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DISTRICT OF COLUMBIA PUBLIC SCHOOLS

Enrollment Count Still Appears Vulnerable to Errors

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District of Columbia Public Schools: Enrollment Count Still Appears Vulnerable to Errors

Mr. Chairman and Members of the Subcommittee:

I am pleased to be here today to assist the Subcommittee in its oversight of the District of Columbia Public Schools' (DCPS) enrollment count. An accurate count of the number of enrolled students is the cornerstone of a school district's financial needs assessment. Although in the past, DCPS did not receive funds on the basis of the number of students enrolled, new budget initiatives will soon directly link DCPS' funding to school enrollment. Even now, the number of enrolled students is an important factor in developing DCPS' budget and distributing its funds. Consequently, a valid enrollment count process and an accurate count are critical for DCPS' district- and school-level planning, staffing, funding, and resource allocation.

Today, I will discuss our recent report[1] on the enrollment count process that DCPS used in school year 1996-97 and actions DCPS officials report they have taken in response to our recommendations. Our report was prepared at your request and was in response to criticisms raised in the past several years about the accuracy of DCPS' enrollment count. Specifically, you asked us to examine DCPS' 1996-97 enrollment count process to determine whether the process appeared sufficient to produce an accurate count. Subsequently, for this hearing, you asked us to follow up with DCPS regarding any actions taken in response to our recommendations.

Our report on DCPS' 1996-97 enrollment count process is based on interviews with and documents obtained from DCPS administrative staff, city officials, officials in other urban school districts and their state departments of education, officials in the U.S. Department of Education, and education experts. We also visited 15 DCPS elementary and secondary schools, randomly selected according to school level and city quadrant. During our school visits, we interviewed principals, school administrative staff, and teachers and reviewed selected documents. To follow up with DCPS regarding actions taken in response to our recommendations, we interviewed DCPS' Director of Educational Accountability, who is the DCPS official responsible for the 1997-98 enrollment count, and reviewed various documents he provided to us. It is noteworthy that we neither visited DCPS schools, talked with teachers and principals, nor reviewed documents at the school level for our follow-up as we did for our report.

[1]District of Columbia Public Schools: Student Enrollment Count Remains Vulnerable to Errors (GAO/HEHS-97-161, Aug. 21, 1997).

Results in Brief

As we reported in August 1997, in spite of some changes in DCPS' enrollment count process in response to criticisms, the 1996-97 count process remained flawed in several respects. For example, the Student Information System (SIS) continued to have errors, such as multiple enrollment records for a single student and weaknesses in the system's ability to track students. In addition, verification of student residency remained problematic. On the basis of the flaws we identified in the 1996-97 process, we made several recommendations to DCPS.

Although DCPS made some changes in its enrollment count process for the 1997-98 school year in response to our recommendations and plans to make more, the larger systemic issues appear to remain mostly uncorrected. Consequently, fundamental weaknesses still remain in the enrollment count process, making it vulnerable to inaccuracy and weakening its credibility. For example, DCPS staff report that although an important internal control—duplicate record checks—has been implemented for SIS, additional internal controls are still lacking. Several DCPS enrollment and pupil accounting procedures continue to increase the possibility of multiple enrollment records for a single student. We are concerned that duplicate record checks alone may not be sufficient to protect the integrity of SIS, given the many possibilities for error.

Furthermore, the enrollment count may still include nonresident students. More than half (56 percent) of DCPS' students have either failed to provide the residency verification forms or have provided no proofs of residency (for example, copies of deeds, rental leases, utility bills, or vehicle registrations, among others) to accompany their forms. We question the appropriateness of including students who have failed to prove residency in the official count, particularly students who have not even provided the basic form. In addition, because DCPS has not yet monitored and audited residency verification at the school level, additional problems may exist that are not yet apparent. Proposed new rules governing residency will help DCPS deal with residency issues. Until these issues are fully addressed and resolved, however, the accuracy and credibility of the enrollment count will remain questionable.

