



El Paso  
Independent  
School District

Report to Data Process Owners and  
Administration

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2015-2016

## LEAVER CODING AND DOCUMENTATION AUDIT

Twelve percent of student files had at least one error. Although the error rate dropped from previous audits, the type of errors has remained the same.



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## ABBREVIATIONS LIST

AAR/CUM	Academic Achievement Record/Cumulative Record folder (student file)
AR001	Executive Summary
AR002	Detailed Internal Audit Report
CAP	Corrective Action Plan
EPISD	El Paso Independent School District
FY	Fiscal Year
IA	Internal Audit Department
PDS	PEIMS/Data Standards
PEIMS	Public Education Information Management System (encompasses all electronic data requested and received by TEA about public education)
PID	Personal Identification Database (locates a student in Texas and used through TEA TREx)
SchYr	School Year
SPS	Student and Parent Services Department
TEA	Texas Education Agency
TEAMS	Total Education Administrative Management Solution; also referred to as Student Systems
TREx	Texas Records Exchange (allows the electronic exchange of student records between Texas <b>public</b> schools)
TS	Technology Services Department

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## Executive Summary (AR01)

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### Background

In accordance with the Board approved 2015-2016 Audit Plan, the Internal Audit Department performed an audit of Leaver coding and related documentation. Leavers were identified as an area of concern in the United States Department of Education audit report (ED-OIG/A06L0001 June 2013) and Board members identified it as an area of interest.

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### Objective(s) and Scope

The objective of the audit was to provide reasonable assurance to the Board and Administration regarding the adequacy of the internal controls for the Leaver/Mover (withdrawals) reason coding and documentation. In addition, the audit was a proactive approach to assist the data-process owner, Student and Parent Services (SPS), in identifying coding/documentation issues prior to the Public Education Information Management System (PEIMS) resubmission in January 2016.

The scope of our audit was for the 2014-2015 student Leavers who were reported in the fall 2015-2016 PEIMS submission records.

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### Limitations

In accordance with the *Institute of Internal Auditors' Practice Advisory 2320-3: Audit Sampling*, "The internal auditor should validate the completeness of the population to ensure that the sample is selected from an appropriate data set." The objective of this audit did not include testing of Information Technology general controls over applications that produce the system-generated data/reports we used to select our sample selections.

Although we cannot for certain determine that the populations provided from TEAMS reports were 100% complete and accurate, our completeness and accuracy procedures, on a sample basis, gave us sufficient comfort to rely on this data for our testing purposes.

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### Commendation(s)

We would like to commend the following campuses as no findings/errors were found in the sample we tested: Burges High School (HS), El Paso HS, Guillen Middle School (MS), and Morehead MS

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### Summary of Findings

Note that when the student withdrawal form was not located some of the additional document testing could not be performed.

1. Twelve percent (12%) of the student files reviewed had at least one error, and although the error rate dropped from 37% in the 2009-2010 audit to 12% in 2013-2014 and 2015-2016 audits, the type of errors has remained the same (see Finding 2).
2. We found three areas where eight percent (8%) of the coding and/or documents did not conform to requirements as follows:
  - a. Leaver documents did not conform to the Texas Education Agency's (TEA) PEIMS/Data Standards (PDS), Appendix D.

- b. Leaver codes in the Student System (TEAMS) were not supported by Leaver documents.
- c. The Leaver codes on the student withdrawal forms (SWF) did not match Leaver codes entered in TEAMS.

All the type of errors we found could have and should have been corrected if the registrars and at-risk-coordinators had used the Leaver Self-Audit tool throughout the 2014-2015 school year.

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### Summary of Observations

- 1. Students who leave EPISD to attend Job Corps are counted by the District as a 98-Other/Unknown (dropout). Job Corps has a GED program (counted as drop-out) and now has an online diploma program (Penn Foster). This means beginning with the 2014-2015 school year the District had an opportunity to change a drop-out code to a private school code if proper documentation was received from Job Corps.
- 2. One middle school campus had a private school student "enrolled" for one day, for Special Education testing, and then coded as a 98 (drop-out). Students who are enrolled for Special Education testing only, should not appear on a campus' Leaver report when enrolled correctly. Although only one campus is cited, it is possible other campuses, middle schools in particular, are coding students who enroll for one day for Special Education testing as 98 (drop-outs).

