



Dave Yost • Auditor of State

The State of Ohio, Auditor of State

INTERIM Report on Student Attendance Data and Accountability System



Dave Yost • Auditor of State

To the People of the State of Ohio:

In response to reports of irregular student attendance, enrollment and withdrawal practices within multiple school districts and a statewide concern over the integrity of the Ohio Department of Education (ODE) accountability and reporting system, the Auditor of State's Office is conducting an audit in accordance with Ohio Revised Code Section 117.11. This audit will include an objective review and assessment of ODE accountability policies, procedures and data, and local school district attendance, enrollment, withdrawal and reporting practices.

This interim report includes the project history; scope, objectives, methodology, and summary of the audit, including results of the assessments and corrective action recommendations to date.

This engagement is not a financial or performance audit, the objectives of which would be vastly different. Therefore, it is not within the scope of this work to conduct a comprehensive and detailed examination of local school report cards or Ohio's Accountability system. Additionally, certain information included in this report was derived from ODE, Information Technology Center (ITC), and school district Student Information System (SIS), which may not be completely accurate.

This report has been provided to the ODE and discussed with the schools selected for testing whose results are included within. ODE is encouraged to use the results of this review as a resource in improving its Accountability guidance and compliance monitoring.

Additional copies of this report can be requested by calling the Clerk of the Bureau's office at (614) 466-2310 or toll free at (800) 282-0370. In addition, this report can be accessed online through the Auditor of State of Ohio website at <http://www.ohioauditor.gov> by choosing the "Audit Search" option.

Sincerely,

A handwritten signature in black ink that reads "Dave Yost".

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October 4, 2012

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1. PROJECT HISTORY

The No Child Left Behind (NCLB) Act of 2001 was signed into law on January 8, 2002. Under the NCLB model, a school's report card specifies its performance as compared to other schools in Ohio. Specifically, the NCLB school report card displays student achievement data in reading, mathematics, science and other core subjects required by the state so that parents and the public can see how their schools are progressing over time. In addition, the report card includes information on student attendance rates and graduation rates.

A school's performance on the report card can be affected by the students counted in the scoring. If the scores of low-performing students can be excluded from a particular school's report card, the overall performance of that school shows a corresponding improvement. This effect is described in a July 25, 2012 letter from the Ohio Department of Education to the Lockland School District which found that attendance data had been "falsely reported" and revised downward the school district's report card rating. A copy of this letter is provided in the Appendix of this report.

There are four components to Ohio's accountability system. They are State Indicators, Performance index Score, Value-Added, and Adequate Yearly Progress (AYP). The State Indicators are generally based on the number of state assessments given over all tested grades. To earn each indicator, a district or school needs to have a certain percentage of students reach proficient or above a given assessment. Student test scores on the Ohio Achievement Assessment (OAA) and the Ohio Graduation Test (OGT) are State Indicators for the 2010-11 school year. The percentage of students per grade and test that were enrolled in the district for a "Full Academic Year" (FAY) are counted in the local report card. To have a day counted as an attendance day for meeting the FAY criterion, a student must be enrolled and in attendance during the year or be on expulsion status and receiving services from the school district (if the school district has adopted a policy as stated in paragraph (C) of Rule 3301-18-01 of the Ohio Administrative Code). Sometimes, however, allowable events occur that cause student scores to be removed from the local composite and included only in the statewide composite score.

Under No Child Left Behind (NCLB), there are several allowable ways student test scores can be excluded from an individual school's report card and pushed to the school district wide or state report card as described in ODE's "Where Kids Count" (WKC) Methodology. Students do not always count at the school in which they are enrolled. For example, when a *district* makes the decision to educate a student in a location other than the resident school, the student will be counted in the resident school's results. An example is a school that educates all of the Limited English Proficient students in the district because of expertise or resources in one building – those students will count in their resident school's report card results. Conversely, when a parent, guardian, or the courts place a student in another educational setting, those students will count in the educating schools report cards results or, if in attendance for less than the FAY, those students will be counted if enrolled.

Our report focuses mainly on breaks in enrollment which cause student test scores to be pushed to the statewide composite report card. In this scenario, the local report card includes only students enrolled for the FAY. A student must be enrolled continuously at a single school from the end of October count week to May 10th for grades 3-8 or March 19th for all other grades to qualify for the full academic year of attendance. When a lawful break in enrollment occurs, school districts push the student's test scores to the State's report card. Furthermore, if a student transfers between buildings within the same school district, the student's test score is pushed to the school district's overall report card. Schools break enrollment by withdrawing or enrolling students between October count week and the end of the academic school year, which can occur routinely among some Ohio public school districts.

Amid the tough economic pressures and rigorous federal performance ranking requirements, some schools are incentivized to remove students with high absenteeism and lower test scores from their local

report cards to boost performance measures used to determine government aid and improve school performance rankings. In fact, some schools also receive financial bonuses based on the schools' ranking.

2. OBJECTIVES AND SCOPE

On August 11, 2011, Dr. Harris, Superintendent of the Columbus City School District requested that the Auditor of State (AOS) review the district internal auditor's finding that there were absences deleted from the Columbus CSD school attendance records. Dr. Harris indicated the Columbus CSD's internal auditor was made aware of these changes from a truancy officer who was handling a court truancy filing. The truancy officer discovered the absences originally recorded in the student attendance records for the students in question were altered after charges had been filed. AOS met with district officials noting isolated attendance irregularities and requested Columbus CSD continue to investigate the attendance data internally and contact AOS if further discrepancies were noted.

Later, on June 15, 2012 the AOS was requested by Columbus City School District (CSD) to meet with their internal auditor to discuss the results of an internal audit on student withdrawal activity after an article was published in the local newspaper, *The Dispatch*. A representative of the AOS met with the Internal Auditor at Columbus CSD soon thereafter. Additional allegations of irregular attendance and enrollment practices surfaced in Toledo and ODE uncovered similar practices in Lockland School District, leading to questions about the integrity of Ohio's accountability system statewide. As a result, AOS initiated a statewide systematic and objective assessment of school year 2010-11 student attendance and enrollment systems for more than 100 school buildings among 74 Ohio school districts.

The purpose of this initial review was threefold: (1) to identify systemic, and potentially duplicitous, student attendance and enrollment practices among Ohio schools; (2) to provide recommendations to the Ohio Department of Education (ODE) and Ohio General Assembly for making future policy and legislative improvements to Ohio's Accountability system; and (3) to determine whether schools are scrubbing enrollment data to improve their local report card scores.

This engagement is not a financial or performance audit, the objectives of which would be vastly different. Therefore, it is not within the scope of this work to conduct a comprehensive and detailed examination of local school report cards or Ohio's Accountability system. Additionally, certain information included in this report was derived from ODE, ITC, and school district SIS, which may not be completely accurate.

3. OVERVIEW OF ACCOUNTABILITY

Adequate Yearly Progress

Adequate Yearly Progress (AYP) originated from the federal No Child Left Behind (NCLB) Act of 2001. The federal NCLB requires Ohio to set AYP goals each year and raise the bar in gradual increments so that all of Ohio's students are proficient on state reading and mathematics assessments by the 2013-2014 school year.

Schools must annually review the progress of each school served under Title I, Part A to determine whether the school has made AYP. Schools must identify for school improvement any school that fails to make AYP, as defined by ODE, for two or more consecutive school years. In identifying a school for improvement, ODE may base identification on whether the school did not make AYP because it did not meet (1) ODE's annual measurable objectives for the subject or (2) the same other academic indicator for two consecutive years.

Every school and district must meet AYP goals that are established for reading and mathematics proficiency and test participation, attendance and graduation rates. AYP determinations for districts and schools are based on test participation and proficiency rate goals. Failure to meet any of the proficiency or participation goals, attendance levels or graduation targets results in the district or school not meeting AYP.

The AYP calculations are applied separately to each building within a district and the district itself. The AYP determination for the district is not dependent on the AYP status of each of the buildings (e.g. Building A met AYP and Building B met AYP so the district met AYP). Instead the calculations are applied again to district level data (e.g. Building A had 20 out of 50 students who were proficient or above and Building B had 35 out of 60 students who were proficient or above, so the District had 55 out of 110 students who were proficient or above). Therefore, it is possible for buildings within a district to meet AYP while the district itself fails to meet AYP.

A school or district can miss AYP and earn “Excellent” or “Effective” designations for only two consecutive years. With the third year of missing AYP, the school or district designation drops to “continuous improvement” at which point the school district must take corrective measures including, but not limited to, restructuring.

Where Kids Count

Every school year, thousands of students change schools for a variety of reasons. While families living in poverty have the highest mobility rates, foster children and children in military families also move frequently. Mobility can negatively affect a student’s learning, achievement, social supports, physical and mental health. Since schools are graded based on student achievement, attendance and graduation, a key question for the Accountability system is: which school do mobile students belong to for scoring purposes?

This question is actually a series of questions and is more complex than it might at first appear. The answers are governed by the Where Kids Count (WKC) rules. The Full Academic Year rule is a specific WKC rule that states how long a student must be enrolled in a school or district for their test score to count toward that entity.

Students who count toward a resident district or school designation under Ohio’s accountability system are those who:

- Met the full academic year criterion (i.e., the student was enrolled and funded during the October funding count week and continuously enrolled through the spring test administration).
- Attended a JVSD, ESC, or Postsecondary Institution and met the ‘Full Academic Year’ criteria at the district level.
- Enrolled in a special education cooperative program educated at another district and met the ‘Full Academic Year’ criteria at the educating district.

However, as described earlier in this report, students do not always count at the school in which they are enrolled. Students that are court- or parent-placed into an institution within the district or state school will not count at the building or district level. Students that only receive services from a district do not count in the accountability calculations for the reporting district or building. Examples of a student who only receives services would be one who participates in latchkey programs or a student that is not enrolled but receives career-technical evaluation services.

Flexibility Waiver

Ohio operates under a flexibility agreement with USDOE pursuant to section 9401 of the federal ESEA. This agreement permits Ohio to include its differentiated accountability model as part of its system of

interventions through the 2011-12 school year, unless reauthorization of the ESEA changes the requirements on which Ohio's model is based. As part of this flexibility agreement, Ohio must agree to certain conditions detailed in the U.S. Department of Education's (USDOE) August 2008 Condition Letter. Should Ohio fail to satisfy these conditions, or should it fail to remain eligible to participate in the pilot, USDOE may terminate this flexibility.

Despite the aforementioned waiver, however, student attendance and enrollment remain an integral part of Ohio's Accountability system and the local report cards.

4. OVERVIEW OF STATEWIDE STUDENT IDENTIFIER

The Statewide Student Identifier (SSID) System is the cornerstone of ODE's student-level Education Management Information System (EMIS), a statewide data collection system for Ohio's primary and secondary education, including demographic, attendance, course information, financial data and test results. The SSID System assigns a unique identifier to every student receiving services from Ohio's public schools. This code will "follow" students as they move within and between Ohio districts, enabling studies of student progress and performance trends over time. The system has the following functions:

- Prevents the identification of actual student names, social security numbers, or other personal data that could breach individual confidentiality.
- Stores matching data and associated student identifier code throughout the course of each child's education.
- Facilitates assignment of individual SSIDs or mass assignment of SSIDs through batch processing or an online, web service.

Federal Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. 1232(g), and Ohio Rev. Code §3301.0714 give guidance regarding proper and improper practice for records maintenance and transfer.

Ohio law restricts ODE access to certain personally identifiable student information. ORC §3301.0714 states, "the guidelines shall prohibit the reporting under this section of a student's name, address, and social security number to the state board of education or the department of education. The SSID System does not replace a district's student information system software, nor is it the entirety of the student level EMIS. It is a duplicative system designed to connect the district's student software system to ODE's student level EMIS database. Pursuant to the aforementioned Ohio law, ODE uses only the SSID, in lieu of personally identifiable student information, for EMIS reporting purposes to protect the privacy of student records. Only school districts can access the "crosswalk" that links personally identifiable student information to the SSID reported to ODE in EMIS. In addition to the complications noted herein, Ohio's system creates duplicative costs that will be reported in this office's separate, ongoing performance audit of ODE.

Per the federal Missing Child Act (28 USC 534) and Ohio Revised Code § 3313.672, school districts are required to obtain reliable identification from parents upon enrollment in public schools. This can be obtained from birth certificates, passports, or immigration forms, for example. Ohio Revised Code §3301.0714(D)(2) further provides the following guidance:

"Each school district shall ensure that the data verification code is included in the student's records reported to any subsequent school district or community school in which the student enrolls and shall remove all references to the code in any records retained in the district or school that pertain to any student no longer enrolled. Any such subsequent district or school shall utilize the same identifier in its reporting of data under this section."

ODE provides verification reports to districts that will assist in determining whether two students have been assigned the same SSID. These reports will specify whether SSIDs are missing, invalid, or have potentially been used for multiple students.

The only reason to delete a SSID is if it is found to be a proven duplicate SSID. If a student moves out of state, transfers to a private school, dies, withdraws or graduates, the SSID should not be deleted. Generally, a record deletion actually deactivates the SSID from the production SSID database so that it can no longer be used. ODE cautions school districts that unless the deletion is conducted as part of a system-wide duplicate clean-up process, school districts should confer with other reporting entities using different SSIDs for the same student prior to making the deletion. If a deletion is conducted in error, school districts may contact IBM for assistance in re-activating the record.

5. "BREAKING" ENROLLMENT

The school report card performance measures, and rewards and sanctions, associated with Ohio's accountability system have changed over time. The incentives to create attendance breaks have generally increased over time as the consequences for poor performance became more severe.

The process of creating breaks in enrollment entails admitting or withdrawing students after the official October Average Daily Membership (ADM) count week. The following are valid reasons to create a "break" in enrollment pursuant to Chapter 2 of the 2011 ODE EMIS Manual:

| Code | Reason |
|------|--|
| 36 | Withdrew from Preschool; Preschool student has withdrawn from the preschool program (for any reason) |
| 37 | Withdrew from Kindergarten; Kindergarten student has withdrawn because it has been deemed to be in the best interest of the student if he/she waits one more year until starting his/her kindergarten experience; may only be used by students in kindergarten. |
| 40 | Transferred to Another School District Outside of Ohio; Transcript request on file. |
| 41 | Transferred to Another Ohio School District; Local, Exempted Village, or City, transcript request on file. |
| 42 | Transferred to a Private School; Transcript request on file, i.e., Ed Choice students. |
| 43 | Transferred to Home Schooling; Superintendent's approval on file. |
| 45 | Transferred by Court Order/Adjudication; If Court has designated a public district other than yours as district responsible for paying for the education. The resident district should not withdraw ANY students placed into the Department of Youth Services. |
| 46 | Transferred out of the United States |
| 47 | Withdrew Pursuant to Yoder vs. Wisoncsin |
| 48 | Expelled |
| 51 | Verified Medical Reasons; Doctor's authorization on file. |
| 52 | Death |
| 71 | Withdraw Due to Truancy/Nonattendance |
| 72 | Pursued Employment/Work Permit; Superintendent Approval on file. |
| 73 | Over 18 Years of Age |
| 74 | Moved; Not known to be continuing. |
| 75 | Student Completed Course Requirements but did NOT pass the |

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| | appropriate statewide assessments required for graduation. In the case of a student on an IEP who has been excused from the individual consequences of the statewide assessments, using this code indicates that the student completed course requirements but did not take the appropriate statewide assessments required for graduation. |
| 99 | Completed High School Graduation Requirements; Student completed course requirements and passed the appropriate statewide assessments required for high school graduation. In the case of a student on an IEP who has been excused from the individual consequences of the statewide assessments, using this code indicates that the student completed course requirements and took the appropriate statewide assessments required for high school graduation. |

With regard to truancy, schools are permitted to withdraw students only after appropriate due process. The statutes provide several procedural steps which schools must follow in dealing with violations of the compulsory attendance laws. Ohio Rev. Code §3321.19 and 3321.20 require schools to give prior warning of the legal consequences of truancy to the parent or guardian of the truant child. When any child of compulsory school age is not attending school and is not properly excused from attendance, the school must notify the parent or guardian who must thereafter cause the child to attend the proper school (Ohio Rev. Code §3321.19).

