

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
OFFICE OF THE INSPECTOR GENERAL**

**AUDIT OF THE MANAGEMENT
OF TRUANCY IN THE DISTRICT
OF COLUMBIA PUBLIC SCHOOLS**



**CHARLES J. WILLOUGHBY
INSPECTOR GENERAL**

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Office of the Inspector General

Inspector General



August 10, 2012

Kaya Henderson
Chancellor
District of Columbia Public Schools
1200 First Street, NE
Washington, D.C. 20002

Dear Chancellor Henderson:

Enclosed is our final report summarizing the results of the Office of the Inspector General's (OIG) *Audit of the Management of Truancy in D.C. Public Schools* (OIG No. 09-1-32GA). This audit was included in our OIG's Fiscal Year 2009 Audit and Inspection Plan.

As a result of our audit, we directed five recommendations to the District of Columbia Public Schools (DCPS) for action necessary to correct the described deficiencies. On April 13, 2012, DCPS provided a response to a draft of this report and agreed with 3 of 5 recommendations made in the report. DCPS actions taken or planned on Recommendations 3, 4, and 5 are considered to be responsive and meet the intent of the recommendations. However, DCPS did not provide the target dates for completing the planned actions for recommendation 5. We respectfully request that DCPS provide our Office with the target dates for planned actions by August 31, 2012. The OIG considers DCPS's comments to recommendations 1 and 2 to be nonresponsive and, consequently, these recommendations are unresolved. Accordingly, we request that DCPS reconsider its position taken on those two recommendations and provide an additional response to us by August 31, 2012. The full text of DCPS's response is included in Exhibit B.

We appreciate the cooperation and courtesies extended to our staff by DCPS. If you have questions, please contact me or Ronald W. King, Assistant Inspector General for Audits, at 202-727-2540.

Sincerely,


Charles J. Willoughby
Inspector General

Enclosure

CJW/tda

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ACRONYMS

AIM	Attendance Intervention Module
CSS	Court Social Services
CFSA	Child and Family Services Agency
DCMR	District of Columbia Municipal Regulations
DCPS	District of Columbia Public Schools
DC STARS	DCPS Student Tracking and Reporting System
LEA	Local Education Agency
MPD	Metropolitan Police Department
OAG	Office of the Attorney General
OIG	Office of the Inspector General
OSSE	Office of the State Superintendent of Education
OYE	Office of Youth Engagement
SHS	Senior High School
SY	School Year

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EXECUTIVE DIGEST

OVERVIEW

This report summarizes the results of the Office of Inspector General's (OIG) audit of the Management of Truancy in the District of Columbia Public Schools (DCPS) (OIG No. 09-1-32GA). This audit was included in our Fiscal Year (FY) 2009 Audit and Inspection Plan. The audit objectives were to evaluate the adequacy and effectiveness of: (1) DCPS' program for managing unauthorized student absences (truancy); (2) policies and procedures for recording and reporting student absences; (3) punitive actions for chronic truants; and (4) community policing programs for reducing truancy.

CONCLUSIONS

This report contains three findings that detail the conditions found during our audit. In our first finding, we noted that schools did not have the required or appropriate number of staff to effectively implement their attendance programs. In October 2009, DCPS laid off 388 school employees, which left some high schools without attendance counselors. As a result, DCPS lacked sufficient staffing resources to perform day-to-day attendance duties in order to effectively combat truancy.

Our second finding indicated that DCPS did not develop a mechanism to track useful truancy data, such as the number of students that were picked up by Metropolitan Police Department (MPD), or the number of students that were referred to the Child and Family Services Agency (CFSA) for educational neglect. The failure to capture statistics on truants prevents DCPS from determining the severity of problems and implementing programs to reduce truancy. Widespread truancy increases the likelihood that children will drop-out, which in turn, leads to an increased likelihood that, as young adults, they will be unemployed, live in poverty, receive welfare, and/or engage in criminal behavior.

Our third finding indicated that truancy policies, protocols, and procedures need revision. For example, we believe that the policy requiring DCPS to refer students to the court system once they accumulate 25 absences results in students missing a significant amount of instruction time, which negatively impacts their ability to successfully complete the academic term. Our benchmarking efforts revealed that some jurisdictions allow fewer unexcused absences before a student is referred to the next level for disciplinary action. In addition, DCPS did not include in its protocols information detailing how school officials should monitor truants, maintain truancy reporting forms, and handle truants dropped off at schools by MPD officers. As a result of not having specific procedures documented for monitoring truants, maintaining truancy reporting forms, and handling truants picked up by MPD, school officials may not be following consistent procedures to address truancy throughout DCPS.

EXECUTIVE DIGEST

SUMMARY OF RECOMMENDATIONS

We directed five recommendations to the Chancellor of the DCPS to correct the deficiencies noted in this report. The recommendations focus on:

- Ensuring schools have the necessary resources to implement attendance programs;
- Tracking truancy statistics to assist DCPS in developing additional strategies to combat truancy;
- Strengthening policies and procedures to ensure students are timely referred to the court system;
- Revising policies and procedures to ensure school officials follow consistent procedures for handling truancy; and
- Ensuring school attendance plans address the required procedures and contain updated information.

MANAGEMENT RESPONSES AND OIG COMMENTS

On April 13, 2012, DCPS provided a written response to the draft report. DCPS agreed with three of the five recommendations in the report. Action taken or planned by DCPS on recommendations 3, 4, and 5 are considered to be responsive and meet the intent of the recommendations. However, DCPS did not provide the target dates for completing the planned actions for recommendation 5. We respectfully request that DCPS provide our Office with the target dates for planned actions by August 31, 2012. The OIG considers DCPS's comments to recommendations 1 and 2 to be nonresponsive and, consequently, these recommendations are unresolved. Accordingly, we request that DCPS reconsider its position taken on those two recommendations and provide an additional response to us by August 31, 2012. The full text of DCPS's response is included in Exhibit B.

