Thomas P. DiNapoli
COMPTROLLER

OFFICE OF THE
NEW YORK STATE COMPTROLLER

DIVISION OF STATE
GOVERNMENT ACCOUNTABILITY

STATE EDUCATION DEPARTMENT

ACCURACY OF GRADUATION AND DROPOUT DATA IN ANNUAL REPORT CARDS FOR SELECTED HIGH SCHOOLS

Report 2008-S-45

AUDIT OBJECTIVES

Our first objective was to determine if report cards issued by the State Education Department showing selected high school graduation and dropout-related data were accurate. Our second objective was to determine if the Department has sufficient controls in place to ensure schools provided accurate information for the report cards.

AUDIT RESULTS - SUMMARY

The Department is responsible for reporting high school graduation and dropout rates to the public. To do this, the Department publishes an annual report card for each public high school in the State.

We found that the graduation rates reported by 2 of the 12 schools we audited were inaccurate by more than 5 percentage points. Dropout rates were inaccurate by more than five percentage points in four schools. We also found that, while the Department has some controls in place to ensure the accuracy of the information on the report cards, these controls are not sufficient.

To determine if report cards are accurate, we reviewed the report cards that were released on April 25, 2007 which covered the 2005-06 school year and compared the reported graduation and dropout rate information to student files at 12 high schools. In total, we reviewed 3,667 student files. Our audit found that the graduation rates on the report cards for 2 of the 12 schools we tested were overstated by more than 5 percentage points. The largest difference was found in Corcoran High School, which reported their graduation rate as 50 percent when the actual graduation rate was 41 percent. Similarly, we found that 4 of the 12 schools understated the dropout rate by more than five percentage points. The largest difference was found in Rochester's

John Marshall High School which reported its dropout rate as 24 percent whereas the audited rate was 44 percent.

The major types of errors we found were that schools were removing students from the calculations because of undocumented transfers, classifying students as transfers to a GED program when there was no evidence the student actually enrolled in such a program and not including otherwise eligible students in the calculations. As a result, the report cards understated the number and percentage of dropouts and overstated the percentage of graduates for some of the schools we reviewed. The detailed results of our audit are summarized in Exhibits A and B.

The Department is responsible for implementing reasonable controls to provide some assurance that the schools accurately report the status of students prior to the release of report cards. We determined that the Department does have some controls in place, but they need to be improved to prevent the problems we found at several of the 12 schools we visited.

Our report contains seven recommendations to improve the accuracy of reporting high school graduation and dropout-related information to the Department and the public. Department officials generally agreed with our report's recommendations, and indicated steps they have taken or will be taking to implement them.

This report dated March 26, 2009, 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, 11th Floor
Albany, NY 12236

BACKGROUND

The No Child Left Behind Act of 2001 (Act) requires that public schools report performance information to the public. Under the Act, the New York State Department of Education (Department) reports high school graduation rates to the public through an annual report card for each public high school in the State. The report cards include summary information for students at each high school such as the number and percentages of students who graduated, dropped out, earned an Individualized Education Program (IEP) diploma (e.g., special education students), or transferred to a General Educational Development (GED) program (e.g., a high school equivalency preparation program). The report card enables parents to see the data for their children's school and how it compares to other schools in the State.

The report cards are prepared based on information furnished by the schools to one of the 14 Regional Information Centers (RICs). The RICs feed demographic, enrollment, assessment and other information into the Department's Student Information and Repository System (System). The information on the System can be reviewed by school district personnel through a website tool, the New York Statewide Testing and Accountability Reporting Tool or NYSTART. NYSTART allows school officials to verify that data for their school was uploaded into NYSTART and to view their report cards before they are made public. The Department requires each school district superintendent to review the information in NYSTART and certify a verification report that the information is accurate prior to the release of the report card.

The Department's System for Tracking Education Performance Manual (Manual) specifies the definitions schools should use when classifying students as graduates, dropouts and transfers and the student documents the school must retain. The Manual contains definitions and guidance on classifying students that are designed to produce uniform results from one school district to the next school district. Among the key definitions contained in the Manual are those for classifying students in order to measure the graduation rates. The Manual defines student classifications as follows:

- Graduates - students who were awarded credentials as of June.

- Dropouts - students who left school prior to graduation for any reason except death or leaving the country and have not been documented to have entered another school or program leading to a high school diploma or a program leading to a high school equivalency diploma.