Special provisions of the law apply to any student who is considered to be either a “habitually truant” or a “chronic truant”. Ohio Rev. Code §2151.011 defines “habitual truant” as a school-age child who is absent from school without legitimate excuse for five or more consecutive days, seven or more days in a school month, or 12 or more school days in a school year. Ohio Rev. Code §3313.62 defines a “school month” as four school weeks. Ohio Rev. Code §2151.011 and 2152.02 define a “chronic truant” as a school-age child who is absent from school without legitimate excuse for seven or more consecutive days, ten or more days in a school month, or 15 or more days in a school year.

If a parent, guardian, or other custodian of a habitual truant fails to cause the child’s attendance at school, the board of education may proceed with an intervention strategy in accordance with its adopted policy, may initiate delinquency proceedings, or both (Ohio Rev. Code §3321.19). Each board is required under Ohio Rev. Code §3321.191 to adopt a policy to guide employees in addressing and ameliorating the habitual truancy of students. If the board has established an alternative school, assignment to the alternative school must be included in the policy as an interventions strategy.

Ohio Rev. Code §3321.19 requires that upon the failure of the parent, guardian, or other person having care of the child to cause the child’s attendance at school, if the child is considered an habitual truant, the board of education of the school district or the governing board of the educational service center shall do either or both of the following:

- (1) Take any appropriate action as an intervention strategy contained in the policy developed by the board pursuant to section 3321.191 of the Revised Code;
- (2) File a complaint in the juvenile court of the county in which the child has a residence or legal settlement or in which the child is supposed to attend school jointly against the child and the parent, guardian, or other person having care of the child. A complaint filed in the juvenile court under this division shall allege that the child is an unruly child for being an habitual truant or is a delinquent child for being an habitual truant who previously has been adjudicated an unruly child for being an habitual truant and that the parent, guardian, or other person having care of the child has violated section 3321.38 of the Revised Code.

Upon the failure of the parent, guardian, or other person having care of the child to cause the child's attendance at school, if the child is considered a chronic truant, the board of education of the school district or the governing board of the educational service center shall file a complaint in the juvenile court of the county in which the child has a residence or legal settlement or in which the child is supposed to attend school jointly against the child and the parent, guardian, or other person having care of the child. A complaint filed in the juvenile court under this division shall allege that the child is a delinquent child for being a chronic truant and that the parent, guardian, or other person having care of the child has violated section 3321.38 of the Revised Code.

Attendance and student performance are highly correlated.¹ Withdrawing students with significant absences could improve aggregate proficiency rates on average. Thus, even high schools (whose "other" AYP indicator is the graduation rate, as opposed to the attendance rate) have long had incentives to withdraw chronically absent students. This point also implies that schools and districts need not be particularly savvy to take advantage of attendance "breaks." In particular, they need not wait until they receive preliminary results from the ODE to benefit from changes to attendance data. Thus, withdrawing just a few students from a subgroup could allow a school to avoid the adverse consequences of AYP failure due to a relatively large number of low-achieving students. Because NCLB's AYP focuses on reading and mathematics test results, schools and districts have especially strong incentives to withdraw students who scored poorly (or were expected to score poorly) on those tests.

It also is important to understand that schools and districts potentially stood to gain by improving their test and attendance outcomes, regardless of their demographic characteristics and achievement levels. Ohio's mechanism for labeling schools provided a number of complicated ways to reach the publicized designations. As a result, improvement on any report card indicator could be pivotal (e.g., in demonstrating the type of improvement associated with NCLB's "safe harbor" provision, schools and districts could avoid having to meet a proficiency level if sufficient improvement was shown). Additionally, there have been rewards and sanctions associated with each of these potential designations, ranging from public shaming and levy problems, to state and federal rewards and sanctions.

6. SUPPORT ROLES IN ACCOUNTABILITY

Role of ODE

Pursuant to Ohio's organizational structure, ODE must ensure compliance with statewide policy by outlining Accountability and other requirements of federal and state laws so that the state, districts, school buildings, and school boards can incorporate these requirements into their family involvement

¹ References:

Roby, Douglas E. Research on School Attendance and Student Achievement: A Study of Ohio Schools. Educational Research Quarterly available at <http://www.eric.ed.gov/PDFS/EJ714746.pdf>

Gottfried, Michael A. Evaluating the Relationship Between Student Attendance and Achievement in Urban Elementary and Middle Schools: An Instrumental Variables Approach. American Educational Research Journal available at: [http://69.8.231.237/uploadedFiles/Divisions/School_Evaluation_and_Program_Development_\(H\)/Awards/Cat_2_GOTTFRIED_ONLINE_FIRST.pdf](http://69.8.231.237/uploadedFiles/Divisions/School_Evaluation_and_Program_Development_(H)/Awards/Cat_2_GOTTFRIED_ONLINE_FIRST.pdf)

Lamdin, Douglas J. Evidence of Student Attendance as an independent Variable in Education Production Functions. The Journal of Educational Research available at: <http://www.gb.nrao.edu/~sheather/new%20lit/ContentServer.pdf>

policies. In this role, ODE must communicate policy to districts, buildings, school boards and stakeholder groups; monitor districts for compliance; and provide support and infrastructure for continued implementation of federal and state family and community engagement policies. In addition, ODE policies should include evidence-based guidance for implementation.

ODE also provides expert technical assistance and support to facilitate the development and continuous improvement of programs for school, family and community partnerships.

In this capacity, as described in ODE's Recommended Roles and Responsibilities for Supporting School, Family, and Community Partnerships, ODE must:

- Provide adequate staff to monitor compliance of federal and state laws and policies;
- Secure adequate funding for supporting state-level goals and provide guidance for district allocation of funding;
- Allocate funds for staff to develop tools and resources, and to conduct compliance reviews; and
- Provide guidance to districts in the use of federal entitlement funds, state funds and other funding sources available for supporting school, family and community partnerships.

As described earlier in this report, EMIS is ODE's primary system for collecting student, staff, course, program, and financial data from Ohio's public schools. The data collected via EMIS are used to determine both state and federal performance accountability designations, produce the local report cards, calculate and administer state funding to school districts, determine certain federal funding allocations, and meet federal reporting requirements. The data collected through EMIS provide the foundation for Ohio's soon-to-be developed P-20 Statewide Longitudinal Data System, intended to meet all of the America COMPETES Act elements. Also, ODE launched a newly redesigned EMIS system (EMIS-R) in January 2012. EMIS-R is intended to provide enhanced system functionality that will improve the timeliness and quality of the data while simplifying the process.

Role of Information Technology Centers and Student Information System Vendors

There are 23 governmental computer service organizations serving more than 1,000 educational entities and 1.8 million students in the state of Ohio. These organizations, known as Information Technology Centers (ITCs), and their users make up the Ohio Education Computer Network (OECN) authorized pursuant to Section 3301.075 of the Revised Code.

ITCs provide information technology services to school districts, community schools, joint vocational schools (JVS)/career & technical, educational service centers (ESCs) and parochial schools; however, not all schools subscribe to the same services. Therefore software applications can vary between schools, even if they are members of the same ITC.

As noted earlier, not all schools use an ITC. Typically larger school districts, such as Columbus CSD and Cleveland MSD, maintain their own in-house data centers.

Schools use SIS software applications to electronically manage student data. There are approximately 26 different SIS applications developed by various vendors used by schools in the state of Ohio. SIS applications are sometimes distributed by an ITC, but not always. Some schools contract with a vendor directly to obtain a SIS application or develop their own SIS in house. SIS applications are used to electronically store information related to:

- Student demographics
- Student scheduling
- Student attendance

- Student registration/enrollment
- Student withdrawal
- Student grades
- Student test scores

7. USE OF REPORTS AND OTHER DATA SOURCES

To complete this report, auditors gathered and assessed data from the selected school districts; conducted interviews with USDOE, ODE, ITC's, SIS vendors, and district personnel. Data from external sources, such as the SIS vendors, were not tested for reliability.

We also used the following governing sources to assist in our review:

- Federal Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. 1232(g)
- Individuals with Disabilities Education Act (IDEA), (Pub. L. No. 108-446; 20 USC 1400 et seq.)
- No Child Left Behind Act of 2001
- Title I, Part A of the Elementary and Secondary Education Act (ESEA), as amended (Pub. L. No. 107-110 (20 USC 6301 through 6339 and 6571 through 6578)
- American Recovery and Reinvestment Act (ARRA)
- Title I program regulations at 34 CFR part 200
- 2011 OMB Compliance Supplement
- The Education Department General Administrative Regulations (EDGAR) at 34 CFR parts 76, 77, 81, 82, 98, and 99
- Certain requirements of 34 CFR part 299 (General Provisions)
- Ohio Revised Code (ORC) §3301.0714
- ODE 2011 EMIS Manual

8. METHODOLOGY

Report card data are submitted to ODE by each school district. The report card data are filtered through a special set of ODE business rules used to get the most accurate data for the accountability calculations. For example, the FAY rule limits the set of students whose data are used in the proficiency calculations to those who have been in the school or district the majority of the year. In most schools and districts, this is a subset of the students that are actually enrolled on testing day. When trying to show the instructive effectiveness of a school or district, it makes sense to limit the population to those students who were actually in the school or district the majority of the year. Many other ODE business rules are also applied to get the data that best represent what is happening in each school and district.

The data on a school or district's report card is reported to ODE through EMIS (Education Management Information System) by the district's EMIS coordinator over a series of reporting periods throughout the year. The majority of data for the local report cards are submitted over the course of eight weeks during the summer. The data is extracted from the school and district student information systems (SIS) and sent to ODE through the school district's Information Technology Center (ITC) or data center if they do not have a contracted service agreement with an ITC. The schools do not use a uniform district student information system. New data can be sent each week if districts choose. Each week following data submission, a series of data verification reports are sent from ODE to district EMIS coordinators and ITCs. These reports are intended to help EMIS coordinators and ITCs ensure that the data was uploaded accurately and successfully. However, in practice, due to the fact the projections in the Secure Data Center show school and district designations without the value-added component, *which can only*

improve a school or district's designation, these reports provide schools and districts with incentive and opportunity to “scrub” their attendance and enrollment data submissions to improve report card results.

Amid these concerns and after irregular enrollment and attendance practices were discovered in the Columbus, Toledo, and Lockland school districts, the AOS initiated a statewide analysis of school attendance records to determine whether Ohio schools manipulated their enrollment and attendance numbers in order to boost their performance (i.e., scrubbing) and to determine if other problems existed in the EMIS reporting process.

For this first phase of testing, AOS initially selected 100 schools with the highest number of students that took the assessment tests and whose test scores were subsequently pushed to the state based on a break in enrollment or change in the WKC. However, AOS noted two districts, Columbus City School District and Cleveland Municipal City School District, had a large number of schools included in the initial selection. In an effort to achieve more diverse coverage in Ohio schools selected for initial testing, AOS narrowed the schools in the Columbus CSD and Cleveland MSD to only ten and 15 schools, respectively, based on the schools with the greatest number of students pushed to the state’s report card. Furthermore, AOS selected an additional 28 school districts to include in its testing sample. The goal of the first phase of testing was to obtain a general understanding of how the EMIS system operates and how schools might use breaks in enrollment to improve report card results. The data collected from this testing will be used to determine the most effective and efficient testing approach to address the second phase of the AOS review – testing approximately 3,400 schools.

AOS performed the following procedures for each of the selected schools or districts:

- Reviewed school’s enrollment, attendance, and withdrawal policies and practices. Each board is required under Ohio Rev. Code §3321.191 to adopt a policy to guide employees in addressing and ameliorating the habitual truancy of students. For example, if the board has established an alternative school, assignment to the alternative school must be included in the policy as an interventions strategy.
- Traced breaks in student enrollment to supporting attendance records to determine reasonableness and timeliness of breaks in enrollment. Pursuant to ODE’s 2011 EMIS Manual Chapter 2, *Student Data*, supporting attendance records should include, but not be limited to:
 - Notes and other verification information relative to excused absences and tardiness;
 - Authorized medical excuses;
 - Expulsion notifications to students and parents or guardians;
 - Telephone and meeting logs describing nature and timing of contact with student parents or guardians and reasons for absence;
 - Notices to parents, guardians, and truancy officers demonstrating due process under Ohio Rev. Code §3321.191 and the board-approval truancy policies;
 - Court and parent/guardian orders for student placement in homes or institutions;
 - Transcript requests from other school districts supporting student mobility;
 - Evidence that the student completed course requirements but did not take the appropriate statewide assessments required for graduation;
 - Evidence that the student is 18 years old and no longer under the purview of the Compulsory Education Act; and
 - Other source documents such as lists of Limited English Proficient (LEP) students, students in open enrollment, students attending classes at an Educational Service Center (ESC), Career Technical Planning District (CTPD), or Joint Vocational School (JVS), and students enrolled in Post-Secondary Enrollment Options (PSEO).

All excuses from parents, and other documents, regardless of format or condition, become official attendance records. Ohio Rev. Code §3317.031 requires the, “membership record shall be kept intact for at least five years and shall be made available to the State Board of Education or its representative in making an audit of the average daily membership or the transportation of the district.” “Membership record” encompasses much more than just attendance records. As defined in statute, it includes: “name, date of birth, name of parent, date entered school, date withdrawn from school, days present, days absent, and the number of days school was open for instruction while the pupil was enrolled.”

9. SUMMARY OF RESULTS

The following is a summary of AOS testing results over enrollment for the 2010-11 school year on selected schools and school districts to date.

9.1. SYSTEMIC STATEWIDE ISSUES

Lack of Written Attendance Policies

The NCLB Act and ESEA include Federal flexibilities and policies to States for designing their own student attendance requirements, which are not static. The U.S. Congress felt states should have flexibility to determine the required number of school days in a school year and develop their own truancy processes. However, withdrawing truant students without adjudication to improve the report card was clearly not the intent of the U.S. Congress. **The NCLB and ESEA already include factors to take into consideration the law of averages by removing the worst and best students in school buildings and districts from significant report card computations so that no school building or district is penalized or rewarded for its outliers.**

Ohio Rev. Code §3321.19 defines truancy and empowers Ohio school governing boards to adopt their own policies for intervention and withdrawal of students. If a parent, guardian, or other custodian of a habitual truant fails to cause the child’s attendance at school, the board of education may proceed with an intervention strategy in accordance with its adopted policy, may initiate delinquency proceedings, or both. Each board is required under Ohio Rev. Code §3321.191 to adopt a policy to guide employees in addressing and ameliorating the habitual truancy of students. If the board has established an alternative school, assignment to the alternative school must be included in the policy as an intervention strategy. Currently, while certain school association organizations provide sample policies, ODE does not have written business rules that provide specific policies or direction to school boards. Based on the intent of the state and federal statutes that follow, it is clear that school boards should immediately notify students and their parents or guardians that the student is deemed truant, provide an opportunity for intervention, counseling, truancy prevention mediation, and parental involvement programs; notify the Registrar of Motor Vehicles, if applicable; take appropriate legal action; and assign the student to an alternative school prior to a school withdrawing the student due to truancy. Additionally, Ohio Rev. Code 3321.13 (B)(2) requires the Superintendent develop administrative guidelines that establish proper procedures so the student and his/her parents are provided the opportunity to challenge the attendance record prior to notification and withdrawal of students.