INTRODUCTION

BACKGROUND

DCPS' mission is to educate children in the District of Columbia by providing the knowledge and skills they need to achieve academic success and choose a rewarding professional path. Each school-age child¹ in the District must attend a public, independent, private, or parochial school, or receive private instruction unless the child has earned a high school diploma or its equivalent, or participates in a home schooling program that complies with District laws and regulations.²

Absenteeism and Truancy. The Office of the State Superintendent of Education (OSSE), which is the state education agency for the District, establishes the attendance policies for public education. Truancy is defined by 5 DCMR § 2099.1 as the unexcused absence from school with or without approval, or parental knowledge or consent. A student is considered truant when they are absent from school without a valid reason for a school day, or a portion of it.³

When a student is absent, DCPS is required to obtain a written statement from the student's parent or guardian verifying the reason for an absence. The DCMR states that the following are considered valid or excused absences:

- (a) Illness or other bona fide medical cause experienced by the student;^[4]
- (b) Exclusion, by direction of the authorities of the District of Columbia, due to quarantine, contagious disease, infection, infestation, or other condition requiring separation from other students for medical or health reasons;
- (c) Death in student's family;
- (d) Necessity for a student to attend judiciary or administrative proceedings as a party to the action or under subpoena;
- (e) Observance of a religious holiday;
- (f) Lawful suspension or exclusion from school by school authorities;
- (g) Temporary closing of facilities or suspension of classes due to severe weather, official activities, holidays, malfunctioning equipment, unsafe or unsanitary conditions, or other condition(s) or emergency requiring a school closing or suspension of classes;
- (h) Employment or other volunteer work approved by the school, provided that the student is seventeen (17) years of age, and

¹ A school-age child is a child who is 5 years of age or older by September 30 of a current school year, but who has not yet reached his or her 18th birthday. 5 DCMR § A2199.

² 5 DCMR §§ A2100.2 and .3.

³ DCPS' school year starts in August and ends in July.

⁴ A doctor's certificate is needed for appointments scheduled during school time, or if a student is absent more than 5 days.

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- provided further that any excused absences shall not adversely impact the student's academic performance or timely graduation;
- (i) Failure of the District of Columbia to provide transportation in cases where the District of Columbia has a legal responsibility for the transportation of the student;
 - (j) Medical or dental appointments for the student; and
 - (k) An emergency or other set of circumstances approved by a [local education agency (LEA)], independent, private or parochial school in conformance with published policies distributed to parents and guardians.^[5]

An unexcused absence occurs when a child misses class or school without a valid reason. Invalid reasons include babysitting, shopping, running errands, oversleeping, or job hunting. When a student misses school for an invalid reason, his/her student record will show an unexcused absence for the days that he/she was not in school.

Attendance and Truancy Policies. OSSE requires LEAs, such as DCPS, to develop and implement a protocol for handling student absenteeism. In accordance with this requirement, DCPS has developed attendance and truancy policies for school officials to follow. Attendance checks are conducted once a day at elementary schools, and every class period at secondary schools. Student attendance is recorded in DC STARS.

Every year, each District public school is required to prepare a school attendance plan, which includes truancy protocols. The plan must include a: (1) system for conducting attendance interventions; (2) process to establish and maintain an attendance committee; (3) system for analyzing attendance data; and (4) procedure to ensure student tardiness is noted and recorded. DCPS requires each school to designate an attendance counselor or designee to oversee implementation of the attendance plan. In addition, each high school must assign a full-time attendance counselor and ensure adequate staff is designated to effectively implement the attendance plan.

When a student has one unexcused absence, DCPS is required to contact the student's parent or guardian.⁶ To satisfy this requirement, DCPS requires school officials to call and notify the parent or guardian of the student's absence. To facilitate the notification process, DCPS implemented an automated dialing system (Connect Ed) for students attending secondary schools and educational centers. When students are not marked present in DC STARS, the system calls their parents or guardians within 24 hours of the absence. After a student accrues five unexcused absences in a marking period or similar timeframe, a school must (*inter alia*) develop an attendance intervention plan in consultation with the student's parent or guardian.⁷

⁵ 5 DCMR § A2102.2.

⁶ 5 DCMR § A2103.3(c)(1).

⁷ 5 DCMR § A2103.3(c)(3)(F).

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When students accumulate 10 or more unexcused absences, other District agencies become involved. For example, DCPS is required to refer students between 5 and 13 years-old to CFSA when they accrue 10 consecutive, unexcused absences at any time during a school year, and after completion of the intervention process or immediately if educational neglect is suspected.⁸ DCPS also is required to refer students over 13 years-old to the Court Social Services (CSS) Division of the D.C. Superior Court and the Office of the Attorney General (OAG) for truancy when they accumulate 25 or more unexcused absences within a school year.⁹ The MPD becomes involved with truancy when there is a reasonable ground to believe that a student is found unlawfully absent from a public or public charter school while school is in session.¹⁰ If an MPD officer observes a student roaming the streets, the officer will pick up and transport the student to his/her enrolled school or the attendance center.¹¹ Parents may be criminally prosecuted if their children do not regularly attend school.¹²

Student Population and Truancy Statistics. The number of students attending District public schools has decreased during the last few years, but the truancy rate's general trend has increased. The truancy rate is the percentage of all students enrolled in a school during the school year who were chronic truants. Chronic truants are the number of students that have accumulated 15 or more unexcused absences.¹³ The following table shows the student population and truancy rates for the last 4 school years (SYs).

Table 1. Student Population and Truancy Rates

School Year	DCPS Student Population ¹⁴	Truancy Rate ¹⁵
SY 2006-2007	52,645	16%
SY 2007-2008	49,422	19%
SY 2008-2009	45,190	20%
SY 2009-2010	44,718	15%

⁸ 5 DCMR § A2103.5(a). Section A2103.5(b) further mandates referral to CFSA for this age group after 20 unexcused absences within the school year and after the intervention process or immediately when educational neglect is suspected.

⁹ *Id.* § A2103.5(c). The DCMR provisions regarding school attendance were revised in November 2009. Prior to the revision, a student was referred to CSS/OAG for truancy after 15 days of unexcused absence.

¹⁰ See D.C. Code §§ 38-251(Supp. 2011).