- Still Enrolled - students who were still enrolled in high school.

- GED - students who transferred into a high school equivalency diploma program.

- IEP - students who earned an IEP diploma.

In 2006-2007, the State had more than 2.7 million students attending public school. Currently, there are 698 school districts in the State.

AUDIT FINDINGS AND RECOMMENDATIONS

Accuracy of Report Cards

Each year the Department is required to release report cards for each public school showing the school's graduation rate. To develop uniform graduation rates, the Manual states that the school should start with measuring a fixed cohort of students at the start of their freshman year and then follow the students through the next four years. The school should make certain adjustments to the cohort, based upon an event such as when it is confirmed that a student has transferred to another school.

At the end of the four years, the school should account for the disposition of all students that started in the cohort and students that were added to or removed from it during the next four years. The Manual provides very specific guidance for schools to follow when classifying the disposition of students. This guidance is designed to ensure that graduation rates and dropout rates are measured uniformly across the State's nearly 700 school districts. It is critical that school district and Department officials have uniform, accurate performance data to use as the basis for their decision making.

The two key statistics in the report card related to student performance are the graduation rate and the dropout rate. To determine if the 2005-06 graduation rate information on the report cards was accurate for the 12 schools we visited, we reviewed the report cards that were released on April 25, 2007, the student files for the freshman cohort for the 2002-2003 school year and other students added to or removed from the cohort, as well as other reports. We then computed the graduation rates using the methods prescribed by the Department. Our audit found that the graduation rates for 10 of the 12 schools were generally accurate (within 5 percentage points). However, the graduation rates were inaccurate by more than 5 percentage points in the remaining two schools. The following table shows the reported graduation rate and the audited graduation rate for all 12 schools. The schools are listed alphabetically by district.

School District	High School	Graduation Rate Percentage		Percentage Point Difference
		Reported	Audit	
Buffalo City School District	Emerson School of Hospitality	56%	56%	0
	Hutchinson Central Technical High School	84%	86%	2%
	McKinley Vocational High School	73%	66%	(7%)
Broadalbin-Perth Central School District	Broadalbin-Perth High School	86%	86%	0
Central Islip Union Free School District	Central Islip Senior High School	62%	57%	(5%)
Chenango Forks Central School District	Chenango Forks High School	84%	83%	(1%)

School District	High School	Graduation Rate Percentage		Percentage Point Difference
Lake George Central School District	Lake George Junior-Senior High School	97%	92%	(5%)
Rochester City School District	John Marshall High School	39%	36%	(3%)
Syracuse City School District	Corcoran High School	50%	41%	(9%)
West Irondequoit Central School District	Irondequoit High School	86%	86%	0
Yonkers City School District	Saunders Trade and Technical High School	87%	85%	(2%)
	Yonkers High School	97%	94%	(3%)

We also computed the dropout rate using the Department's guidance. Similar errors were found in the dropout rates reported by the schools. The dropout rate is an important statistic because it accounts for students that have not completed high school and are considered to be no longer pursuing their education. Similar to our findings on the graduation rates, we found that 8 of the 12 schools generally reported their dropout rates accurately. However 4 of the 12 schools made errors of more than 5 percentage points in computing their dropout rates. The following table shows the dropout rates for the 12 schools we audited. The schools are listed alphabetically by district.

School District	High School	Dropout Rate Percentage		Percentage Point Difference
		Reported	Audit	
Buffalo City School District	Emerson School of Hospitality	7%	7%	0
	Hutchinson Central Technical High School	4%	4%	0
	McKinley Vocational High School	13%	27%	14%
Broadalbin-Perth Central School District	Broadalbin-Perth High School	8%	9%	1%
Central Islip Union Free School District	Central Islip Senior High School	15%	22%	7%
Chenango Forks Central School District	Chenango Forks High School	7%	11%	4%
Lake George Central School District	Lake George Junior-Senior High School	1%	1%	0
Rochester City School District	John Marshall High School	24%	44%	20%
Syracuse City School District	Corcoran High School	18%	37%	19%
West Irondequoit Central School District	Irondequoit High School	0	5%	5%
Yonkers City School District	Saunders Trade and Technical High School	3%	5%	2%
	Yonkers High School	0	3%	3%

Types of Errors Identified

There were two common types of errors we found in our review of the graduation and dropout rates. We found that some schools removed or added students to the original cohort of students inappropriately. When students are removed from the cohort incorrectly, it generally results in the graduation rate being overstated because the number of graduates is divided by a smaller number. In other cases, the students were placed into the GED or still enrolled category when they should have been placed into the dropout category.