The concept of due process prior to withdrawal of truant students is further emphasized by the NLCB Act and IDEA. The NCLB Act requires every Title I eligible child be served under the program. Withdrawing students prior to receiving due process inaccurately inflates the school’s AYP report card rating, which results in an understatement of Title I allocations to the eligible buildings within a school district. Overstatement and understatement of Title I allocations can impact federal funding in other federal

programs since ODE must use Title I funding allocations to distribute a host of other Federal programs to schools, such as the federal Perkins Career Technical funding for example.

Similarly, IDEA requires school districts provide an alternative setting for the education of students that are legitimately truant. Failure to provide an opportunity for truant students to receive an alternative means of education is a fundamental violation of the intent of IDEA.

AOS identified systemic concerns regarding the withdrawal of students due to truancy without court adjudication. While most schools had written policies for truancy, these policies were incomplete, lacked clearly defined procedures for withdrawal, or contravened the due process proceedings for truant students. Refer to Sections **11.1** and **11.2** for lists of the top 100 schools with systemic and episodic issues, respectively, and Section **11.5** for the results of testing for the additional 28 school districts pertaining to incomplete or poorly defined student withdrawal policies.

The lack of clearly defined written procedures for truancy and withdrawal of students, including specified due process for students and parents and strategies for intervention, prior to a student's withdrawal from a school's report card creates inconsistencies in the local report card ratings. Additionally, since schools receive federal award allocations based both on U.S. Census data and their corresponding school report card rankings, with lower ranking schools receiving a higher percentage of available federal funding, a school's failure to count all students being educated within the school neglects students that have a right to be served by federal programs.

Lack of Due Process Prior to Withdrawal

Special provisions of the law apply to any student who is considered to be either a "habitually truant" or a "chronic truant". Ohio Rev. Code §2151.011 defines "habitual truant" as a school-age child who is absent from school without legitimate excuse for five or more consecutive days, seven or more days in a school month, or 12 or more school days in a school year. Ohio Rev. Code §3313.62 defines a "school month" as four school weeks. Ohio Rev. Code §2151.011 and §2152.02 define a "chronic truant" as a school-age child who is absent from school without legitimate excuse for seven or more consecutive days, ten or more days in a school month, or 15 or more days in a school year.

If a parent, guardian, or other custodian of a *habitual* truant fails to cause the child's attendance at school, the board of education may proceed with an intervention strategy in accordance with its adopted policy, may initiate delinquency proceedings, or both, pursuant to Ohio Rev. Code §3321.19. Each board is required under Ohio Rev. Code §3321.191 to adopt a policy to guide employees in addressing and ameliorating the habitual truancy of students. If the board has established an alternative school, assignment to the alternative school must be included in the policy as an interventions strategy. If the parent, guardian, or other custodian of a *chronic* truant fails to cause the child's attendance at school, the board must proceed directly with the filing of delinquency proceedings in the juvenile court by filing a complaint jointly against the student and the parent, guardian, or other custodian to have the child declared a delinquent child by reason of such truancy Ohio Rev. Code §3321.19.

The concept of due process prior to withdrawal of truant students is further emphasized by the NLCB Act and IDEA. The NCLB Act requires every Title I eligible child be served under the program. Withdrawing students prior to receiving due process inaccurately inflates the school's AYP report card rating, which results in an understatement of Title I allocations to the eligible buildings within a school district. Overstatement and understatement of Title I allocations can impact federal funding in other federal programs since ODE must use Title I funding allocations to distribute a host of other Federal programs to schools, such as the federal Perkins Career Technical funding for example.

Similarly, IDEA requires school districts provide an alternative setting for the education of students that are legitimately truant. Failure to provide an opportunity for truant students to receive an alternative means of education is a fundamental violation of the intent of IDEA.

A child is not truant until a court adjudicates the child truant under the statutes noted above, and therefore, cannot be withdrawn from a school for reason of truancy prior to the court's adjudication.² However, for the schools tested as of the date of this report, AOS found the following schools had systemic weaknesses in the application of due process and withdrew students without court determination of truancy:

- Campbell CSD, IRN 043703
- Cleveland MSD, IRN #043786
- Columbus CSD, IRN #043802
- Toledo CSD, IRN #044909

As a result, the district and building report cards could potentially be misstated due to these students being sent to the State's report card without court determination of truancy. Refer to Sections **11.1** and **11.2** for lists of the top 100 schools with systemic and episodic issues, respectively, and Section **11.5** for the results of testing for the additional 28 school districts pertaining to incomplete or poorly defined student withdrawal policies.

Maintaining Official Student Attendance Records

The Family Educational Rights and Privacy Law (FERPA), 20 U.S. Code, protects the rights of students and their parents regarding confidentiality, access to information and entitlement to a due process hearing if a disagreement arises. Parents and eligible students must be notified annually of their rights under FERPA. Among other things, this law requires that a school must maintain: (1) a log of requests for access to information from education records as long as the records themselves are maintained; (2) parental statements commenting on student records as long as the records are maintained; and (3) educational records for which there is an outstanding request by a parent to inspect or review.

IDEA, 20 U.S.C. 1400, provides all students with a Free Appropriate Public Education (FAPE). Regarding student records, IDEA provides parents with the right to request that school officials destroy records which are no longer needed.

Section 427 of General Education Provisions Act (GEPA), 20 U.S.C. 1232f., requires public school entities to include in their applications for Federal funds an explanation of how its program will ensure equitable access for students, teachers, and other program beneficiaries with special needs. This law states that recipients of federal funds must retain records for three years after the completion of the activity for which funds are used. Special education records such as Individualized Education Plans (IEPs) and evaluations reports are examples of records covered by GEPA's records retention requirements.

However, Ohio Rev. Code §3317.031 includes a more restrictive burden for maintaining school attendance records. All excuses from parents, and other documents, regardless of format or condition, become official attendance records. Ohio Rev. Code §3317.031 requires this membership record be kept intact for at least **five** years and shall be made available to the State Board of Education or its representative in making an audit of the average daily membership or the transportation of the district.

² Note that Ohio law treats differently "withdrawal" (ORC 3321.13) and truancy (ORC 3321.19 *et seq.*). Withdrawal is an action, which must have a statutorily authorized reason; truancy is one of many authorized reasons.

Since the Ohio Rev. Code is more restrictive, the five-year requirement for student records retention from Ohio Rev. Code §3317.031 supersedes the three-year period specified in federal legislation.

Although Ohio is under a flexibility waiver, student attendance is still a required part of the revised accountability structure. Therefore, schools must maintain adequate student attendance records to support attendance events reported in EMIS to ODE, which are then included in the calculation of the local report cards. Based on the testing results to date, the lack of appropriate student attendance records is an important concern.

The majority of schools maintain some supporting documentation to support breaks in enrollment as reported to ODE. However, the lack of appropriate supporting documentation was systemic for certain schools, causing significant concerns about building- or district-wide AYP determinations in the local report card.

Also, Ohio Rev. Code §3313.672 requires schools obtain specific records from new students during the admission process for enrollment. See Section 11.1 of this report for a list of schools with a systemic lack of student attendance supporting documentation and Sections 11.2 and 11.5 for lists of schools and districts, respectively, with a less pervasive, episodic lack of student attendance documentation.

As a matter of practice, based on the guidance included in ODE's 2011 EMIS Manual, Chapter 2, schools should not withdraw students for truancy, change of residency, or other reasons until receiving proof that the student has been determined to be truant by the court or is attending another school district. Additionally, during testing of enrollment for the 2010-11 school year, AOS identified many schools that purged student attendance records upon student turning 18 years of age or within one year of graduating high school, which is contrary to the five-year student records retention period required by Ohio Rev. Code §3317.031.

Adequate Yearly Progress for Title I Schools

Title I, Sections 1116(a) and (b)(1), (7), and (8) of the ESEA (20 USC 6316(a) and (b)(1), (7), and (8)) and 34 CFR sections 200.30 through 200.34 require school districts annually review the progress of each school served under Title I, Part A to determine whether the school has made AYP. Every school and district must meet AYP goals that the ODE Accountability Model (approved by USDOE) has established for reading and mathematics proficiency and test participation, attendance rate and graduation rate. AYP determinations for districts and schools are based on test participation and proficiency rate goals. These goals are evaluated for the student groups when the minimum subgroup size has been met. AYP graduation and attendance goals are evaluated for the "All Students" group only. Failure to meet any of the proficiency or participation goals, attendance levels or graduation targets results in the district or school not meeting AYP.

Title I, Sections 1111(h)(2) and 1116(a)(1)(C) of ESEA (20 USC 6311(h)(2) and 6316(a)(1)(C)) and 34 CFR sections 200.36 through 200.38 also require each school district that receives Title I, Part A funds prepare and disseminate to all schools in the district—and to all parents of students attending those schools—an annual district-wide report card that, among other things, includes the number, names, and percentage of schools identified for school improvement and how long the schools have been so identified.

The State of Ohio and its school are obligated under the NCLB Act to ensure information reported in their respective reports cards is accurate and complete. However, the lack of appropriate supporting documentation was systemic for certain schools, causing significant concerns about building- or district-wide AYP determinations in the local report card.

See Section 11.1 of this report for a list of schools with a systemic lack of student attendance supporting documentation and Sections 11.2 and 11.5 for lists of schools and districts, respectively, with a less pervasive, episodic lack of student attendance documentation.

9.2. SCHOOLS WITH EVIDENCE OF SCRUBBING

Scrubbing Indicators

For the purposes of this report, scrubbing is the practice of removing students from enrollment without lawful reason, regardless of the purported motivation. The term “scrubbing” does not necessarily imply malintent. Based on testing performed as of the date of this report, five school districts employed questionable attendance policies and practices which AOS believes is an indication that these schools were at a higher risk for scrubbing attendance data to improve their local report cards. As further described below, these schools withdrew students based on a pattern of absences, which could have been influenced by lower test scores, without truancy adjudication. In some cases, AOS was able to obtain SIS transaction modification data to determine the exact date on which schools withdrew students, noting certain instances of retroactive withdrawals.

9.2.1. COLUMBUS CITY SCHOOL DISTRICT

As described earlier in this report, the AOS was contacted by the Columbus CSD’s Superintendent about the possibility of district officials retroactively withdrawing students. The AOS met with the Internal Auditor (IA), at which time the IA presented a report indicating approximately 10,000 withdrawn students with retroactive SIS transaction modification dates in May or June 2011. However, the withdraw dates schools entered for these students fell within the “120 days” (i.e., between the official October count week and dates on which the students took their assessment tests). The IA department selected a sample from these students to investigate. Based upon the IA’s review, 81 out of 82 student files tested had no documentation to support the EMIS withdraw code reason used by school officials. Furthermore, the IA informed the AOS of the procedures the school district used to determine which students were to be withdrawn at each building.

See Section 11.1 of this report for a list of Columbus CSD schools with a systemic lack of student attendance supporting documentation.

9.2.2. TOLEDO CITY SCHOOL DISTRICT

After news reports that Columbus CSD altered student attendance data, Toledo CSD publicly announced they too scrubbed attendance data. Toledo CSD officials indicated they understood these practices (i.e., removing students with a high number of absences) to be allowable. AOS met with representatives of Toledo at which time Toledo CSD explained its practice of removing students with five consecutive days of unexcused absences and a total of 20 unexcused absences throughout the school year. Toledo CSD has been using the “5/20” rule for withdrawing students since 2001. However, until 2005, Toledo CSD actively removed these students throughout the school year. In 2005, Toledo CSD lost several high-level administrators to Cleveland MSD. Toledo CSD subsequently hired new administrators and in 2006 the local report card ratings fell since the “5/20” rule for withdrawing students was no longer in place. After realizing lower report card rankings, Toledo CSD administrators decided to reinstitute the “5/20” rule for withdrawing students in the following school year. However, instead of withdrawing students throughout the school year, Toledo CSD waited until after they received the first report from the Secure Data Center from ODE during the reporting period projecting the district’s report card rankings. Toledo CSD informed AOS that they removed all students that met the 5/20 criteria, regardless of assessment test score results for the affected students. However, AOS is still investigating these claims and will report its results later.

9.2.3. CLEVELAND MUNICIPAL SCHOOL DISTRICT

ODE provided the AOS with a list showing the state roll up of students, percentage of roll up students, tested state roll up students, and percentage of tested roll up students for each district throughout the State. Cleveland Municipal City School District (MSD) was top on this list for the 2010-2011 school year. Cleveland MSD showed 19,633 students rolled up (34.4%) and 12,235 tested students rolled up (21.4%). Our review at Cleveland MSD showed the following:

- Of the students rolled up to the State as described above, AOS provided Cleveland MSD a list of approximately 3,700 students from 15 schools for review. Cleveland MSD officials indicated due to the number of files requested and the mobility of students, the files could not be completely gathered for review from the 15 schools included on the initial request. Cleveland MSD officials determined the requested files were located at 109 different schools within the district. As such, this prolonged the gathering of these files and the 3,700 files were not gathered in their entirety at the time of this report.
- AOS was able to conduct a limited review of certain files at three Cleveland MSD schools: Walton Elementary School, Collinwood High School, and Lincoln West High School. There was insufficient documentation in all 48 files reviewed at Walton Elementary School, in all 12 files reviewed at Collinwood High School, and all six files reviewed at Lincoln West High School. Additionally, AOS called three additional Cleveland MSD schools, John Adams High School, Glenville High School, and Buckeye-Woodland Elementary School, noting such supporting documentation was also not included within student files at these schools. Cleveland MSD does not have a policy regarding completing and maintaining enrollment or withdrawal forms. Once information is entered into the electronic SIS system, district policy does not require schools to maintain any specific forms signed by parents or guardians or to maintain any other documentation received from or sent to other school districts. AOS determined Cleveland MSD could not be audited pursuant to the established statewide procedures due to the lack of supporting documentation maintained.
- Regarding truanancies for the 2010-2011 school year, Cleveland MSD withdrew students under EMIS withdraw code 71 if the students had five or more consecutive unexcused absences. Cleveland MSD officials indicated the withdrawal of these students occurred both during the year and at the end of the year. Cleveland MSD officials also stated this procedure was applied uniformly to all students meeting the threshold of five or more unexcused absences during the 2010-2011 school year.

Based on the information gathered to date, it appears evident that none or virtually none of the student files previously requested will include necessary supporting documentation related to the attendance event causing the student to be pushed to the State during the 2010-2011 school year. Additionally, it appears Cleveland MSD potentially removed truant students under code 71 without full completion and documentation of truancy due process.

AOS is currently obtaining electronic data in an attempt to determine the impact of Cleveland MSD processes and procedures on accountability reporting and we will report results in a later report.

9.2.4. MARION CITY SCHOOL DISTRICT

During the course of testing, AOS noted numerous instances of students being automatically transferred to the Marion Digital Academy during the 2010-11 school year. As such, these students were included on the list of those students being pushed to the State and excluded from District report card results.

In many of these cases, the student file included a letter indicating the following:

"{Student} has missed four (4) days of school this quarter, which violates our attendance policy. {Student} has lost all high school credit for the current quarter of the 2010-2011 school year.

Due to nonattendance and the loss of credit for the quarter, we are enrolling {Student} in a credit recovery program through Marion City Digital Academy. While home computers will not be provided, Marion City Digital Academy will provide computer access at Harding High School from 12:00-2:30, in rooms 126 and 127. Students are responsible for transportation to Harding High School and will not be permitted in other areas of the Harding High School Campus.

