



**LEAVER AUDIT PHASE THREE  
SCOPE SPRING 2013-2014**

Prepared by:  
Internal Audit

2014-2015

**Final**

## **Executive Summary**

### **BACKGROUND**

The U.S. Department of Education (USDE) found in their audit of Bowie and Coronado High School (HS) that the District's Leaver data was unreliable and recommended the District review this data on a regular basis. This project is part of the Board approved 2013-2014 Internal Audit Plan.

### **OBJECTIVES AND SCOPE**

The objectives of the audit were to (i) provide the Board and administration assurance the District's Leaver data is accurate, and (ii) test students withdrawn with high risk Leaver codes to verify students withdrawn with these codes were withdrawn appropriately with proper verifiable documentation. The scope of the audit was spring 2014 Leaver data.

### **COMMENDATIONS**

The following nine high schools (HS) are commended as they had no errors or only one student file with an error(s): Andress, Austin, Bowie, Burges, Delta Academy, Franklin 9<sup>th</sup>, Irvin, School Age Parent Center (SAPC), and Silva. Five high schools were commended during both the first and second audits, and were not audited during phase three: Chapin, Coronado, Jefferson, Telles Academy, and Transmountain Early College.

### **COMPARISON OF PHASE ONE, TWO, AND THREE LEAVER AUDITS**

Overall District error rates are calculated by dividing the number of student files with one or more errors with the total number of files reviewed. Campuses were commended if they had no student files with errors or only one student file with an error(s).

- Phase 1 overall District error rate: 13%, or 94 student files out of 703 - 6 campuses were commended
- Phase 2 overall District error rate: 7% or 35 out of 528 - 11 campuses were commended
- Phase 3 overall District error rate: 12% or 39 out of 317 - 9 campuses were commended

The increased error rate for the phase three audit is related to Findings 1 and 2 both for Sunset HS. SAPC and Sunset HS were combined into the College, Career, and Technology Academy (CCTA) under one principal in the month of June 2014. However, at the time of this audit, they were separate campuses with different principals and support personnel, and will be referenced in this report as such. The SAPC registrar is now the CCTA registrar and the Sunset HS registrar is no longer with the District.

See Appendix A for a side-by-side comparison chart of the first, second, and third Leaver audit results. See Appendix B for campus' complete Leaver audit results for phase three.

### **PHASE THREE FINDINGS:**

1. The former Sunset HS principal, former registrar, and at-risk coordinator did not comply with State and District Leaver procedures as no follow-up appeared to be performed to locate and/or verify 70% or 21 students' Leaver status out of 30 files/Leaver codes reviewed. We found an additional 166 students were at risk for being counted as dropouts for a total of 187 students. This may negatively affect Sunset HS students' Leaver status, in turn, affecting the District's state and federal accountability ratings and Performance-Based Monitoring (PBM) ratings.
2. The former Sunset HS principal (i) inappropriately allowed registrar duties to be performed by the school's business agent/PEIMS clerk (clerk) and (ii) did not provide proper oversight of the duties performed. The clerk was assigned as backup for the registrar and performed the duties when the registrar position was vacant. However, it appears he was directed to continue to perform all initial withdrawals at the campus, even after the registrar position was filled in December 2013.
3. We found non-compliance related to documentation and Leaver code requirements including:

- a. One withdrawal form (of 317) was missing (Sunset). The one missing withdrawal form was not counted as errors for other criteria in order not to gig the campus multiple times for the same missing document. As such, the denominator is lower (316) for (b) and (c) below, than all files reviewed (317).
  - b. Four percent (4%) or 14 of 316 students at eight campuses had Leaver codes that did not match the documents in the student's file.
  - c. Three percent (3%) or 8 of 316 student files at five campuses Leaver documentation did not meet the requirements of the Texas Education Agency PEIMS Data Standards (PDS), Appendix D.
4. One activity from the corrective action plan for the Leaver Audit Phase One Report has not been completed. The activity includes ensuring "...all Leaver/withdrawal directions are in writing, included in District-wide guidance, and/or updated...." This affects future Leaver data reliability (<sup>1</sup>USDE finding), as without concise language within local guidance, data/documentation errors may continue.