When developing the measurement system for the graduation rates (and by default the related dropout rate and other categories), the Department provided explicit instructions as to how the original cohort of students should be identified for measurement purposes and under what circumstances it can be modified. The Manual also states the specific documentation that schools must have for each disposition.

Our audit found that five of the schools were not adhering to these guidelines and removing students from the cohort inappropriately as shown in the following chart.

High School	Students in Cohort		Difference	Percentage Increase
	Reported	Audit		
Central Islip	392	425	33	8%
Corcoran	368	441	73	20%
John Marshall	256	303	47	18%
McKinley	269	299	30	11%
Saunders	280	296	16	6%

Student files did not always include reasons why students were not on the report card. For example, we found 36 students at John Marshall High School who started 9th grade in 2002-03, but were not in the cohort and had no documentation or inadequate documentation to support why the student left the school. Therefore, we determined the students to be dropouts. One reason why the cohort numbers differed so significantly at two of the schools is student files were missing for a significant number of students (101 files at Corcoran High School and 53 files at John Marshall High School) that were in the cohort or on school rosters. We asked the school districts to search for the missing files, but they could not provide us with the files. However, they did provide us with some documents from their student management systems.

The second common type of error that we identified was in classifying students in one category that should have been in another, such as a student coded as a GED or still enrolled that should have been a dropout. For example, at McKinley High School 34 students were reported as still enrolled, but we found nine should have been dropouts and one should have been reported as a graduate. Similarly, 79 students were reported as still enrolled at Central Islip but we found 15 should have been coded as dropouts. The results of our audit are summarized in Exhibits A and B.

In response to our findings, some school officials told us they were not aware of the records required to be retained for each student status or how long the records had to be retained. In fact, when we visited Corcoran High School, we found that a school district official at the building where student

files are stored was in the process of purging student records which the school was required by law to keep. Some school officials also told us resources are not available to ensure that timely follow-up will be done on every transferred student to determine if they actually enroll in another school. For example, at Yonkers High School we initially found that 31 students were coded as transferred to another school, but student files did not contain the required documentation. In response, Yonkers officials contacted the schools they believed the students transferred to and were able to obtain and provide adequate documentation for 28 of the 31 students coded as transfers.

Since certain schools and school districts did not report the correct number of students, parents and the public did not receive accurate graduation rates and other important student information for these schools.

Recommendations

1. Follow-up with schools to resolve the discrepancies noted above, and update the System, as appropriate.

2. Remind schools of documentation retention requirements.

Department Controls

The Department is responsible for implementing reasonable controls to provide some assurance that the schools accurately report the status of students prior to the release of report cards. To do this, the Department should provide appropriate guidance for schools to track students and how to report the information. We found the Department did have some controls in place, but they are not enough since we identified reporting deficiencies at some schools we visited.

We found the Department provided extensive guidance to schools relating to reporting the status of students in the System. For example, the Manual is available to high school and district staff on the Department's website. The Department also provided training on the new student information system in 2006, and conducts semi-annual videoconferences and weekly telephone meetings to provide information to school districts and the organizations that maintain the System for the school districts. The Department also provides a dedicated email box to provide consistent responses to field questions. However, we found some high school staff that maintain student files and determine the status of students were not familiar with the Manual, how to determine a student's proper status or the records required to be maintained for each status.

We also found the Department's system to monitor the accuracy of reported data prior to the release of the report cards is insufficient. For example, while the Department requires school district officials to certify the information provided in the System is accurate, it does not prevent inaccurate information from being entered. In fact, of the nine school districts we visited, two had reported inaccurate graduation rates although they had all submitted a certification. These weaknesses increase the risk that schools could inaccurately report student graduation and dropout information, resulting in the public not receiving the correct information on schools.

Department officials said they rely on school district audits to monitor school district reporting of student graduations. Therefore, we reviewed the school district audits done by the Department's Office of Audit Services. During the period July 1, 1996 to May 18, 2006, Audit Services issued 26 audit reports of school districts. Of the 26 audits, 14

included reviews of school district reporting of the status of students. One of the Department's audits visited a school in the same district we audited and identified a similar finding.