We wish {Student} the best of luck in all future endeavors. If you have any questions concerning this notice or {Student's} attendance please contact the Marion Digital Academy."

The student was then withdrawn from Marion CSD and enrolled in the Marion City Digital Academy. AOS determined this practice was only in place during the 2010-2011 and the District informed AOS verbally that it has since deemed this intervention unsuccessful and eliminated it.

AOS identified 46 students transferring to Marion City Digital Academy during the 2010-2011 school year with no parent or guardian initiation or approval included in Marion CSD's student files.

See Section **11.1** of this report for a list of Marion CSD schools with a systemic lack of student attendance supporting documentation.

9.2.5. CAMPBELL CITY SCHOOL DISTRICT

AOS tested Memorial High and Campbell Middle Schools at Campbell CSD (Mahoning County), identifying 11 (High School) and 29 (Middle School) students, respectively, that did not have supporting documentation available in the student files to support breaks in enrollment related to the following withdrawal reasons: Verified Medical, Truancy, Expulsion, and Homeschool.

AOS obtained permission from the Superintendent to obtain student data from the District's Information Technology Center (ITC) to further investigate the nature and timing of these exceptions. Upon receiving the ITC report, AOS found that 32 out of 40 student withdrawals were made retroactively, during the months of May and June 2011.

AOS is continuing to investigate these retroactive withdrawals and will report further results later.

See Section **11.1** of this report for a list of Campbell CSD schools with a systemic lack of student attendance supporting documentation.

9.3. POLICY RECOMMENDATIONS TO OHIO DEPARTMENT OF EDUCATION

The results of our statewide assessment indicate that there are a number of areas requiring centralized, improved ODE guidance and immediate clarification. ODE should use this report as a management tool to identify critical Accountability systems and weaknesses requiring enhancement to aid Ohio schools in Accountability determinations and reporting. The following is a summary of the major recommendations to date for ODE stemming from the statewide issues included in section 9.1 of this report:

Independent Accountability

Currently, ODE relies heavily on the honor system, assuming that schools honestly report their attendance and other data in EMIS as required by law. ODE is handicapped by the limited timeframe it has to produce the local report cards. Expanding cross-checks and EMIS data monitoring throughout the school year would greatly enhance ODE's ability to identify and correct mistakes or detect fraud in EMIS reporting, but may require additional resources and re-tasking existing resources to accomplish.

The current system relies upon local schools and school districts – but these are the very entities that are interested in the outcome of the accountability measures. That is, the local building or district has a duty to ensure complete and accurate reporting, and a self-interest in making the reported data to appear in the best possible light – a classic conflict of interest.

The system should be reformed by introducing independent oversight. EMIS monitoring functions should be performed by an independent agency or commission appointed by the General Assembly. While such measures would require legislative change, empowering an outside commission or another state department to conduct Accountability monitoring increases segregation of duties. Alternatively, the policy, licensing and accountability functions could be divided with another existing entity such as the Board of Regents.

Ideally, such monitoring efforts should be ongoing throughout the school year, or if not feasible, conducted in close proximity to the close of the academic school year. ODE and the General Assembly should consider enacting penalties and taking corrective measures, such as temporary suspension of State Foundation funding or federal funding for noncompliant schools, until significant inaccuracies are fully corrected by noncompliant schools.

ODE Accountability Monitoring

Currently, ODE's Department of Accountability performs high-level reviews of school enrollment information at year end, looking for obvious anomalies based upon ODE's experience and knowledge of the individual schools. ODE analyzes school enrollment data for significant changes in student assessment scores, ranking, mobility, and categorization of students in subcategories as required by NCLB. Based upon the ODE EMIS report submission timeframes outlined in the FY 2011 EMIS Manual, the timeframe for ODE to conduct these reviews is limited based upon availability of school data, allowing only an eight-week window within which ODE can perform analyses. This timeframe has been shortened over the past few years due to ODE sending EMIS report card data to an out-of-state vendor to perform the complex calculation for the value-added component of the report card.

However, ODE collects a vast amount of information through their EMIS system that could be utilized to increase and streamline Accountability monitoring efforts and place more reliance upon the information that schools submit to ODE in EMIS. Currently, schools report enrollment information to ODE in EMIS in a silo fashion. School district A cannot see the enrollment information school district B submits to ODE or vice versa. Only ODE can combine EMIS data submitted by multiple schools to trace the history of student mobility. To improve the effectiveness and frequency of ODE monitoring efforts, ODE should generate statewide school reports by SSID number for key enrollment and withdraw codes. ODE should utilize these reports to perform analyses and cross-check the timing of student withdraws and subsequent

enrollments against EMIS data reported by individual schools for completeness and accuracy. While unexplained gaps in attendance will likely still occur on occasion for particular SSID's, this type of random and frequent monitoring would limit the ability for schools to mistakenly misreport or intentionally "scrub" students without ODE inquiry and investigation. The following are just a few of the withdrawal codes for which ODE could generate reports generated from EMIS for analysis:

1. *Code 41 Withdraws, Transfers to Another Ohio School District:*

As described in the introduction of this report, all schools must generate an SSID number for each attending student upon entrance into Ohio's school system (e.g., pre-school students, students moving into Ohio for the first time, etc.). ODE should generate a SSID history report for students that schools withdrew under code 41, as having transferred to another Ohio school district. This report should include all significant attendance transactions for each SSID that were pushed to the state based upon a break in the FAY or a change in the majority of attendance IRN assignment as entered in EMIS by schools. If a student was withdrawn, the next transaction in the SSID History report for the same SSID number should list the new building IRN where the student subsequently transferred. If a new building IRN is not listed in the SSID History report, this could be an indication of possible scrubbing that ODE should further investigate.

While admittedly not foolproof, this type of report analysis will allow ODE to perform more effective monitoring over code 41 withdraws and limit schools' ability to misreport or scrub attendance data. Furthermore, ODE can use this report to monitor school assignments of new SSID codes to prevent multiple SSID's from being assigned to the same student among several school districts.

2. *Code 43 Withdraws, Transfers to Home Schooling:*

Ohio law requires students being educated by local school districts that wish to be homeschooled must obtain prior approval from their local education service center (ESC). Conversely, students being educated by city and village exempt school districts only require the school district's Superintendent approval for homeschooling. To strengthen and foster consistency in the reporting of approved homeschooling, ODE should consider requesting the General Assembly to amend the authorities and powers of ESC's to approve homeschooling for all Ohio school districts, including city and exempt village districts. This would create a reliable third-party resource for ODE to confirm approval of homeschooled students as reported in EMIS using code 43.

3. *Code 45 Withdraws, Court-Placed Students:*

Some students are sent to the state report card based on court placement; code 45, to remove a student from their residential district to another district for a specific program; special education needs, foster placement, or assignment to a juvenile detention center. The General Assembly should provide authority for ODE to collect personally identifiable information, such as student names, to enable ODE to work cooperatively with the Ohio Juvenile Court system and DYS tracking and reporting truant students. This type of interagency integration would foster a strong third-party verification of court-placed withdraws in the EMIS system, significantly restricting schools' ability to inaccurately report or scrub student attendance data using code 45.

4. *Code 48 Withdraws, Expelled Students:*

ODE requires schools submit disciplinary information to ODE when a student is expelled or suspended, which is maintained in ODE's general discipline database. ODE can generate a report of all students reported as being withdrawn under EMIS code 48 due to expulsion. Then, ODE can compare the EMIS code 48 expelled students to those students included in the general discipline database. Theoretically, students withdrawn due to expulsion but with no disciplinary record on file at ODE could indicate possible scrubbing that ODE should further investigate.

5. *Code 71 Withdraws, Truancy:*
Students that are habitually truant, reported as code 71, should be declared so by the court prior to schools withdrawing students from enrollment. Based on this, the Juvenile Court system and Ohio Department of Youth Services (DYS) possess records sufficient to confirm a student's court placement. However, since the courts do not have the SSID numbers for students (only student names) and ODE does not have student names (only SSID numbers), there is currently no way for ODE to cross-check court-placed students with these other state agencies. The General Assembly should provide authority for ODE to collect personally identifiable information, such as student names, to enable ODE to work cooperatively with the Ohio Juvenile Court system and DYS tracking and reporting truant students. This type of interagency integration would foster a strong third-party verification of court-placed withdraws in the EMIS system, significantly restricting schools' ability to inaccurately report or scrub student attendance data using code 71.
6. *Code 73 Withdraws, Over 18 Years of Age:*
School districts can withdraw students at their discretion as soon as the student turns 18 years old, at which point the Compulsory Education Act no longer applies. Since this withdraw is based solely on student standing data, ODE could generate an EMIS report of student standing date, including birthdates, and compare this report to students withdrawn under code 73 in EMIS to ensure the student was indeed 18 years of age at the time of withdraw based upon the standing data.
7. *Other Withdraws*
ODE should consider whether additional EMIS report comparisons could be made using significant withdraw or enrollment codes. Also, ODE should consider requiring schools to submit other information to ODE to support withdraws, changes to WKC, changes to the majority of attendance IRN numbers, and other data relevant to the report card. ODE collection of additional supporting documentation could be used to compare to the respective EMIS withdraw codes for completeness and accuracy.

Secure Data Center

ODE uses the Secure Data Center (SDC) to verify information submitted by school districts in EMIS. ODE returns edit checks on the report card data submissions to school districts weekly during the close out period. This includes all fields required in Chapter 5 of the EMIS Manual; however, these edit reports also indicate the projected performance rating status at the building and district wide levels for the local report card.

While the concept of the SDC was to correct or verify EMIS information, allowing school districts to realize the projected report card ratings prior to the finalization of EMIS data and close of the submission period gives the school districts the opportunity to intentionally "scrub" or change EMIS report card data to improve the outcome of the Districts' final report card ratings.

ODE should remove the report card performance rating information from the SDC, allowing school districts to verify only the EMIS data submissions without projected rankings. This will greatly reduce schools' ability to change the outcome of their local report card.

Centralization of Accountability Resources

ODE maintains several Accountability resources in various locations on its website for school districts to use in reporting student attendance, enrollment, and other important report card factors. However, there is no centralized Manual or crosswalk that helps connect these resources and provide clarity. ODE should develop a centralized location on its website to provide clear instruction on Accountability requirements and how they relate to EMIS reporting.

Statewide Student Information System

Currently, most Student Information systems (SIS) that are utilized by school districts have an “Audit Log Capability” to capture all changes made to the standing data in the SIS system; however, these audit logs are not always turned on by the schools. Also, given the complexities of Accountability rules and the EMIS system, the large number of student information system vendors creates difficulty reviewing reporting and collecting student enrollment information in a consistent and timely fashion. The General Assembly should establish a single statewide student information system so that all data is uniform, uniformly reported, and accessible for data mining. Alternatively if such is not feasible the General Assembly should require ODE to approve the Student Information System used by each district in the state to ensure it meets requirements.

9.4. CONCLUSION

This report includes preliminary findings about the AOS statewide assessment of school year 2010-11 student attendance and enrollment systems for select Ohio schools. As described earlier, the purpose of this assessment was threefold: (1) to identify systemic, and potentially duplicitous, student attendance and enrollment practices among Ohio schools; (2) to provide recommendations to the Ohio Department of Education (ODE) for making future policy and legislative improvements to Ohio’s Accountability system; and (3) to determine whether schools are scrubbing enrollment data to improve their local report card scores.

The AOS is releasing this report as interim communication, prior to the completion of its statewide testing of attendance and enrollment. Accordingly, this communication is based on the audit procedures performed on select schools through September 28, 2012, an interim period. Because AOS has not completed its testing, additional findings may be identified and communicated in a later report.

The Ohio State University John Glenn School of Public Affairs is working with AOS to develop a statewide protocol for identifying schools that have a higher probability to scrub attendance data to improve their local report cards for the next phase of the AOS statewide assessment. As described throughout this report, the sheer complexity of the accountability system creates incentives for all schools and districts to improve indicators such as attendance, which could prove pivotal in the final outcome of their respective local report card rankings.

The AOS will provide its next report to the public before the November election. Once the next testing phase is completed, AOS will provide a final report, including results, recommendations for improved policies and procedures, and possible suggestions for legislative action.

10. SCHOOLS SELECTED FOR TESTING

For purposes of this report, “State Roll Up Students” are those students counted only in the state’s report card for attendance and “Tested State Roll Up Students” are the State Roll Up Students that took the state assessment tests. Using attendance data reported by schools to ODE for the 2010-11 school year, AOS selected the following top 100 schools (as opposed to districts) with the highest number of student withdrawals for testing:

| | District IRN | School District Name | Building IRN | School Name | State Roll Up Students | Percent of State Roll Up Students | Tested State Roll Up Students | Percent of Tested State Roll Up Students | Total State Roll Up Students |
|-----|--------------|---|--------------|--------------------------------------|------------------------|-----------------------------------|-------------------------------|--|------------------------------|
| 1. | 043489 | Akron City | 009268 | Akron Opportunity Center | 43 | 29.7% | 24 | 16.6% | 145 |
| 2. | 043489 | Akron City | 027565 | North High School | 310 | 33.0% | 75 | 8.0% | 939 |
| 3. | 046623 | Ansonia Local | 000778 | Ansonia High School | 33 | 13.8% | 27 | 11.3% | 239 |
| 4. | 045229 | Bradford Exempted Village | 003376 | Bradford High School | 93 | 22.6% | 56 | 13.6% | 412 |
| 5. | 043703 | Campbell City | 024190 | Memorial High School | 82 | 17.7% | 52 | 11.3% | 462 |
| 6. | 043703 | Campbell City | 031237 | Campbell Middle School | 85 | 18.3% | 52 | 11.2% | 465 |
| 7. | 043711 | Canton City | 140152 | Choices Alternative School | 182 | 57.2% | 162 | 50.9% | 318 |
| 8. | 043711 | Canton City | 042648 | Community Educational Services | 24 | 46.2% | 11 | 21.2% | 52 |
| 9. | 043711 | Canton City | 015495 | Hartford Middle School | 41 | 15.3% | 24 | 9.0% | 268 |
| 10. | 048793 | Cardington-Lincoln Local | 004861 | Cardington-Lincoln High School | 79 | 18.0% | 59 | 13.5% | 438 |
| 11. | 043752 | Cincinnati City | 015818 | George Hays-Jennie Porter Elementary | 139 | 32.8% | 65 | 15.3% | 424 |
| 12. | 043752 | Cincinnati City | 006015 | Chase Elementary School | 144 | 33.6% | 54 | 12.6% | 428 |
| 13. | 043752 | Cincinnati City | 029009 | Oyler School | 278 | 34.7% | 88 | 11.0% | 802 |
| 14. | 043752 | Cincinnati City | 030957 | Quebec Heights Elementary School | 171 | 33.9% | 47 | 9.3% | 504 |
| 15. | 043752 | Cincinnati City | 033134 | South Avondale Elementary School | 177 | 28.1% | 55 | 8.7% | 629 |
| 16. | 043760 | Circleville City | 027201 | Nicholas Elementary School | 37 | 19.3% | 20 | 10.4% | 192 |
| 17. | 043794 | Cleveland Heights-University Heights City | 002212 | Bellefaire | 100 | 72.5% | 48 | 34.8% | 138 |
| 18. | 043786 | Cleveland Municipal City | 037101 | Thomas Jefferson School | 258 | 91.2% | 149 | 52.7% | 283 |
| 19. | 043786 | Cleveland Municipal City | 018416 | John Marshall High School | 772 | 47.6% | 607 | 37.4% | 1,622 |
| 20. | 043786 | Cleveland Municipal City | 018382 | John F Kennedy High School | 670 | 51.7% | 478 | 36.9% | 1,296 |
| 21. | 043786 | Cleveland Municipal City | 009555 | East Technical High School | 553 | 49.0% | 384 | 34.0% | 1,128 |

