



# New York City Department of Education

## Accuracy of Reported Discharge Data

Report 2009-N-9



Thomas P. DiNapoli

This page is left intentionally blank.

# Table of Contents

	Page
Authority Letter .....	5
Executive Summary .....	7
Introduction .....	9
Background .....	9
Audit Scope and Methodology .....	11
Authority .....	12
Reporting Requirements .....	12
Contributors to the Report .....	12
Audit Findings and Recommendations .....	13
General Education Cohort .....	13
Special Education Cohort .....	15
Recommendations .....	16
Agency Comments .....	19
State Comptroller's Comments .....	45

This page is left intentionally blank.

# State of New York Office of the State Comptroller

---

## Division of State Government Accountability

March 29, 2011

Ms. Cathleen Black  
Chancellor  
New York City Department of Education  
52 Chambers Street  
New York, NY 10007

Dear Chancellor Black:

The Office of the State Comptroller is committed to helping State agencies, public authorities and local government agencies manage government resources efficiently and effectively and, by so doing, providing accountability for tax dollars spent to support government operations. The Comptroller oversees the fiscal affairs of State agencies, public authorities and local government agencies, as well as their compliance with relevant statutes and their observance of good business practices. This fiscal oversight is accomplished, in part, through our audits, which identify opportunities for improving operations. Audits can also identify strategies for reducing costs and strengthening controls that are intended to safeguard assets.

Following is a report of our audit of the New York City Department of Education: *Accuracy of Reported Discharge Data*. This audit was performed pursuant to the State Comptroller's authority as set forth in Article V, Section 1 of the State Constitution and Article III, Section 33 of the General Municipal Law.

This audit's results and recommendations are resources for you to use in effectively managing your operations and in meeting the expectations of taxpayers. If you have any questions about this report, please feel free to contact us.

Respectfully submitted,

*Office of the State Comptroller  
Division of State Government Accountability*

This page is left intentionally blank.



## State of New York Office of the State Comptroller

---

### EXECUTIVE SUMMARY

#### Audit Objective

Students are said to be “discharged” from high school when they transfer to another school or another authorized educational program, leave the country, or die. The objective of our audit was to determine whether the New York City Department of Education (DoE) has accurately reported the number of students discharged from City public high schools, in accordance with the guidelines of the New York State Education Department (SED).

#### Audit Results - Summary

High school graduation and dropout rates are publicly reported, and are generally regarded as important indicators of a school’s effectiveness. If these rates are to be accurate, they must be calculated correctly. In particular, students who drop out of school must be properly distinguished from students who are discharged, because discharged students are not counted when a school’s graduation or dropout rates are calculated. In accordance with SED guidelines, students who leave school without required documentation to support a discharge must be reported as dropouts. We consider reported rates that are within 5 percent of our audited rate to be generally accurate.

We found that the DoE is classifying some students as discharged without sufficient documentation under SED guidelines to support a discharge classification. Specifically, when we examined DoE’s discharge classifications for its 2004-08 general education cohort (i.e., the students who entered ninth grade in 2004 and were expected to graduate four years later in 2008), we found that 74 of the 500 (14.8 percent) randomly selected students who were classified as discharged were not supported with required documentation, and all 74 therefore should have been classified as dropouts. This caused DoE’s reported graduation rate to be higher than the actual and the dropout rate to be lower than actual.

When we statistically projected the results of our sample to the entire cohort, we found that the correct graduation rate for the cohort was probably between 62.9 and 63.6 percent, rather than the 65.5 percent reported by DoE, and the correct dropout rate was probably between 15.5 and 16.5 percent, rather than the 13.0 percent reported by DoE. At some individual high schools, the correct graduation rates could be lower, and the correct dropout rates higher, than was reported by DoE. As the recalculated graduation rate for the general education cohort was

within 5 percentage points of the reported rate, we consider the reported rate to be generally accurate.

We also examined DoE's discharge classifications for its 2004-08 special education cohort (i.e., certain ungraded students in self-contained special education classes) and identified similar errors. Specifically, when we examined DoE's discharge classifications for its 2004-08 special education cohort, we found that 20 of the 100 (20 percent) randomly selected students were classified as discharged without the required supporting documentation, and all 20 therefore should have been classified as dropouts. As a result, the correct graduation rate for this cohort was probably between 8.9 and 9.3 percent, rather than the 9.7 percent reported by DoE, and the correct dropout rate was probably between 20.6 and 23.8 percent, rather than the 17.2 percent reported by DoE. As the recalculated graduation rate for the special education cohort was within 5 percentage points of the reported rate, we consider the reported rate to be generally accurate. Moreover, the error rates we identified would not negate the upward trends in graduation rates that the DoE has reported in recent years.

We determined that, generally, DoE was misclassifying some students as discharged because its classification and documentation guidelines were not consistent with SED's guidelines, DoE staff were not always familiar with the classification guidelines, and DoE did not have an adequate quality control procedure for verifying that its discharge classifications are correct.

Our report contains three recommendations for improving the accuracy of DoE's reported discharge data. DoE officials generally agreed with our recommendations and indicated they have taken action or will be taking action to implement them. Most notably, DoE's guidelines were amended before the 2009-10 school year to better align with SED's guidelines on required documentation to support a discharge classification.

This report, dated March 29, 2011, is available on our website at: <http://www.osc.state.ny.us>. Add or update your mailing list address by contacting us at (518) 474-3271 or  
Office of the State Comptroller  
Division of State Government Accountability  
110 State Street, 11<sup>th</sup> Floor  
Albany, NY 12236



# Introduction

## Background

Under the No Child Left Behind Act of 2001, the New York State Education Department (SED) accumulates a variety of performance measures, such as graduation and dropout rates, and prepares an annual report card for each public high school in New York State. The report card enables parents to see the data for their child's school so they can compare it with data from other schools in the State. The report cards are prepared based on information furnished by the school districts. To ensure that report card results are reported uniformly, making it possible to compare them with results generated at other schools, SED prescribes the methodology school districts should use to accumulate information and also defines the terms used in the reporting system.

According to SED guidelines, graduation and dropout rates are to be calculated for certain defined cohorts of students (i.e., students who entered the ninth grade in the same year and are therefore expected to graduate from high school in the same year). Thus, the 2004-08 cohort would consist of the students who entered the ninth grade in 2004 and were expected to graduate four years later in 2008. Each high school has its own 2004-08 cohort, and any students who began in one school but transferred to another are included in the cohort of the school to which they transferred.

There are two types of cohorts: the general education cohort (containing most students) and the special education cohort. The graduation and dropout rates are calculated separately for each type. According to SED guidelines, the special education cohort consists of ungraded students in self-contained special education classes who are deemed to have entered the cohort when they became 17 years of age. Special education students who receive supplemental assistance and support services in a general education setting are included in the general education cohort.

For both general and special education cohorts, graduation and dropout rates are to be calculated at the end of the four-year cohort period. At that time, each student in the cohort is to be placed into one of four categories: graduated, still enrolled, discharged, or dropped out. According to SED guidelines, these categories are defined as follows:

- Graduated students have either a regular or an equivalency (GED) diploma.
- Still enrolled students returned for a fifth year of high school.

- Discharged students either died, aged out of the system by reaching age 21, left the country, or transferred to another school or another authorized educational program leading to a high school diploma or GED.
- Dropouts stopped attending school, and there is not sufficient documentation to indicate that they were discharged (i.e., died, left the country, or enrolled in another school or authorized educational program).

A cohort's graduation (or dropout) rate is calculated by ignoring the discharged students, and dividing the number of graduates (or dropouts) by the sum of the graduates, still enrolled students and dropouts. For example - in a cohort of 1,000 students - if 700 students graduated, 100 were still enrolled, 100 were discharged and 100 dropped out, the graduation rate would be 77.8 percent (700 divided by 900) and the dropout rate would be 11.1 percent (100 divided by 900).

If students are incorrectly classified as discharged when they should be classified as dropped out, a high school's dropout rate will be understated and its graduation rate will be overstated. To illustrate this risk, in the prior example, if 50 of the 100 students who were incorrectly classified as discharged when they should have been classified as dropped out, the reported dropout rate would increase from 11.1 percent to 15.8 percent (150 divided by 950) and the reported graduation rate would decrease from 77.8 percent to 73.7 percent (700 divided by 950). It is therefore important that all discharge classifications be appropriately documented and otherwise consistent with SED guidelines.

In New York City, the Department of Education (DoE) is responsible for providing SED with the information that is needed to calculate the graduation and dropout rates for the City's 374 public high schools. This information is provided in an annual filing prepared by DoE's Research and Policy Support Group and its Division of Information and Instructional Technology.

Our audit focused on the 2004-08 cohort in New York City. According to DoE, the City's 2004-08 general education cohort had a total of 88,612 students, of whom 46,896 graduated, 15,368 were still enrolled after four years, 17,025 were discharged, and 9,323 dropped out. This resulted in a graduation rate of 65.5 percent and a dropout rate of 13.0 percent for this cohort. According to DoE, the City's 2004-08 special education cohort had a total of 8,030 students, of whom 593 graduated, 4,464 were still enrolled after four years, 1,923 were discharged, and 1,050 dropped out. This resulted in a graduation rate of 9.7 percent and a dropout rate of 17.2 percent for this cohort.

**Audit  
Scope and  
Methodology**

We audited DoE to determine whether its reported student discharge data for the 2004-08 cohort was accurate and in accordance with SED's regulations and policies. Our audit covered the period September 1, 2004 through August 31, 2008.

To accomplish our objective, we interviewed officials in DoE's Research and Policy Support Group, Office of Accountability, Office of School and Youth Development, and Division of Information and Instructional Technology. We also interviewed school officials (e.g., principals, assistant principals, guidance counselors, attendance teachers, and pupil accounting secretaries) at approximately 200 high schools. In addition, we interviewed officials at two of DoE's Integrated Service Centers/Children First Networks, and we met with SED officials. We also reviewed SED regulations and policies, and DoE guidelines for discharge classifications.

For our review, we randomly selected 500 of the 17,025 general education student discharges and 100 of the 1,923 special education student discharges reported by DoE for the 2004-08 cohort, excluding students who were discharged because of pregnancy. We then visited these students' schools and reviewed the students' cumulative file folders, and also reviewed the discharge information generated from DoE's Automate the School (ATS) computer system. We then compared this discharge documentation to DoE's reported discharge codes for the students (these codes, which were reported to SED, indicated why the students were discharged). We did not audit the reporting of dropout students for the cohorts. Consequently, to the extent such dropouts were in error and should have been reported as student discharges, graduation rates for the cohort would have been understated.

We conducted our performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

In addition to being the State Auditor, the Comptroller performs certain other constitutionally and statutorily mandated duties as the chief fiscal officer of New York State. These include operating the State's accounting system; preparing the State's financial statements; and approving State contracts, refunds and other payments. In addition, the Comptroller appoints members to certain boards, commissions and public authorities, some of whom have minority voting rights. These duties may be considered management functions for purposes of evaluating

organizational independence under generally accepted government auditing standards. In our opinion, these functions do not affect our ability to conduct independent audits of program performance.

**Authority**

The audit was performed pursuant to the State Comptroller’s authority as set forth in Article V, Section 1 of the State Constitution and Article III, Section 33 of the General Municipal Law.