In our more recent discussions with DCPS officials, they acknowledge that more needs to be done to improve the enrollment count process, particularly in the areas of further strengthening DCPS' automated internal controls and addressing the nonresident issue. They have expressed concern, however, that we have failed to recognize fully the improvements DCPS made in the enrollment count process for school year 1997-98. We

have recognized DCPS' progress but nevertheless remain concerned about fundamental systemic weaknesses.

DCPS' Enrollment Count Process in School Year 1996-97

We reported that even though DCPS changed parts of its enrollment process in school year 1996-97 to address prior criticisms, the process remained flawed. Some of the changes, such as the use of an enrollment card to verify attendance, increased complexity and work effort but did little to improve the count's credibility. Because DCPS counts enrollment by counting enrollment records—not actual students—accurate records are critical for an accurate count. Errors, including multiple enrollment records for a single student, remained in SIS, but DCPS had only limited mechanisms for correcting these errors. For example, although Management Information Services personnel maintained SIS, they had no authority to correct errors. In addition, DCPS' enrollment procedures allowed multiple records to be entered into SIS for a single student, and its student transfer process may have allowed a single student to be enrolled in at least two schools simultaneously. Furthermore, DCPS' practice of allowing principals to enroll unlimited out-of-boundary students increased the possibility of multiple enrollment records for one student. Nevertheless, DCPS did not routinely check for duplicate records.

In addition, DCPS' official enrollment count included categories of students usually excluded from enrollment counts in other districts when the counts are used for funding purposes. For example, DCPS included in its enrollment count students identified as tuition-paying nonresidents of the District of Columbia and students above and below the mandatory age for public education in the District of Columbia, including Head Start participants,[2] prekindergarten students (age 4), preschool students (age 0 to 3), and some senior high and special education students aged 20 and older.[3] In contrast, the three states that we visited reported that they exclude from enrollment counts used for funding purposes any student who is above or below mandatory school age or who is fully funded from other sources. Furthermore, even though the District of Columbia Auditor has suggested that students unable to document their residency be excluded from the official enrollment count, whether they pay tuition or not, DCPS included these students in its enrollment count for school year 1996-97.

[2]Head Start has its own funding source.

[3]The District of Columbia School Reform Act of 1995 requires separate reporting of some of these groups but does not require that they be included in aggregate counts.

During school year 1996-97, District of Columbia schools had some attractive features. Elementary schools in the District had free all-day prekindergarten and kindergarten, and some elementary schools had before- and after-school programs at low cost. For example, one school we visited had before- and after-school care for $25 per week. This program extended the school day's hours to accommodate working parents—the program began at 7 a.m. and ended at 6 p.m. In addition, several high schools had highly regarded academic and artistic programs; and some high schools had athletic programs that reportedly attracted scouts from highly rated colleges. Furthermore, students could participate in competitive athletic programs until age 19 in the District, compared with age 18 in some nearby jurisdictions.

Problems persisted, however, in the critical area of residency verification. In school year 1996-97, schools did not always verify student residency as required by DCPS' own procedures. Proofs of residency, when actually obtained, often fell short of DCPS' standards. Moreover, central office staff did not consistently track failures to verify residency. Finally, school staff and parents rarely suffered sanctions for failure to comply with the residency verification requirements.

In addition, the pupil accounting system failed to adequately track students. SIS allowed more than one school to count a single student when the student transferred from one school to another. Furthermore, schools did not always follow attendance rules, and SIS lacked the capability to track implementation of the rules. Finally, some attendance rules, if implemented, could have allowed counting of nonattending students.

Other school districts report that they use several approaches to control errors, such as the ones we identified, and to improve the accuracy of their enrollment counts. These include using centralized enrollment and pupil accounting centers and a variety of automated SIS edits and procedures designed to prevent or disallow pupil accounting errors before they occur.