| | District IRN | School District Name | Building IRN | School Name | State Roll Up Students | Percent of State Roll Up Students | Tested State Roll Up Students | Percent of Tested State Roll Up Students | Total State Roll Up Students |
|-----|--------------|----------------------------|--------------|---------------------------------------|------------------------|-----------------------------------|-------------------------------|--|------------------------------|
| 22. | 043786 | Cleveland Municipal City | 025650 | Mound Elementary School | 122 | 40.5% | 93 | 30.9% | 301 |
| 23. | 043786 | Cleveland Municipal City | 013680 | Glenville High School | 569 | 44.5% | 385 | 30.1% | 1,280 |
| 24. | 043786 | Cleveland Municipal City | 062315 | Lincoln-West High School | 788 | 46.8% | 477 | 28.4% | 1,682 |
| 25. | 043786 | Cleveland Municipal City | 025874 | The School of One | 98 | 50.3% | 54 | 27.7% | 195 |
| 26. | 043786 | Cleveland Municipal City | 006940 | Collinwood High School | 455 | 47.2% | 260 | 26.9% | 965 |
| 27. | 043786 | Cleveland Municipal City | 018325 | John Adams High School | 603 | 43.6% | 347 | 25.1% | 1,382 |
| 28. | 043786 | Cleveland Municipal City | 024687 | Miles School | 149 | 32.7% | 113 | 24.8% | 456 |
| 29. | 043786 | Cleveland Municipal City | 012682 | Fullerton School | 151 | 30.7% | 110 | 22.4% | 492 |
| 30. | 043786 | Cleveland Municipal City | 067918 | Buckeye-Woodland School | 124 | 33.3% | 83 | 22.3% | 372 |
| 31. | 043786 | Cleveland Municipal City | 039149 | Walton School | 225 | 34.1% | 140 | 21.2% | 660 |
| 32. | 043786 | Cleveland Municipal City | 000489 | Almira | 132 | 29.4% | 95 | 21.2% | 449 |
| 33. | 043802 | Columbus City | 040782 | Westmoor Middle School | 166 | 27.6% | 166 | 27.6% | 601 |
| 34. | 043802 | Columbus City | 035253 | Southmoor Middle School | 129 | 26.7% | 129 | 26.7% | 484 |
| 35. | 043802 | Columbus City | 035824 | Starling Middle School | 86 | 25.6% | 86 | 25.6% | 336 |
| 36. | 043802 | Columbus City | 005827 | Champion Middle School | 82 | 25.5% | 82 | 25.5% | 322 |
| 37. | 043802 | Columbus City | 042499 | Yorktown Middle School | 140 | 25.3% | 140 | 25.3% | 554 |
| 38. | 043802 | Columbus City | 024067 | Medina Middle School | 139 | 24.9% | 139 | 24.9% | 558 |
| 39. | 043802 | Columbus City | 018465 | Johnson Park Middle School | 124 | 23.8% | 124 | 23.8% | 522 |
| 40. | 043802 | Columbus City | 024067 | Hilltonia Middle School | 129 | 20.6% | 129 | 20.6% | 626 |
| 41. | 043802 | Columbus City | 018465 | Buckeye | 132 | 20.5% | 132 | 20.5% | 644 |
| 42. | 043802 | Columbus City | 034439 | Sherwood Middle School | 111 | 21.1% | 111 | 21.1% | 526 |
| 43. | 045344 | Crestline Exempted Village | 035154 | Crestline Southeast Elementary School | 73 | 32.3% | 23 | 10.2% | 226 |
| 44. | 043844 | Dayton City | 023986 | Meadowdale High School | 179 | 24.9% | 76 | 10.6% | 718 |
| 45. | 043844 | Dayton City | 023978 | Meadowdale PreK-8 School | 130 | 23.7% | 50 | 9.1% | 549 |
| 46. | 043950 | Euclid City | 010819 | Euclid High School | 491 | 18.8% | 285 | 10.9% | 2,618 |
| 47. | 048843 | Franklin Local | 062224 | Roseville Elementary School | 49 | 33.1% | 18 | 12.2% | 148 |
| 48. | 044040 | Garfield Heights City | 013144 | Garfield Heights Middle School | 200 | 19.2% | 107 | 10.2% | 1,044 |

| | District IRN | School District Name | Building IRN | School Name | State Roll Up Students | Percent of State Roll Up Students | Tested State Roll Up Students | Percent of Tested State Roll Up Students | Total State Roll Up Students |
|-----|--------------|---------------------------|--------------|---|------------------------|-----------------------------------|-------------------------------|--|------------------------------|
| 49. | 044107 | Hamilton City | 013102 | Garfield Middle School | 169 | 20.0% | 105 | 12.4% | 845 |
| 50. | 044107 | Hamilton City | 000467 | Hamilton Education Center | 659 | 87.7% | 88 | 11.7% | 751 |
| 51. | 044107 | Hamilton City | 036822 | Hamilton High School | 293 | 15.0% | 228 | 11.7% | 1,955 |
| 52. | 046953 | Hamilton Local | 000118 | Hamilton Intermediate School | 170 | 19.7% | 107 | 12.4% | 862 |
| 53. | 046953 | Hamilton Local | 028407 | Hamilton Middle School | 99 | 17.9% | 68 | 12.3% | 552 |
| 54. | 048686 | Jefferson Township Local | 018150 | Jefferson High School | 90 | 29.3% | 34 | 11.1% | 307 |
| 55. | 044222 | Lima City | 020677 | Lima Alternative | 28 | 47.5% | 25 | 42.4% | 59 |
| 56. | 044263 | Lorain City | 012335 | New Beginnings | 125 | 57.6% | 61 | 28.1% | 217 |
| 57. | 044263 | Lorain City | 000840 | General Johnnie Wilson Middle School | 104 | 19.6% | 55 | 10.4% | 530 |
| 58. | 044263 | Lorain City | 000841 | Longfellow Middle School | 86 | 16.5% | 44 | 8.4% | 521 |
| 59. | 044297 | Mansfield City | 135566 | Mansfield Integrated Learning Center, Hedges Campus | 28 | 26.7% | 13 | 12.4% | 105 |
| 60. | 044339 | Marion City | 015214 | Harding High School | 348 | 21.0% | 208 | 12.5% | 1,660 |
| 61. | 048520 | Meigs Local | 024117 | Meigs High School | 125 | 17.4% | 81 | 11.3% | 717 |
| 62. | 046672 | Mississinawa Valley Local | 025122 | Mississinawa Valley JR/SR High School | 68 | 18.9% | 38 | 10.6% | 359 |
| 63. | 044412 | Mt Healthy City | 035105 | Mt Healthy Junior High School | 147 | 23.3% | 84 | 13.3% | 631 |
| 64. | 044446 | Nelsonville-York City | 026567 | Nelsonville-York High School | 73 | 16.3% | 50 | 11.2% | 447 |
| 65. | 044461 | New Boston Local | 028159 | Oak Intermediate Elementary School | 70 | 34.7% | 28 | 13.9% | 202 |
| 66. | 044479 | New Lexington City | 064865 | New Lexington High School | 125 | 17.8% | 73 | 10.4% | 702 |
| 67. | 044453 | Newark City | 009213 | Heritage Middle School | 111 | 22.2% | 76 | 15.2% | 501 |
| 68. | 044453 | Newark City | 027011 | Newark High School | 502 | 26.5% | 249 | 13.1% | 1,895 |
| 69. | 044511 | North College Hill City | 026120 | North College Hill High School | 100 | 17.5% | 66 | 11.6% | 570 |
| 70. | 048736 | Northridge Local | 027763 | Northridge High School | 177 | 28.7% | 94 | 15.3% | 616 |
| 71. | 048736 | Northridge Local | 027797 | Esther Dennis Middle School | 101 | 24.9% | 46 | 11.4% | 405 |

| | District IRN | School District Name | Building IRN | School Name | State Roll Up Students | Percent of State Roll Up Students | Tested State Roll Up Students | Percent of Tested State Roll Up Students | Total State Roll Up Students |
|-----|--------------|---------------------------|--------------|---|------------------------|-----------------------------------|-------------------------------|--|------------------------------|
| 72. | 044628 | Painesville City Local | 015560 | Harvey High School | 287 | 34.4% | 91 | 10.9% | 834 |
| 73. | 044677 | Princeton City | 030759 | Princeton High School | 354 | 18.8% | 170 | 9.0% | 1,883 |
| 74. | 047001 | Reynoldsburg City | 066738 | Baldwin Road Junior High School | 101 | 22.4% | 46 | 10.2% | 450 |
| 75. | 046599 | Richmond Heights Local | 031583 | Richmond Heights Secondary School | 62 | 17.9% | 43 | 12.4% | 347 |
| 76. | 044784 | Sidney City | 034561 | Sidney High School | 314 | 25.8% | 176 | 14.4% | 1,218 |
| 77. | 044818 | Springfield City | 035527 | Springfield High School | 676 | 28.9% | 146 | 6.2% | 2,338 |
| 78. | 044909 | Toledo City | 033886 | Scott High School | 283 | 91.0% | 100 | 32.2% | 311 |
| 79. | 044909 | Toledo City | 018523 | Samuel M. Jones at Gunckel Park Elementary School | 137 | 34.8% | 91 | 23.1% | 394 |
| 80. | 044909 | Toledo City | 014936 | Leverette Elementary School | 119 | 27.0% | 73 | 16.6% | 441 |
| 81. | 044909 | Toledo City | 032276 | Rogers High School | 311 | 32.1% | 156 | 16.1% | 970 |
| 82. | 044909 | Toledo City | 035865 | Start High School | 554 | 35.4% | 235 | 15.0% | 1,567 |
| 83. | 044909 | Toledo City | 068478 | East Broadway Elementary School | 157 | 29.0% | 74 | 13.7% | 542 |
| 84. | 044909 | Toledo City | 068460 | Byrnedale Middle School | 121 | 19.7% | 77 | 12.6% | 613 |
| 85. | 044909 | Toledo City | 023929 | McTigue Elementary School | 158 | 25.6% | 65 | 10.5% | 618 |
| 86. | 048694 | Trotwood-Madison City | 009224 | Trotwood-Madison Elementary | 116 | 21.2% | 68 | 12.5% | 546 |
| 87. | 048694 | Trotwood-Madison City | 022194 | Trotwood-Madison Middle School | 171 | 23.2% | 87 | 11.8% | 737 |
| 88. | 048694 | Trotwood-Madison City | 009223 | Madison Park Elementary | 116 | 29.1% | 47 | 11.8% | 399 |
| 89. | 045005 | Warrensville Heights City | 012392 | Eastwood Elementary School | 76 | 21.8% | 50 | 14.4% | 348 |
| 90. | 049155 | Western Local | 040667 | Western High School | 100 | 24.6% | 48 | 11.8% | 406 |
| 91. | 045096 | Willard City | 026732 | New Haven Elementary School | 51 | 30.7% | 37 | 22.3% | 166 |
| 92. | 045096 | Willard City | 041301 | Willard Middle School | 141 | 22.6% | 112 | 17.9% | 624 |
| 93. | 045096 | Willard City | 041319 | Willard High School | 124 | 18.4% | 70 | 10.4% | 673 |
| 94. | 045666 | Windham Exempted Village | 071381 | Windham Junior High School | 59 | 30.9% | 21 | 11.0% | 191 |

| | District IRN | School District Name | Building IRN | School Name | State Roll Up Students | Percent of State Roll Up Students | Tested State Roll Up Students | Percent of Tested State Roll Up Students | Total State Roll Up Students |
|------|--------------|----------------------|--------------|------------------------------------|------------------------|-----------------------------------|-------------------------------|--|------------------------------|
| 95. | 044081 | Winton Woods City | 066787 | Winton Woods Elementary School | 118 | 20.5% | 66 | 11.5% | 575 |
| 96. | 045120 | Wooster City | 003327 | Boys Village | 113 | 88.3% | 69 | 53.9% | 128 |
| 97. | 045161 | Youngstown City | 142224 | University Project Learning Center | 46 | 31.7% | 21 | 14.5% | 145 |
| 98. | 045161 | Youngstown City | 009506 | P. Ross Berry Middle School | 101 | 20.6% | 57 | 11.6% | 490 |
| 99. | 045161 | Youngstown City | 038497 | Volney Rogers Junior High School | 91 | 16.4% | 52 | 9.4% | 556 |
| 100. | 045161 | Youngstown City | 031138 | Youngstown East High School | 176 | 16.0% | 77 | 7.0% | 1,097 |

Additionally, since schools likely adopted their attendance practices over time, many without propensity to introduce “breaks” for the purpose of improving attendance, AOS selected an additional 28 school districts with less students withdraws for testing and comparison purposes. Unlike the “Top 100,” AOS tested all schools within the following selected districts:

| | District Name | District IRN |
|-----|-------------------|--------------|
| 1. | Avon Lake CSD | 048124 |
| 2. | Barnesville EVSD | 045203 |
| 3. | Beachwood CSD | 043554 |
| 4. | Berkshire LSD | 047167 |
| 5. | Central LSD | 046714 |
| 6. | Crestview LSD | 046433 |
| 7. | Danville LSD | 047837 |
| 8. | Elgin LSD | 048413 |
| 9. | Fairland LSD | 047936 |
| 10. | Franklin LSD | 048843 |
| 11. | Fredericktown LSD | 047852 |
| 12. | Goshen LSD | 046342 |
| 13. | Indian Hill EVSD | 045435 |
| 14. | Lakeview LSD | 050187 |
| 15. | Lexington LSD | 049437 |
| 16. | Lincolnview LSD | 050369 |
| 17. | Lisbon EVSD | 045450 |
| 18. | Madeira CSD | 044289 |
| 19. | Manchester LSD | 000442 |
| 20. | Mohawk LSD | 050740 |
| 21. | Niles CSD | 044495 |
| 22. | North Canton CSD | 044503 |
| 23. | Ontario LSD | 049478 |
| 24. | Otsego LSD | 050724 |

| | District Name | District IRN |
|-----|-------------------|--------------|
| 25. | Perry LSD | 045781 |
| 26. | Revere LSD | 050054 |
| 27. | Symmes Valley LSD | 047969 |
| 28. | Warren LSD | 050500 |

11. STATUS OF STUDENT FILE TESTING FOR SUPPORTING DOCUMENTATION

11.1. TOP 100 SCHOOLS WITH EVIDENCE OF SCRUBBING

The following table describes the schools with evidence of scrubbing identified during the 2010-11 school year for the Top 100 schools. These testing results are as of this report date. Testing of student files for some schools is still indeterminate.