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### Summary of Recommendations

- 1. In our opinion, additional training would be insufficient to remedy the problem as many registrars and at-risk coordinators have been in their positions for several years. As such, we are recommending the following:
  - a. A campus administrator, in addition to the at-risk coordinator, should oversee/monitor the Leaver process to ensure the Leaver Self-Audit is completed and corrections occur for all errors.
  - b. The Area Superintendents should consider working with the SPS' Director to make the Leaver Self Audit and other Leaver processes tied to evaluations, and as necessary, disciplinary action should occur by principals at the campus level, and by the respective Area Superintendent at the District level for principals.
  - c. Several registrars reported they were overwhelmed by work resulting from the new online registration process. The SPS' Director, in collaboration with TS, should consider modifying the online registration form to not allow certain sections or pages to be skipped by parents, and insert a message that pops up stating in order to move on, that area/section must first be completed.
  - d. The SPS' Director, in collaboration with the TS' PEIMS/Data Quality Analyst (Student System), should consider reducing the number of District letter indicators added to PEIMS codes in TEAMS, which in turn may reduce the risk of a student inadvertently reported as a drop-out.
- 2. The SPS' Director should work with Job Corps to ensure Job Corps' written documentation/request contains the information necessary for EPISD to code students enrolled in the Penn Foster diploma program as 81(R) – Enrolled in Private School in Texas.

3. To avoid coding students who enroll for one day for Special Education testing as drop-outs, SPS should include in training and/or written guidelines the proper enrollment designation for these students.

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### **Corrective Action Plan**

The SPS' Director and TS' PEIMS/Data Quality Analyst (Student System) were provided with draft Leaver audit results for each campus, which were used to identify Leaver coding and/or documentation issues before and during PEIMS clearing, and prior to the PEIMS resubmission in January.

A Corrective Action Plan (CAP) was provided outlining the activities to be implemented. The CAP appears to be sufficient to address the reportable conditions outlined in this report.

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### **Conclusion(s)**

Appropriately identifying, coding, and obtaining supporting documentation for students who withdraw from the District is imperative as this impacts the District's state and federal accountability and Performance-Based Monitoring (PBM) ratings. Low PBM ratings could result in future audits and affect public confidence. It should be noted that in determining accreditation status, the commissioner may consider data reported through PEIMS to include Leavers. Active oversight and intervention by Student and Parent Services and the Area Superintendents, is critical to ensuring Leaver data and processes are correctly administered.

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

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## Detailed Internal Audit Report (AR02)

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### Methodology

We obtained a District list of Leaver and Mover students from the Total Education Administrative Management Solution (TEAMS) PEIMS Student School Leaver Report for the 2014-2015 school year. To determine our sample, we reviewed past Leaver audit reports and data, and met with the data-process owner(s). Beginning of the year (BOY) "No Shows" (August 2015) were included as part of the audit (high risk to District), while graduates were not included (low risk for error and low risk to District). A representative sample was selected in accordance with Internal Audit's (IA) controls sampling guidance.

We tested samples and supporting documentation found in the students' files to determine whether these documents were in accordance with state requirements and local guidance. Results of our testwork are cited within the findings section of the report.

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### Findings (01 to 02)

#### Finding (#01)

##### Condition

Twelve percent (12%) of students' Academic Achievement Record/Cumulative Record folders (AAR/CUM) reviewed had at least one error, and although the error rate dropped from 37% in the 2009-2010 audit to 12% in 2013-2014 and 2015-2016 audits, the type of errors has remained the same (see Finding 2).