Finally, the District of Columbia School Reform Act of 1995 imposed enrollment count reporting and audit requirements. The act requires the enrollment count process to produce an enrollment count that includes the number of special needs and nonresident students by grade level and the amount of tuition assessed and collected. The official enrollment count report released for school year 1996-97 did not provide this information. The act also requires the District of Columbia Financial Responsibility and Management Assistance Authority to provide for an independent audit of

the enrollment count. The Authority decided, however, that the inadequacies that led to the restructuring of the public school system would make auditing the school year 1996-97 count counterproductive. In short, the Reform Act's audit requirement was not met.

Because the enrollment count will become the basis for funding DCPS and is even now an important factor in developing DCPS' budget and allocating its resources, we recommended in our report that the Congress consider directing DCPS to report separately in its annual reporting of the enrollment count those students

- fully funded from other sources, such as Head Start participants and tuition-paying nonresidents;
- above and below the mandatory age for compulsory public education, such as those in prekindergarten or those aged 20 and above; and
- for whom District residency cannot be confirmed.

We also recommended that the DCPS Chief Executive Officer/ Superintendent do the following:

- Clarify, document, and enforce the responsibilities and sanctions for employees involved in the enrollment count process.
- Clarity, document, and enforce the residency verification requirements for students and their parents.
- Institute internal controls in the student information database, including database management practices and automatic procedures and edits to control database errors.
- Comply with the reporting requirement of the District of Columbia School Reform Act of 1995.

We further recommended that the District of Columbia Financial Responsibility and Management Assistance Authority comply with the auditing requirements of the District of Columbia School Reform Act of 1995.

In commenting on a draft of our report, DCPS' Chief Executive Officer/ Superintendent stated that DCPS concurred with our major findings and recommendations and would correct the identified weaknesses. He also acknowledged that the enrollment numbers for school year 1996-97 are subject to question for the reasons we cited—especially because the enrollment count credibility hinged almost entirely on the written verification provided by local administrators. He said that no substantial

checks and balances, no aggressive central monitoring, and few routine reports were in place. In addition, he said that virtually no administrative sanctions were applied, indicating that the submitted reports were hardly reviewed.

The Authority shared DCPS' view that many findings and recommendations in our report will help to correct what it characterized as a flawed student enrollment count process. Its comments did, however, express concerns about certain aspects of our report. The Authority was concerned that we did not discuss the effects of the Authority's overhaul of DCPS in November 1996.[4] It also commented that our report did not note that the flawed student count was one of the issues prompting the Authority to change the governance structure and management of DCPS. In the report, we explained that we did not review the Authority's overhaul of DCPS or the events and concerns leading to the overhaul.

Reported Responses to Our Recommendations

DCPS has made some changes in response to our recommendations. For example, it dropped the enrollment card. DCPS now relies upon other, more readily collected information, such as a child's grades or work, as proof that a child has been attending. DCPS has also strengthened some mechanisms for correcting SIS errors, such as multiple enrollment records for a single student. Staff reported that central office staff now conduct monthly duplicate record checks. These staff then work with the schools to resolve errors. In addition, central office staff now have the authority to correct SIS errors directly. Schools are also now required to prepare monthly enrollment reports, signed by the principal, throughout the school year. Central office staff review and track these reports. In addition, SIS can now track consecutive days of absence for students, which helps track the implementation of attendance rules. Finally, all principals are now required to enter into SIS the residency status of all continuing as well as new DCPS students. DCPS officials believe SIS' residency verification status field also serves as a safeguard against including both duplicate records and inactive students in the enrollment count.