**Reporting Requirements**

A draft copy of this report was provided to DoE officials for their review and comment. Their comments were considered in preparing this report, and are included at the end of this report. State Comptroller’s Comments address selected matters contained in DoE’s response.

DoE officials agreed with our recommendations but disagreed with some of the student discharge exceptions cited in our report. DoE officials also express their view that certain of the SED documentation requirements involving student discharges, which were applied as criteria for this audit, impose an unfair and unwarranted burden on school principals, administrators, counselors and outreach workers.

We request that within 90 days of the final release of this report, New York City Department of Education officials report to the State Comptroller advising what steps were taken to implement the recommendations contained herein, and where recommendations were not implemented, the reasons why.

**Contributors to the Report**

Major contributors to this report include Steve Sossei, Kenrick Sifontes, Sheila Jones, Jeffrey Marks, Natalie Sherman, Teeranmattie Mahtoo-Dhanraj, Jonathan Bernstein, Katrina Lau and Dana Newhouse.

## Audit Findings and Recommendations

### General Education Cohort

If the graduation and dropout rates that are reported for a cohort are to be accurate, all student discharges within the cohort must be appropriately documented and otherwise consistent with SED guidelines. DoE reported a 65.5 percent graduation rate and a 13.0 percent dropout rate for its 2004-08 general education cohort; it also reported a total of 17,025 student discharges within the cohort. To determine whether these discharges were accurately reported by DoE, we selected a random sample of 500 of the 17,025 discharges and visited the discharged students' high schools to review the schools' records and discharge documentation for the students.

The discharges in our sample reportedly included students who transferred to schools or educational settings outside New York City or who left the United States, as well as those who transferred to private and parochial schools in the City and those who transferred to non-DoE institutions (e.g., hospitals, prisons or foster care facilities). The sampled discharges also reportedly included students who left the system to enroll in GED programs, students who enrolled in a college's early admissions program, students who reached the maximum school enrollment age of 21, and students who died.

Documentation confirming a student's discharge must comply with SED regulations and policies. If the documentation does not comply with the policies, the student is to be classified as a dropout. This documentation should be maintained in the student's file. However, to ensure an accurate result, we did not limit our review to the documentation in the students' files. When appropriate, we also accepted additional information and documentation from DoE officials during the audit.

We found that 74 of the 500 students in our sample (14.8 percent) were incorrectly classified as discharged, and all 74 should have been classified as dropouts. Generally, the 74 students were incorrectly classified because there was either no documentation, or inadequate documentation, that they had been discharged (and thus, according to SED regulations and policies, they were to be classified as dropouts), or the available documentation clearly indicated that they met SED's criteria for dropouts. A total of 53 of the 74 were either undocumented or inadequately documented as discharged, and 21 clearly met SED's criteria for dropouts.

When these 74 classification errors are statistically projected, at a 90-percent confidence level, to the total population of 17,025 reported student discharges, the resulting estimate shows that between 2,092 and 3,000 of the reported discharges were probably incorrect and should instead have been classified as dropouts. Thus, the correct number of discharges for the 2004-08 general education cohort was probably between 14,025 and 14,933, rather than the 17,025 reported by DoE, and the correct number of dropouts was probably between 11,415 and 12,323, rather than the 9,323 reported by DoE. Accordingly, the correct graduation rate for this cohort was probably between 62.9 and 63.6 percent, rather than the 65.5 percent reported by DoE, and the correct dropout rate was probably between 15.5 and 16.5 percent, rather than the 13.0 percent reported by DoE.

As the recalculated graduation rate for the general education cohort was within 5 percentage points of the reported rate, we considered the reported rate to be generally accurate. Moreover, the error rate would not negate upward trends in graduation rates that the DoE has reported in recent years.

Following are examples of some of the students in our sample who were incorrectly classified as discharged and should instead have been classified as dropouts:

- One high school classified a student as discharged because the student reportedly transferred to a public school outside New York City, while another high school classified a student as discharged because the student reportedly transferred to a parochial school in the City. However, neither school could confirm the students' enrollments in the other schools. Thus, according to SED regulations and policies, these students should have been classified as dropouts.
- A high school classified a student as discharged because the student reportedly enrolled in a college's early admissions program. However, the student's file contained no documentation verifying enrollment at the college. Instead, the file contained only verbal claims from a sibling that the student had enrolled at the college. Since the file does not contain sufficient documentation to comply with SED regulations and policies, the student should be classified as a dropout.
- A high school classified a student as discharged because the student reportedly transferred to a school outside New York City. However, the documentation showed that the student had actually enrolled in military service, and according to SED regulations and policies, such students should be classified as dropouts.



- A high school classified a student as discharged because the student reportedly transferred to a school in another state. However, there was no documentation to support this transfer. In fact, the documentation provided by the school showed that the student had withdrawn from school voluntarily, and had initially been classified as a dropout. The school subsequently re-classified the student as a discharge, but had no documentation to support the reclassification.

We identified a number of reasons for these classification errors. First, DoE's guidelines on discharge and dropout classifications were not fully aligned with SED's policies. For example, under DoE's guidelines for the 2004-2008 cohort, transfers to full-time GED programs outside of DoE were classified as discharges, whether the programs have been approved by SED or not. However, under SED policies, only student enrollments in SED-approved GED programs are to be classified as discharges.

Also, when students transfer to another school in the United States, SED policies require the New York State high school to obtain either a transcript request or written confirmation of enrollment from the new school, or evidence that it sent a transcript to the new school. However, under DoE's guidelines, other information, such as an attendance teacher's investigative report was accepted as verification that a student had transferred. These reports often relied upon verbal information from a neighbor or purported relative. DoE officials told us that their guidelines were amended before the 2009-10 school year to better align with SED's guidelines on required documentation.

Second, we found that school staff may not be familiar with the proper classification procedures, even when DoE's guidelines are the same as SED's policies. Third, while DoE performs some routine quality control procedures to verify the accuracy of the cohort data, it does not routinely verify that student discharges have been properly classified. Such reviews would help ensure that discharge data is accurate and would identify areas where improvements are needed. Accurate discharge data is needed if the graduation and dropout rates reported by DoE are to be relied on.

**Special  
Education  
Cohort**

DoE reported a 9.7 percent graduation rate and a 17.2 percent dropout rate for its 2004-08 special education cohort; it also reported a total of 1,923 student discharges within the cohort. To determine whether these discharges were accurately reported by DoE, we selected a random sample of 100 of the 1,923 discharges and visited the discharged students' high schools to review the schools' records and discharge documentation. In addition, to ensure an accurate result, we did not limit our review to the

documentation in the students' files, but accepted additional information and documentation from DoE officials.

We found that 20 of the 100 students in our sample (20 percent) were incorrectly classified as discharged, and all 20 should have been classified as dropouts. Generally, the 20 students were incorrectly classified because there was either no documentation, or inadequate documentation, that they had been discharged (and thus, according to SED regulations and policies, they were to be classified as dropouts), or the available documentation clearly indicated that they met SED's criteria for dropouts. A total of 17 of the 20 were either undocumented or inadequately documented as discharged, and three clearly met SED's criteria for dropouts.

When these 20 classification errors are statistically projected, at a 90-percent confidence level, to the total population of 1,923 reported student discharges, the resulting estimate shows that between 266 and 529 of the reported discharges were probably incorrect and should instead have been classified as dropouts. Thus, the correct number of discharges for the 2004-08 special education cohort was probably between 1,394 and 1,657, rather than the 1,923 reported by DoE, and the correct number of dropouts was probably between 1,316 and 1,579, rather than the 1,050 reported by DoE. Accordingly, the correct graduation rate for this cohort was probably between 8.9 and 9.3 percent, rather than the 9.7 percent reported by DoE, and the correct dropout rate was probably between 20.6 and 23.8 percent, rather than the 17.2 percent reported by DoE.

As the recalculated graduation rate for the special education cohort was within 5 percentage points of the reported rate, we considered the reported rate to be generally accurate. Moreover, the error rate would not negate upward trends in graduation rates that the DoE has reported in recent years.

These classification errors were made for the same reasons as the classification errors in the general education cohort (i.e., differences between DoE and SED guidelines, staff unfamiliarity with the guidelines, and inadequate quality control). It should be noted that DoE's age of admission into the special education cohort (14 years old) is not the same as the age in SED's regulations (17 years old). However, none of the 20 classification errors identified by our audit were caused by this difference.

- Recommendations**
1. Ensure that DoE discharge guidelines are fully aligned with SED regulations.



2. Instruct all schools to adhere to the SED regulations for discharge classifications, and provide training in the regulations for the school staff who administer discharges.
3. Conduct periodic reviews of discharge classifications to determine whether they are being made and documented in accordance with SED regulations.

This page is left intentionally blank.

# Agency Comments



January 26, 2011

Jerry Barber  
Office of the State Comptroller  
Division of State Government Accountability  
110 State Street, 11<sup>th</sup> Floor  
Albany, NY 12236

Dear Mr. Barber:

This letter, along with the enclosed Response to Findings and Recommendations, constitutes the New York City Department of Education's (Department) response to the Office of the State Comptroller's (Comptroller) Draft Report 2009-N-9 dated August 31, 2010, with edits as of January 7, 2011 (Report), on the Department's Accuracy of Reported Discharge Data for the 2004-2008 general education and special education cohorts.

We are pleased that the Comptroller found our reported graduation rates, under the City's traditional calculation methodology, to be "generally accurate,"<sup>1</sup> and we appreciate the Comptroller's acknowledgment that "the error rates we identified would not negate the upward trends in graduation rates that the DOE has reported in recent years." In fact, the Department's traditional City four-year graduation rate for the general education cohort rose from 50.8 percent for the Class of 2002 to 68.1 percent for the Class of 2009, while the discharge rate remained steadily between 19 and 20 percent over the same period.<sup>2</sup>

Additionally, as noted in the Report, the Comptroller only audited discharges in one direction – a review of discharged students to determine if they should have been coded as dropouts. There was no review to determine whether some students coded as dropouts may have met the criteria for a non-dropout discharge code. To the extent dropout determinations were in error and students should have been reported as discharged, our graduation rates may in fact have been understated.

\*  
Comment  
1

<sup>1</sup> The Comptroller projects that "the correct graduation rate for [the general education] cohort was probably between 62.9 percent and 63.6 percent, rather than the 65.5 percent reported by DOE," and that "the correct graduation rate for [the special education] cohort was between 8.9 and 9.3 percent, rather than the 9.7 percent reported by DOE." Because the recalculated cohort graduation rates were "within five percentage points of the reported rate," the Comptroller "considered the reported rates to be generally accurate."

<sup>2</sup> The New York State Education Department (SED) began calculating and reporting graduation rates using its own business rules and guidelines with the 2001-2005 cohort. For the 2004-2008 cohort that is the subject of the audit, the official graduation rate for the Department, pursuant to the SED's methodology, was reported as 56.4 percent (61.0 percent including August graduates). The SED rates were used for all school accountability purposes, while the City's traditional graduation rate was used solely for long-term historical analysis.

\* See State Comptroller's Comments, page 45.