| SCHOOLS WITH EVIDENCE OF SCRUBBING | | | | | | |
|------------------------------------|--------------|--------------------------|----------------------------|-------------------------------|---|--|
| | District IRN | School District Name | School Name | Tested State Roll Up Students | Issues Identified to Date (See notes for additional information) | Notes |
| 1. | 043703 | Campbell City | Memorial High School | 52 | 11 | Lack of support for 11 students. Nothing to indicate these were valid withdraws and/or admissions. |
| 2. | 043703 | Campbell City | Campbell Middle School | 52 | 29 | Lack of support for 29 students. Nothing to indicate these were valid withdraws and/or admissions. |
| 3. | 043786 | Cleveland Municipal City | John Marshall High School | 607 | Undetermined | Refer to Section 9.2.3 of report. |
| 4. | 043786 | Cleveland Municipal City | John F Kennedy High School | 478 | Undetermined | Refer to Section 9.2.3 of report. |
| 5. | 043786 | Cleveland Municipal City | East Technical High School | 384 | Undetermined | Refer to Section 9.2.3 of report. |
| 6. | 043786 | Cleveland Municipal City | Mound Elementary School | 93 | Undetermined | Refer to Section 9.2.3 of report. |
| 7. | 043786 | Cleveland Municipal City | Glenville High School | 385 | Undetermined | Refer to Section 9.2.3 of report. |
| 8. | 043786 | Cleveland Municipal City | Lincoln-West High School | 477 | Undetermined | Refer to Section 9.2.3 of report. |
| 9. | 043786 | Cleveland Municipal City | The School of One | 54 | Undetermined | Refer to Section 9.2.3 of report. |
| 10. | 043786 | Cleveland Municipal City | Collinwood High School | 260 | Undetermined | Refer to Section 9.2.3 of report. |

SCHOOLS WITH EVIDENCE OF SCRUBBING

| | District IRN | School District Name | School Name | Tested State Roll Up Students | Issues Identified to Date (See notes for additional information) | Notes |
|-----|--------------|--------------------------|-------------------------|-------------------------------|---|---|
| 11. | 043786 | Cleveland Municipal City | John Adams High School | 347 | Undetermined | Refer to Section 9.2.3 of report. |
| 12. | 043786 | Cleveland Municipal City | Miles School | 113 | Undetermined | Refer to Section 9.2.3 of report. |
| 13. | 043786 | Cleveland Municipal City | Fullerton School | 110 | Undetermined | Refer to Section 9.2.3 of report. |
| 14. | 043786 | Cleveland Municipal City | Buckeye-Woodland School | 83 | Undetermined | Refer to Section 9.2.3 of report. |
| 15. | 043786 | Cleveland Municipal City | Walton School | 140 | Undetermined | Refer to Section 9.2.3 of report. |
| 16. | 043786 | Cleveland Municipal City | Almira | 95 | Undetermined | Refer to Section 9.2.3 of report. |
| 17. | 043786 | Cleveland Municipal City | Thomas Jefferson School | 149 | Undetermined | Refer to Section 9.2.3 of report. |
| 18. | 043802 | Columbus City | Westmoor Middle School | 166 | 58 | Issues related to: <ul style="list-style-type: none"> Files that could not be located. Unsupported admission/re-admission dates. Unsupported withdrawal codes of 40, 41, 43, 71, and 74. |
| 19. | 043802 | Columbus City | Southmoor Middle School | 129 | 16 | Issues related to: <ul style="list-style-type: none"> Files that could not be located. Unsupported admission/re-admission dates. Unsupported withdrawal codes of 41. |
| 20. | 043802 | Columbus City | Starling Middle School | 86 | 10 | Issues related to: <ul style="list-style-type: none"> Unsupported admission/re-admission dates. Unsupported withdrawal codes of 40 and 41. |
| 21. | 043802 | Columbus City | Champion Middle School | 82 | 7 | Issues related to: <ul style="list-style-type: none"> Unsupported admission/re-admission dates. Unsupported withdrawal codes of 40 and 41. |
| 22. | 043802 | Columbus City | Yorktown Middle School | 140 | 52 | Issues related to: <ul style="list-style-type: none"> Files that could not be located. Unsupported admission/re-admission dates. Unsupported withdrawal codes of 40, 41, 43, and 74. |

SCHOOLS WITH EVIDENCE OF SCRUBBING

| | District IRN | School District Name | School Name | Tested State Roll Up Students | Issues Identified to Date <i>(See notes for additional information)</i> | Notes |
|-----|--------------|----------------------|----------------------------|-------------------------------|--|---|
| 23. | 043802 | Columbus City | Medina Middle School | 139 | 34 | Issues related to: <ul style="list-style-type: none"> Files that could not be located. Unsupported admission/re-admission dates. Unsupported withdrawal codes of 40, 41, 46, and 48. |
| 24. | 043802 | Columbus City | Hilltonia Middle School | 129 | 13 | Issues related to: <ul style="list-style-type: none"> Unsupported admission/re-admission dates. Unsupported withdrawal codes of 41. |
| 25. | 043802 | Columbus City | Buckeye Middle School | 132 | 40 | Issues related to: <ul style="list-style-type: none"> Files that could not be located. Unsupported admission/re-admission dates. Unsupported withdrawal codes of 40, 41, and 42. |
| 26. | 043802 | Columbus City | Johnson Park Middle School | 124 | 38 | Issues related to: <ul style="list-style-type: none"> Files that could not be located. Unsupported admission/re-admission dates. Unsupported withdrawal codes of 40, 41, and 46. |
| 27. | 043802 | Columbus City | Sherwood Middle School | 111 | 34 | Issues related to: <ul style="list-style-type: none"> Files that could not be located. Unsupported admission/re-admission dates. Unsupported withdrawal codes of 41, 48, and 71. |

SCHOOLS WITH EVIDENCE OF SCRUBBING

| | District IRN | School District Name | School Name | Tested State Roll Up Students | Issues Identified to Date (See notes for additional information) | Notes |
|-----|--------------|----------------------|---|-------------------------------|---|--|
| 28. | 044339 | Marion City | Harding High School | 208 | 58 | <p>Refer to Section 9.2.4 of report.</p> <p>12 exceptions due to students that have graduated and do not have supporting enrollment/withdraw documentation in student file (records purged).</p> <p>46 failed due to student transferring to Marion City Digital Academy and no parent approval noted in the student file maintained by the District. We also noted letters within files indicating students were automatically withdrawn from Marion CSD and enrolled in the Marion City Digital Academy during FY '11 if they had 5 or more unexcused absences in a quarter. This transfer was initiated by the District and no parent/guardian approval was noted within files. The District indicated, per the District's attendance policy, that the student had failed for the current quarter based on lack of attendance and was enrolled into the 'credit recovery program' through the Marion City Digital Academy. This practice was discontinued after the FY '11 school year.</p> |
| 29. | 044909 | Toledo City | Scott High School | 100 | Undetermined | Refer to Section 9.2.2 of report. |
| 30. | 044909 | Toledo City | Samuel M. Jones at Gunckel Park Elementary School | 91 | Undetermined | Refer to Section 9.2.2 of report. |
| 31. | 044909 | Toledo City | Leverette Elementary School | 73 | Undetermined | Refer to Section 9.2.2 of report. |
| 32. | 044909 | Toledo City | Rogers High School | 156 | Undetermined | Refer to Section 9.2.2 of report. |
| 33. | 044909 | Toledo City | Start High School | 235 | Undetermined | Refer to Section 9.2.2 of report. |
| 34. | 044909 | Toledo City | East Broadway Elementary School | 74 | Undetermined | Refer to Section 9.2.2 of report. |
| 35. | 044909 | Toledo City | Byrnedale Middle School | 77 | Undetermined | Refer to Section 9.2.39.2.2 of report. |
| 36. | 044909 | Toledo City | McTigue Elementary School | 65 | Undetermined | Refer to Section 9.2.2 of report. |

11.2. TOP 100 SCHOOLS WITH ERRORS

The following table describes the schools with less pervasive errors in enrollment identified during the 2010-11 school year for the Top 100 schools. For purposes of this report, “errors” are defined as sporadic exceptions including, but not limited to, a lack of documentation, missing student files, and incorrect or unsubstantiated EMIS withdraw codes. These testing results are as of this report date. Testing of student files for some schools is still indeterminate.

| SCHOOLS WITH ERRORS | | | | | | |
|---------------------|--------------|----------------------|--------------------------|-------------------------------|---|---|
| | District IRN | School District Name | School Name | Tested State Roll Up Students | Issues Identified to Date (See notes for additional information) | Notes |
| 37. | 043489 | Akron City | Akron Opportunity Center | 24 | 6 | <p>2 - Withdrawn to homeschooling; however, the students should not have been withdrawn because they were on home instruction.</p> <p>1 - There should not have been a break in attendance. The student was enrolled at AOC, sent to the Phoenix Program at the YMCA, then came back to AOC.</p> <p>1 - The student never showed up for school and was withdrawn for truancy. However, the District could not provide documentation that the student was referred to the Office of Student Services, the District truancy letters to the student (required by policy), or filed a complaint in juvenile court. Additionally, the student was re-enrolled into the District at a later date, but no enrollment form could be provided.</p> <p>1 - The student was withdrawn on 10/25/10 using withdrawal code "45" (transferred by court order to correctional facility) and reenrolled in the District on 11/15/10. Per inquiry of the Director of Student Services, the withdrawal on 10/25/10 was a mistake, as the student was still a resident and responsibility of the District.</p> <p>1 - The student was listed as being expelled on 5/5/11; however, per the discipline record, the student was enrolled in an alternative program, and should not have been withdrawn from the District.</p> |

SCHOOLS WITH ERRORS

| | District IRN | School District Name | School Name | Tested State Roll Up Students | Issues Identified to Date (See notes for additional information) | Notes |
|-----|--------------|---------------------------|----------------------|-------------------------------|---|---|
| 38. | 043489 | Akron City | North High School | 75 | 2 | <p>1-The student attended North until 10/5/10. The Entry Withdrawal List indicated the student withdrew to another district (a notation of ""w/d to Berea"" was made); however, no supporting documentation could be provided that the student actually withdrew to another district. The detail attendance records in the E-School Plus system did support the student was not in attendance at the District after the withdrawal date.</p> <p>1-The student attended North until 3/7/11. The Entry Withdrawal List indicated the student withdrew to a district out of state (a notation of w/d to Armarillo Tx was made); however, no supporting documentation existed to indicate the student withdrew out of State. Additionally, the notation did not indicate who the person withdrawing the student talked to, if it was a phone call or face to face, the date/time, etc. The detailed E-School Plus System attendance records supported the student did not attend the District after 3/7/11.</p> |
| 39. | 046623 | Ansonia Local | Ansonia High School | 27 | 11 | <p>6- The EMIS coordinator maintained a correspondence file with Districts asking for transcripts and her information on faxing/mailling the information for 6 of these students, however this file was thrown away after the school year.</p> <p>4-Students did not have files, but per conversation with the EMIS coordinator and Superintendent it was noted that one was a migrant worker's child from Texas, another one was enrolled in the County Alternative school due to kidney issues, one other child was special education and just stopped showing up and another one was foster placed to another District.</p> <p>1-Student was included on an open enrollment sheet but had no file or application supporting such open enrollment.</p> |
| 40. | 045229 | Bradford Exempted Village | Bradford High School | 56 | 1 | <p>One student with severe disabilities had very little in school file to support withdrawal. Auditor obtained support from outside source. Withdrawal appears accurate, but support was not on file at school.</p> |

SCHOOLS WITH ERRORS

| | District IRN | School District Name | School Name | Tested State Roll Up Students | Issues Identified to Date (See notes for additional information) | Notes |
|-----|--------------|--------------------------|------------------------|-------------------------------|---|--|
| 41. | 043844 | Dayton City | Meadowdale High School | 76 | 9 | <p>3-The students were not withdrawn from the District during the 2010-2011 school year. Two of the students were detained by the Montgomery County Juvenile Court, however, the students weren't detained until 6/5/2011 and were only detained for 4 days (1 school day). The third student was detained by the Montgomery County Juvenile Court, however, the student wasn't detained until 5/31/2011 and was only detained for 9 days (5 school days).</p> <p>2-The students were withdrawn from the District during the 2010-2011 school year for expulsion, however, the students were not actually expelled from the District. The student were placed at the District's alternative school and should not have been withdrawn from the District.</p> <p>1-The student was placed at Paint Creek Academy via the Court and committed to the legal custody of the Department of Youth Services for Institutionalization. The Court ordered the Dayton Public Schools responsible for the cost of education for the child. The proper withdrawal code for transferred by Court Order/Adjudication is 45, however since the student was placed into the Department of Youth Service the student should not have been withdrawn from the District and the WKC code should not be 04.</p> <p>2-Lack of support to support the attendance event.</p> <p>1-The student was not withdrawn from the District during the 2010-2011 school year, however, the student did transfer to the District's alternative school. Thus, the 04 WKC code does not appear appropriate as the student was enrolled at the District for the full academic year.</p> |
| 42. | 048686 | Jefferson Township Local | Jefferson High School | 34 | 9 | No documentation supporting the attendance events. (Some student files were not available; other files had no support for the transaction that pushed them to the state report). |
| 43. | 044222 | Lima City | Lima Alternative | 25 | 3 | <p>No support for 2 truancy withdrawals and 1 withdrawal for completing graduation requirements.</p> <p>There were also 4 students over 18 with no support. However, this is an alternative school with mostly students that are over the age of 18. It is not always possible to get a withdrawal notice. Most of the time the students just stop coming. For those events coded as "over 18", auditor confirmed student was over 18 based on system recorded birth date. These 4 were not included as exceptions.</p> |

SCHOOLS WITH ERRORS

| | District IRN | School District Name | School Name | Tested State Roll Up Students | Issues Identified to Date (See notes for additional information) | Notes |
|-----|---------------------|-----------------------------|---|--------------------------------------|---|---|
| 44. | 044263 | Lorain City | New Beginnings | 61 | 7 | <p>2-Student files did not have documentation indicating the student was expelled from school as of the withdrawal date indicated.</p> <p>2-Student files did not have documentation indicating they were registered/ enrolled.</p> <p>3-Student files that the EMIS Coordinator could not locate. For these 3 students, the EMIS Coordinator provided AOS with other supporting documentation that student was not enrolled in the district for the full year such as: 1) eSMOC Ohio Report Card for the student which indicated that the student was not enrolled in the district for the full year as noted by grading period(s) missing for the 1st, 2nd or 3rd quarter. AOS also noted in most cases student grades were favorable. 2) documentation that student was expelled; and 3) student registration documentation. These 3 students were included within the failures due to the fact that student files could not be located.</p> |
| 45. | 044263 | Lorain City | General Johnnie Wilson Middle School | 55 | 6 | <p>3-The EMIS Coordinator was unable to locate 3 student files. To determine the student was properly included in our report, the EMIS Coordinator obtained the eSMOC Ohio Report Card for the student which indicated that the student was not enrolled in the district for the full year as noted by grading period(s) missing for the 1st, 2nd or 3rd quarter. In most cases student grades were favorable.</p> <p>3-We noted 3 student files that lacked documentation that the students were enrolled in autism scholarship program.</p> |
| 46. | 044263 | Lorain City | Longfellow Middle School | 44 | 5 | <p>The EMIS Coordinator was unable to locate 5 student files. To determine the student was properly included in our report, the EMIS Coordinator obtained the eSMOC Ohio Report Card for the student which indicated that the student was not enrolled in the district for the full year as noted by grading period(s) missing for the 1st, 2nd or 3rd quarter. In most cases student grades were favorable.</p> |
| 47. | 044297 | Mansfield City | Mansfield Integrated Learning Center, Hedges Campus | 13 | 2 | <p>1-Student at Mansfield High School transferred in - it appears that he changed buildings during the year, however, he did not attend school outside of the district . No support for an attendance event that would have pushed the student's scores to the state.</p> <p>1-We examined attendance records indicating that the student attended outside the district from 8/25/10 – 9/7/10. However, this was prior to count week so this would not cause a student's scores to be pushed to state. The student also moved between district buildings. However, no support for an event that would have pushed the student's scores to the state.</p> |