##### Overall Leaver Audit District Error Rates

<b>AAR/CUMs found to have at least one error.</b>	
District Error Rate	12% or 37 of 318
High School Error Rate	13% or 30 of 234
Middle School Error rate	8% or 7 of 84

##### Criteria

- Texas Education Agency (TEA) PEIMS/Data Standards (PDS), Appendix D - 2014-2015 and 2015-2016
- Texas Education Code - Title 2. Public Education, Subtitle H. Public School System Accountability Chapter 39. Public School System Accountability, Sec. 39.053. Performance Indicators: Student Achievement, Subsection(c.)(2) Drop-out Rates
- 34 Code of Federal Regulations §200.19(b)(1)(ii)(B)(1) – Other Academic Indicators

##### Cause

- There are 17 PEIMS codes and an additional 17 District tracking letters/indicators and combinations. Registrars stated they "forget" and/or they do not go back and add the appropriate letter indicator once new information is received. This results in students reported in PEIMS as a 98, and in the final TEA analysis, may count as drop-outs. The inherent risk of these added indicators is and will continue to be that students are reported as drop-outs who actually may have Leaver documents that show otherwise.
- Continued registrar confusion concerning charter schools versus private schools' codes; either Mover code 80-Enrolled in Other Texas Public School, which includes charter schools, or using Mover code 81-Enrolled in Private School in Texas.

	<ul style="list-style-type: none"> <li>• Several registrars reported they were overwhelmed by the new online registration process. When parents/guardians did not complete various areas/sections, the registrars had to go back and complete those areas, and continue to register new students, complete the "No Show" student withdrawals, regular withdrawals, and request and send out student records within the 10 day required time period.</li> <li>• Although Leaver Self-Audits were not audited, it appears registrars/at-risk coordinators are not completing and/or SPS is not monitoring SPS' required Leaver Self-Audits, as <u>all the errors found in IA's audit</u>, could have been found and corrected using this tool during the 2014-2015 school year.</li> </ul>
Effect and Risks	<ul style="list-style-type: none"> <li>• Risk: If a District Identifier of "R" or "V" is not applied to certain PEIMS codes, the codes will revert to a 98 – Other/Unknown and count as dropouts.</li> <li>• Effect: Drop-outs impact the District's state and federal accountability and Performance-Based Monitoring (PBM) ratings.</li> </ul>
Recommendations	<p>In our opinion, additional training would be insufficient to remedy the problem, as many registrars have been in this position for several years. As such, we are recommending the following:</p> <ol style="list-style-type: none"> <li>1. A campus <u>administrator</u>, in addition to the at-risk coordinator, should oversee the Leaver process to include monitoring and ensuring the Leaver Self-Audit is completed and all corrections occur.</li> <li>2. The Area Superintendents should consider working with the SPS' Director to make the Leaver Self Audit and other Leaver processes tied to evaluations, and as necessary, disciplinary action should occur by principals at the campus level, and by the respective area superintendent at the District level for principals.</li> <li>3. The SPS' Director, in collaboration with TS, should consider modifying the online registration form to not allow certain sections or pages to be to be skipped by parents, and insert a pop-up message stating to move on, that area/section must first be completed. Note: According to Dr. Tom Miller, Deputy Superintendent of Operations and Administration, his department is already working with TS on implementation of the online registration form to not allow certain sections or pages to be skipped by parents.</li> <li>4. The SPS' Director, In collaboration with the TS' PEIMS/Data Quality Analyst (Student System) should consider reducing the number of District letter indicators added to PEIMS codes in TEAMS.</li> </ol>

## Finding (#02)

### Condition

We found three areas where eight percent (8%) of the coding and/or documents did not conform to requirements.

- a. Leaver documents in the AAR/CUMs did not conform to TEA's PEIMS/Data Standards (PDS), Appendix D.
- b. Leaver codes assigned in the TEAMS were not supported by the Leaver documents found in the AAR/CUMs.

- c. Student withdrawal forms' (SWF) Leaver codes did not match the Leaver code assigned in TEAMS.

#### Finding 2 Error Rates

Reference	District Error Rate	High School Error Rate	Middle School Error Rate
a.	8% or 27 of 318	9% or 21 of 234	6% or 5 of 84
b.	8% or 26 of 318	10% or 23 of 234	5% or 4 of 84
c.	8% or 27 of 318	10% or 23 of 234	5% or 4 of 84

All of the errors could have and should have been found and corrected if the registrars and at-risk-coordinators used the Leaver Self-Audit tool throughout the 2014-2015 school year.