**Department of Education**

*Cathleen P. Black, Chancellor*

In only 21 (4.2 percent) of the 500 tested general education student discharge determinations did the Comptroller find clear evidence that the students should have been coded as dropouts under the State Education Department’s (SED) criteria. And only three (3.0 percent) of the 100 special education discharges tested were found to have met SED’s criteria for dropouts. The remaining discharge determinations cited by the Comptroller as “erroneous” were cited due to the absence of specific documentation required under the SED data reporting guidelines.<sup>3</sup> Accordingly, the significant majority of the cited errors relate to the documentation supporting a student’s discharge. While SED’s guidelines require a school district to report a student as a dropout if the documentation to support a discharge does not match the specific requirements set forth in those guidelines, those students are not dropouts in the way that term is generally understood, i.e., students who remain in New York City but leave school and suspend their pursuit of a diploma.<sup>4</sup>

\*  
Comment  
2

As noted in the Report, the predominant cause for these cited errors was inconsistency between the Department’s longstanding internal Transfer, Discharge and Graduation (TDG) guidelines around the classification and documentation of student discharge determinations and the much more recent Student Information Repository System (SIRS) guidelines issued by SED relating to school districts’ submission of student outcome data.

Although the Department amended its TDG guidelines prior to the 2009-2010 school year to align with SED’s SIRS data reporting guidelines, we feel it is important to express our reservations about the fairness and reasonableness of certain aspects of those SIRS guidelines. We believe that, in practice, they impose an unfair and unwarranted burden on school principals, administrators, counselors and outreach workers.

\*  
Comment  
3

The Department’s TDG guidelines, which pre-date by more than two decades any SED regulations requiring school districts to classify and report individual student outcomes, were designed as a user guide for school-based personnel. As such, the TDG guidelines recognized the importance of prioritizing attendance intervention and dropout prevention resources for those students whom the school could reasonably hope to bring back to high school to continue pursuit of a high school diploma. When a

<sup>3</sup> For the reasons detailed in the enclosed Response to Findings and Recommendations, the Department disagrees with the Comptroller’s determination for 9 of the 74 cited general education errors and 1 of the 20 cited special education errors.

<sup>4</sup> In view of the fact that the audit tested the Department’s data used to calculate the City’s traditional graduation rate methodology and projected the results against that traditional rate (see n. 2), it is debatable whether the SED guidelines for classification and required supporting documentation should be applied. Since the only purpose for which the City’s traditional graduation rate was utilized for the 2004-2008 cohort was to permit apples-to-apples comparisons with historical graduation rates dating back long before SED first promulgated guidelines around the classification and reporting of student outcomes, it would arguably make more sense to apply the City’s traditional TDG guidelines on classification and documentation. That said, we acknowledge that it was and is the Department’s obligation to ensure that data submitted to SIRS met the SIRS guidelines around classification and documentation of student outcomes.

\* See State Comptroller’s Comments, page 45.

student stops attending school, there is a legitimate, reasonable and necessary distinction to be made between truants and dropouts living within New York City, and students whose families have actually left New York City, often without prior notification to the school. That is why the TDG guidelines historically permitted an out-of-City (Code 11) discharge to be validated through an attendance investigation confirming, through home visits and interviews of neighbors and/or relatives, that the family had moved out of the City. It is an unwise use of public resources for individual schools or the Department as a whole to devote the limited time and energies of staff to further investigation of students who, based on all available evidence, no longer live within New York City.

\*  
 Comment  
 4

The SIRS guidelines were neither designed nor are they adequate to guide schools' attendance intervention and dropout prevention efforts. They are no more than what they purport to be – a Student Information Repository System – into which school districts feed student outcome data. However, as noted by the Comptroller, that data is used to calculate graduation and dropout rates, which are then used as primary measures of schools' success or failure. Therefore, the classification definitions and required documentation to support such classifications within SIRS must reflect fair and reasonable expectations for which schools can and should be held accountable. They should not impose undue burdens on school personnel.

\*  
 Comment  
 3

Consider one of the cases that the Comptroller deemed to be a dropout under the SIRS guidelines. A student arrived in New York City from the Dominican Republic in February 2006, enrolled in a public high school and attended for one day before returning to the Dominican Republic without parental notification to the school. The Department obtained a transcript from the student's high school in the Dominican Republic indicating that the student was enrolled both before and after his brief appearance in New York City. However, as written in the SIRS guidelines and applied faithfully here by the Comptroller, this student arguably must be recorded as a dropout because of the lack of documented parent notification of the move, regardless of the strength of the other evidence.

\*  
 Comment  
 5

In another case that the Comptroller found to be a dropout under the SIRS guidelines, the student's uncle verified that the student had returned to West Africa following the deportation of her father. Because the school could not obtain verification directly from the deported parent, the strong evidence of the student's move outside the United States was deemed insufficient to meet the SIRS evidentiary requirement.

\*  
 Comment  
 6

While these may sound like extreme examples, the nature of the population served by the New York City public schools is such that every month of every year, students and their families leave the City or leave the United States without notification to the school or the Department, a forwarding address or telephone number, or information about the student's future education plans outside of New York City. In many cases, students leave the City or the country within a few days, weeks or months of their initial enrollment in the New York City public schools. Some students in the Comptroller's sample actually had no days of recorded attendance in a New York City public high school. Therefore, we question whether

\*  
 Comment  
 7

\* See State Comptroller's Comments, pages 45 and 46.



**Department of  
Education**

*Cathleen P. Black, Chancellor*

it is fair and reasonable to charge a school or school district with a dropout in cases where a student's move out of the school district could not be verified directly with a parent or guardian but where it was supported by other evidence obtained after investigation. Moreover, the answer to that question has a uniquely high impact on New York City, compared with all other school districts in New York State that serve populations with far fewer students moving into and out of the United States.

We take very seriously the Department's obligation to accurately track and report student outcomes, and we are pleased that the Comptroller has acknowledged the actions that were taken by the Department before the 2009-2010 school year, prior to the start of this audit, to address the predominant cause of the errors that were noted in the Report – inconsistencies between the Department's and the SED's guidelines around the classification and documentation of student discharge determinations. Although, as discussed above, we have serious concerns about the fairness of and burdens imposed by the SIRS guidelines, the Department's internal guidelines around both classifications and required supporting documentation were amended to align with the data reporting guidelines promulgated by SED.

Sincerely,

A handwritten signature in black ink, appearing to read "Shael Polokow-Suransky".

Shael Polokow-Suransky  
Chief Academic Officer

Enclosure

c: Kenrick Sifontes

**New York City Department of Education Response to Findings and Recommendations  
Office of the New York State Comptroller Audit 2009-N-9**

**RESPONSE TO FINDINGS AND RECOMMENDATIONS**

Along with the January 26, 2011 cover letter from Shael Polokow-Suransky to Jerry Barber, and Appendix A, the following detailed response to findings and recommendations constitutes the New York City Department of Education's (Department) response to the New York State Office of the Comptroller's (Comptroller) Draft Report 2009-N-9 dated August 31, 2010, with edits as of January 7, 2011 (Report) on the Department's Discharge Rate for the Class of 2008.

**Background on the Discharges and the Department's Calculation of the Graduation Rate**

*Graduation Rate Calculation for the Class of 2008*

*New York City Calculation Method*

New York City has been calculating graduation rates using the same methodology for more than 20 years, since 1986. The Class of 2008 is therefore the twenty-second class for which the New York City Department of Education (before 2002, the Board of Education) has conducted a four-year longitudinal study. The 2008 graduation rate represents the progress toward school completion of students who entered the ninth grade in Fall 2004 and were scheduled to graduate on time in Spring 2008 after four years of high school. The Department reports outcomes for the class as a whole, as well as outcomes for specific groups of students categorized by gender, English language status, race/ethnicity, and immigrant status.

The Department follows two student cohorts each year. One is comprised of students in general education classes, including students receiving special education services in less restrictive settings. The other is comprised of students in self-contained special education classes in either regular high schools or in District 75, the citywide special education district, which consists of schools that primarily serve students with severe disabling conditions.

Students were assigned to the Class of 2008 based on the year in which they entered Grades 9 through 12. Although most of the students in the Class of 2008 joined the cohort as entering ninth-graders during the 2004-2005 school year, and most had been in the New York City public schools in lower grades, some entered the school system during Grade 9. Each year, hundreds of students transferred into the New York City public schools during high school and became part of the cohort as tenth graders in 2005-06, as eleventh graders in 2006-07, or as twelfth graders in 2007-08. Table 1 shows the composition of the Class of 2008 cohort over four years.

January 26, 2010

1

**New York City Department of Education Response to Findings and Recommendations  
Office of the New York State Comptroller Audit 2009-N-9**

Table 1. Grade and Year of Admission to, or Transfer from, the Class of 2008, General Education Cohort

Grade and Year	Base Population	Admissions	Discharges*	Total Students In Class
9 <sup>th</sup> Grade 2004-2005	80,029**		5,383	74,646
10 <sup>th</sup> Grade 2005-2006		5,602	4,348	75,900
11 <sup>th</sup> Grade 2006-2007		2,211	4,296	73,815
12 <sup>th</sup> Grade 2007-2008		770	2,998	71,587
Total	80,029	8,583	17,025	71,587 ***

\* Number of students discharged during the indicated school year.

\*\* Number of students on register in grade 9 who were not held over from the previous school year.

\*\*\* This is the student cohort used for calculating outcomes.

Each student who is counted in the Department’s graduation analysis is determined to be in one of four possible categories based on his or her status at the end of the school year that they were expected to graduate. Using the traditional New York City methodology, *graduates* are students who have received a high school diploma, GED, or special education certificate by June or August 2008. *Still-enrolled* students were still on register as of June 30, 2008 and scheduled to continue into a fifth year of high school in Fall 2008. *Dropouts* are students who have left the school system without enrolling in another education program that leads either to a high school diploma or prepares the student for the Test of General Educational Development leading to a general equivalency diploma (GED). *Discharges* are students who left the school system primarily to enroll in another educational program or setting. Students who moved out of the country, and students who died or went to prison prior to completing high school, are also counted in this category.

To calculate the four-year graduation rate for the cohort, the number of graduates is divided by the number of graduates plus still-enrolled and dropouts. In other words, only discharges are excluded from the denominator for the graduation rate calculation; “still-enrolled” students count no differently from dropouts.



**New York City Department of Education Response to Findings and Recommendations  
Office of the New York State Comptroller Audit 2009-N-9**

*New York State Calculation Method*

The New York State graduation rate calculation method was first adopted for the Cohort of 2001 (Class of 2005). The cohort consists of all students who first entered ninth grade in a given school year (e.g., the Cohort of 2005 entered ninth grade in the 2005-2006 school year). Graduates are defined as those students earning either a Local or Regents diploma and exclude those earning either a special education (IEP) diploma or GED.

Graduation rates according to the State calculation tend to be 9 to 11 percentage points lower than the rates according to the City calculation because of these differences in who is included in the cohort and how graduation is defined. In particular the treatment of students with disabilities is different across the two calculation methods. For the state's calculations, students with disabilities who were 17 years-old four years prior to the expected graduation date for the cohort are included, and IEP diplomas are not counted toward the overall graduation rate. In addition, the State calculates graduation rates as of June 30<sup>th</sup> of each year. Since 2008, an August graduation rate has also been reported separately that includes all graduates through August 30<sup>th</sup>.

