the Instructions for a School Withdrawal Code Verification Inquiry in Appendix II. (The instructions should be replicated separately for each school identified in this email.).

Due to the sensitive nature of student documentation, GOSA will provide you with GTID numbers and the withdrawal inquiry cover sheet next week through an online FTP site to be used in your district's inquiry into the withdrawals listed above. This site will also be used by you to upload your answers and documentation upon completion of your inquiry into the withdrawals. To facilitate this transfer, please send an email by <<Insert Date>> to Dave Greenstein at [dgreenstein@georgia.gov](mailto:dgreenstein@georgia.gov) with the appropriate staff member name and email address to gain access to the FTP site. Dave will set up the account and provide directions on how to download the inquiry cover sheet and GTID files from a secure ftp server. Dave will also provide directions on how to upload your answers and student documentation upon completion of your inquiry.

Student withdrawal documentation files must be submitted by <<Insert Date>> at 5:00 PM. Once received, GOSA will review the student withdrawal documentation files 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 Withdrawal Code Verification Audit Overview and Procedures Document provides more details on the process that will be followed for this audit.





*Withdrawal Code Verification Audit Process Overview*

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

Dave Greenstein  
Academic Auditor  
404-844-8534  
[dgreenstein@georgia.gov](mailto: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: Withdrawal Code Verification Inquiry

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### Instructions for a School Withdrawal Code Verification Inquiry

*Please fill out a separate cover and upload along with student withdrawal documentation files for each school.*

The Governor's Office of Student Achievement has identified schools of concern through an analysis of withdrawal codes for the 2015-2016 school year. Errors in withdrawal code reporting may result in inaccurate graduation rates which can affect the standings and measurements of schools, and the College and Career Readiness Performance Index (CCRPI). This inquiry provides LEAs with schools having significant withdrawals an opportunity to provide documentation required for withdrawals (codes C, D, H, J, K, N, X, 2, 3, 4) per State Board of Education Rule 160-5-1-.28. Withdrawal documentation should be provided for all GTIDs listed in the file provided on the ftp site. If appropriate withdrawal documentation is missing, this cover sheet provides an opportunity for LEAs to explain why such documentation is missing. It should be filled out and submitted along with the required student withdrawal documentation files. Student withdrawal documentation files should be submitted by the LEA data coordinator or a district level employee designated to do so by the superintendent and/or LEA data coordinator.

**Student withdrawal documentation files must be submitted by <<Insert Date>> at 5:00 PM. Please upload a separate student withdrawal documentation file for each identified school. All student withdrawal documentation files must be uploaded via GOSA's secure ftp site. To protect student privacy, do not send any documentation via email.**

Once received, GOSA will review the student withdrawal documentation files in accordance with GaDOE rules and guidelines 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 inquiry closure or next steps within 30 days of form submission.

*All student withdrawal documentation files are confidential. Only GOSA Academic Auditing and GaDOE Data Collections staff are able to view submissions.*

## **Withdrawal Code Verification Inquiry Cover Sheet**

**LEA Number:**

**LEA Name:**

**School Name:**

**District Data Coordinator Name:**

**District Data Coordinator Phone Number:**

**District Data Coordinator Email:**

**School Data Coordinator Name:**

**Withdrawal Code Verification Inquiry Questions (Use additional pages to answer if necessary):**

1. Briefly describe training provided to school staff who are responsible for maintaining documentation and reporting withdrawal codes.
2. Briefly describe the school's process for maintaining withdrawal documentation and reporting withdrawal codes.
3. Do you have appropriate documentation for each student withdrawal identified for inquiry? If not, how many are missing? For missing documentation, provide an explanation for why this documentation was not maintained.
4. (Complete if an answer of "No" was given for number one.) What procedural changes have been or will be implemented to ensure accurate withdrawal documentation for future data collections?
5. 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: Acceptable Documentation for Withdrawal Codes

(Appendix is taken from GaDOE Guidance for [State Board of Education Rule 160-5-1-.28 STUDENT ENROLLMENT AND WITHDRAWAL](#))

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
<b>H</b>	Attend Home Study	A document signed by the parent, guardian, or “other person” declaring their intent to utilize a home study program
<b>J</b>	Transferred Out of Country	Written confirmation that a student has emigrated to another country but it need not be official.
<b>K, X</b>	Transferred to Private School or Transferred Out of State	The private school, or out-of-state school’s request for transcript or student records.
<b>2, 3</b>	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.
<b>5</b>	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>
<b>C*</b>	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.
<b>D*</b>	Death	Written notification from parent/guardian, an obituary, or a newspaper article confirming death.
<b>N*</b>	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.

## Appendix IV: Sample Withdrawal Code Verification Inquiry Feedback Letter

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<<Date>>

Dear Superintendent <<Name>>:

Thank you for your district's work to determine the reason for the student withdrawals reported by grade level cohort that occurred during the 2015-2016 school year at <<School Name>>.

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

<<School Name>> was flagged for reporting <<Number of Students>> students in <<Grade Level Cohort>> grade (s).

**Did the school provide all necessary documentation? If not, what reasons were provided for why documentation was not provided?**

- Reason(s).

**School/LEA steps taken to address concerns if student withdrawal documentation was not provided.**

- Steps.

### **GOSA Response**

- GOSA determination based upon available information.

Regards,

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

## Appendix V: On-Site Visit Email Template

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Dear Superintendent <<Name>>,

The Governor's Office of Student Achievement will be conducting an on-site withdrawal code verification audit at <<School Name>> on <<Date>>. This audit was deemed necessary to gain further information regarding the 2015-2016 withdrawals in the <<grade level>> grade, beyond what was provided in the inquiry form that your data coordinator provided on <<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 withdrawal documentation 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 VI: Sample On-Site Audit Report Format

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Conducted by:

Dave Greenstein, Academic Auditor

Governor's Office of Student Achievement

### *Background:*

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

Through a withdrawal code verification audit, GOSA reviews school graduation rates and student withdrawal codes reported to the State to confirm accuracy of those data and to ensure that graduation rates for systems and schools throughout Georgia are as accurate as possible.

### *Authority:*

GOSA conducts withdrawal code verification 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 Governor's Office of Student Achievement identified <<School Name>> for further inquiry for the <<School Year>>. <<School Name>> had a significant number of <<grade level cohort>> grade withdrawals compared to the number of total enrolled <<grade level>> students. Accurate withdrawal codes are essential in determining an accurate graduation rate and College and Career Readiness Performance Index (CCRPI).

Due to the significant number of withdrawals, GOSA initially requested appropriate documentation for student withdrawals and an explanation for any documentation that was missing. <<LEA Name>> submitted this form on <<Date>>.

## *Withdrawal Code Verification Audit Process Overview*

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

On <<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 withdrawn students with missing documentation for withdrawal codes 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 missing documentation/errors are easily explained and occurred because of <<Insert Reason>>. No further action is required by <<School Name>> or <<LEA Name>>.

For future withdrawals, 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 a formal 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.):

The results of this audit have been shared with the Governor's Office, the Georgia Department of Education, and any other relevant state agencies.

### *GOSA Point of Contact:*

David Greenstein  
Academic Auditor  
404-844-8534  
[dgreenstein@georgia.gov](mailto:dgreenstein@georgia.gov)