¹¹ The attendance center is a place where students are held when MPD cannot determine their designated schools.

¹² See D.C. Code §§ 38-202 - 203 (Supp. 2011).

¹³ A chronic truant was defined as a student that accumulated 15 or more absences, until November 2009, when legislation increased the number of absences to 25.

¹⁴ These figures are based on the audited enrollment count.

¹⁵ These figures were taken from DCPS' website:

<http://dcps.dc.gov/DCPS/About+DCPS/Who+We+Are/Facts+and+Statistics>.

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The table shows that there was a five percent decrease in the truancy rate during SY 2009-2010. The Office of Youth Engagement (OYE) attributed the reduction in truancy to: 1) improving data quality and data systems; 2) setting clear expectations for school officials; and 3) reorganizing DCPS central staff. In 2009, DCPS launched the Attendance Intervention Module (AIM) in DC STARS that automated some intervention recordkeeping. Before DC STARS, schools were tracking student absences manually. AIM automatically generates notices to inform attendance staff of which students require an attendance intervention, such as a parent conference, home visit, or a CFSA/CSS referral, based on the prompts set forth in the truancy protocol. In addition to improving data quality and implementing truancy protocols, OYE has a team that monitors schools' attendance data and provides technical assistance to all schools in regard to attendance intervention and resolving difficult student truancy cases.

OBJECTIVES, SCOPE, AND METHODOLOGY

The audit objectives were to evaluate the adequacy and effectiveness of: (1) DCPS' program for managing unauthorized student absences (truancy); (2) policies and procedures for recording and reporting student absences; (3) punitive actions for chronic truants; and (4) community policing programs for reducing truancy.

Our audit period primarily covered SY 2009-2010. To accomplish our objectives, we: (1) reviewed applicable laws, regulations, and policies; (2) interviewed DCPS, CFSA, and MPD officials; (3) visited 13 schools and talked to the attendance counselors and/or principals to discuss truancy at their schools;¹⁶ and (4) reviewed reports extracted from DC STARS to determine student absences. We also researched truancy policies from other jurisdictions for benchmarking purposes. We did not assess the reliability of the computer-based data.

We conducted this performance audit in accordance with generally accepted government auditing standards. These 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 objectives.

¹⁶ These schools include nine high schools, two middle schools, one elementary school, and one elementary center.

INTRODUCTION

PRIOR REVIEWS

Our Office has not previously conducted a truancy audit. Our research also disclosed that neither the U.S. Government Accountability Office nor the Office of the District of Columbia Auditor has conducted a truancy audit of DCPS.

FINDINGS AND RECOMMENDATIONS

FINDING 1. ATTENDANCE STAFF

SYNOPSIS

Schools did not have the required or appropriate number of staff to implement their attendance programs. During SY 2009-2010, DCPS laid off hundreds of employees, including attendance counselors. Attendance designees were appointed when the attendance counselors were laid off; however, the designees did not devote 100 percent of their time to the attendance program due to other job responsibilities. As a result, DCPS lacked sufficient staffing resources to perform daily attendance program requirements designed to effectively combat truancy.

DISCUSSION

Designating Attendance Counselors. Three high schools that we contacted did not have attendance counselors, as required. DCPS' SY 2009-2010 School Attendance Plan provides, "[E]very school must designate an attendance counselor or designee to oversee the implementation of the attendance program. High schools must assign a full-time attendance counselor." *Id.* at 1. Further, DCPS' School Attendance Accountability Handbook (Feb. 2008) requires the attendance counselor to spend 100 percent of his or her time on attendance related duties.

During SY 2009-2010, DCPS laid off hundreds of employees, including the attendance counselors at McKinley Senior High School (SHS), Woodson SHS, and Anacostia SHS. Consequently, the three schools were left without full-time attendance counselors. Other school employees were appointed as the attendance designees; however, unlike attendance counselors, the attendance designees did not spend 100 percent of their time conducting attendance-related duties. The designees continued to perform their normal work duties in addition to their attendance duties.

Overall, DCPS did not properly staff Attendance Counselors at high schools. Further, DCPS did not designate proper staff to spend 100 percent of their time on attendance related duties. These conditions result from DCPS's noncompliance to the DCPS Attendance Accountability Handbook and the School Attendance Plan.

FINDINGS AND RECOMMENDATIONS

Assigning Attendance Staff. Our audit found that some high schools did not have the appropriate number of staff to effectively implement their attendance programs because DCPS did not consider factors, such as the total student enrollment, when allocating resources to daily attendance program requirements. Necessary attendance duties include documenting excused and unexcused absences in DC STARS; mailing certified letters to parents arranging parent conferences; ensuring that parent telephone numbers are correctly entered into Connect Ed, making court referrals; and tracking the progress of truancy interventions. We contacted 18 high schools and each school had only 1-2 employees designated to handle daily attendance duties, irrespective of the size of the student enrollment and the school's truancy statistics. For example, Anacostia SHS had only 1 staff person to handle 572 chronic truants, whereas Eastern SHS had 2 staff persons to deal with 133 chronic truants.

We obtained a student absence report for DCPS high schools from OYE covering the period of SY 2009-2010. The report listed 9,283 DCPS high school students with at least 1 unexcused absence during SY 2009-2010. Our review consisted of identifying students with 15 or more absences, which is what DCPS considered as chronic truancy during SY 2009-2010.¹⁷ We found that 4,199 students were chronically truant from the DCPS high schools we reviewed.

The following table shows the ratio of attendance staff to students, and the number of chronic truants at 18 DCPS high schools. Of the 18 high schools, we analyzed the 7¹⁸ with the highest percentage of chronic truancy as it relates to total student enrollment. These schools are: 1) Youth Engagement Academy; 2) Anacostia; 3) Spingarn; 4) Dunbar; 5) Ballou; 6) Woodson; and, 7) Cardozo. These seven high schools each had between 54% and 67% of their total student enrollment considered chronic truants (ranging from 88 to 651 chronic truants).

¹⁷ The legislation that changed the referral requirement to 25 days was effective in November 2009, after SY 2009-2010 started. However, DCPS continued to adhere to the 15-day rule for the remainder of the school year and began implementing the 25-day rule in SY 2010-2011.