#### **SUMMARY OF RECOMMENDATIONS**

The data-process owner(s) or designee(s) should (i) create an action plan addressing the issues within the report, and (ii) monitor CCTA's progress. Additional recommendations are detailed within the complete report and include considering making attendance at Leaver trainings mandatory for campus personnel responsible for Leaver/withdrawal documentation to include administrators, monitoring of training attendance, reporting noncompliance, and consequences for noncompliance.

#### **ANALYSIS OF MANAGEMENT'S RESPONSE**

A corrective action plan (CAP) was provided outlining the activities to be implemented. The CAP appears sufficient to address the findings outlined in this report. The activities for corrective action include the elements noted in the Summary of Recommendations above and recommendations listed throughout the complete report. Corrective action has been ongoing since issuance of the draft report; as such, three out of 11 CAP activities have been verified as completed at the time this final report was issued.

#### **CONCLUSIONS**

Overall, five campuses improved their error rates and nine campuses were commended. Sunset HS' prior issues must be addressed expediently. The current CCTA principal has taken action on several fronts; however, the data-process owner(s) or designee(s) should continue to provide support until all the issues created by former employees are resolved.

Attached is the complete report, which includes more detailed findings and recommendations for those readers who would like further details.

## LEAVER AUDIT: PHASE THREE

### ADDITIONAL BACKGROUND

Leavers impact the District's state and federal accountability ratings and Performance-Based Monitoring (PBM) ratings. Low ratings could result in future audits and a decrease in public confidence. It should be noted that in determining accreditation status, the commissioner may consider data reported through the PEIMS to include Leavers.

Throughout the USDE audit report<sup>1</sup>, USDE states, "...withdrawals...lacked adequate documentation or were incorrectly reported to TEA (pages 13, 14, 17, and 19)." The report also stated, "Furthermore, students who were listed as leavers, movers, or dropouts could be coded inaccurately in the SASI or TEAMS systems. "Leavers" are students who left the Texas school system, "movers" are students who moved to other Texas public school districts, and "dropouts" are students who quit attending school and their reasons for leaving school are unknown. **These classifications affect the AYP graduation rate calculation; for example, a dropout incorrectly listed as a mover could result in an inaccurate graduation rate for that year. Therefore, it is crucial that student withdrawals be accurately coded** (bold added)." (<sup>1</sup>U.S. Department of Education (USDE) Office of the Inspector General Audit Services Report (June 2013); *El Paso Independent School District's Compliance with the Accountability and Academic Assessment Requirements of the Elementary and Secondary Education Act of 1965*, (pages 13, 14, 17, and 19); Report Control Number ED-OIG/A06L0001)

The USDE audit report<sup>1</sup> also stated, "We also recommend that the Assistant Secretary for Elementary and Secondary Education require TEA to direct El Paso to -

- 1.7 Conduct and document annual training of TEA and El Paso withdrawal policies and procedures.
- 1.8 Conduct reviews at appropriate intervals of withdrawal documentation to determine whether withdrawals were properly documented per the Department's non-regulatory guidance "High School Graduation Rate" and TEA and El Paso withdrawal policies and procedures."

### METHODOLOGY

To achieve our objectives we:

- Attended Withdrawal/Leaver Procedures 2013 beginning of year training presented by the Student and Parent Services (SPS) director prior to the phase one audit to observe and assess the quality of training provided to campus administration and staff.
- We reviewed federal, state, and local requirements including:
  - EPISD Administrator's Reference Guide (ARG)
  - EPISD Leaver Documents Quick Reference Guide 2012-2013 and 2013-2014
  - Texas Education Agency (TEA) PEIMS Data Standards (PDS), Appendix D
  - USDE Non-regulatory Guidance - High School Graduation Rate
  - 34 Code of Federal Regulations §200.19(b)(1)(ii)(B)(1) – Other Academic Indicators
- Reviewed prior audit findings from the <sup>1</sup>U.S. Department of Education (USDE) Office of the Inspector General Audit Services Report (June 2013); *El Paso Independent School District's Compliance with the Accountability and Academic Assessment Requirements of the Elementary and Secondary Education Act of 1965*, (pages 13, 14, 17, and 19); Report Control Number ED-OIG/A06L0001
- A sample of 30 student files were judgmentally selected for each campus based on their assigned Student Systems PEIMS Leaver/Mover code and District letter identifier. Where campuses had less than 30 Leavers/Movers, then 100% were selected for a total of 317 student Leaver/Mover files.
- Students' Leaver documentation was reviewed and compared to the Student Systems PEIMS Leaver/Mover code to determine if the documents supported the code per state law and local requirements.