*Reporting Graduation Rates*

The New York State Education Department (SED) began calculating and reporting graduation rates using its own business rules and guidelines with the 2001-2005 cohort. For the 2004-2008 cohort that is the subject of the audit, the official graduation rate for the Department, pursuant to the SED's methodology, was reported as 56.4 percent (61.0 percent including August graduates). The SED rates were used for all school accountability purposes, while the City's traditional graduation rate was used solely for long-term historical analysis, using the classifications and methodology that have been utilized by the Department since 1986.

Data are submitted to the state for accountability purposes through a variety of channels. The Department's State and Federal Evaluation Team and Division of Instructional and Information Technology are primarily responsible for submitting data to SED. Data are submitted according to the policy rules laid out in the Student Information Repository System (SIRS) manual: electronic data on enrollment are sent to SED each week. At appropriate times, the Department also submits graduation outcomes and test results. SED uses the data to publish total cohort graduation rates after an extensive school verification process.

*Transfer Discharge and Graduation Code Guidelines for the Class of 2008*

When a student leaves the school system to enroll elsewhere, or leaves due to death, institutionalization, or exiting the country, the student is said to have been discharged from NYC public schools. Students meeting those classifications have been discharged from the NYC Board/Department of Education going back many decades, when such discharges were recorded manually in admission and discharge ledgers maintained by the individual schools. With the development of ATS (Automate the Schools) in 1991, the era of recording student specific data into a computer database began. A coding

January 26, 2010

3

**New York City Department of Education Response to Findings and Recommendations  
Office of the New York State Comptroller Audit 2009-N-9**

system compatible with this new database needed to be developed. The Office of Student Information Services, the Office of Information Technology and the Office of Attendance began constructing a numerical coding system that corresponded with the reasons for discharge that existed at this time. Since the early 1990's there has been continued refinement of codes that correspond to the many reasons a student may be discharged. Discharge codes were continually created as the need for statistical differentiation evolved.

One of the guiding policies for the development of the New York City discharge codes is the written document, Chancellor's Regulation A240,<sup>1</sup> dated 12/05/90, entitled "Reasons for Discharging Students". This document does not reference specific numerical codes but does reference multiple reasons that lend themselves to numerical translation and data entry. It should be noted that in the late 1990's and early 2000's all students removed from a school's register were coded as discharges. Sometime toward the end of this period, discharges upon which students left one NYC public school for another were reclassified as "Transfers" and no longer labeled as discharges. Transfers became admission driven, *i.e.*, only when a student was admitted into a new NYC public school or program would the student be removed from the register of the sending school. This process ensures that a student will never be unaccounted for during the course of a transfer.

* Comment 8
-------------------

Discharges of a student must be carefully determined and the appropriate verifications received, as described in the Department's Transfer Discharge and Graduation (TDG) guidelines. The Pupil Accounting Secretary will enter the corresponding discharge code into the student's biographical file in the ATS system, and discharges must be approved by the school's Principal or Assistant Principal. Additional oversights have been programmed into the discharge process over the years. For example, Code 4 discharges are not accepted unless the date of birth agrees with the age requirement. The UPRD function (the screen for Region Planning Interview Updates) was developed in ATS where codes 39, 12 and 10 would require electronic approval by a central administrator before the discharge would be effectuated.

The policies, regulations and controls were designed to promote high schools retaining responsibility for under-credited and truant students and conducting all possible outreach to keep those students in school beyond their fourth year to continue pursuit of a diploma. Accordingly, the goal of the Attendance Teacher's work is to find students with patterns of absences and to address barriers to school attendance in order that students may continue regular school attendance. Attendance Teachers contribute to the verification of discharges by conducting home visits, student and parent interviews, or interviews with neighbors, employers or others. Often it is the information gathered by the Attendance Teacher that provides or corroborates what the school knows about a student's whereabouts.

The guidelines around Code 11 discharges have developed to become increasingly specific. According to the 2001-02 Pupil Accounting Handbook, a Code 11 discharge meant "Removal from New York City." By 2007-08 it fell under the transfers as "Transferred to a School outside of New York City." In 2008-09 a

<sup>1</sup> <http://docs.nycenet.edu/docushare/dsweb/Get/Document-15/A-240.pdf>

January 26, 2010

4

\* See State Comptroller's Comments, page 46.

**New York City Department of Education Response to Findings and Recommendations  
Office of the New York State Comptroller Audit 2009-N-9**

Code 11 became a “Discharge to a School Outside of New York City.” By 2008-09 a “407” alert for all Code 11 discharges was introduced so that an investigation is prompted for students discharged under this code without indicated documentation. However, in 2008-09, only proof of residence in a new city was required. For 2009-10 we amended the guideline in an effort to clarify the documentation required to verify discharges for students moving within the United States and for students leaving the United States. For 2010-11, we added a feature that required schools to affirmatively enter an explanation code specifying the SED-compliant documentation maintained by the school to support the discharge. A new indicator was also added to the DOE Compliance Checklist that addressed code 11 discharges. The DOE Office of Compliance Services tracks Code 11 documentation and works with schools to address problems. Schools receive mid-year and end-of-year checklist analyses, with the end-of-year analyses comprising 15% of their Principal Performance Review.

* Comment 9
-------------------

*New York State Education Department Guidelines*

SED also maintains guidelines about how to track students who have exited the school system. These guidelines were formally outlined in the 2001-2002 school year with the creation of the System for Tracking Education Performance (STEP). In 2006-2007, this was replaced by the New York State Student Information Repository System (SIRS). The STEP and SIRS manuals describe appropriate record keeping for students throughout New York State, including tracking of enrollments, transfers, and discharges.

For students who leave school and transfer to another educational institution, in order to be considered discharged, documentation must include a request for a transcript from a receiving school, a record of sending a transcript to the receiving school, or a written acknowledgement from the receiving school that the student has registered. For students who transfer to home schooling, a discharge requires a formal notice of intent to instruct at home. Students who move outside of the United States and its possessions are not required to reenroll in school in order to be considered discharged. These out of country moves must be documented by a statement from a parent or guardian indicating a destination. According to the most recent SIRS manual, any student, regardless of age, who left school prior to graduation for any reason except death or leaving the country and has not been documented as having entered another school or program leading to a high school diploma or a program leading to a high school equivalency diploma must be considered a dropout.

Outside of the STEP/SIRS guidance for data reporting, there is little in the way of state regulations or guidance relating what kind of attendance outreach should occur or what kind documentation should be maintained around discharges and/or dropouts and outreach efforts. According to Commissioner’s Regulation 104.1 (i), each LEA should outline its own priorities and policies, which New York City has done with its TDG guidelines.

\* See State Comptroller’s Comments, page 46.

**New York City Department of Education Response to Findings and Recommendations  
Office of the New York State Comptroller Audit 2009-N-9**

***The Comptroller's Report***

The purpose of the audit was to determine whether discharge codes were used accurately for the Class of 2008 for both the general education and special education cohorts, based on the New York City traditional calculation of the graduation rate. Despite the fact that the Department's sole purpose in calculating and reporting the City's traditional graduation rate was to permit apples-to-apples comparisons over the course of multiple decades, the auditors assessed the accuracy of the discharge determinations and cited the Department with errors based on SED's SIRS guidelines, rather than the Department's traditional Transfer, Discharge and Graduation (TDG) guidelines. Applying new definitions and documentation requirements to recalculate an unofficial graduation rate figure- intended solely for comparisons with historical rates, calculated under traditional definitions and requirements- undermines the only purpose of that calculation.

\*  
Comment  
2

Even so, after randomly selecting 500 general education records, the Comptroller has determined that 74 of these cases (14.8 percent) are errors in which students were coded as discharges when they should have been coded as dropouts. However, the Comptroller acknowledges that a far lower portion of these cases reflect students who clearly dropped out of school in the traditional sense of the term. In fact, only 21 cases (4.2 percent) have been identified as "clear dropouts". Furthermore, the Comptroller reported the Department's graduation and dropout rates to be generally accurate as originally reported, noting that "the error rates we identified would not negate the upward trends in graduation rates that the DOE has reported in recent years." Even if one applies the 14.8 percent error rate cited in the Report, rather than the 4.2 percent deemed clear dropouts, such errors in coding discharges would have a minimal impact on graduation or dropout rates. In his Report, the Comptroller projected the graduation rate for the general education cohort as between 62.9 and 63.6 percent, rather than the 65.5 percent that was originally reported. For dropouts, the projected rate was between 15.5 and 16.5 percent, compared to 13.0 percent reported by the Department. As these adjustments were well within five percentage points of what was originally reported, the Comptroller noted that the Department's reported graduation and dropout rates for the Class of 2008 were "generally accurate". Furthermore, if the Comptroller had recalculated the graduation rate based on the 4.2 percent error rate of cases that clearly met the criteria for dropouts, then the graduation rate would be between 63.9 and 65.0 percent, and the dropout rate would be between 13.7 and 15.2, an average difference of less than one percentage point from the reported New York City graduation and dropout rates.

\*  
Comment  
10

Similarly, for the special education cohort, the Comptroller randomly selected 100 records, from which 20 were identified as containing errors, resulting in a 20 percent error rate. However, only 3 of these cases (3 percent) were reported as being clear dropouts, according to the Comptroller. When the 20 errors out of 100 are projected onto the special education graduation and dropout rates, the Comptroller reported a graduation rate between 8.9 and 9.3 percent, compared to 9.7 percent reported by the DOE, a difference of less than one percentage point. The Comptroller projected the dropout rate as between 20.6 and 23.8 percent, compared to 17.2 percent reported by the DOE. Since the projected adjustments were within five percentage points, the Comptroller again found the graduation and dropout rates for the special education cohort to be generally accurate as originally reported.

6

January 26, 2010

\* See State Comptroller's Comments, pages 45 and 46.

**New York City Department of Education Response to Findings and Recommendations  
Office of the New York State Comptroller Audit 2009-N-9**

However, as the Report's title makes evident, the Comptroller did not conduct an audit of the graduation rate for the 2004-2008 general education and special education cohorts, but only an audit of the student discharges from the cohort. Moreover, the Comptroller's report acknowledges that since the reporting of dropouts was not audited, then to the extent that certain dropouts were in error and should have been reported as discharges, the graduation rates for the cohort would have been understated. Although the graduation rate was not audited as a whole, it is nonetheless encouraging that an error rate projected from the sample of discharged students that were examined reveals that the graduation rate was generally accurate, and as the Comptroller noted, "the error rates we identified would not negate the upward trends in graduation rates that the DOE has reported in recent years."

Examples of "Errors" listed in the Comptroller's Report

As previously noted, although the Comptroller identified a 14.8 percent error rate for the general education cohort and a 20 percent error rate for the special education cohort, he also acknowledged that a far smaller percentage of tested cases were clearly dropouts. The vast majority of errors were cited as lacking the specific documentation required under state regulations to support the discharge. While the Department acknowledges the importance of thoroughly documenting all discharged students, we also want to distinguish between cases in which the error was due to documentation deficiencies and those that were clearly dropouts. Merely stating that 14.8 percent of the sampled cases contained errors does not reflect this important distinction.