¹⁸ The seven schools are highlighted in Table 2.

FINDINGS AND RECOMMENDATIONS

Table 2. Chronic Truants at DCPS High Schools (SY 2009-2010)

	High School	Ward	Number of Attendance Staff ¹⁹	Student Enrollment Count	Number of Students per Attendance Staff	Number of Chronic Truants	Percentage of Chronic Truants
1.	Banneker SHS	1	1	393	393	0	0%
2.	School Without Walls	2	1	460	460	0	0%
3.	Woodson Business and Finance	7	1 ²⁰	83	83	14	17%
4.	Phelps SHS	5	1	240	240	30	13%
5.	Ellington School of the Arts	2	2	493	246.5	40	8%
6.	Luke C. Moore Academy	5	2	396	198	81	20%
7.	Youth Engagement Academy	1	1	132	132	88	67%
8.	Eastern SHS	6	2	381	190.5	133	35%
9.	McKinley SHS	5	1	712	712	140	20%
10.	Woodson SHS	7	1	509	509	274	54%
11.	Coolidge SHS	4	2	608	304	276	45%
12.	Dunbar SHS	5	2	794	397	483	61%
13.	Roosevelt SHS	4	1	717	717	334	47%
14.	Cardozo SHS	1	1	653	653	350	54%
15.	Spingarn SHS	5	1	558	558	352	63%
16.	Wilson SHS	3	1	1,514	1,514	381	25%
17.	Anacostia SHS	8	1	900	900	572	64%
18.	Ballou SHS	8	1	1,157	1,157	651	56%
	Total			10,700²¹		4,199	

¹⁹ The number of attendance staff only includes the number of school employees who handle truancy matters on a daily basis.

²⁰ Woodson SHS and Woodson Business and Finance share the same attendance counselor.

²¹ We contacted DCPS Data Accountability Office to obtain the number of students enrolled in the 18 DCPS high schools we selected for review.

FINDINGS AND RECOMMENDATIONS

If schools do not assign sufficient staff to implement their attendance programs, the required day-to-day attendance duties cannot be completed, such as notifying parents or guardians of their children's unexcused absences and conducting home visits. In fact, the attendance counselor at Cardozo SHS had to rely on employees working for the Department of Parks and Recreation's Roving Leaders Programs to conduct home visits because she did not have enough time to conduct them during her work day. Instead of arbitrarily assigning one or two employees to handle day-to-day truancy matters at each school, DCPS should consider the total student enrollment and past truancy statistics in order to determine the appropriate staffing level for each school.

RECOMMENDATION

We recommend that the Chancellor, DCPS:

1. Ensure schools have adequate staffing resources to combat truancy by requiring the DCPS Central Office to work collaboratively with school principals to identify the appropriate number of attendance staff for each school.

DCPS RESPONSE

DCPS partially agrees with the recommendation. DCPS stated that it will continue to work diligently with the Mayor and the Council to ensure the effective allocation of limited public resources to support student success. DCPS is an active member of the interagency Citywide Truancy Taskforce. However, some secondary schools are not able to implement the truancy policy with fidelity due to the high volume of students requiring intensive intervention and limited staff and time resources. Thus, DCPS has stated that it has worked with the Citywide Truancy Taskforce and others to develop agency and non-profit partnerships to provide student and family interventions at the 5th unexcused absence to supplement efforts at targeted schools.

OIG COMMENT

We have concluded that DCPS did not adequately respond to this recommendation. Therefore, we request that DCPS provide an additional response by August 31, 2012, which addresses staffing resources to combat truancy, as well as collaborate with school principals to ensure accurate recording of truants in their perspective schools.

FINDINGS AND RECOMMENDATIONS

FINDING 2. TRUANCY DATA

SYNOPSIS

DCPS did not have a mechanism to track relevant truancy data other than the number of unexcused absences, such as the number of students that were picked up by MPD or referred to CFSA for educational neglect. In addition, DCPS could not provide statistics documenting the reasons for truancy. DCPS officials did not develop a mechanism to track the MPD and CFSA data because they did not understand the importance of tracking such severity of problems and implementing programs to reduce truancy. Widespread truancy increases the likelihood that children will drop-out, which in turn, leads to an increased likelihood that, as young adults, they will be unemployed, live in poverty, receive welfare, and/or engage in criminal behavior.

DISCUSSION

DCPS uses DC STARS to track the number of excused and unexcused absences for students, and calculate the truancy rate for individual schools and DCPS as a whole.²² Besides absences, there are other relevant statistics - such as the number of students picked up by MPD or referred to CFSA - that DCPS should track to assist the school system in identifying problems and implementing strategies to reduce truancy.

Students Picked Up by MPD. When an MPD police officer finds a student roaming the streets in the District during school hours and transports the student to his/her enrolled school, the officer completes a truancy reporting form and provides a carbon copy of the form to the attendance counselor or designee. The form details the location where the officer picked up the student and the location type (i.e., bus stop, liquor store, vacant building, etc.), along with the student's name, gender, and other information.

When attendance counselors/designees receive copies of the truancy reporting forms, they simply file the forms. They do not capture the information contained on the report forms in a spreadsheet or database so that DCPS can readily determine how often MPD picked up students and the number picked up on multiple occasions. In order for DCPS to capture these important statistics, its officials would have to visit and review the truancy reporting forms at each school. At some schools, the attendance counselors/designees stated that they

²² DC STARS is also used to track students' schedules and grades.

FINDINGS AND RECOMMENDATIONS

write a note in DC STARS when a student is picked up by MPD. However, DC STARS cannot generate a report to track students picked up by MPD because it is configured in such a manner that this important data element is not routinely captured.

In addition to using truancy reporting forms to track how often MPD picks up students, DCPS can also track other useful statistics based on information written on these forms for control purposes. For example, if DCPS tracked the day of the week that truants are most likely to skip school, DCPS can focus efforts on reducing truancy on this particular day. The failure to capture statistics on students picked up by MPD prevents DCPS and others from determining the severity of the problem and implementing appropriate intervention programs to reduce truancy.