The District letter identifiers (listed below) are internal controls to help SPS and Technology Services track the Leaver/Mover (Leaver) documentation needed for a code assigned by the campus. Numbers are PEIMS codes, letters are District identifiers: V=verified, R=records request, or G=GED Certificate.

Codes reviewed included:

16/16V - (Leaver) Student returned to family's home country

60 - (Leaver) Student is home schooled

80/80G/80R - (Mover) Enrolled in other Texas public school

81/81R - (Leaver) Enrolled in private school in Texas or the Texas Job Corps Diploma Program

82/82R - (Leaver) Enrolled in public or private school outside Texas

School leavers with the Leaver reason codes 88, 89, and 98 are counted as dropouts for federal accountability purposes:

88 - Student was ordered by a court to attend a GED program and has not earned a GED certificate - no District letter identifier

89 - Student is incarcerated in a state jail or federal penitentiary as an adult or as a person certified to stand trial as an adult – no District letter identifier (rarely used by EPISD, but selected due to rarity)

98 - Other (reason unknown): District letter identifiers for 98 include J-Job Corps (Not Diploma Program - See 81); K-Met Graduation Requirement failed TAKS; T-Enrolled in GED Program; V-Verified (as) Other/Unknown/Not listed

### **FINDINGS/RECOMMENDATIONS**

Appendix A provides a side-by-side comparison chart for results of the first, second, and third Leaver audits. Appendix B provides the Leaver audit phase three results by campus.

1. **Finding:** The former Sunset HS principal, former registrar, and at-risk coordinator did not comply with State and District Leaver procedures for follow-up. This may negatively affect Sunset HS students' Leaver status, in turn, affecting the District's state and federal accountability ratings (graduation rate calculations) and Performance-Based Monitoring (PBM) ratings.
  - a. Follow-up evidence was not provided for 70% or 21 students' Leaver status out of 30 files reviewed. Note that when a records request or other documentation is not received from another campus/district in a timely manner, registrars and at-risk coordinators are to follow-up on students' whereabouts. Once documentation is received, the registrar must add a District letter identifier to the student's PEIMS codes to ensure it will not count as a dropout (where applicable).
  - b. There is the risk an additional 166 Sunset students may be counted as dropouts during PEIMS submission, as they did not have the additional District Leaver letter identifier (per the Sunset HS' Student System 2013-214 Leaver report for withdrawals August 2013 through June 2014).

#### **Recommendations:**

1. The data-process owner(s) or designee(s) should ensure the CCTA principal is informed of the findings from this report in writing, and ensure the CCTA principal:
  - i. Directs the registrar and at-risk coordinators to follow-up on the 187 Leavers identified in the audit (in progress as of a September 2014 meeting with SPS director),
  - ii. Directs in writing the registrar and at-risk coordinators are to follow up on all Leavers in a timely manner,
  - iii. Directs in writing the registrar, at-risk coordinators, APs or other appropriate personnel to use the District's Leaver Follow-up Form as appropriate, and ensure the completed form is submitted to the registrar in a timely manner,
  - iv. Monitors that the registrar is updating students' Leaver coding timely and appropriately within the Student System and on the withdrawal form as applicable, and
  - v. Applies consequences to those employees failing to follow procedures.
2. We recommend Student and Parent Services (i) include follow-up timeliness on the campus Leaver Self-Audit form, (ii) emphasize during trainings that follow-up should occur in a timely manner, and (iii) review this area on the self-audit forms on a regular basis.
2. **Finding:** The former Sunset HS principal (i) inappropriately allowed registrar duties to be performed by the school's business agent/PEIMS clerk (clerk) and (ii) did not provide proper oversight of the duties performed. The clerk was assigned as backup for the registrar and performed the duties when the