\*  
Comment  
11

Moreover, in 9 of the 74 general education cases cited as errors, and in one of the 20 special education cases cited as errors, the Department strongly disagrees with the Comptroller's conclusion that the documentation was inadequate to support the discharge. The Department maintains that the evidence provided to the auditors in those 10 cases showed that the discharge was warranted under state guidelines. In half of these cases, the student moved outside of New York City and reenrolled in another educational setting within the United States. In the other half, the evidence showed that the student moved outside of the United States. Examining these 10 cases in view of other cases where the supporting documentation was accepted by the auditors, we remain perplexed that these cases were cited as errors. For example, two students who moved out of New York City and were subsequently enrolled in home school programs that were documented by the local authorities were considered to have inadequate documentation.<sup>2</sup> Another student whose enrollment in nearby Scarsdale High School was verified in writing by the receiving school was also considered inadequately documented, perhaps due to the fact that the initial discharge code entered by the school indicated that the student transferred to an early college program. Even so, this does not negate the strength of the documentation from the receiving school in demonstrating that the student was properly discharged from the 2008 cohort.<sup>3</sup> Similarly perplexing decisions were made for cases in which the student moved out the country (and thus reenrollment information was not required per SED guidelines). For example,

\*  
Comments  
5,6,12,13,19

<sup>2</sup> Cases 2 and 10 in Table 2.

<sup>3</sup> Case 3 in Table 2.

January 26, 2010

\* See State Comptroller's Comments, pages 45, 46 and 47-48.

**New York City Department of Education Response to Findings and Recommendations  
Office of the New York State Comptroller Audit 2009-N-9**

a student whose move out of country was documented by the legal guardian, and one whose move (due to her father being deported) was documented by her uncle, were considered errors.<sup>4</sup> In yet another case, the Department obtained a transcript from a school in the Dominican Republic that documented the student’s enrollment both before and after the time that the student was enrolled in NYC public schools – for a period of one day<sup>5</sup> – yet this was deemed inadequate to support the student’s discharge, likely because it was not accompanied by a parental signature to verify the move. If cases such as these are considered to be errors according to the state’s guidelines, the Department is uncertain what further actions schools and school districts are expected to take in order to confirm the status of students who have stopped attending their schools.

The following table lists the cases where we dispute an error cited by the Comptroller. In each case, the available evidence clearly shows that the student was properly discharged from the cohort, and the documentation meets the evidentiary requirements established by the State Education Department.<sup>6</sup>

Table 2. Properly Discharged Students Coded as Errors by OSC

Case	Cohort	Description
1.	General	The student enrolled in New York City public schools in late February of 2006 and was discharged the next day. Transcripts from his school in the Dominican Republic showed that he attended both before and after his brief enrollment in New York City.
2.	General	The DOE confirmed with the student’s mother that the student moved to Greensboro, North Carolina. Legal documentation from the North Carolina Division of Non-Public Education provides confirmation that a Home School was opened by the student’s mother on 8/2/07 for her daughter to continue her education.
3.	General	The DOE received confirmation from the receiving school that the student was admitted to Scarsdale High School on September 6, 2006.
4.	General	Documentation was received from the Escuela Elsa E. Couto Annoni in Puerto Rico

* Comment 5
-------------------

* Comment 12
--------------------

* Comment 13
--------------------

<sup>4</sup> Cases 5 and 7 in Table 2.

<sup>5</sup> Case 1 in Table 2.

<sup>6</sup> Because the Comptroller’s expressed objective was to assess the impact of the accuracy of discharge determinations on the ultimate accuracy of the reported graduation and dropout rates for the 2004-2008 cohort, the auditors fairly and appropriately afforded the Department an opportunity to review a listing of preliminary errors identified by the auditors after their initial fieldwork and to pursue and produce any additional evidence that would support the student’s ultimate accounting as a discharge for that cohort. As such, the Comptroller in most cases properly credited the Department with a valid discharge where additional SIRS-compliant evidence was obtained to demonstrate that the student was in fact a valid discharge, not a dropout, for the cohort graduation and dropout rate calculations. We believe the same standard should have been applied in the cases contested here.

\* See State Comptroller’s Comments, pages 45 and 46.

**New York City Department of Education Response to Findings and Recommendations  
Office of the New York State Comptroller Audit 2009-N-9**

		that he attended school there. Confirmation of the student's move was provided by the mother of his child who also confirmed that he was attending high school there.
5.	General	The DOE confirmed with the <u>student's guardian</u> that the student moved to Grandview, Grenada on 02/01/05.
6.	General	A written letter from the student's family's ACS case worker indicated that the family had moved to Mexico, and thus their ACS case had been closed.
7.	General	The student's uncle signed form stating that the student moved to West Africa after her father was deported in late 2004.
8.	General	Attendance teacher's home visit confirmed via a neighbor that the family moved to South Korea in 2005. In a further attempt at due diligence, the principal also visited the home and spoke to the neighbor, and documented his findings in a letter to the DOE which was part of the student's record.
9.	General	The DOE confirmed with the student's neighbor via home visit by an attendance teacher on 1/11/08 that the student moved to the Dominican Republic. This was later confirmed by the student directly.
10.	Special	The student was a foster child who moved to live with a family in Virginia. The DOE confirmed that the student was registered for Home Instruction with the Loudoun County Public Schools in Ashburn, Virginia for the 2005-2006 school year. The documentation includes curriculum plans for the student and other students who were home schooled at the same address

\*  
Comment 14

\*  
Comment 15

\*  
Comment 16

\*  
Comment 6

\*  
Comment 17

\*  
Comment 18

\*  
Comment 18

\*  
Comment 19

Discrepancies between NYC and NYS Discharge Guidelines for the Class of 2008

We also note another set of cases cited as errors by the Comptroller (38 general education and six special education) in which the documentation met the requirements for a Code 11 discharge based on New York City guidelines that were in place at the time. Because the NYC transfer, discharge, and graduation code guidelines had been in place prior to the state implementing its own guidelines, there was for several years a mismatch between the documentation required by the city and by the state. As such, while these cases are errors in that they did not meet the New York State SIRS guidelines, these are not cases that school principals, guidance counselors, family workers and attendance teachers would have considered dropouts during the period covered by the audit. During the audit investigation period, many attendance teachers noted that they had properly documented the student's discharge according to the guidelines that they had been given at the time. The discrepancies between the state and city guidelines have since been rectified due to changes in the transfer, discharge, and graduation code guidelines for New York City starting in the 2009-10 school year.

It is because many students in New York are so transient, with frequent moves in and out of the city- as well as in and out of the country- that the New York City transfer, discharge, and graduation guidelines were developed to allow for a discharge if the available evidence revealed that a student had moved out

9

January 26, 2010

\* See State Comptroller's Comments, pages 45, 46 and 47-48

**New York City Department of Education Response to Findings and Recommendations  
Office of the New York State Comptroller Audit 2009-N-9**

of New York City. The Department believes that it is a better use of school resources to focus outreach efforts on students who still reside in New York City and may return to pursue their diploma, rather than attempting to track students who, based on all available evidence, have moved to another state or country.

\*  
Comment  
20

*Concerns about the Reasonableness of the State Evidentiary Requirements*

Although the Department has amended its longstanding TDG guidelines to align with SED's SIRS data reporting guidelines, we have reservations about the fairness and reasonableness of certain aspects of those SIRS guidelines. The Department's transfer and discharge guidelines, which pre-date by more than two decades any SED regulations requiring school districts to classify and report individual student outcomes, were designed as a user guide for school-based personnel. As such, the TDG guidelines recognized the importance of prioritizing attendance intervention and dropout prevention resources for those students whom the school could reasonably hope to bring back to high school to continue pursuit of a high school diploma. When a student stops attending school, there is a legitimate, reasonable and necessary distinction to be made between truants and dropouts living within New York City, on the one hand-and students whose families have left New York City-in many cases without prior notification to the school, on the other hand. That is why the TDG guidelines historically permitted an out-of-City (Code 11) discharge to be validated through an attendance investigation confirming, through home visits and interviews of neighbors and/or relatives, that the family had moved out of the City. Furthermore, given that student transience is a significantly more common occurrence in New York City than it is in other parts of the state, implementing SIRS guidelines takes a disproportionate amount of time and resources away from schools, relative to implementing these same guidelines in other areas of New York State. As a result, it is an unfair burden on individual schools, administrators, and teachers to devote the energies of limited guidance, family and/or attendance outreach staff to further investigation of students who, based on all available evidence, no longer live within New York City.

\*  
Comment  
3

The SIRS guidelines were neither designed nor are they adequate to guide schools' attendance intervention and dropout prevention efforts. They are no more than what they purport to be – a Student Information Repository System – into which school districts feed student outcome data. However, as noted by the Comptroller, that data is used to calculate graduation and dropout rates, which are then used as primary measures of schools' success or failure. Therefore, the classification definitions and required documentation to support such classifications within SIRS must reflect fair and reasonable expectations for which schools can and should be held accountable; they should not impose undue burdens on school personnel. Given these concerns, we posit that the spirit of the guidelines could be enforced while allowing for more flexibility in the investigation and documentation of discharges due to the resources involved in tracking students, and the larger obligation to operate effective attendance intervention and dropout prevention programs for the benefit of New York City public school children.

\* See State Comptroller's Comments, pages 45 and 48.



**New York City Department of Education Response to Findings and Recommendations  
Office of the New York State Comptroller Audit 2009-N-9**

***Comptroller's Recommendations and DOE Responses***

*Comptroller's Recommendation:*

*1. Ensure that DoE discharge guidelines are fully aligned with SED regulations*

*Response to Recommendation:*

The Department agrees with and has already implemented the recommendation.

As previously described, the Department's Transfer Discharge and Graduation Guidelines have been updated to clarify that moves within the United States require documented confirmation of the fact that the student has enrolled in school outside of New York City, and that moves outside of the United States require a statement from the parent or guardian confirming the city and country of the new location (See Appendix A for current TDG guidelines). All Code 11 discharges entered into ATS now trigger a pop-up menu requiring the data enterer to select the type of documentation obtained to support that discharge. If the data enterer indicates that no documentation has been obtained, then the Code 11 will be reflected as a dropout rather than a discharge.

Despite having already implemented this recommendation, the Department maintains that SED regulations place an unfair burden on schools, administrators, and attendance teachers in New York City, relative to the rest of the state. Accordingly, we intend to engage SED in a discussion about the fairness and appropriateness of the guidelines for New York City and other large cities.

*Comptroller's Recommendation:*

*2. Instruct all schools to adhere to the SED regulations for discharge classifications, and provide training in the regulations for the school staff who administer discharges.*

*Response to Recommendation:*

The Department agrees with and has already implemented the recommendation.

Schools have been informed of the changes to TDG regulations described above in a variety of ways, including updates in several weekly newsletters (i.e. ATS weekly, DSSI weekly (formerly SSO weekly), and Principals' Weekly). For the current school year, the Office of Attendance has provided additional professional development to the school-support personnel who train and support the schools on the requirements and procedures for student discharges, among other enrollment and attendance matters. In addition to weekly newsletters that go out to schools and the professional development for school-support personnel, Pupil Accounting Secretaries and attendance teachers receive staff development annually, and attendance teachers also attended monthly staff meetings.

