



Withdrawal Code Verification Audit

Process Overview

State Board of Education Rule 160-5-1-.28 Student Enrollment and Withdrawal requires all Georgia local education agencies (LEAs) to document reasons for all student withdrawals from Georgia public schools. The Governor's Office of Student Achievement (GOSA) reports LEAs that do not comply with this requirement to the State Board of Education. The withdrawal code verification audit seeks to gain additional information and documentation (where required) to ensure LEAs are complying 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;
- Ensure accuracy of graduation rate, and
- Provide additional support to school systems and schools in refining and improving data reporting and storage practices.

The withdrawal code verification audit reviews withdrawal codes reported to GaDOE for grades nine through twelve. The audit focuses on schools that meet certain thresholds of withdrawals dependent on cohort size. 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 Ready Performance Index (CCRPI).

The audit has three phases:

Phase 1: Data Review and School Determination

Phase 2: Notification, Inquiry Report, Review, and Response

Phase 3: Investigation and Closeout

Phase 1: Data Review and School Determination

The GaDOE provides withdrawal code reports by grade level and school for GOSA to review and identify high schools that will be subject to further inquiry. The audit focuses on the eight withdrawal codes that allow a student to be removed from the graduation rate cohort (D, H, J, K, N, X, 2, 3), and the two withdrawal codes that do not allow a student to be removed from the graduation rate cohort but that are not already verifiable with data housed at the GaDOE (C and 5).

Grade level cohorts with at least 10 students enrolled are identified for further inquiry using the following criteria:¹

- If cohort enrollment is between 10 and 39 students – 10% or more of students were withdrawn during the 2017-2018 school year using the ten audited withdrawal codes, OR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 the ten audited withdrawal codes, OR
- Random Selection – A subset of remaining schools is chosen from all schools not already flagged for further inquiry using the *Random Picker* web-based software. All schools are given equal weight regardless of size.

Phase 2: Notification, Inquiry Report, and Response

GOSA notifies superintendent of withdrawal code verification audit via email.

- LEAs are given three weeks to submit answers via GOSA's secure FTP site.
- LEAs are required to complete a withdrawal inquiry cover sheet for each school identified for further inquiry.
- 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. GOSA will provide the LEA with the specific students requiring documentation.
- Refer to the table at the bottom of this document 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 forty days of the deadline date for the receipt of LEA cover letter.

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

Phase 3: Investigation and Closeout

Withdrawal Code Verification 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.

GOSA will deliver the Withdrawal Code Verification Audit report will to appropriate LEA and state personnel, including:

- Designated GaDOE Data Collections and Accountability personnel;
- Georgia State Board of Education;
- 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 audit requires further inquiry, GOSA will request additional documents or conduct an on-site audit.
- If GOSA has no further concerns and agrees with the LEA's explanation and corrective action put in place (if required), then the inquiry will be considered closed.
- If GOSA's Executive Director recommends an investigation or on-site audit, the audit will remain open until an investigation can be conducted to satisfy GOSA's concern.
 - If an investigation satisfies GOSA's concerns, GOSA will deliver an amended report to all appropriate personnel and consider the matter closed.
 - If the investigation does not satisfy GOSA's concerns, GOSA will refer the matter to the Georgia Professional Standards Commission, the Inspector General, and/or any other agency deemed appropriate for further action.

Acceptable Documentation for Withdrawal Codes

(The language in the appendix is taken directly from GaDOE Guidance for [State Board of Education Rule 160-5-1-.28 STUDENT ENROLLMENT AND WITHDRAWAL](#))²

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	<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>		

² Language in the table was amended for readability.