Department officials told us they recently developed new monitoring reports to identify and correct errors in student's status, and are working with trainers to develop new training materials that will be shared with districts by the end of 2008. The reports, which are based on each student's unique identification number assigned by the Department, are as follows:

- Simultaneous enrollment - identifies instances where the same unique student identification number is associated with enrollments in more than one district during the same time period.

- False dropouts - identifies students who were reported as dropouts by one district, but the student is subsequently enrolled in another district.

- Missing students - identifies instances where a student has not been reported as ending enrollment in a district during one school year, but is not reported as enrolled in the same district in the following school year.

These reports will be shared with the affected districts for review and corrective action. We believe these reports will help to identify and eliminate errors in school district reporting.

We note that officials at several school districts we visited told us that they could not follow up on all transfers because they had a large transient population. We believe this is a valid issue. We suggested to Department officials they add another report to identify students who were reported by high schools as transferred to another school yet have not shown up on another school's roster as enrolling. Such students should be reported as dropouts instead. Department officials told us they would implement such a report and a report to verify that students reported as transferring to a GED program actually enroll in one.

We also found the Department does not have a process to analyze the data reported by school districts to determine if a school's student statistics are much higher or lower than comparable schools. Such statistics could include an unusually high percentage of transfers to other school districts, an exceptionally high number of graduates, or very few dropouts. For example, three schools in our sample (Lake George, Yonkers High School, and Irondequoit) reported one or no dropouts. For one of the three schools (Irondequoit), we found that there were actually 18 dropouts (five percent of the cohort). Without a data analysis process in place, the Department cannot identify such cases and take action to determine if the information is accurate before the report card is released to the public. If the Department identified questionable data, it could ask the school district to recheck the accuracy of the data and report back on the results, and remind the district of documentation requirements. The Department could also refer questionable data to Audit Services to determine if an audit of the data is warranted. Because such a process does not exist, potential discrepancies are not identified promptly for follow-up action.

Department officials told us that they are implementing additional initiatives to improve student data accuracy including system edits to prevent incorrect data from being entered and reasonability checks. They are also developing a plan and requesting a

grant to fund the use of data stewards to review school district data as it comes in and review it for reasonability based on historical data.

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Recommendations

3. Require school districts to have all employees responsible for maintaining student files and determining the status of students trained in the Manual's requirements.

4. Remind school district superintendents to review data for their students prior to signing the certification.

5. Implement a system to analyze graduation rate data submitted by school districts for reasonableness, and follow-up on questionable data with the school district.

6. Based on our findings and those in the school district audits, determine the need for future audits of school district reporting of graduation and dropout rates, as resources permit.

7. Develop a new report to identify false student transfers and determine the proper status.

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AUDIT SCOPE AND METHODOLOGY

We audited the Department to determine if report cards were accurate and if the Department has sufficient controls in place to ensure schools provided accurate information for the report cards. Our audit period was from September 1, 2002 through August 31, 2008.

To accomplish our objectives, we focused our audit on students who entered the 9th grade for the first time in the 2002-03 school year at any school, or was an ungraded student who turned 17 during the 2002-03 school year, and the status of the student after four years. Specifically, we reviewed graduation rates for those entering school in the 2002-03 school year. Students excluded from this category include those who transferred to a school in another district or state, students who left the United States and its territories, and students who died.

We reviewed the Department's student performance reporting requirements for high schools and selected a judgmental sample of 12 high schools in nine school districts, excluding high schools in New York City. We based our selection on the level of graduation rates reported, school size, and geographic location. We attempted to select a cross section of schools that reported high, average and low graduation rates, schools located in different regions of the State, and urban, suburban and rural schools. At each school we reviewed the student's cumulative file folders to determine if they were reported correctly as graduates or dropouts. We reviewed a total of 3,667 student file folders at the 12 schools. We then compared what we found in the student's file folder to what was reported as the exit code for the student.

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 objectives.

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 II, Section 8 of the State Finance Law.

REPORTING REQUIREMENTS

A draft copy of this report was provided to Department officials for their review and comment. Their comments were considered in preparing this final report and are included as Appendix A. Department officials generally agreed with our report's recommendations, and indicated steps they have taken or will be taking to implement them.