**New York City Department of Education Response to Findings and Recommendations  
Office of the New York State Comptroller Audit 2009-N-9**

Comptroller's Recommendation:

3. *Conduct periodic reviews of discharge classifications to determine whether they are being made and documented in accordance with SED regulations.*

Response to Recommendation:

The Department agrees with and is implementing this recommendation.

The Department is committed to maintaining accuracy in discharge classifications, as well as other aspects related to the calculation and reporting of data for graduation rates. As such, periodic reviews are being conducted by school staff as well as the central administration to ensure that discharges are being made and documented in accordance with SED regulations. For example, in 2010-2011, a new indicator was added to the DOE Compliance Checklist that addresses code 11 discharges. The DOE Office of Compliance Services tracks Code 11 documentation and works with schools to address problems. Schools receive mid-year and end-of-year checklist analyses, with the end-of-year analyses comprising 15% of their Principal Performance Review

***Closing Remarks***

Despite disagreeing with the Comptroller on 9 of the 74 General Education and one of the 20 Special Education errors that were cited, and disputing the fairness of some of the discharge guidelines with the New York State Education Department, the Department is encouraged to know that the Comptroller independently verified the general accuracy of the NYC traditional graduation rate calculation for the Class of 2008. According to this method of calculating graduation rates, high school graduation rates have increased by 33 percent since 2002, a trend that would not be negated by the discharge errors identified by the Comptroller. Even as New York City has implemented greater alignment to state reporting guidelines, discharge rates remain low, and graduation rates continue to rise.

## Quick Reference Table 2010-11

### TRANSFER CODES

*Transfers within NYC Department of Education Schools*

CODE	DESCRIPTION
00	Transferred to Another DOE School (Includes all Elementary, Middle and High Schools, Home Schooling, Full-Time Alternative Program, Home Instruction, District 75)
38	Transferred to a part-time DOE GED Program (D79 Only)
43	Transferred to a Full-Time DOE GED Program (D79 Only)
48	Transferred to a YABC Program
51	Transferred to a school or program for a limited time period

### DISCHARGE CODES

*Discharges Out of NYC Department of Education Schools*

CODE	DESCRIPTION
02*	Obtained Full-Time Employment Certificate
04	Under Six Years Old
06	Discharged to a NYC Parochial School
08	Discharged to a NYC Private School
10	Discharged to an Institution (Non-DOE)
11	Discharged to a School outside of New York City
12*	Address Unknown (Authorized by an Attendance Teacher)
15	Deceased Student
21*	Over 21 Years of Age
35*	Entered Military Service
39*	Voluntary Withdrawal or Discharge after 20 consecutive days of non-attendance
*	<b>Dropout Code</b>

### GRADUATION CODES

*Diploma Granting Codes*

CODE	DESCRIPTION
23	Received High School IEP Diploma (Special Education Only)
25	Proof of Receipt of High School Diploma
26	Received Local High School Diploma
27	Received High School Regents Endorsed Diploma
28	Received High School Regents Endorsed Diploma with Honors
29	Received at an Earlier Date a Local Diploma, IEP Diploma or High School Equivalency Diploma
30	Received High School Equivalency Diploma (GED)
47	Received High School Advanced Regents Diploma
62	Received High School Advanced Regents Diploma with Honors

TRANSFER, DISCHARGE, AND GRADUATION CODE GUIDELINES

**Transfers**

The following codes are recorded in the ATS system when students transfer from one Department of Education school to another school within the Department of Education. The completed admission by the admitting school will generate the appropriate transfer code.

CODE	DESCRIPTION	USAGE
00	Transferred from One New York City Department of Education School to Another New York City Department of Education School	<p>This code is recorded in ATS when a student transfers from one Department of Education school or program to another. This includes all elementary, middle and high schools, District 75 programs, home schooling* and home instruction.</p> <p>For the transfer code to be implemented the student must first be admitted to the receiving school, and the sending school must then confirm the transfer out upon receipt of a "pending discharge" notification on ATS.</p> <p>*Students transferring into home schooling (a 444 school) must have a "letter of Intent" on file at the central Home Schooling Office.</p>
38	Transferred to a Part-Time Department of Education High School Equivalency Program (GED) (District 79 Only)	<p>This code is recorded in ATS for students 18 years or older who have enrolled in part-time GED study in a Department of Education program. The sending school must confirm the transfer out upon receipt of a "pending discharge" notification on ATS. By confirming the transfer, the school acknowledges that the student has attended, or has been notified in writing of the opportunity to attend, a planning interview where their educational options were discussed and where they were informed of their right to return to school through age 21.</p> <p>This code is also to be used for students who have completed the school year in which they turn 17 years of age if the following conditions are true:</p> <ul style="list-style-type: none"><li>• The student has fewer than 17 credits; AND,</li><li>• The parent/guardian gives written permission to transfer to a GED program. – OR – the student demonstrates extenuating life circumstances such as emancipated minor/head of household.</li></ul> <p>Students 16 and under cannot enroll in GED.</p>

TRANSFER, DISCHARGE, AND GRADUATION CODE GUIDELINES

CODE	DESCRIPTION	USAGE
43	Transferred to a Full-Time Department of Education High School Equivalency Program (GED) (District 79 Only)	<p>This code is recorded for students 18 years or older who have enrolled in full-time GED study in a Department of Education program. The sending school must confirm the transfer out upon receipt of a "pending discharge" notification on ATS. All students transferred under this code should have attended, or been notified in writing of the opportunity to attend, a planning interview where their educational options were discussed and they were informed of their right to return to school through age 21.</p> <p>This code is also used for students who have completed the school year in which they turn 17 years of age if the following conditions are true:</p> <ul style="list-style-type: none"> <li>• The student has fewer than 17 credits; AND,</li> <li>• The parent/guardian gives written permission to transfer to a GED program. – OR – the student demonstrates extenuating life circumstances such as emancipated minor/head of household.</li> </ul> <p>A student who is within the school year in which he/she turns 17 may be transferred to a full-time GED program if the following conditions are true:</p> <ul style="list-style-type: none"> <li>• The student demonstrates extenuating life circumstances such as parenthood or full-time employment.</li> <li>• The student has fewer than 17 credits; AND,</li> <li>• The parent/guardian gives written permission to transfer to a GED program. – OR – is an emancipated or minor/head of household.</li> </ul> <p>Students 16 and under cannot enroll in GED.</p>
48	Transferred to a Young Adult Borough Center (YABC) Program	<p>This code is recorded when a student transfers to a YABC program.</p> <ul style="list-style-type: none"> <li>• Students must be 17.5 years old.</li> <li>• Students must have 17 or more credits.</li> <li>• Students must already be enrolled in a NYC high school and must be in fifth year or more of high school.</li> <li>• Students must have had an individual counseling session with the guidance counselor.</li> </ul>
51	Temporary Transfer from one New York City Department of Education School to another New York City Department of Education School or Program.	<p>This code is recorded in ATS when a student transfers to a school or program for a limited duration of time e.g. Passages. This code alerts the sending school to the fact that the student will be returning back to the register at a later date.</p>

TRANSFER, DISCHARGE, AND GRADUATION CODE GUIDELINES

## Discharge Codes

Discharge codes are used in situations when students drop out of school, or leave a New York City Department of Education school without transferring to another Department of Education school. All discharge confirmation documents must be kept in the school's discharge files (e.g., Form 407, proof of enrollment and intervention notes, etc.). For all discharges requiring a planning interview, the Planning Interview Form must be approved by the CFN designee prior to the discharge being effectuated and a copy of the approved Planning Interview Form must be placed in the student's cumulative record folder, and in the school's discharge file. The original form is given to the student along with the Planning Interview Packet.

CODE	DESCRIPTION	USAGE
<p><b>02*</b></p> <p><b>Dropout</b></p>	<p>Obtained Full-Time Employment Certificate</p>	<p>This code is only used for 16 and 17 year old students who have obtained a pledge of employment indicating that they are to be hired to a full-time position.</p> <ul style="list-style-type: none"> <li>• Students discharged under this code must have attended a planning interview where their educational options were discussed and they were informed of their right to return to school through age 21.</li> <li>• Written parental consent is required.</li> </ul> <p>Upon presentation of all appropriate documentation (required for issuance of employment certificate) students are issued a Full-Time Employment Certificate and may be discharged from school. A copy of the employment certificate is filed in the student's cumulative record folder.</p> <p>Students who are 18 years or older who wish to withdraw from school for reason of full-time employment are to be discharged using Code 39.</p>
<p><b>04</b></p>	<p>Under Six Years Old</p>	<p>This code is used for students who are under compulsory school age when they are to be voluntarily withdrawn from school by a parent or guardian. The discharge is effective on the day of withdrawal provided there is documentation of the parent's request for withdrawal and a school staff member has seen the parent and child prior to the discharge.</p> <p>For transfers to other UPK, Parochial, or Private school for children under six, please use appropriate transfer codes. There are no circumstances in which a student under six is discharged Code 11. A student under compulsory age does not require proof of enrollment in a school outside NYC. They would be discharged Code 4 (voluntary withdrawal) or Code 12 (address unknown).</p> <p>If there are concerns regarding the status of the child, an attendance teacher's investigation should be initiated and the student should not be discharged until the completion of the investigation. If there are questions concerning the safety and welfare of the student, the Administration for Children's Services must be contacted.</p> <p>Students under six years old who are absent from school for 20 consecutive days without explanation, may be discharged Code 4 after the 20th day under the following circumstances:</p> <ul style="list-style-type: none"> <li>• An investigation conducted by an attendance teacher, including an interview with the parent and child, has confirmed the safety and well-being of the child.</li> <li>• The parent is informed that the child will be discharged from school and that the parent is responsible for registering the child in school at the beginning of the school year in which he/she turns age six.</li> <li>• After all procedures are completed, a registered letter informing the parent of the discharge must be sent to the home.</li> </ul>

**TRANSFER, DISCHARGE, AND GRADUATION CODE GUIDELINES**

CODE	DESCRIPTION	USAGE
<p><b>04</b> Cont'd</p>	<p>Under Six Years Old</p>	<p>Students under six years old who are absent for 20 consecutive days for whom an investigation does not lead to a home address and parent interview may be discharged Code 12, following all appropriate approvals.</p> <p>Upon entering a code 4 discharge, select one of the indicated reasons from the pop-up menu:</p> <ul style="list-style-type: none"> <li>A. Child aged out (no longer eligible for LYFE or UPK).</li> <li>B. Moved outside of NYC (under age 6).</li> <li>C. Alternate child care being provided by a family member.</li> <li>D. Alternate child care being provided by a non DOE program or center.</li> <li>E. Investigation complete—parent interview completed.</li> <li>F. Parent graduated and therefore child no longer eligible for LYFE program.</li> <li>G. Parent discharged (for reasons other than graduation) and therefore child no longer eligible for LYFE program.</li> <li>H. Parent no longer has custody.</li> </ul>
<p><b>06</b></p>	<p>Discharged to a New York City Parochial School</p>	<p>This code is used for students who transfer to a parochial school in New York City. Confirmation from the receiving school must be obtained prior to the discharge. The enrollment date, name of the receiving school, telephone number, and the name of the school official providing the information must be documented. The date of the discharge is the date of enrollment in the new school.</p> <p>Note: In addition to entering Code 06, the name of the parochial school must be entered on the ATS discharge screen.</p>
<p><b>08</b></p>	<p>Discharged to a New York City Private School</p>	<p>This code is used for students who transfer to a private school in New York City. Confirmation from the receiving school must be received prior to the discharge. The enrollment date, name of the receiving school, telephone number, and the name of the school official providing the information must be documented. The date of discharge is the date of enrollment in the new school.</p> <p>Note: In addition to entering Code 08, the name of the private school must be entered on the ATS discharge screen.</p>
<p><b>10</b></p>	<p>Discharged to an Institution (Non-Department of Education)</p>	<p>This code is used for students who are residing in a full-time institutional setting. This includes students in Special Education programs who are placed in schools or facilities outside of New York City. Verification that the student resides at a Non-Department of Education facility outside or within New York City is required.</p> <p><i>All Code 10 Discharges will be subject to approval by District 79, District 75, CFN Offices and the Central Office of Attendance Policy and Planning as appropriate.</i></p> <p>Schools must enter the name of the institution or facility of placement in the school name field on ATS. The effective date of discharge is the date the student entered the institution.</p>

