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May 6, 2020

Ms. Shannon Tahoe
Interim Commissioner
State Education Department
State Education Building
89 Washington Avenue
Albany, NY 12234

Re: Oversight of Chronic Absenteeism
Report 2019-F-57

Dear Ms. Tahoe:

Pursuant to the State Comptroller's authority as set forth in Article V, Section 1 of the State Constitution and Article II, Section 8 of the State Finance Law, we have followed up on the actions taken by officials of the State Education Department to implement the recommendations contained in our audit report, *Oversight of Chronic Absenteeism* (Report [2017-S-52](#)), issued on September 18, 2018.

Background, Scope, and Objective

Chronic absenteeism is a widespread problem, defined by the State Education Department (Department) as a student missing at least 10 percent of enrolled school days. Student absences attributed to factors like poor school performance, bullying, and unwelcoming school climates increase students' risk for disengagement, low achievement, and dropout, among other issues. Additionally, research shows that homelessness is a significant contributing factor to whether a student may be chronically absent. Researchers have estimated that the rate of chronic absenteeism for homeless students is at least twice that for the overall student population.

Traditionally, districts have collected and reported attendance data using average daily attendance (ADA), which measures the average number of students who are typically present each day. However, ADA does not identify some students who miss a significant number of days of school. By contrast, chronic absenteeism emphasizes individual student attendance by tracking missed instructional time, which takes into account both excused and unexcused absences, to identify at-risk students who may otherwise be overlooked. School districts and other local education agencies (LEAs), such as charter schools and Boards of Cooperative Educational Services (BOCES), report student daily attendance information, which the Department uses to calculate chronic absenteeism rates.

Schools, districts, and other LEAs also maintain their own attendance information. As of June 2018, there were approximately 2,620,000 K–12 public school students enrolled in New York State's 732 public schools, which represents a decrease of 10,000 students from the

previous school year. Nationally, 7 million students (about 1 of every 6 students) missed 15 or more days of school in the 2015-16 school year. That translates to approximately 105 million school days lost. According to Department figures, about 18 percent of students in New York State's public schools were considered chronically absent during the 2017-18 school year.

Our initial audit report, which covered the period April 1, 2014 through April 24, 2018, determined whether the Department had taken actions to address chronic absenteeism within New York school districts. We found that the Department had taken steps to address chronic absenteeism in New York school districts by:

- Encouraging school personnel to track student absenteeism through the certification process outlined in the Department's Student Information Repository System (SIRS) Manual.
- Communicating with the school districts and LEAs, which is coordinated through the efforts of the Department's Information and Reporting Services (IRS) unit and Office of Accountability (OA).
- Conducting monthly meetings and weekly calls with Regional Information Centers (RICs), where guidance is provided in the development of strategies to increase student engagement and reduce chronic absences.

The Department had also incorporated chronic absenteeism into its Every Student Succeeds Act (ESSA) plan as one of several factors that measure school climate and quality. However, according to Department officials, their efforts to address chronic absenteeism were still relatively new and involved implementation and improvements over an extended period of time. Based on our review of chronic absenteeism data and policies and procedures at a sample of school districts, we identified certain risks that could adversely impact the Department's chronic absenteeism initiatives. For example, we identified discrepancies in attendance data between the Department's system and data provided by some schools.

The objective of our follow-up was to assess the extent of implementation, as of April 10, 2020, of the five recommendations included in our initial audit report.

Summary Conclusions and Status of Audit Recommendations

We found that the Department has implemented the five recommendations from our initial audit report.

Follow-Up Observations

Recommendation 1

Take steps to ensure that students' school attendance data in the Department's system accurately reflects the data reported by school districts and LEAs.

Status – Implemented

Agency Action – The Department has taken steps to ensure the attendance data in its system accurately reflects the data reported by school districts and LEAs. The specific actions are as follows:

- On March 27, 2019, Department officials issued a memo titled *Accurately*

Reporting Attendance and Chronic Absenteeism Data. The memo contains guidance on the proper way to record absences as well as a listing of Department reports to assist schools in verifying the accuracy of data submitted in SIRS. The memo was reviewed by RIC staff and discussed during the weekly RIC call.

- The OA has created protocols to ensure monitoring of the data's accuracy.
- The Department uses the Level 2 Reporting System (L2RPT) to monitor absenteeism data.

Recommendation 2

Provide clear guidance to school districts on how to set up local attendance codes that will translate the correct data to the Department's attendance system.

Status – Implemented

Agency Action – The Department provided its March 27, 2019 memo, which contains guidance on reporting absenteeism, to BOCES district superintendents, superintendents of school districts, principals of public schools, and charter school leaders. Specifically, the memo explains the difference between chronic absenteeism and truancy. It clarifies that chronic absenteeism relates to missed instructional time while truancy focuses exclusively on unexcused absences. While local districts may track school-affiliated excused absences for events such as field trips, assemblies, and college fairs for record-keeping purposes, the memo indicates these types of absences are not to be included in the chronic absence data provided to the Department. The memo also instructs districts to ensure an accurate mapping of State attendance codes collected in SIRS to the local attendance codes used in district (or school) student management systems that maintain attendance records.

Recommendation 3

Work with school districts to develop guidance for certifying chronic absenteeism data.

Status – Implemented

Agency Action – The certification process outlined in SIRS is communicated to the school districts and LEAs through the coordinated efforts of the Department's IRS unit and OA. The March 27, 2019 memo contains a reminder of the appropriate process to follow. The IRS unit compiles the certified data from the schools, and the OA reviews this data to determine whether school districts need assistance with their compliance efforts.

Recommendation 4

Ensure communications to school districts and LEAs contain sufficient detail outlining expected actions to address chronic absenteeism.

Status – Implemented

Agency Action – The March 27, 2019 memo contains detailed information to guide school districts with the proper reporting of absenteeism. The memo also contains contact information should districts have questions about these procedures. The Department

also issues a quarterly newsletter, which includes reminders and contact information. The newsletter is used to communicate changes to school districts and LEAs. A specific example is the February 2019 issue, which discussed changes and updates to ESSA as well as ways to reduce chronic absenteeism. Finally, the OA conducts weekly conference calls with the RICs to address specific concerns they identified in their oversight efforts.

Recommendation 5

Monitor school districts' and LEA efforts to address chronic absenteeism; identify and share best practices.

Status – Implemented

Agency Action – The OA monitors school districts' efforts to address chronic absenteeism and also shares identified best practices. Department officials documented the monitoring process in their Chronic Absenteeism Accountability and Support Structures. These procedures include the formulas used to assign chronic absenteeism levels, the corrective actions that both the Department and the schools need to take, and the measures of interim progress. The document contains:

- Details on the most current accountability indicators under ESSA,
- The procedures for calculating chronic absenteeism (including the baseline, long-term goal, measure of interim progress, and priority level based on the school's ability to reach the required goal),
- The different school categories (based on priority level),
- The level of support (provided either federally or from the Department) needed for each one to reduce chronic absenteeism, and
- The requirements each school must fulfill based on their priority level.

Major contributors to this report were Ed Durocher, Peter Carroll, Kathy Garceau, Jacqueline Keeys-Holston, and Lisa Whaley.

We thank the management and staff of the Department's Office of Student Support Services for the courtesies and cooperation extended to our auditors during this review.

Very truly yours,

Mark Ren
Audit Director

cc: Sharon Cates-Williams, State Education Department
James Kampf, State Education Department
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