Students Referred to CFSA. DCPS did not have a mechanism to track the number of students that school officials referred to CFSA for educational neglect. When attendance counselors/designees refer students to CFSA, they call the CFSA hotline and provide educational neglect reporting forms to CFSA. DCPS requires school officials to document the calls in DC STARS. However, because the calls are documented in the notes section, DC STARS cannot generate a report to show the number of CFSA referrals for individual schools and the system.

As a result, it is difficult for DCPS to determine the number of educational neglect referrals in a given school year. The attendance counselors/designees that we visited were readily able to tell us how many referrals they made. However, given the possibility of staff turnover and the loss of uncomputerized data, DCPS should develop a mechanism to track the CFSA referrals at each school and collectively at all of the schools. DCPS cannot rely on CFSA to provide the number of referrals made by DCPS school officials because public charter schools and private citizens also refer students to CFSA²³ and CFSA does not distinguish between these sources in FACES.²⁴

DCPS also does not track the results of CFSA investigations. After CFSA investigates parents for educational neglect, CFSA completes an alleged abuse/neglect form, which shows the results of the investigation. There are three possible outcomes for these investigations - the allegations are unfounded, inconclusive, or substantiated. The attendance designees at two schools that we visited stated that CFSA does not timely report the results of their investigations to them.

Reasons for Truancy. When we met with DCPS and MPD officials, they discussed some of the common reasons for student truancy; however, DCPS did not have data to support their claims. The officials stated that many students are truant because they: (1) did not have clothes to wear; (2) were pregnant; (3) feared gang violence; or (4) had problems at home.

²³ Neighbors, friends, and other concerned individuals can call the CFSA hotline to report truants.

²⁴ FACES is CFSA's child welfare information system.

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DCPS officials recognize that truancy is often a symptom of a larger issue, such as problems at home, and the agency has developed programs to address the issues. For example, DCPS has a program to provide clothes to homeless students, and DCPS allows students to attend out-of-boundary schools if they do not feel safe attending their neighborhood schools.

Because the reasons for truancy are not routinely tracked, DCPS, other agencies, and community groups cannot determine which current programs need more resources and when additional programs should be developed to effectively address truancy.

Conclusion. Based on our review, we found that DCPS does not effectively capture truancy data. DCPS should track truancy and other related important statistics so that city officials can take appropriate measures to reduce the truancy rate. DCPS also needs to coordinate with other District agencies, such as CFSA and MPD, and determine which statistics need to be captured in order to facilitate the development and implementation of appropriate prevention initiatives for truancy.

RECOMMENDATION

We recommend that the Chancellor, DCPS:

2. Consult with other appropriate District agencies and develop a mechanism to track the number of students picked up by MPD, the number of students referred to CFSA, and other useful statistics that would help the District more effectively address truancy.

DCPS RESPONSE

DCPS does not agree with the recommendation. DCPS states that not all truant students are picked up by MPD, thus reliance on that number to make programmatic or policy determinations would base decisions on incomplete assessment. The true scope of the truancy problem is better assessed using the first source data entered at a classroom level, which captures all student absences and thus can easily provide data regarding all instances of truancy, or unexcused absences, to drive critical action.

Beginning SY11-12, DCPS started implementing a process for central collection of the number of students referred by local schools to CFSA. Prior to calling CFSA, schools must contact their assigned OYE attendance specialists to review due diligence efforts.

In August 2011, DCPS published a new Guide to Student Attendance. This manual, designed for school leaders and school-based attendance staff, provides updated policies and procedure guidance to local schools for attendance programs. In SY11-12, as part of the revised policies and procedures, DCPS established a new Student Attendance Support plan used by local school staff during student attendance interventions. This document includes a section on the root cause of a student's absence. While this root cause information is now

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captured, it is still not easily reported in aggregate to support the types of community-wide planning referenced in the findings. This documentation and reporting requirement was addressed by the South Capitol Street Memorial Amendment Act of 2012 and pursuant to the legislation will be implemented in SY14-15 through the utilization of an expanded district-wide student intervention data system.

OIG COMMENT

DCPS's response is noted and partially meets the intent of the recommendation. We agree that all students are not picked up by MPD and DCPS does not just rely on MPD's numbers for recording truants. Further, we acknowledge that DCPS developed new policies and procedures on attendance entitled "Guided to Student Attendance," dated August 2011. However, the full intent of the recommendation was to ensure DCPS communication with District agencies, such as MPD and CFSA, to track and provide DCPS statistical data of truants to assist DCPS with capturing accurate and complete data of truants.

Accordingly, we request DCPS to revise this response by August 31, 2012, to include the District agencies involved in processing of truants, as well as recording and reporting statistical data involving truancy.

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FINDINGS 3. TRUANCY POLICIES, PROTOCOLS, AND PROCEDURES

SYNOPSIS

In order to effectively address truancy, DCPS needs to revise truancy policies, protocols, and procedures. For example, we believe OSSE's policy requiring DCPS to refer high school students to CSS and OAG when students accumulate 25 unexcused absences needs to be changed because it results in these students missing a significant amount of instruction time. Other urban jurisdictions refer truants to a local child protective agency or local juvenile court system after a lesser number of unexcused absences are accumulated. Further, DCPS needs to include additional information in its protocols and ensure school officials include required and updated information in their school attendance plans. As a result of the current policies, protocols, and procedures, the District may be less successful in reducing the truancy rate, and school officials may not be following consistent procedures for handling truancy.

DISCUSSION

DCPS Truancy Policies. Prior to SY 2010-2011, DCPS school officials referred students to CSS and OAG when students had 15 unexcused absences. However, after OSSE changed the referral requirement in November 2009, DCPS began referring high school students with 25 or more absences to CSS and OAG in SY 2010-2011.²⁵ We believe that increasing the number of absences required before a student can be referred to CSS and OAG is not in the District's best interest. The increased number of required absences results in students missing a significant amount of instruction time before being reported. For example, if a student accumulates 25 unexcused absences in one advisory, 56 percent of the term will have expired before DCPS reports the student to CSS.²⁶ By this time period, it would be difficult for the students to catch up with his/her missed assignments.