TRANSFER, DISCHARGE, AND GRADUATION CODE GUIDELINES

CODE	DESCRIPTION	USAGE
<p style="text-align: center;">11</p> <p style="text-align: center;">11 w/out documentation is a Dropout</p>	<p>Discharged to a school outside of New York City</p>	<p>This code is to be used for students who have left New York City and are currently <u>attending school</u> elsewhere. The discharge of a student out of the city and within the United States may be effectuated after the school has obtained a new street address, along with the city and state of residence, and within 20 school days of the date the discharge is entered into ATS, <u>documented confirmation of the fact that the student has been enrolled in a school</u> outside of New York City.</p> <p>Appropriate documentation includes a request for a transcript or records from a receiving school or a written acknowledgement from the receiving school that the student has registered. Every effort to verify the enrollment in a school outside of NYC must be made.</p> <p>The type of verification obtained must be entered into ATS on the Discharge Verification Screen. Upon entering this discharge code in ATS schools must select from the pop-up menu requiring the selection of a form of documentation (verification):</p> <ul style="list-style-type: none"> <li>E: ACADEMIC EXCHANGE PRGRM</li> <li>R: RECEIVED REQ FOR RECS/TRANSCRIPT</li> <li>W: WRITTEN ACKNOWLEDGEMENT FROM NEW SCH-REGISTERED</li> <li>X: NO DOCUMENTATION, 407 WILL OPEN IN 20 DAYS</li> <li>Z: MOVE OUTSIDE USA; VERIFICATION RECEIVED</li> </ul> <p>Secondary documentation (telephone calls or verbal verification from the new school) are not accepted as appropriate verification. For 2010-11, <b>-E</b> is a new documentation code to record students spending a semester away at school or academic program, such as a legislative page.</p> <p>If the sending school is unable to obtain appropriate verification within 20 days of the discharge, a Form 407 will generate and the school will be required to conduct an attendance investigation. If the move is verified and documentation from the new school is collected, the 407 may be closed with reason code <b>-93</b> and the discharge updated in UPDI. Under the documentation field select from the drop-down menu the following form of documentation:</p> <ul style="list-style-type: none"> <li>B: A407/RC93; DISC CODE 11 CONFIRMED.</li> </ul> <p>If the 407 investigation does not end with verification of enrollment in a new school, the 407 may be closed with a reason code <b>-83</b>." The Code 11 discharge documentation will remain <b>-X</b></p> <p>The discharge of a student who has moved outside of the United States and its possessions requires a statement from a parent or guardian indicating the city and country of the new location. The parent statement may be written or verbal with the information verified by an attendance teacher or other school staff member. This verification must be documented, signed and included in the student's file or recorded in ILOG. A discharge for a move outside the USA <u>without</u> documented verification is entered with an <b>-X</b>." In that case, a 407 will open in 20 days to prompt another investigation. The 407 is closed as above: with documentation, use reason code "93" and update documentation field to "B"; without documentation, use reason code "83" and do not update the documentation field.</p> <p>Any Code 11 discharge with <b>-X</b>" (no documentation) will be considered a drop-out for accountability purposes. Discharge date is the first day of absence following the last day the student was marked present.</p> <p>All Code 11 discharge documentation should be filed at the school and remain on file for six years beyond the student's expected graduation date.</p>



TRANSFER, DISCHARGE, AND GRADUATION CODE GUIDELINES

CODE	DESCRIPTION	USAGE
<b>12*</b>  <b>Dropout</b>	Address Unknown	<p>This code is used for students who cannot be located after an extensive investigation has been undertaken by an attendance teacher. An -Address Unknown” discharge may only be implemented by an attendance teacher following a complete investigation. The principal must review the steps taken to locate the student and must authorize the discharge by signing Form 407 documenting the investigation. The effective date of discharge is the first day of absence following the last day the student was marked -present.”</p> <p>If a student is officially reported as missing or as a runaway, an -Address Unknown” discharge may be implemented if the following conditions are met:</p> <ul style="list-style-type: none"> <li>• The parent has reported the child as missing to the Police Department.</li> <li>• The attendance teacher is provided with a Police Department case number, which is then entered on the Form 407.</li> </ul> <p><i>All code 12 discharges must be approved by the CFN Network Attendance Manager before they are effectuated.</i></p> <p>A follow up Form 407 is automatically generated through the ATS system 30 days after a Code 12 discharge has been implemented. The second 407 requires a re-investigation of the discharge to confirm the status of the student. All findings are documented on Form 407 which is then filed in the student’s Cumulative Record folder.</p>
<b>15</b>	Student Deceased	<p>This code is used when a student has died. A Death certificate, copy of an obituary, or other types of proof must be on file. The effective date of discharge is the date of death.</p>
<b>21*</b>  <b>Dropout</b>	Over 21 Years Old	<p>This code is used for students who complete the school year in which they turn 21. In the discharge reason field, schools should enter additional information about the student: I: Enrolled in DOE Adult and Continuing Ed J: Enrolled in non-DOE Adult Ed K: Unknown</p> <p>Students who are discharged prior to the end of the school year in which they turn 21 should be discharged through an appropriate -Over 17” code (i.e., Code 39) and a planning interview must be held or scheduled.</p>
<b>35*</b>  <b>Dropout</b>	Entered Military Service	<p>This code is used for students who are admitted into any division of military service including: Coast Guard, Army, Navy, Air Force or Marines. The effective date of discharge is the date when the student is admitted into Military Service.</p> <ul style="list-style-type: none"> <li>• Students must be 17 years of age.</li> <li>• All students discharged under this code must have attended, or been notified in writing of the opportunity to attend, a planning interview where their educational options were discussed and they were informed of their right to return to school through age 21.</li> </ul>

TRANSFER, DISCHARGE, AND GRADUATION CODE GUIDELINES

CODE	DESCRIPTION	USAGE
<b>39*</b>  <b>Dropout</b>	<p>Voluntary Withdrawal or Discharge after 20 Consecutive Days of Non- Attendance</p> <p>for students who have completed the school year in which they turn 17</p>	<p>This code is used for students who are over the mandatory school age (must have completed the school year in which they turned 17 years of age) who wish to withdraw from school. This includes:</p> <ul style="list-style-type: none"> <li>• students who wish to transfer to a GED Program;</li> <li>• students who wish to transfer to a vocational program;</li> <li>• students who choose to withdraw due to pregnancy;</li> <li>• students who are over the mandatory school age and are absent for 20 consecutive days.</li> </ul> <p>Students discharged under this category must have either:</p> <ul style="list-style-type: none"> <li>• attended a planning interview where their educational options were discussed and they were informed of their right to return to school through age 21; or,</li> <li>• have been notified in writing of the opportunity to attend a planning interview where their educational options were discussed and they were informed of their right to return to school through age 21.</li> </ul> <p>Prior to effectuating the discharge the school is required to have made outreach attempts to return the student to school and must have mailed two separate letters inviting the student and parent to attend the planning interview. A Planning Interview Form must still be completed and the box marked "Parent and/or Student Did Not Appear for Planning Interview" checked off. The Planning Interview Form and supporting documentation are then sent to the CFN for approval.</p> <p>Upon entering this discharge code in ATS, schools must indicate from a pop-up menu one of the following discharge reasons:</p> <ul style="list-style-type: none"> <li>A. Student is no longer interested in attending school.</li> <li>B. Student has completed all required credits to graduate, but is missing one or more Regents exams.</li> <li>C. Student has taken the GED examination and is awaiting results.</li> <li>D. Student has been absent for 20 consecutive days and has not responded to invitations to attend a planning interview.</li> <li>L. Student has enrolled in a business, trade, vocational or other training program.</li> <li>M. Student has enrolled in a full-time non-DOE GED Program</li> <li>N. Student has enrolled in a part-time non-DOE GED Program</li> <li>O. Student is voluntarily withdrawing due to pregnancy</li> </ul> <p>The effective date of discharge is the first day of absence following the last day the student was marked "present."</p>

TRANSFER, DISCHARGE, AND GRADUATION CODE GUIDELINES

### Graduation Codes

CODE	DESCRIPTION	USAGE
23	Received High School IEP Diploma	<i>For students with disabilities only.</i> This code is used 1) when students with disabilities who have achieved the educational goals specified in their current IEPs have been awarded IEP diplomas at the end of the school year in which they turned 21 or 2) upon application of the student or the student's parent at any time after the student has attended school, or received a substantially equivalent education elsewhere, for at least twelve years excluding Kindergarten, and has achieved the educational goals of the current IEP. This is a non-Regents endorsed diploma.
25	Proof of Receipt of High School Diploma	This code is used when a student has documented proof that (s)he has completed high school within the United States or in a country outside of the United States.
26	Received Local High School Diploma	<p>This code is used for students who have met the requirements according to NYC Chancellor's Regulation A-501 for a local diploma. Requirements vary according to the year in which a student enters 9 grade. This diploma is available to students who first entered 9 grade in 2007 or earlier and for students with disabilities who meet the eligibility requirements, via the safety net provision. This is a non-Regents endorsed diploma. Upon entering this graduation code in ATS, schools may indicate from a pop-up menu one of the following Diploma distinctions:</p> <ul style="list-style-type: none"> <li>• Local Diploma received via safety net provision<sup>1</sup></li> <li>• Local Diploma with Career and Technical Education (CTE) endorsement</li> <li>• Local Diploma with Career and Technical Education (CTE) endorsement received via safety net provision</li> </ul> <p>If a selection from the pop-up menu is not made, the designation will remain as <del>Local Diploma.</del>"</p> <p><sup>1</sup>The safety net provision is for students with disabilities who meet very specific eligibility requirements. For information on student eligibility and documentation requirements please visit: <a href="http://www.emsc.nysed.gov/specialed/publications/extRCTsafetynt.htm">http://www.emsc.nysed.gov/specialed/publications/extRCTsafetynt.htm</a> and <a href="http://www.emsc.nysed.gov/specialed/publications/learnstand/safetynetbrochure">http://www.emsc.nysed.gov/specialed/publications/learnstand/safetynetbrochure</a></p>
27	Received High School Regents Endorsed Diploma	<p>This code is used when a student has been granted a Regents Diploma according to NYSED guidelines. Upon entering this graduation code in ATS, schools may select from a pop-up menu one of the following Diploma distinctions:</p> <ul style="list-style-type: none"> <li>• Regents Diploma with Career and Technical Education (CTE) endorsement</li> <li>• Regents Diploma with approved Arts sequence acknowledgement (3-unit Arts sequence)</li> <li>• Regents Diploma with approved Arts sequence acknowledgement (5-unit Arts sequence)</li> <li>• Regents Diploma received via Regents exam appeal<sup>2</sup></li> </ul> <p>If a selection from the pop-up menu is not made the designation will remain as <del>Regents Endorsed Diploma.</del>"</p> <p><sup>2</sup>The Regents exam appeal provision is for students who meet very specific eligibility requirements. For information on student eligibility and documentation requirements: <a href="http://www.emsc.nysed.gov/part100/pages/1005.html#regpasscore">http://www.emsc.nysed.gov/part100/pages/1005.html#regpasscore</a> and <a href="http://www.emsc.nysed.gov/sar/appeal05-06.pdf">http://www.emsc.nysed.gov/sar/appeal05-06.pdf</a>. Please note that in ATS, there are additional safety net Regents Diploma distinctions for CTE and Arts sequences.</p>