SCHOOLS WITH ERRORS

| | District IRN | School District Name | School Name | Tested State Roll Up Students | Issues Identified to Date (See notes for additional information) | Notes |
|-----|---------------------|-----------------------------|------------------------------------|--------------------------------------|---|---|
| 48. | 044461 | New Boston Local | Oak Intermediate Elementary School | 28 | 1 | <p>Student has been in and out of system since 2008 - no support for attendance event.</p> <p>Also identified 19 instances whereby no enrollment/ withdrawal form was present; however other documentation was maintained in student file to support attendance event.</p> |
| 49. | 044479 | New Lexington City | New Lexington High School | 73 | 1 | <p>No student file or documentation supporting the student's withdrawal could be obtained for audit.</p> <p>Additionally, of the 73 students tested, 25 withdrawals were noted for which there was no completed Withdrawal Report within the student file and 28 enrollments were noted for which there was no completed Student Registration Form within the student file. Other documentation was available and reviewed pertaining to correspondence between districts to support the student was properly coded and pushed to the State.</p> |
| 50. | 044453 | Newark City | Heritage Middle School | 76 | 2 | <p>Nothing to support attendance event.</p> <p>Additionally, there were instances where no forms were in the files but other support was included to support the event.</p> |
| 51. | 044453 | Newark City | Newark High School | 247 | 65 | <p>38-Purged files: Meaning, student either graduated or reached age that they can't attend H.S. (within the past 2 years). Everything except transcripts, test scores, IEPs, and medical information are removed. No withdrawal, enrollment forms or records requests are kept. The purge is based on a District practice/policy put in place by an ex-asst. superintendent. We confirmed that file was purged based on District criteria.</p> <p>13-Nothing to support the attendance event in the student file.</p> <p>5-No "cum file". Newark is home District, student is elsewhere and has never attended District.</p> <p>4-Student has file, but not enough information to support enrollment during the year.</p> <p>5-Student was 18 and withdrawn (code 73) due to nonattendance. No withdrawal support in file, confirmed student was 18, no further attendance noted after withdrawal date.</p> <p>There were additional files with lack of forms but other support was available to support the attendance event.</p> |
| 52. | 047001 | Reynoldsburg City | Baldwin Road Junior High School | 46 | 1 | <p>Student file could not be located.</p> |
| 53. | 044784 | Sidney City | Sidney High School | 176 | 42 | <p>19-No support for attendance event.</p> <p>23 – The attendance event code reported to the state for the attendance event was incorrect.</p> |

SCHOOLS WITH ERRORS

| | District IRN | School District Name | School Name | Tested State Roll Up Students | Issues Identified to Date (See notes for additional information) | Notes |
|-----|---------------------|-----------------------------|-----------------------------|--------------------------------------|---|---|
| 54. | 048694 | Trotwood-Madison City | Trotwood-Madison Elementary | 68 | 9 | <p>1-Student classified as WKC Code 12 - first year LEP student but enrolled for several years.</p> <p>1-Student excluded due to withdrawal, however per supporting documentation the student did not have a break in attendance during the 2010-11 school year and should have been included on the school's report card.</p> <p>7-Students excluded due to expulsion. Student was expelled for 10 or less days therefore this would appear to represent a suspension and he/she should have been included in the District's report card.</p> <p>Additionally, for Trotwood-Madison Elementary, 6 students were noted for which a withdrawal form or request for records were not included within the student file. Other documentation was available to support the attendance event.</p> |

SCHOOLS WITH ERRORS

| | District IRN | School District Name | School Name | Tested State Roll Up Students | Issues Identified to Date (See notes for additional information) | Notes |
|-----|--------------|-----------------------|--------------------------------|-------------------------------|---|---|
| 55. | 048694 | Trotwood-Madison City | Trotwood-Madison Middle School | 87 | 8 | <p>3 - Students with an event code of expulsion, was expelled for 10 or less days therefore this would appear to represent a suspension and he/she should have been included in the District's report card.</p> <p>1- Student with an event code of expulsion, was expelled for 10 or less days therefore this would appear to represent a suspension and he/she should have been included in the District's report card. AND the expulsion notice documented an expulsion date at or near the end of the school year; however, the withdrawal date was back-dated to a date prior to the end of the Full Academic Year, which is May 10th for grades 3-8. No documentation as to why the date of the actual withdrawal varied from the expulsion date per the expulsion notice.</p> <p>2-Students had an event code of expulsion. The expulsion notice documented an expulsion date at or near the end of the school year; however, the withdrawal date was back-dated to a date prior to the end of the Full Academic Year, which is May 10th for grades 3-8. No documentation as to why the date of the actual withdrawal varied from the expulsion date per the expulsion notice.</p> <p>1-Student withdrawn under code 41 but should have been withdrawn under code 74. Student was withdrawn during the year due to not being a resident after confirmation that the student no longer resided at the last known address.</p> <p>1-Student excluded due to entrance into the District in the middle of the school year. Per review of the student's report card, this student received grades for all four quarters and received final grades. This is inconsistent with the report cards of other students who registered in the middle of the year. All other students in this situation did not receive grades until they registered. The student's total days present and absent were consistent with the reported registration however AoS will still consider this a failure due to the reported grades.</p> <p>Additionally, for Trotwood-Madison Middle School, 4 students were noted for which a enrollment form, withdrawal form or request for records were not included within the student file. Other documentation was available to support the attendance event.</p> |

SCHOOLS WITH ERRORS

| | District IRN | School District Name | School Name | Tested State Roll Up Students | Issues Identified to Date (See notes for additional information) | Notes |
|-----|---------------------|-----------------------------|-----------------------------|--------------------------------------|---|--|
| 56. | 048694 | Trotwood-Madison City | Madison Park Elementary | 47 | 2 | <p>1-Student excluded due to expulsion. Student was expelled for 10 or less days therefore this would appear to represent a suspension and he/she should have been included in the District's report card.</p> <p>1-Student withdrawn due to non-attendance but the District withdrew under code 74 (moved - not known to be continuing) and did not follow the written policy that the Juvenile Court be notified.</p> <p>Additionally, for Madison Park Elementary, 3 students were noted for which a withdrawal form or request for records were not included within the student file. Other documentation was available to support the attendance event.</p> |
| 57. | 045005 | Warrensville Heights City | Eastwood Elementary School | 50 | 3 | Lack of district transfer forms. However, additional support was provided to determine the students were transferred appropriately. |
| 58. | 045096 | Willard City | New Haven Elementary School | 37 | 3 | Nothing on file to support the attendance events. |
| 59. | 045096 | Willard City | Willard Middle School | 112 | 3 | <p>2-Nothing on file to support the attendance event.</p> <p>1-Noted that documentation supported withdrawal date but not code. Student was improperly coded as moving to another district in state, 40, when documentation shows student moving out of state, 41.</p> |
| 60. | 045096 | Willard City | Willard High School | 70 | 1 | 1-Noted that documentation supported withdrawal date but not code. Student was improperly coded as moving to another district out of state, 41, but court documents state student is no longer required to attend school and is not known to be continuing. Should be code 74. |

SCHOOLS WITH ERRORS

| | District IRN | School District Name | School Name | Tested State Roll Up Students | Issues Identified to Date (See notes for additional information) | Notes |
|-----|--------------|----------------------|---|-------------------------------|---|--|
| 61. | 045161 | Youngstown City | University Project Learning Center (UPLC) | 21 | 5 | <p>1-We reviewed a Student Withdrawal/Record Transfer Form dated 9/29/10 stating the student withdrew; however, no withdrawal date was provided and the form was not signed by anyone. We reviewed a letter from the Supervisor of Student Services to the Principal dated 10/27/10 stating the student should be re-enrolled at UPLC. However, no documentation was found officially re-enrolling the student. We reviewed a Student Withdrawal/Record Transfer Form dated 5/9/11 stating the student withdrew; however, no withdrawal date was provided and the form was not signed by anyone. The form was initialed stating the student withdrew on 5/5/11 under code 41. There is no documentation stating where the student transferred to. We spoke to the Supervisor Of Student Services regarding the status of the student and she explained that the District has no proof that the student has been re-enrolled at another school; therefore, the student is considered an ongoing truancy case, which is currently being handled by the courts. We also asked the District if they normally recode the student upon finding out that the student never re-enrolled in another school and they stated that they kept code 41, since eventually the courts will force the child to re-enroll at another school or return to UPLC. Due to the fact the student is an ongoing truancy, it would be more accurate to code the student with code 71 (Withdrew due to truancy/nonattendance) while maintaining appropriate evidence of due process.</p> <p>1- We reviewed Attendance Summary, noting the student started on home instruction on 12-15-10. No supporting documentation noting this was court mandated. Therefore, it is indeterminable if the withdrawal code of 45 is appropriate;</p> <p>1-We reviewed Student Withdrawal/Record Transfer Form dated 2/4/11 stating the student was withdrawn. The form was signed by the Principal on 1/9/10 and the Director of Pupil Personnel. The student had unexcused absences from 12/9/10 until the date of the Withdrawal/Record Transfer Form. This may explain why the Withdraw Date reflected on this spreadsheet shows 12/9/10. We reviewed the Admission/Withdraw Maintenance print screen from the system, which noted the student was admitted to UPLC on 3/19/10 and withdrew on 12/9/10 (Code 41 - Tran-PSD in Ohio). The sheet also noted that her next school was the MCESC PACE Program; however there is no additional documentation to support the claim. We spoke to the Supervisor Of Student Services regarding the student's status after leaving UPLC and she said the District has no record of the student after she withdrew from UPLC. We also asked her about seeing the MCESC PACE Program on the Admission/Withdraw Maintenance print screen and she said that if she did indeed enroll in the PACE Program, she would have had to enroll at one of the other public school districts in Mahoning County; however, YCSD has no record of her re-enrolling, nor is there proof of her participating in the MCESC PACE Program. As such, a correct coding cannot be determined without knowing what happened to the student after she withdrew from UPLC.</p> <p>2- There was no documentation supporting inter-district enrollment, only intra-district transfer; therefore, no evidence supporting students' mid-year enrollment and push to the State.</p> |

| SCHOOLS WITH ERRORS | | | | | | |
|---------------------|--------------|----------------------|----------------------------------|-------------------------------|---|--|
| | District IRN | School District Name | School Name | Tested State Roll Up Students | Issues Identified to Date (See notes for additional information) | Notes |
| 62. | 045161 | Youngstown City | P. Ross Berry Middle School | 57 | 4 | Student files did not include documentation to support the noted enrollment date during the FY '11 academic year. |
| 63. | 045161 | Youngstown City | Volney Rogers Junior High School | 52 | 3 | <p>1-We viewed the Admission/Withdraw Maintenance Form showing the student was enrolled during the school year, however, there is no Registration Form on file or Record Request Form from the previous school.</p> <p>1-Beginning 11/16/09, the student was on Health Impaired Home Instruction. No documentation showing the admission to Leonard Kirtz in August of 2010, except for the Admission/Withdraw Maintenance Screen.</p> <p>1-The student stopped attending school effective 3/21/11 due to nonattendance. No transfer or Withdrawal forms noted. Attendance Summary ended at 3/21/11. Per Release of School Records form, student enrolled with P. Ross Berry to start the 2011-12 school yr. Admission date was 8/31/11 withdrawal reason should have been 71, nonattendance after appropriate due process. Withdrawal code of 41 appears inappropriate.</p> |
| 64. | 045161 | Youngstown City | Youngstown East High School | 77 | 28 | <p>1 - The student file could not be located and there was no explanation as to why the file was missing.</p> <p>4-The students were open enrolled and never attended YCSD and no files were available for review.</p> <p>1-The student left the District pursuant to Court Order - however, documentation of the Court Order was not available for review.</p> <p>18-The student was improperly coded with withdrawal code of 41 yet there was no evidence of the student transferring to another Ohio school district and in many cases the transferring district was marked as "unknown" and the student had stopped attending. In other cases, the student was noted as over the age of 18 and should have been coded as 73 rather than 41.</p> <p>4-There was no documentation within the student file to support the noted attendance event.</p> |

11.3. TOP 100 CLEAN SCHOOLS

The following table describes the schools with no enrollment issues identified during the 2010-11 school year for the Top 100 schools. These testing results are as of this report date. Testing of student files for some schools is still indeterminate.

| CLEAN SCHOOLS | | | | | |
|---------------|--------------|----------------------------|---------------------------------------|-------------------------------|---------------------------|
| | District IRN | School District Name | School Name | Tested State Roll Up Students | Issues Identified to Date |
| 65. | 048793 | Cardington-Lincoln Local | High School | 59 | 0 |
| 66. | 043760 | Circleville City | Nicholas Elementary School | 20 | 0 |
| 67. | 045344 | Crestline Exempted Village | Crestline Southeast Elementary School | 23 | 0 |
| 68. | 043844 | Dayton City | Meadowdale PreK-8 School | 50 | 0 |
| 69. | 043950 | Euclid City | Euclid High School | 285 | 0 |
| 70. | 048843 | Franklin Local | Roseville Elementary School | 18 | 0 |
| 71. | 044040 | Garfield Heights City | Garfield Heights Middle School | 107 | 0 |
| 72. | 046953 | Hamilton Local | Hamilton Intermediate School | 107 | 0 |
| 73. | 046953 | Hamilton Local | Hamilton Middle School | 68 | 0 |
| 74. | 048520 | Meigs Local | High School | 81 | 0 |
| 75. | 046672 | Mississinawa Valley Local | Mississinawa Valley JR/SR High School | 38 | 0 |
| 76. | 044412 | Mt Healthy City | Junior High School | 84 | 0 |
| 77. | 044446 | Nelsonville-York City | Nelsonville-York High School | 50 | 0 |
| 78. | 044511 | North College Hill City | North College Hill High School | 66 | 0 |
| 79. | 044628 | Painesville City Local | Harvey High School | 91 | 0 |
| 80. | 046599 | Richmond Heights Local | Richmond Heights Secondary School | 43 | 0 |
| 81. | 044818 | Springfield City | Springfield High School | 146 | 0 |
| 82. | 049155 | Western Local | Western High School | 48 | 0 |
| 83. | 045666 | Windham Exempted Village | Windham Junior High School | 21 | 0 |
| 84. | 044081 | Winton Woods City | Winton Woods Elementary School | 66 | 0 |
| 85. | 045120 | Wooster City | Boys Village | 69 | 0 |

11.4. TOP 100 SCHOOLS INDETERMINATE AS OF THE DATE OF THIS REPORT

The following table describes the schools where enrollment testing for the 2010-11 school year is still indeterminate due to factors outside AOS control (e.g., schools are still gathering student information files and other information to support enrollment) as of the date of this report.

| INDETERMINATE | | | | | |
|---------------|--------------|----------------------|--------------------------------------|-------------------------------|--------------|
| | District IRN | School District Name | School Name | Tested State Roll Up Students | Status |
| 86. | 043711 | Canton City | Choices Alternative School | 162 | Undetermined |
| 87. | 043711 | Canton City | Community Educational Services | 11 | Undetermined |
| 88. | 043711 | Canton City | Hartford Middle School | 24 | Undetermined |
| 89. | 043752 | Cincinnati City | George Hays-Jennie Porter Elementary | 65 | Undetermined |
| 90. | 043752 | Cincinnati City | Chase Elementary School | 54 | Undetermined |

| INDETERMINATE | | | | | |
|---------------|--------------|---|----------------------------------|-------------------------------|--------------|
| | District IRN | School District Name | School Name | Tested State Roll Up Students | Status |
| 91. | 043752 | Cincinnati City | Oyler School | 88 | Undetermined |
| 92. | 043752 | Cincinnati City | Quebec Heights Elementary School | 47 | Undetermined |
| 93. | 043752 | Cincinnati City | South Avondale Elementary School | 55 | Undetermined |
| 94. | 043794 | Cleveland Heights-University Heights City | Bellefaire | 48 | Undetermined |
| 95. | 044107 | Hamilton City | Garfield Middle School | 105 | Undetermined |
| 96. | 044107 | Hamilton City | Hamilton Education Center | 88 | Undetermined |
| 97. | 044107 | Hamilton City | Hamilton High School | 228 | Undetermined |
| 98. | 048736 | Northridge Local | Northridge High School | 94 | Undetermined |
| 99. | 048736 | Northridge Local | Esther Dennis Middle School | 46 | Undetermined |
| 100. | 044677 | Princeton City | Princeton High School | 170 | Undetermined |