Benchmarking Chronic Truancy in Other School Districts. As part of our benchmarking review, we obtained information on chronic truancy from other jurisdictions. We obtained the number of unexcused absences required to consider a student a chronic truant from other public school jurisdictions. Our review consisted of the following six public school districts: 1) Baltimore, MD; 2) Philadelphia, PA; 3) Saint Louis, MO; 4) Atlanta, GA; 5) Boston, MA; and 6) Oakland, CA. Our benchmarking efforts revealed that some of the jurisdictions refer truants to a local child protective agency or local juvenile court system after less unexcused absences are accumulated than DCPS. For example, Baltimore, MD refers students to local

²⁵ See 5 DCMR § A2103.5(c).

²⁶ There are approximately 45 days in a school advisory. If a student misses 25 of the 45 days, this would represent 56 percent of the advisory.

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authorities after 15 unexcused absences, whereas DCPS refers students to CSS after a student accrues 25 unexcused absences within a school year. Chronic truants in some jurisdictions are referred to local juvenile court systems significantly sooner than chronic truants attending DCPS. Out of a 180-day school year, a chronic truant attending DCPS can miss as much as 13% of the school year before an attendance counselor/designee can refer a student to CSS. In some instances the 25th unexcused absence can occur close to the end of the school year, causing CSS to receive many referrals as late as April or May of a school year that ends in July. For this reason, OSSE should consider amending the DCMR to reduce the number of absences before a court referral to a lesser number than 25 unexcused absences. Table 3 below shows the comparison of chronic truant absences of other jurisdictions to DCPS.

Table 3. Chronic Truants in Other School Districts

Jurisdiction	Chronic Truant
Washington, DC (DCPS)	25 Unexcused Absences
Baltimore, MD (BCPS)	15 Unexcused Absences
Philadelphia, PA	10 Unexcused Absences
St. Louis, MO (SLPS)	10 Unexcused Absences
Atlanta, GA (APS)	7 Unexcused Absences
Boston, MA (BPS)	5 Unexcused Absences-Student is referred to truant officer for investigation
	12 Unexcused Absences-Student fails
Oakland, CA (OUSD)	Student is absent from school without a valid excuse for 10% or more of the school days in 1 year, from date of enrollment to the current date

DCPS Truancy Protocols. As required by OSSE, DCPS has developed truancy protocols for public school officials to follow. During our review, we found that the protocols need to be revised to provide additional guidance to school officials.

Monitoring Truants. DCPS' Truancy Protocol (revised on August 3, 2010) does not state what actions school officials must take after secondary students accumulate 15 absences and before they are reported to CSS and OAG. After a student accumulates 10 unexcused absences, school officials are required to refer the students to the Attendance Committee. When a student accumulates between 11-14 absences, school officials are required to continue documenting their absences in STARS and tracking their progress on the attendance intervention plan. The revised Truancy Protocol fails to state what must occur on days 15 through 24. When DCPS revised its protocols to be in compliance with the DCMR requirement for schools to refer students to CSS and OAG after 25 absences instead of 15 absences, DCPS did not include what intervention steps should be followed when students are absent 15 through 24 days. To ensure that schools continue to perform due diligence in monitoring chronic truants, DCPS needs to revise the Truancy Protocol to direct what actions DCPS must take for absences ranging from 15 to 24 days.

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Maintaining Truancy Reporting Forms. DCPS' truancy protocols did not require school officials to maintain the truancy reporting forms that MPD provides when students are brought to school by police officers. Although DCPS did not require schools to maintain the truancy reporting forms, officials at the schools that we visited are maintaining the forms. Some schools file the forms with each student's enrollment file, and other schools file all the forms in a binder. To ensure consistency, DCPS should develop a policy for maintaining the forms, which should also include the length of time that the forms should be retained. Maintaining the forms will allow DCPS to track useful truancy data as discussed in Finding 2.

DCPS School Truancy Procedures. Each year, OYE requires all District public schools to prepare school attendance plans, which include their procedures for following the truancy protocols and the individuals who are responsible for performing tasks. During our review, we found that some school attendance plans did not contain required or correct information, such as the appropriate truancy protocols to follow.

Procedures for Students Picked Up by MPD. DCPS requires school officials to follow certain procedures when students are picked up by MPD; however, some schools did not discuss the procedures for handling these students in their school attendance plans for SYs 2009-2010 and 2010-2011. When a student is picked up by MPD, the school is required to call the student's parents to schedule a meeting and document the call and meeting in DC STARS. Although these procedures are not included in the schools' plans, attendance counselors/designees at the schools that we visited are performing these procedures. However, the procedures need to be documented in the schools' plans to ensure consistency in application among all of DCPS.

Referring Students to CSS and OAG. The school attendance plans for some secondary schools contained incorrect information on the timing of referring students to CSS and OAG. The SY 2010-2011 school attendance plans for Eastern SHS, Coolidge SHS, and Anacostia SHS incorrectly stated that students should be referred in 15 days instead of 25. We believe that these schools had the incorrect number of days in their plans because they did not use the revised school attendance plan template.

Conclusion. Not having specific documented procedures for monitoring truants, maintaining truancy reporting forms, and handling truants picked up by MPD, indicates that existing policies, protocols, and procedures need to be revised to improve the consistency and timeliness in, and effectiveness of addressing problems associated with truancy.

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RECOMMENDATIONS

We recommend that the Chancellor, DCPS:

3. Consult with OSSE to reduce the number of unexcused absences required before school officials refer students to CSS and OAG.

DCPS RESPONSE

DCPS disagreed with the recommendation and indicated that students become chronic truants after 15 unexcused absences instead of 25 as we stated in our report. Also, DCPS officials are required to continue student interventions beyond 15 unexcused absences and to document their efforts. Further, the D.C. Council reviewed the number of excused absences required before school officials refer students to CSS and OAG and reduced that number to 20 unexcused absences beginning with SY14-15.

OIG COMMENT

DCPS's comment is responsive and meets the intent of the recommendation.