registrar position was vacant. However, it appears he was directed to continue to perform all initial withdrawals at the campus, even after the registrar position was filled in December 2013. According to the Sunset HS clerk, s/he had Leaver training five years ago and was not aware of changes/updates to District guidelines. The effects include:

- a. Sunset HS has an overall error rate of 87% or 26 of 30 student files reviewed had at least one error.
- b. On 85% or 23 of 27 withdrawal forms, the certification area was filled out by the clerk (one withdrawal form was missing and two students dropped out without formally withdrawing). According to the ARG, "Only the parent/responsible person or adult student may complete the certification section. The Registrar/PEIMS Clerk must review this section to ensure the parent/responsible person or adult student has completed it properly, including their destination, as required by the PEIMS Data Standards (PDS), Appendix D." This requirement was added to the ARG in December 2013. Note that at elementary campuses, Delta Academy, and Telles Academy, the PEIMS clerk is also the registrar.
- c. On 10% or 3 of 29 withdrawal forms, administrators did not date the form as required by the PDS, Appendix D. This error rate is high compared to the District's overall error rate of 2% for this criterion.

**Recommendations:**

1. Refer to the recommendations under Finding 1.
  2. The data-process owner(s) or designee(s) should remind principals District-wide in writing, it is ultimately the principal's responsibility to:
    - (i) Ensure Leavers/withdrawals are coded appropriately,
    - (ii) Notify SPS or other departments when there are changes in personnel/assignments applicable to the responsible department/data-process owner(s), and
    - (iii) Ensure campus personnel responsible for Leaver/withdrawals, to include emergency back-ups and assistant principals (APs), attend the Leaver training(s) needed to complete their duties in accordance with federal and state law, TEA's PDS, Board policy, and local District guidance.
  3. As Leavers/withdrawals impact annual yearly progress (AYP) graduation rate calculations, the data-process owner(s) or designee(s) should also:
    - (i) Direct that Leaver trainings are mandatory and failure to attend should be reported to the principal and applicable area superintendent,
    - (ii) Direct principals to monitor/document that registrars, registrar-assistants, emergency back-ups, and APs have received the appropriate yearly Leaver training(s), and include in the registrar's Leaver binder, and
    - (iii) Apply consequences for noncompliance and those failing to follow procedures.
3. **Finding:** We found noncompliance related to documentation and Leaver code requirements including:
- a. One withdrawal form (of 317) was missing (Sunset). The one missing withdrawal form was not counted as errors for other criteria in order not to gig the campus multiple times for the same missing document. As such, the denominator is lower (316) for (b) and (c) below, than all files reviewed (317).
  - b. Four percent (4%) or 14 of 316 students at eight campuses had Leaver codes that did not match the documents in the student's file
  - c. Three percent (3%) or eight (8) of 316 student files at five campuses had Leaver documentation that did not meet the requirements of PDS, Appendix D.

**Recommendations:**

- a. Refer to recommendations two and three under Finding 2.
- b. As assistant principals (APs) are typically designated to review and sign/date the withdrawal forms District-wide, the data-process owner or designee should ensure APs receive Leaver training that includes:
  - (i) Student and Parent Services' El Paso ISD Leaver Documents Quick Reference Guide which has codes, descriptions, documentation requirements, and is updated yearly,
  - (ii) Leaver information within the District Administrator's Reference Guide (ARG),

- (iii) Withdrawal form procedures such as whom may fill out which areas, signatures/dates,
- (iv) High risk code 16/16V documentation requirements for students returning to their home country,
- (v) Leaver Follow-up Form usage as acceptable documentation; how to fill out, whom may fill out, when a code may be changed, etc., and
- (vi) Direct APs to ensure they are reviewing the withdrawal form in its entirety prior to signing/dating, and if it has Leaver code 16V, there is the proper supporting documentation.