11.5. ADDITIONAL 28 SCHOOL DISTRICTS

The following table describes the results of enrollment testing for the 2010-11 school year for the additional 28 school districts as of the date of this report.

| | District IRN | School District Name | School Name | Tested State Roll Up Students | Issues Identified to Date (See notes for additional information) | Notes |
|-----|--------------|----------------------|-------------|-------------------------------|---|-------|
| 1. | 048124 | Avon Lake CSD | All | 93 | 0 | Clean |
| 2. | 045203 | Barnesville EVSD | All | 51 | 0 | Clean |
| 3. | 047167 | Berkshire LSD | All | 34 | 0 | Clean |
| 4. | 046433 | Crestview LSD | All | 15 | 0 | Clean |
| 5. | 047837 | Danville LSD | All | 21 | 0 | Clean |
| 6. | 048413 | Elgin LSD | All | 87 | 0 | Clean |
| 7. | 047936 | Fairland LSD | All | 52 | 0 | Clean |
| 8. | 048843 | Franklin LSD | All | 170 | 0 | Clean |
| 9. | 046342 | Goshen LSD | All | 161 | 0 | Clean |
| 10. | 045435 | Indian Hill EVSD | All | 27 | 0 | Clean |
| 11. | 050369 | Lincolnviev LSD | All | 67 | 0 | Clean |
| 12. | 045450 | Lisbon EVSD | All | 41 | 0 | Clean |
| 13. | 044289 | Madeira CSD | All | 28 | 0 | Clean |

| | | | | | | |
|-----|--------|-------------------|-----|--------------|--------------|--|
| 14. | 050740 | Mohawk LSD | All | 21 | 0 | Clean |
| 15. | 044495 | Niles CSD | All | 152 | 0 | Clean |
| 16. | 044503 | North Canton CSD | All | Undetermined | Undetermined | Clean |
| 17. | 049478 | Ontario LSD | All | 47 | 0 | Clean |
| 18. | 050054 | Revere LSD | All | 64 | 0 | Clean |
| 19. | 050500 | Warren LSD | All | 107 | 0 | Clean |
| 20. | 043554 | Beachwood CSD | All | 52 | 2 | <p>During this period the District was on ESIS, now the district is on a new system and they were unable to pull the names of these students as they also withdrew before transition to the new system.</p> <p>We obtained clarification from ODE indicating that these students were properly excluded.</p> |
| 21. | 046714 | Central LSD | All | 33 | 3 | <p>1- Student was reported as withdrawn on 11/9/10 on F/Y 2011 WKC list. The student was enrolled at the district during the 2010-2011 school year; the student file included graduation testing scores and an official transcript from the district was dated 6/5/11. Student was miscoded with a "41" withdrawal date and not detected by district personnel.</p> <p>1-Student was reported with an admission date of 4/20/11 on F/Y 2011 WKC list. The student was enrolled at the district during the 2010-2011 school year; IEP's are on file for the student and graduation testing scores were in the student file indicating the student had passed all graduation testing back on 3/1/09. Student was miscoded and not detected by district personnel.</p> <p>1-Student was reported with an admission date of 3/1/11 on F/Y 2011 WKC list; however the student's actual enrollment date was 8/1/11. The student was enrolled at another local school district all of the 2010-2011 school year. Correspondence in the student's file requesting release of the student's records did not occur between districts until August 2011, which corresponds to the actual enrollment date and not the admission date reported on the F/Y 2011 WKC list. Student was miscoded and not detected by district personnel.</p> |
| 22. | 047852 | Fredericktown LSD | All | 50 | 2 | <p>1 - Was unable to find name associated with SSID #. Two different employees looked up the SSID# and were unable to find a student name.</p> <p>1 – Student file lacked support for withdrawal date.</p> |

| | | | | | | |
|-----|--------|----------------|-----|----|----|---|
| 23. | 050187 | Lakeview LSD | All | 64 | 25 | <p>2-Students had no files.</p> <p>1-Special Ed. Student attending Trumbull Career and Technical Center with home school of Girard. File contains minimal support other than official transcript and email.</p> <p>20-Viewed official transcript. No file maintained.</p> <p>1-Transcript documents student graduated in June 2008.</p> <p>1-File shows student has attended Lakeview Schools since 2006. Student File does not support WKC Description.</p> <p>Lakeview High School procedures have been to purge files after 1 year of withdrawal. Transcripts were maintained noting the withdrawal date.</p> |
| 24. | 000442 | Manchester LSD | All | 46 | 1 | <p>Manchester LSD did not have documentation as to the withdrawal of this student and indicated the withdrawal code 41 used was improper - However, we were able to review the data file received from ODE noting this student also shows up on the file for West Clermont LSD with an enrollment date consistent with the noted withdrawal date from Manchester LSD. The student was coded as a 41 transfer to another Ohio School District; however, the file did not contain a withdrawal form or any request for records from another school district around the date noted on the report. Therefore, we asked the EMIS Secretary to look at the file and see if she could find the documentation. She responded that the student was withdrawn under code 41 by error as she was their student when she was placed elsewhere by court order. The EMIS Secretary indicated the code used should have be an "R" for a student placed elsewhere by court order. Although the coding may have been wrong for this student, the student was properly pushed to the State under the noted circumstances.</p> |
| 25. | 050724 | Otsego LSD | All | 58 | 3 | <p>1-A student was coded as a "41" which was transfer to another district, transcript request on file. Student was over 18 when left, and did not provide a new district going to attend, so should have been coded "73". The "73 was a vaild code for pushing the student to the State and not including in District count.</p> <p>2-A family withdrew their 2 children on 4/25 and went to another District in another City. The family did not re-enroll the children till the start of the following school year. The student files could not be located due to misplaced during a new building project. Their school was torn down and files moved to the new location.</p> <p>Additionally, 2 withdrawals of students did not include withdrawal forms within the student files. However, the file did include records requests from the other districts to support the transfer of the student to the other district.</p> |

| | | | | | | |
|-----|--------|-------------------|-----|-----|---|--|
| 26. | 045781 | Perry LSD | All | 42 | 3 | 3- Lack of support for the attendance event. Also noted 14 instances whereby enrollment/withdraw form not included in file; however, other documentation/information available in student file/from district to support attendance event. |
| 27. | 047969 | Symmes Valley LSD | All | 38 | 1 | One student was improperly coded due to the fact that the student was withdrawn by mistake then re-enrolled the same day. However, this created an inaccurate break in attendance that was not corrected by the District, causing the student to be pushed to the State. |
| 28. | 049437 | Lexington LSD | All | 103 | 1 | The District was unable to locate the file of 1 student. We were able to review the data file received from ODE noting this student also shows up on the file for Highland Local Schools with an enrollment date consistent with the noted withdrawal date from Lexington LSD. The coding/withdrawal appears to be accurate. |

12. VIEWS OF RESPONSIBLE SCHOOL OFFICIALS

The schools for which testing was complete as of September 28, 2012 were provided an opportunity to respond to this report. Their responses were evaluated and changes were made to this report as AOS deemed necessary.

District responses can be obtained by contacting the school districts listed in section **11** of this report.

13. APPENDIX

ODE sent the following July 25, 2012, letter to Lockland School District upon finding that Lockland had “falsely reported” school attendance data. As described in this letter, ODE revised downward the school district’s report card rating.



VIA EMAIL AND CERTIFIED MAIL

July 25, 2012

Donna F. Hubbard, Superintendent
Lockland School District
210 N. Cooper Avenue
Cincinnati, OH 45215-3011

Dear Superintendent Hubbard:

This letter is to inform you that the Ohio Department of Education (ODE) has completed its investigation into the allegation that the Lockland School District (Lockland) had improperly reported its Education Management Information System (EMIS) data during the 2010-2011 school year. In summation, as a result of our investigation, and as further detailed in this letter, ODE has determined that:

- Lockland failed to meet the burden of proof required to demonstrate that it made a good faith effort to properly report data to ODE as required by law.
- Lockland personnel improperly and falsely reported that thirty-seven students were withdrawn during the 2010-2011 school year to attend another Ohio school district.
- Lockland subsequently reenrolled thirty-seven withdrawn students into the district despite the fact that EMIS data illustrates that the students did not leave to attend another Ohio school district as falsely reported.
- Lockland's falsification of attendance data wrongfully benefitted the 2010-2011 district and school building report cards, thus requiring ODE to exercise its statutory authority to recalculate and reissue corrected 2010-2011 district and school building report cards to lower ratings in numerous areas of Ohio's accountability system.
- Findings of this investigation will be provided to the Office of Professional Conduct at ODE for formal review to determine if further investigation and action is warranted to ascertain if you or any ODE licensed professionals in Lockland participated in conduct unbecoming the teaching profession to falsely improve 2010-2011 district and/or school building local report card ratings.
- Lockland and Lockland personnel shall immediately report any/all EMIS data honestly and correctly in accordance with all required policies, procedures, regulations, and laws.

As you will recall, on March 27, 2012, after an initial review of your district data, ODE requested in writing any information in your possession to support the coding of thirty-eight Lockland students as withdrawn. On May 2, 2012, ODE received Lockland's response drafted by legal counsel, David J. Lampe. Mr. Lampe stated in his letter that, "documentation of efforts made by the District to obtain executed withdrawal forms, receipt of requests for records from receiving School districts, and other documents supporting a designation as withdrawn are lacking."

Pursuant to Ohio Revised Code 3301.0714(L), ODE has the authority to investigate and take certain actions with regard to the submission of inaccurate EMIS data. RC 3301.0714(L)(9) indicates that, "the burden of proof shall be on the district to demonstrate that it made a good faith effort to report data as required by this section." ODE has dutifully provided your district the opportunity to support, with any documentation in its possession, the decisions to report the students in question as withdrawn in EMIS. Lockland has not provided required documentation to support the withdrawal reason, "transferred to another Ohio school district," reported for thirty-seven of the thirty-eight students in question. As a result, ODE concludes that Lockland has failed in its burden to show it made a good faith effort to report accurate attendance data for thirty-seven students during the 2010-2011 school year.

Again, ODE's data review has determined that Lockland failed to provide any documentation to support the withdrawal of thirty-seven of the students in question. In fact, based upon a review of EMIS data, ODE has confirmed that thirty-seven of the thirty-eight students withdrawn from your district were not reported in EMIS as having enrolled in another school district during the period of being withdrawn from Lockland. Furthermore, these thirty-seven students were later reenrolled in Lockland after their break in attendance. Thus, EMIS data clearly demonstrates that these thirty-seven students were educated exclusively by Lockland and improperly withdrawn during the 2010-2011 school year by Lockland personnel. This falsification is further evidenced by inconsistencies in daily attendance records and alleged periods of student withdrawals entered by Lockland personnel.

Lockland's failure to provide accurate data requires ODE to conclude that EMIS data for thirty-seven students in question was falsely reported. This falsification resulted in inflated accountability ratings for Lockland. By falsely withdrawing these students via EMIS data submitted, the limited and basic assessment scores for these students were not counted in their respective school or your district accountability calculations for the 2010-2011 school year report cards.

Because Lockland benefitted wrongly from the inaccurate withdrawal data entered into EMIS, in accordance with RC 3301.0714(L)(2)(d)(viii), ODE is exercising its power to revise the 2010-2011 Lockland Report Cards. The 2010-2011 report cards bearing the water mark referencing this investigatory review will be removed and ODE will reissue corrected 2010-2011 Lockland District and Building Report Cards.

The revised report cards now illustrate the inclusion of assessment data for thirty-six of the remaining thirty-seven students in question by ODE. Two of the original thirty-eight students in question were excluded from the data recalculation. As previously accounted,

one student in question was properly justified and documented for withdrawal status. A second student, although not properly documented for withdrawal, was a first year Limited English Proficient student who would have been excluded from the accountability calculation despite the inappropriate break in enrollment. Overall, the proper inclusion of the accountability data for the thirty-six students will result in the following changes for Lockland as illustrated in the attached corrected report cards for the 2010-2011 school year:

| LEA Name | Number of Students Added to Results | Old Rating | New Rating | Old State Indicators Met | New State Indicators Met | Old PI | New PI | Old AYP | New AYP | Old Improvement Status | New Improvement Status |
|---------------------------|---|--|------------------------|--------------------------|--------------------------|--------|--------|---------|---------|------------------------|------------------------|
| Lockland Local | 36 | Effective | Continuous Improvement | 20 of 26 | 14 of 26 | 93.3 | 88.1 | Met | Not Met | Ok | At Risk |
| | 10 in 3 rd 8 in 4 th 4 in 5 th 1 in 7 th 3 in 8 th 4 in 10 th 6 in 11 th | | | | | | | | | | |
| Arlington Heights Academy | 4 | Not Rated | Continuous Improvement | 1 of 2 | 1 of 7 | 89.3 | 79.3 | Met | Met | Ok | Ok |
| | 2 in 10 th 2 in 11 th | (due to insufficient number of students) | | | | | | | | | |
| Lockland Elementary | 22 | Continuous Improvement | Academic Watch | 3 of 8 | 1 of 8 | 85.6 | 77.7 | Met | Not Met | OK | At Risk |
| | 10 in 3 rd 8 in 4 th 4 in 5 th | | | | | | | | | | |
| Lockland Middle | 4 | Effective | Effective | 7 of 8 | 6 of 8 | 94.2 | 92 | Met | Met | Ok | Ok |
| | 1 in 7 th 3 in 8 th | | | | | | | | | | |
| Lockland High | 6 | Excellent | Excellent | 12 of 12 | 11 of 12 | 103.2 | 100.4 | Met | Met | Ok | Ok |
| | 2 in 10 th 4 in 11 th | | | | | | | | | | |

Based upon the actions outlined herein, ODE's investigation of EMIS data related to thirty-eight students during the 2010-2011 school year is now concluded. However, pursuant to RC 3301.0714(L)(2)(d)(vi) & (N), findings of this investigation will be provided to the Office of Professional Conduct at ODE for review to determine if further investigation is warranted to ascertain if you or any ODE licensed professionals in Lockland participated in conduct unbecoming the teaching profession to contribute to the falsified reporting of attendance data to improve 2010-2011 district and school ratings. As I have communicated to you previously, these actions are serious in nature, will not be tolerated, and may result in professional conduct sanctions against any/all culpable Lockland personnel, up to and including suspension or revocation of licensure, and/or other personnel actions as determined by the Lockland Board of Education.

It is my expectation that Lockland will continue to cooperate fully if further action is determined necessary by the Office of Professional Conduct. Additionally, Lockland will immediately report any/all EMIS data honestly, accurately, and in accordance with all reporting policies, procedures, regulations, and laws.

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Dave Yost • Auditor of State

**INTERIM REPORT ON STUDENT ATTENDANCE DATA AND ACCOUNTABILITY SYSTEM
FRANKLIN COUNTY**

CLERK'S CERTIFICATION

This is a true and correct copy of the report which is required to be filed in the Office of the Auditor of State pursuant to Section 117.26, Revised Code, and which is filed in Columbus, Ohio.

Susan Babbitt

CLERK OF THE BUREAU

**CERTIFIED
OCTOBER 4, 2012**