4. Revise DCPS' truancy protocols to: (a) require school officials to take some action after secondary students accumulate 15 absences and before they are reported to CSS and OAG; and (b) address the retention of the truancy reporting forms.

DCPS RESPONSE

DCPS agrees with this recommendation and indicated that it is revising the manual to include document retention requirements. This revision will occur during summer 2012, prior to the redistribution of the guide for the 2012-2013 school year.

OIG COMMENT

Our review of DCPS's comments and actions taken is responsive and meets the intent of the recommendation.

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5. Require the DCPS Central Office to review school attendance plans to ensure they address all required procedures and contain updated information.

DCPS RESPONSE

DCPS agrees with this recommendation and will review its current procedures and will determine the appropriate actions needed to improve the school attendance plan review process.

OIG COMMENT

Our review of DCPS's comments and actions taken and planned are responsive and meet the intent of the recommendation; however DCPS did not provide estimated target dates for completing planned action for this recommendation. Thus, we respectfully request that DCPS provide target dates for planned corrective action by August 31, 2012.

**EXHIBIT A: SUMMARY OF POTENTIAL BENEFITS
RESULTING FROM AUDIT**

Recommendation	Description of Benefit	Amount and Type of Benefit	Agency Reported Estimated Completion Date	Status²⁷
1	Internal Control. Ensures schools have adequate staffing resources to comply with truancy procedures and measures designed to reduce the truancy rates.	Non-Monetary	TBD	Open
2	Internal Control. Ensures useful truancy statistics are captured to help reduce truancy rates.	Non-Monetary	TBD	Open
3	Internal Control. Ensures timely court intervention to reduce truancy.	Non-Monetary	TBD	Closed
4	Compliance, Internal Control. Ensures school officials adequately monitor chronic truants and perform consistent procedures for monitoring truants.	Non-Monetary	TBD	Closed
5	Compliance, Internal Control. Ensures school attendance plans include required and updated truancy procedures.	Non-Monetary	TBD	Closed

²⁷ This column provides the status of a recommendation as of the report date. For final reports, “**Open**” means management and the OIG are in agreement on the action to be taken, but action is not complete. “**Closed**” means management has advised that the action necessary to correct the condition is complete. If a completion date was not provided, the date of management’s response is used. “**Unresolved**” means that management has neither agreed to take the recommended action nor proposed satisfactory alternative actions to correct the condition.

EXHIBIT B: DCPS's RESPONSE TO DRAFT AUDIT REPORT



DISTRICT OF COLUMBIA
PUBLIC SCHOOLS

To: Ronald King, Office of the Inspector General,
From: Amoretta Morris, DCPS, Office of Youth Engagement & Sharon Artis DCPS, Office of Compliance
Date: April 13, 2012
Subject: Draft Agency Response to 2009 OIG Audit of the Management of Truancy in DC Public Schools

We have reviewed the findings and recommendations resulting from the 2009 audit of our truancy reduction efforts. We appreciate the opportunity to gain objective feedback about ways to strengthen our approach to this critical issue facing the city.

In general, please note that since the original audit commenced in July 2009, DCPS has made much progress in our attendance and truancy reduction efforts. The same month the audit began, DCPS hired a director of student attendance within the Office of the Chief Academic Officer. This new director-level position dedicated to strengthening district-wide attendance monitoring and improvement has allowed the agency to identify gaps in existing practice and innovate in multiple areas including ones noted in these findings. Evidence of the success of these advances can be found in the District's attendance performance report for the past two years. From the conclusion of SY08-09 to SY10-11, the district's truancy rate declined by 40% dropping from 20% in SY08-09 to 15% in SY09-10 and declining again to 12% in SY10-11.³

We expect to continue that progress by maintaining high expectations for our students, parents and school staff; continuing our relentless focus on data-driven decisions; and, strengthening school-based capacity to support high quality intervention when students are absent.

Please find responses to specific findings and recommendations below.

OIG Audit Finding 1: Attendance Staff

OIG Audit Recommendation 1: Ensure schools have adequate staffing resources to combat truancy by requiring the DCPS Central Office to work collaboratively with school principals to identify the appropriate number of attendance staff for each school.

DCPS' Response to Audit Finding 1:

The district's year end attendance data is available here:

<http://dcps.dc.gov/DCPS/About+DCPS/Who+We+Are/Facts+and+Statistics>

EXHIBIT B: DCPS's RESPONSE TO DRAFT AUDIT REPORT



DCPS continues to work diligently with the Mayor and the Council to ensure the effective allocation of limited public resources to support student success. During the last several years, we have continued to increase the percentage of the agency-wide budget that is dedicated to local school staffing and direct supports for students. As part of the annual local school budget development process, central office program staff and instructional superintendents meet with principals to identify the appropriate number of staff needed to meet all instructional and student support functions. In addition to in-person meetings and technical assistance, the school budget guide provided to principals each year also includes guidance regarding the roles of various school functions to be supported within their staffing structure including the critical role of attendance intervention.

Additionally, DCPS is an active member of the interagency Citywide Truancy Taskforce. While we have made great progress in reducing truancy the last two years, some secondary schools are not able to implement the policy with fidelity due to the high volume of students requiring intensive intervention and limited staff and time resources. Thus, we have worked with the Citywide Truancy Taskforce and other s to develop agency and non-profit partnerships to provide student and family interventions at the 5th unexcused absence to supplement efforts at targeted schools. Our priority with our partnerships is to build comprehensive high schools' capacity for early intervention and case management of truant students, especially students with 5 unexcused absences. In particular, our work this year with the Taskforce has focused on the two highest need high schools – Ballou and Anacostia – and two of their feeder middle schools- Kramer and Johnson – in Ward8.