Within 90 days of the final release of this report, as required by Section 170 of the Executive Law, the Commissioner of the Department shall report to the Governor, the State Comptroller, and the leaders of the Legislature and fiscal committees, advising what steps were taken to implement the recommendations contained herein, and where recommendations were not implemented, the reasons therefor.

CONTRIBUTORS TO THE REPORT

Major contributors to this report include Steven Sossei, Brian Mason, Steve Goss, Theresa Podagrosi, Emily Wood, Taryn Davila-Webster, and Sue Gold.

Comparison of the Number of Reported Graduates to Audited Graduates								
	Students Starting 9th Grade Fall 2002			Graduated in Four Years					
								Amount Understated (Overstated)	
	Report Card	Audit	Difference	Report Card		Audit			
School				Number	Percent	Number	Percent	Number	Percent
Broadalbin-Perth High School	159	160	1	137	86	137	86	0	0
Central Islip Senior High School	392	425	33	242	62	242	57	0	(5)
Chenango Forks High School	164	161	(3)	138	84	133	83	(5)	(1)
Corcoran High School	368	441	73	184	50	180	41	(4)	(9)
Emerson School of Hospitality	59	59	0	33	56	33	56	0	0
Hutchinson Central Technical High School	277	274	(3)	234	84	236	86	2	2
Irondequoit High School	360	366	6	311	86	313	86	2	0
John Marshall High School	256	303	47	101	39	108	36	7	(3)
Lake George Junior-Senior High School	87	91	4	84	97	84	92	0	(5)
McKinley Vocational High School	269	299	30	197	73	198	66	1	(7)
Saunders Trade and Technical High School	280	296	16	244	87	251	85	7	(2)
Yonkers High School	154	159	5	150	97	150	94	0	(3)

Comparison of the Number of Reported Dropouts to Audited Dropouts								
	Students Starting 9th Grade Fall 2002			Dropouts After Four Years					
								Amount Understated (Overstated)	
School	Report Card	Audit	Difference	Report Card		Audit			
				Number	Percent	Number	Percent	Number	Percent
Broadalbin-Perth High School	159	160	1	13	8	14	9	1	1
Central Islip Senior High School	392	425	33	60	15	95	22	35	7
Chenango Forks High School	164	161	(3)	11	7	17	11	6	4
Corcoran High School	368	441	73	68	18	165	37	97	19
Emerson School of Hospitality	59	59	0	4	7	4	7	0	0
Hutchinson Central Technical High School	277	274	(3)	11	4	12	4	1	0
Irondequoit High School	360	366	6	1	0	18	5	17	5
John Marshall High School	256	303	47	61	24	133	44	72	20
Lake George Junior-Senior High School	87	91	4	1	1	1	1	0	0
McKinley Vocational High School	269	299	30	36	13	80	27	44	14
Saunders Trade and Technical High School	280	296	16	9	3	16	5	7	2
Yonkers High School	154	159	5	0	0	5	3	5	3

THE STATE EDUCATION DEPARTMENT / THE UNIVERSITY OF THE STATE OF NEW YORK / ALBANY, NY 12234

PRESIDENT OF THE UNIVERSITY
AND COMMISSIONER OF EDUCATION

January 30, 2009

Mr. Steven E. Sossei
Audit Director
Office of the State Comptroller
Division of State Government Accountability
110 State Street, 11th Floor
Albany, New York 12236

Dear Mr. Sossei:

The following are the Department's responses to the Office of the State Comptroller's draft audit report (2008-S-45) on the Accuracy of Graduation and Dropout Data in Annual Report Cards for Selected High Schools.

The audit covered the school year 2005-06. Several years ago, we recognized the need to upgrade the data system significantly. For that reason, we created a new high school data repository and a unique ID for every student, implemented a variety of electronic checks to reduce the possibility of errors in the data submitted by school districts, and last year moved all high school data into the repository. We are in the midst of major advances in data collection and reporting, organizationally and technologically, all of which will foster timely and accurate data collection and reporting. We will implement still more checks during this coming year.

As you note in the audit, it needs to be emphasized that the data audited (for the school year 2005-06) was submitted prior to the transition to the statewide high school data repository and the creation of the data checks cited here. While transitions to new systems are never easy, we believe that many of the identified issues are being addressed by school districts.

Some of the major improvements include:

- Alerting districts of possible errors based on inconsistent data and significant changes in data from year to year;
- Electronic checks for the reasonability of data;
- Electronic checks to help eliminate "false dropouts" and "false transfers;"

- Restructuring the data system to allow districts to see and review edited data earlier in the process;
- Continuing to expand communication and training using technology to help to address resource limitations.