TRANSFER, DISCHARGE, AND GRADUATION CODE GUIDELINES

CODE	DESCRIPTION	USAGE
28	Received High School Regents Endorsed Diploma with Honors	<p>This code is used when a student has been granted a Regents endorsed diploma and achieved an average of 90% in all required Regents exams. Upon entering this graduation code in ATS schools may select from a pop-up menu one of the following Diploma distinctions:</p> <ul style="list-style-type: none"> <li>• Regents Diploma with Honors with approved Arts sequence acknowledgement (3-unit Arts sequence)</li> <li>• Regents Diploma with Honors with approved Arts sequence acknowledgement (5-unit Arts sequence)</li> <li>• Regents Diploma with Honors with Career and Technical Education (CTE) endorsement</li> </ul> <p>If a selection from the pop-up menu is not made, the designation will remain as -High School Regents Diploma with Honors."</p>
29	Received, at an Earlier Date, a Local Diploma, IEP Diploma, or High School Equivalency Diploma.	<p>This code is used when a student, who has already been granted a Local Diploma, IEP Diploma, or High School Equivalency Diploma returns to school and leaves prior to being granted a Regents Diploma.</p> <p>Students have the right to obtain a regular high school diploma until the end of the school year in which they turn 21 years old.</p>
30	Received High School Equivalency Diploma (GED)	<p>This code is used when a student has been granted a High School Equivalency Diploma (GED).</p>
47	Received High School Advanced Regents Diploma	<p>This code is used when a student has been granted an advanced Regents Diploma according to NYSED. Upon entering this graduation code in ATS schools may select from a pop-up menu one of the following Diploma distinctions:</p> <ul style="list-style-type: none"> <li>• Advanced Regents Diploma with approved Arts sequence acknowledgement (5-unit Arts sequence)</li> <li>• Advanced Regents Diploma with Career and Technical Education (CTE) endorsement</li> </ul> <p>If a selection from the pop-up menu is not made the designation will remain as -Advanced High School Regents Diploma."</p>
62	Received High School Advanced Regents Diploma with Honors	<p>This code is used when a student has been granted an Advanced Regents Diploma and has achieved an average of 90% on all required Regents exams. Upon entering this graduation code in ATS schools may select from a pop-up menu one of the following Diploma distinctions:</p> <ul style="list-style-type: none"> <li>• Advanced Regents Diploma with Honors with approved Arts sequence acknowledgement (5-unit Arts sequence)</li> <li>• Advanced Regents Diploma with Honors with Career and Technical Education (CTE) endorsement.</li> </ul> <p>If a selection from the pop-up menu is not made the designation will remain as -Advanced High School Regents Diploma with Honors."</p>

## State Comptroller's Comments

1. Because there was a low risk that students reported as dropouts had been coded improperly, we did not audit for that possibility. Moreover, DoE officials told us they are aware of just one previous instance in which dropouts had been miscoded.
2. DoE is required to comply with regulations and guidelines established by SED. The objective of our audit was to determine whether DoE, in accordance with SED's guidelines, had accurately reported the number of students discharged from City public schools. Consequently, we performed our audit using the guidelines SED established for the transfer, discharge, and graduation of students. These guidelines were first issued for the 2001 - 02 school year. As DoE points out, the SED guidelines are clear that a student must be reported as a dropout if documentation does not support a discharge. We do not believe that we have undermined the calculations that were made by DoE for historical purposes. Separately, we have shown their accuracy when applying SED criteria.
3. DoE officials should resolve this issue with SED.
4. Discharge codes are used when students drop out of school or leave a New York City Department of Education (DoE) school without transferring to another DoE school. School officials should support their discharge decisions by ensuring that they obtain the appropriate information at the time the student's discharge determination is recorded. We initially informed DoE officials that school employees could not provide documentation to support the discharge determinations for 316 of the 600 students in our statistical sample. DoE officials then conducted extensive outreach and were able to obtain and provide adequate documentation to support their discharge determinations for 222 of the 316 students. This effort should have been performed initially by employees at the individual schools.
5. School officials recorded this student as discharged on March 1, 2006, using the out-of-City discharge code without basing its determination on appropriate information/documentation. It was not until May 2010, after conducting an investigation in response to our initial audit findings, that DoE officials determined the student had enrolled in school in the Dominican Republic in February 2007. DoE officials did not offer an explanation for the student's whereabouts for the period March 1, 2006, through February 2007. Absent such information, the student should have been classified as a dropout.
6. At the time of discharge in November 29, 2004, school officials had no documents that could support their discharge determination. It was not until May 2010 that DoE officials visited the student's uncle and were told the student and her father had returned to West Africa in 2007. There is no evidence that this student was attending school or had moved out of the City during the period between November 29, 2004, and the time she may have left for West Africa in 2007. Therefore, she should have been classified as a dropout at the time of discharge.

7. We acknowledge DoE's large transient student population. However, school officials could not always provide documentation to show they had performed the required investigations, as required by SED, before they recorded a discharge classification.
8. Application of this process does not always take place, since we found that some students had been removed from the home school register before they were confirmed as being enrolled at the receiving school.
9. We acknowledge DoE's efforts to ensure the appropriate use of the Code 11 classification, since some school officials told us that instead of classifying some students as dropouts, they generally classified them as a Code 11 - transferred to a school outside of New York City. In our statistical sample we noted that an overwhelming number of discharges - 77 percent of the 500 general education students and 62 percent of the 100 special education students had been classified as Code 11.
10. It would not be appropriate to apply a 4.2 percent error rate because that rate does not include exceptions for missing or inadequate documentation that is required by DoE and SED guidelines.
11. SED's guidelines require school districts to report a student as a dropout if the documents to support a discharge do not match the specific requirements set forth in the guidelines. The disputed cases had resulted from missing, inadequate, and/or contradictory information provided by school and DoE officials. In such instances, school officials did not have adequate documentation justifying discharge determinations.
12. School officials discharged this student on February 16, 2007, without having proper documentation to support their discharge determination. It was not until December 1, 2009, that school officials became aware the student might be attending high school in North Carolina. DoE officials telephoned the student's mother on April 14, 2010, and were told the student was being home-schooled, effective February 2007. DoE received two separate confirmations from the North Carolina Division of Non-Public School Education stating that the home-schooling had begun on either August 2, 2007 or April 23, 2010.
13. School officials discharged this student on September 4, 2007, without having proper documentation to support their discharge determination. It was not until May 2010, after an investigation initiated by our audit, that DoE officials became aware the student had been admitted to Scarsdale High School in September 2006, although DoE's attendance records indicate the student was attending a NYC public school in March, 2007. This conflicts with the information supplied by officials at Scarsdale High School.
14. School officials discharged this student on September 13, 2004, without having proper documentation to support their discharge determination. It was not until May 2010 that DoE officials received information that the student had enrolled in an adult education program in Puerto Rico in August 2005. DoE officials did not offer any information on the student's whereabouts for the period of September 13, 2004 to August 2005.



15. School officials discharged this student in February 2005 without proper documentation to support their discharge determination. Information provided by school officials showed the student had moved to Guyana, but the effective date of this move was not specified. However, a statement provided by DoE officials in May 2010 stated the student had moved to Grenada. Furthermore, the statement indicated that the student had not enrolled in a new school after moving.
16. School officials discharged this student in September 2006 without proper documentation to support the discharge determination. School attendance records show the student was absent 68 out of 168 days during the 2004-05 school year and had attended just 6 days during the 2005-06 school year, which ended in June 2006. A May 2010 letter from a social worker stated, "The last physical contact between the case planner and client was August 29, 2005. After several months of Case Planner Attempt visits, the last attempt was December, 13, 2005." The social worker subsequently concluded that the student's family had relocated to Mexico in August 2005. This meets SED's classification as a dropout since DoE had no confirmation that the student had indeed returned to Mexico.
17. School officials discharged this student on September 8, 2005, without proper documentation to support their discharge determination. School attendance records state that no one can recall ever seeing this student even though the student was listed on attendance records as being present in school for seven days during the 2004-05 school year. In a January 2010 letter, the principal of Morris High School stated that an attendance teacher, who is no longer on staff, had conducted a home visit and was told by a neighbor the family had moved to South Korea. The principal also stated that he had conducted a home visit and was told by the building superintendent that the student had "moved out" in 2005. Absent more definitive information, this student meets SED's requirement for classification as a dropout.
18. School officials discharged this student in January 2008 without proper documentation to support their discharge determination. School officials stated they made a home visit in January 2008 and were told by a neighbor that the family had moved to the Dominican Republic (DR). DoE officials provided a memo, dated May 1, 2010, in which the student confirmed having travelled to the DR on December 18, 2007. However, when we spoke to the student, she told us that she and her family had lived at the same address for many years and she had not been visited by any attendance teachers in January 2008. She did acknowledge that a DoE employee had visited her in May 2010. She also told us she had traveled to the DR on December 18, 2007, to spend Christmas with her family. She said when she tried to attend school after her return to the USA, she was refused admittance because the school had already listed her as being discharged. Since school officials did not have the appropriate documentation required by SED, this student should have been classified as a dropout or should have remained on the school's register and included in the calculation of the graduation rate for her cohort.
19. School officials discharged this student in March 2005 without proper documentation to support their discharge determination. Attendance records show the student had

attended a DoE school for just 7 days in school year 2004 - 05 and 40 days in school year 2005 -06. Her last day of attendance was March 22, 2006. DoE officials provided a letter dated June 11, 2010 that showed the student was registered for home instruction in Virginia for the 2005-06 school year. However, other DoE records, dated August 2005, show that an adoption agency had taken the student back to Haiti. This student, because of the conflicting information, should have been listed as a dropout.

20. School officials, at the time the discharge determination was made and recorded, did not always know whether a student had dropped out; moved to another address; or had moved out of the city, State, or country. Therefore, for these students, they should have conducted appropriate outreach efforts, as required by both DoE and SED guidelines.