Key agency and non-profit partnerships include:

Partnership	Description/Staffing	Partners
Interagency Truancy Reduction Initiative	Intensive case management for a cohort of 9 th graders – first time and repeating- who were chronically truant the previous year. Case management services are provided by the Far Southeast Family Support Collaborative for the first-time 9 th graders and the school-based attendance counselors for the repeating 9 th graders. FSFSC case managers and school attendance counselors conduct home visits with students and their families, complete family assessment (including other school-age siblings) to identify root cause of students truancy and other family needs, develop Attendance Support Plans for SY11-12 and continue case management support to ensure students and families connect to identified services and resources.	Citywide Truancy Taskforce, CFSA, Far Southeast Family Strengthening Collaborative
Byer Model Truancy Court Program	Weekly mock court session held with truant students and their parents. Volunteer DC Superior Court judges host sessions for 10 weeks including both group activities and individual meetings. Collaborative family service workers conduct home visits, complete family assessments and	Citywide Truancy Taskforce, CFSA, Far Southeast

EXHIBIT B: DCPS's RESPONSE TO DRAFT AUDIT REPORT



	provide on-going case management to ensure students and families are connected to necessary resources. The Kramer program began in January. The Johnson MS program will begin late-February.	Family Strengthening Collaborative, Criminal Justice Coordinating Council
Truancy Intervention Partnership (TIP-DC)	Volunteers from Alston & Bird law firm mentor students who have been truant at Shaw MS and Eliot-Hine MS	TIP-DC
DHS Parent & Adolescent Support Services (PASS) program	DHS PASS staff provide case management for truant students at Spingarn SHS	DHS

OIG Audit Finding 2: Truancy Data

OIG Audit Recommendation 2: Consult with the other appropriate District agencies and develop a mechanism to track the number of students picked up by MPD, the number of students referred to CFSA, and other useful statics that would help the district more effectively address truancy.

DCPS Response to Audit Finding 2:

The report incorrectly notes that the lack of a central data repository for MPD pickups prevents DCPS from “determining the severity of problems and implementing programs to reduce truancy.” DCPS maintains a robust attendance data collection system. Student attendance is entered daily and tracked through DC STARS, the data system of record. DCPS adopted DC STARS as the central attendance data collection system in the 2004-2005 school years. DC STARS has the capability to generate reports that provide statistical analysis and trend data at a student, school or district-level. The Office of Youth Engagement and the Office of Data and Accountability routinely provide analysis of attendance trends and correlation with other key data points including academic achievement for internal and external stakeholders to drive decision-making and identify where resources must be targeted.

Not all truant students are picked up by MPD. Thus to rely on that number to make programmatic or policy determinations would base decisions on incomplete assessment. As reflected in the finding, school staff does document truancy pick-ups in the notes section of the DC STARS data system. However, the true scope of the truancy problem is better assessed using the first source data entered at a classroom level which captures all student absences and thus can easily provide data regarding all instances of truancy, or unexcused absences, to drive critical action.

Beginning SY11-12, DCPS implemented a process for central collection of the number of students referred by local schools to CFSA. As noted in the DCPS Truancy Protocol attached, prior to calling CFSA, schools must contact their assigned OYE attendance specialists to review due diligence efforts. A new

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educational neglect reporting form was developed and at the conclusion of the call, all schools submit a copy of these forms to OYE. These referrals are documented at this time. And, while it is correct that DCPS does not track the results of CFSA investigations, this is not due to a deficiency in our data collection systems. It is because local and federal child welfare protocols and confidentiality laws prevent CFSA from reporting the results of investigations to the original reporter – whether private citizen or school official.

In August 2011, DCPS published a new Guide to Student Attendance. This manual, designed for school leaders and school-based attendance staff, provides updated policies and procedures guidance to local schools for attendance programs. In SY11-12, as part of the revised policies and procedures, DCPS established a new Student Attendance Support plan used by local school staff during student attendance interventions. (See p.57 of the attached guide.) This document includes a section on the root cause of a student's absence. While this root cause information is now captured, it is still not easily reported in aggregate to support the types of community-wide planning referenced in the findings. This documentation and reporting requirement was addressed by the South Capitol Street Memorial Amendment Act of 2012 and pursuant to the legislation will be implemented in SY14-15 through the utilization of an expanded district-wide student intervention data system.

OIG Audit Findings 3: Truancy Policies, Protocols and Procedures

OIG Audit Recommendation 3: Consult with OSSE to reduce the number of unexcused absences required before school officials refer students to CSS and OAG.

DCPS' Response to Audit Finding 3:

In the findings, Table 3 misstates the number of unexcused absences that define a student as a chronic truant. In DCPS, chronic truancy is defined by 15 unexcused absences. Notably, the definition of chronic truancy and the benchmark at which a student is eligible for referral to CSS or OAG are not the same thing. The chart appears to capture the latter for multiple jurisdictions so this issue could be resolved by simply relabeling the second column of the chart to more accurately describe its contents.

It is an incorrect assumption that school officials are not required to take action after secondary students become chronically truant at 15 unexcused absences. Attempted student interventions do not end after that day. The truancy protocol only highlights critical benchmark dates in which a new action is mandated. Schools are required to continue intervention efforts and document them even after 15 unexcused absences.

Additionally, DC Council reviewed the number of excused absences required before school officials refer students to CSS and OAG and reduced that number to 20 unexcused absences beginning with SY14-15.

EXHIBIT B: DCPS's RESPONSE TO DRAFT AUDIT REPORT



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This legislative action was included in the passage of the South Capitol Street Memorial Amendment Act of 2012.

OIG Audit Recommendation 4: Revise DCPS' truancy protocols to: (a) require school officials to take some action after secondary students accumulate 15 absences and before they are reported to CSS and OAG; and (b) address the retention of the truancy reporting forms.

DCPS' Response to Recommendation 4:

The new Guide to Student Attendance, referenced earlier, clearly outlines the procedures for processing MPD pickups. As correctly noted in the findings, the policies do not include direction regarding where school staff should keep 379-T's (the copy of the MPD form left with the school) or how long those forms must be held on record. DCPS will revise the manual to include document retention requirements. This revision will occur during Summer 2012 prior to the redistribution of the guide for the 2012-2013 school years.

OIG Audit Recommendation 5: Require the DCPS Central Office to review school attendance plans to ensure they address all required procedures and contain updated information.

DCPS' Response to Recommendation 5:

DCPS will review its current procedures and will determine the appropriate actions needed to improve our school attendance plan review process.