**4. Finding:** One activity from the corrective action plan for the Leaver Audit Phase One Report has not been completed. The activity includes ensuring "...all Leaver/withdrawal directions are in writing, included in District-wide guidance, and/or updated...." This affects future Leaver data reliability (<sup>1</sup>USDE finding), as without concise language within local guidance, data/documentation errors may continue.

It appears the activity has not been completed due to ongoing delays and/or miscommunications between SPS and the Policy Office. According to SPS staff, they submitted a final update for the Districts' ARG in June 2014. However, as of the date of this report, the ARG has not been updated.

**Recommendation:** The ARG should be updated without further delay, to help ensure through clearly defined guidance withdrawals are accurately documented.

#### **CORRECTIVE ACTION TAKEN**

1. The CCTA principal took corrective action concerning the employee's duties.
2. The director of SPS met with the CCTA principal, registrar, and at-risk coordinators in September 2014 to discuss audit Findings 1 and 2, staff responsibilities, and Leaver procedures, and a plan for follow up on the 187 students. Continued corrective action is in progress by the CCTA principal and is being monitored by the SPS director.
3. Corrective action for Finding 3 has been taken by the campus principals and/or registrars where Leaver documentation and coding errors were found.
4. Student and Parent Services (SPS) conducted trainings throughout the spring semester of 2013-2014 in response to the corrective action plan (CAP) implemented for the Leaver phase one and two audits. Annual withdrawal policies/procedures trainings with registrars, at-risk coordinators, and counselors occurred July 29 and August 21, 2014. In addition, the SPS director conducts regular reviews through a mandated campus Leaver self-audit every six weeks (electronic). Campus Leaver documentation must be provided by the campus to support the Leaver coding on the self-audit.

Leaver Audits Phase One, Two, and Three Side by Side Comparison Chart

Appendix A

	First Review Scope 2012-2013				Second Review Scope August 2013-November 2013				Third Review Scope January 2014-June 2014			
High School Campuses	Number of student files reviewed	Number of student files with at least ONE error	Error Rate (Number of student files with errors divided by total number of student files reviewed)	Commended first audit?	Number of student files reviewed	Number of student files with at least ONE error	Error Rate (Number of student files with errors divided by total number of student files reviewed)	Commended second audit?	Number of student files reviewed	Number of student files with at least ONE error	Error Rate (Number of student files with errors divided by total number of student files reviewed)	Commended third audit?
ANDRESS	52	18	35%	NO	40	0	0%	YES	30	1	3%	YES
AUSTIN	48	12	25%	NO	40	2	5%	NO	30	1	3%	YES
BOWIE	46	1	2%	YES	41	3	7%	NO	30	0	0%	YES
BURGES	48	11	23%	NO	40	2	5%	NO	30	1	3%	YES
CHAPIN	65	1	2%	YES	40	1	3%	YES	Commended 1st and 2nd Audit-Not Audited 3rd			
CORONADO	72	0	0%	YES	40	0	0%	YES	Commended 1st and 2nd Audit-Not Audited 3rd			
DELTA ACADEMY	42	3	7%	NO	30	4	13%	NO	30	1	3%	YES
EL PASO	30	7	23%	NO	38	1	3%	YES	30	4	13%	NO
FRANKLIN 9TH	30	4	13%	NO	14	0	0%	YES	31	1	3%	YES
FRANKLIN	48	3	6%	NO	40	0	0%	YES	30	3	10%	NO
IRVIN	53	11	21%	NO	40	0	0%	YES	30	0	0%	YES
JEFFERSON	34	0	0%	YES	36	1	3%	YES	Commended 1st and 2nd Audit-Not Audited 3rd			
SCHOOL AGE PARENT CENTER	40	7	18%	NO	11	4	36%	NO	7	1	14%	YES
SILVA	19	3	16%	NO	11	0	0%	YES	9	0	0%	YES
SUNSET	32	12	38%	NO	40	17	43%	NO	30	26	87%	NO
TELLES ACADEMY	31	1	3%	YES	13	0	0%	YES	Commended 1st and 2nd Audit-Not Audited 3rd			
TRANSMOUNTAIN	13	0	0%	YES	14	0	0%	YES	Commended 1st and 2nd Audit-Not Audited 3rd			
DISTRICT TOTAL	703	94	13%	6	528	35	7%	11	317	39	12%	9