Nonetheless, some DCPS policies and practices that increase the possibility of multiple records and other SIS errors have not changed. For example, DCPS continues allowing schools to enroll, without restriction, students

[4]For many years, DCPS had been governed by an elected Board of Education. In Nov. 1996, the specially appointed Authority declared a state of emergency in DCPS and transferred DCPS management—until June 30, 2000—to the Authority's agents, a nine-member specially appointed Emergency Transitional Education Board of Trustees. The Authority also replaced DCPS' superintendent with a Chief Executive Officer/Superintendent.

who live outside school attendance boundaries. School data entry staff may still manually override SIS safeguards against creating multiple records. In addition, SIS still lacks adequate safeguards to ensure that it accurately tracks students when they transfer from one school to another. SIS' new residency verification status field will not prevent the creation or maintenance of duplicate records. For example, a student might enroll in one school, filling out all necessary forms required by that school, including the residency verification form, and decide a few days later to switch to another school. Rather than officially transferring, the student might simply go to this second school and re-register, submitting another residency verification form as part of the routine registration paperwork. If the second school's data entry staff choose to manually override SIS safeguards, duplicate records could be created. Even if a student did not submit a residency verification form at the second school, the data entry staff could simply code the SIS residency field to show that no form had been returned, creating duplicate records.

Regarding the critical area of residency verification, all principals must now issue and collect from all students a completed and signed residency verification form (as well as enter residency verification status information into SIS as discussed). Principals are also encouraged to obtain proofs of residency and attach these to the forms. DCPS considers the form alone, however, the only required proof of residency for the 1997-98 count. The school district encouraged but not did not require such supporting proofs to accompany this form. A signed form without proofs of residency is insufficient to prove residency in our opinion. Such proofs are necessary to establish that residency requirements have been met. Until DCPS students are required to provide substantial proofs of residency, doubts about this issue will remain.

To illustrate this point, DCPS states that 83 percent of its officially enrolled students have provided signed residency verification forms and therefore have provided certification of residency. DCPS staff, however, told us that only 33,852 (44 percent) of the 77,111 students included in the official 1997-98 count have provided both completed residency verification forms and accompanying proofs of residency. Another 30,337 (39 percent) have provided completed forms but no accompanying proofs, and 12,878 (17 percent) have provided no completed forms. In other words, more than half (56 percent) of DCPS' students have either failed to provide basic residency forms or have provided no proofs of residency to accompany their forms. (DCPS believes that our characterization of this situation is misleading and that the great majority of its students have provided proof

of residency.) Furthermore, DCPS staff told us that the school district has not yet monitored and audited the schools' residency records but plans to do so shortly.

DCPS has proposed modifications to the Board of Education's rules governing residency to strengthen these rules. The proposed modifications would strengthen the residency rules in several ways by stating that at least three proofs of residency "must" be submitted, rather than "may be" submitted, as current rules state; specifying and limiting documents acceptable as proofs; eliminating membership in a church or other local organization operating in the District of Columbia as an acceptable proof; and strengthening penalties for students who do not comply. DCPS staff told us that these proposed changes are now under consideration by the Authority.

Regarding our recommendation that the Congress consider directing DCPS to report separately the enrollment counts of certain groups of students, the Congress has not yet required that DCPS do this. DCPS continues to include these groups in its enrollment count. For school year 1997-98, DCPS reports an official count of 77,111 students.[5] This number includes 5,156 preschool and prekindergarten students who are below mandatory school age in the District of Columbia. Some of these students are Head Start participants and are paid for by Head Start; nevertheless, DCPS counts Head Start participants as part of its elementary school population. The count also includes 18 tuition-paying nonresident students attending DCPS. In addition, DCPS staff told us that although the count excludes adult education students, they did not know whether it includes other students above the mandatory school age. Finally, as noted earlier, the count includes students who have not completed residency verification.

In addition to talking to DCPS staff, we talked to staff at the Authority about whether the Authority has provided for an independent audit of the 1997-98 enrollment count. Staff said that the Authority is in the process of providing for an audit but has not yet awarded a contract.

Mr. Chairman, this concludes my prepared statement. I would be pleased to respond to any questions you or members of the Subcommittee may have.

[5]DCPS School Year 1997-98 Official Membership, Oct. 30, 1997.

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