Criteria	<ul style="list-style-type: none"> <li>• Texas Education Agency (TEA) PEIMS/Data Standards (PDS), Appendix D - 2014-2015 and 2015-2016</li> <li>• EPISD Administrators' Reference Guide, SPS Section, page 54, "Coding leaver changes, <u>"All leaver coding changes must be made on the withdrawal form and in the Student System within three days of the withdrawal request, receipt of the record's request and/or when new documentation is received indicating a change in coding is supported."</u></li> <li>• Texas Education Code - Title 2. Public Education, Subtitle H. Public School System Accountability Chapter 39. Public School System Accountability, Sec. 39.053. Performance Indicators: Student Achievement, Subsection(c.)(2) Drop-out Rates</li> </ul>
Cause	<ul style="list-style-type: none"> <li>• See <i>Cause</i> under Finding 1.</li> <li>• According to registrars, they are "forgetting" to go back and change the coding in TEAMS when new Leaver documentation comes in (typically having to add the District letter/indicators), and also "forgetting" to change the code on the withdrawal form.</li> <li>• Not using the Leaver-Self Audit effectively if at all.</li> </ul>
Effect and Risks	<ul style="list-style-type: none"> <li>• See <i>Effect and Risk</i> under Finding 1.</li> <li>• Risk: The documentation on and in the AAR/CUM is considered the official record and should match whatever has been entered in TEAMS. When documentation does not match coding in TEAMS, this could result in an increased dropout rate.</li> </ul>
Recommendations	<ol style="list-style-type: none"> <li>1. See <i>Recommendations</i> under <i>Finding 1</i>.</li> <li>2. The SPS' Director should create directions for the Leaver Follow-up Form. Emphasize completeness and the requirement for a campus/District administrator's signature and date, especially for the Leaver code 16V, as often, it is the only existing documentation verifying a student or student's family returned to their home country.</li> </ol>



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## Observations

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While conducting this audit, some observations were made that were outside of our original scope and objectives. These observations do not violate local, state, or federal guidelines, and as such, were not included in the findings of the Leaver Audit Report. However, we felt the items noted or observed were worthy of informing you as the data owner/expert, in order for you to make the determination as to whether they should be addressed.

Observations one and two are related as the issues described could impact the District's state and federal accountability and Performance-Based Monitoring (PBM) ratings. The concerns relate to coding issues, and could possibly lead to higher drop-out rates.

### Observations

1. Currently, students who leave EPISD to attend Job Corps are counted by the District as a 98-Other/Unknown (dropout). Job Corps has a GED program (counted as drop-out) and now has an online diploma program (Penn Foster). This means beginning with the 2014-2015 school year the District had an opportunity to change a drop-out code to a private school code if proper documentation was received from Job Corps (81R).

However, the request for records documentation received from Job Corps did not indicate what program the student was enrolled in. Documentation must indicate the student is actually enrolled in the diploma program to not count as a drop-out. As such, the student(s) would be reported as a drop-out.

2. One middle school campus had a private school student "enrolled" for one day, for Special Education testing, and then coded as a 98 (drop-out). Documentation from the Special Education Department was in the file and it appears code 98 is incorrect. According to TS' PEIMS/Data Quality Analyst (Student System) this is not a Leaver/Mover coding issue, rather it is an issue with the student's designation at the time of enrollment. Students who are enrolled for Special Education testing only should not appear on a campus' Leaver report when enrolled correctly. This is a management issue/decision as to how to direct the campus regarding the proper enrollment designation for students in these situations to ensure they are not inadvertently coded as drop-outs.

### Recommendations

1. The SPS' Director should work with Job Corps to ensure Job Corps' written documentation/request contains the information necessary for EPISD to code students enrolled in the Penn Foster diploma program as 81(R) – Enrolled in Private School in Texas.
2. The middle school campus' registrar was advised to contact SPS concerning correcting the coding for the student. Student and Parent Services should stress in training(s) and/or written guidelines the appropriate enrollment procedures for students enrolling for Special Education testing only.