# Leaver Audit Phase Three Data Summary

# Appendix B

AAR/CUM = Academic Achievement Record/Cumulative Record folder

W/D Form = Withdrawal Form(s)

0 = No errors; A number equals number of errors per question.

High School Campuses	Number of student files audited	Number of student files with at least ONE error	Error Rate (Number of student files with at least one error divided by total number of student files audited)	1. Is there a withdrawal form?	2. Is there a withdrawal code on the withdrawal form?	3. Does the W/D form have parent/ responsible person or qualified student signature & date? <sup>4</sup>	4. Does the W/D form have correct admin. signature & date?	5. Is the certification area on the W/D form filled out by parent/ guardian, or adult student? <sup>4</sup>	6. Do Lvr documents conform to PEIMS Data Standards (PDS), Appendix D?	7. Does The District Lvr code (TEAMS) match the Lvr documents in AAR/ CUM/file?	Total Errors Per Campus (one file may have more than one error)
ANDRESS	30	1	3%	0	0	0	0	0	1	1	2
AUSTIN	30	1	3%	0	0	0	0	0	1	1	2
BOWIE	30	0	0%	0	0	0	0	0	0	0	0
BURGES	30	1	3%	0	0	0	0	0	0	1	1
DELTA (Delta has file folders, not AAR/CUMs)	30	1	3%	0	0	0	0	0	0	1	1
EL PASO	30	4	13%	0	0	0	1	0	3	3	7
FRANKLIN 9TH <sup>1</sup>	31	1	3%	0	0	0	1	0	0	0	1
FRANKLIN	30	3	10%	0	0	0	1	0	1	2	4
IRVIN	30	0	0%	0	0	0	0	0	0	0	0
SCHOOL AGE PARENT CENTER <sup>2</sup>	7	1	14%	0	0	0	0	0	0	1	1
SILVA	9	0	0%	0	0	0	0	0	0	0	0
SUNSET <sup>3</sup>	30	26	87%	1	0	1	3	23	2	4	34
<b>DISTRICT TOTAL</b>	<b>317</b>	<b>39</b>	<b>12%</b>	<b>1</b>	<b>0</b>	<b>1</b>	<b>6</b>	<b>23</b>	<b>8</b>	<b>14</b>	<b>53</b>
District percentage per question>				0%	0%	0%	2%	8%	3%	4%	
Number of applicable files per question>				Out of 317	Out of 316	Out of 297	Out of 316	Out of 300	Out of 316	Out of 316	

<sup>1</sup> Franklin 9th is counted separately from Franklin High School for Leaver, as each site has its own registrar.

<sup>2</sup> School Age Parent Center (SAPC) has some AAR/CUMs and some student file folders. When an AAR/CUM is not received, the registrar creates a file folder for documents.

<sup>3</sup> Sunset was without an official registrar August through December 1, 2013. Student and Parent Services provided the support of their lead registrar starting in September when available.

<sup>4</sup> Questions 2 and 7: The lower denominators are due to one of the following reasons: parents not withdrawing student (Q3 & 5); or student died, incarcerated, leaving to pursue a GED, or dropped out (Q5). The certification area states, "...requesting information for student enrollment to ("Receiving District" is under the line to be filled out)...", or no W/D form and error only counted once in first column.

Sunset Business Agent/ PEIMS Clerk filled out, not parent, responsible person, or adult student.	Although PDS requires admin. sig/date, we did not count as error a 2nd time on question 6 or 7. Errors included no documentation in the file, documents not conforming to PDS, or not supporting the Lvr code, or documents are <u>in</u> the file and code not changed appropriately.
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