Thank you for recognizing that "the Department provided extensive guidance to schools relating to reporting the status of students in the System." Nonetheless, we recognize that more needs to be done since some school administrators were not familiar with all of the key requirements for reporting. We are working on an expanded system of training.

Below you will find our responses to the recommendations contained in the draft audit:

Recommendation 1: Follow-up with school districts to resolve the discrepancies noted above, and update the System, as appropriate.

We agree with this recommendation. As soon as the Comptroller has concluded its audit and released its findings, we will contact both district and Regional Information Center (RIC) officials regarding these discrepancies, and all appropriate steps will be taken.

Recommendation 2: Remind schools of documentation retention requirements.

We agree with this recommendation and have done so. We believe SED provides extensive guidance to school district staff throughout the year. As was noted in your findings, SED has provided districts with documentation requirements for some time. In addition to providing guidance in the Student Information Repository System (SIRS) Manual, we have provided considerable training since the introduction of SIRS, including 17 training sessions statewide between March and August 2006. While limited staff and the loss of the unit coordinator in September 2007 have necessitated a decrease of formal training sessions, we use a number of venues to keep the field informed about this and other key data collection and reporting issues, including:

- Online manuals, available 24/7 to new and returning district data managers;
- Semiannual statewide videoconference meetings with RIC and District staff;
- Individual RIC/BOCES meetings with CIOs within their regions;
- Weekly telephone meetings with all RIC project managers;
- Dedicated email box to provide consistent responses to field questions and to serve as the basis for online guidance provided both through the IRS website and the nySTART site.

In addition to the methods outlined above, in December we sent an update via email to all superintendents reminding them of these requirements. We will also ask BOCES District Superintendents to reinforce this information with all school superintendents, and will also provide guidance again to RIC staff.

We are planning to augment current efforts with still more training during the next school year.

Recommendation 3: Require school districts to have all employees responsible for maintaining student files and determining the status of students trained in the Manual's requirements.

We agree in part with this recommendation. We believe it is unnecessary at this time to develop regulations which would require districts to identify staff, and document compliance with such a requirement. As we expand the already extensive training provided to school officials, we will strongly urge that they ensure all employees responsible for data collection are appropriately trained.

Recommendation 4: Remind school district superintendents to review data for their students prior to signing the certification.

We agree with this recommendation, and we have done so. In December, we once again reminded superintendents to review the data carefully prior to certifying it.

In addition, we already provide the following advice on the Department's internet site, which school officials access frequently:

Once the LEAs have confirmed that the data as reflected in the Verification Reports are accurate, superintendents (or charter school principals) sign and fax to their RICs a Statement of Certification that indicates that they have reviewed the data in the reports and that the data are accurate. Superintendents (and charter school principals) are responsible for submitting a number of Statements of Certification. Each statement certifies data in a different set of Verification Reports. Deadlines for submitting each Statement of Certification are in Appendix 1: 2008–09 Timelines. Corrections to data in the Level 2 Repository after these deadlines will not be reflected in NYSED reports.

The importance of the superintendent's certification cannot be overemphasized. Any questions that the superintendent has about the accuracy of the data reported should be addressed before he or she signs the certification. Consistent with Commissioner's regulations in section 100.2(b), if the data are not reported to the Department, the district will be assumed to have not made AYP for the current year.

This advice is consistent with that provided in previous manuals. The Department will continue through personal contact, email, manuals, and other communications to stress the importance of superintendent review prior to certification.

Recommendation 5: Implement a system to analyze graduation rate data submitted by school districts for reasonableness, and follow-up on questionable data with the school district.

We agree with this recommendation and have done so. The Department is developing a plan to provide data stewards for all key Department P-12 data; this will be in place by March 2009. The data stewards will review data as it is being submitted, look for reasonability, and work with districts where problems arise.

The Department has also applied for a grant from the U.S. Department of Education, Institute of Education Sciences (IES), Statewide Longitudinal Data System Grant program to support this and other key initiatives related to continuing to improve our data systems.

In addition, SED has developed electronic reports that will alert district officials at the time of data entry when data is inconsistent with past reporting or does not pass all applicable data edits. Electronic reports have also been developed to alert both SED and district staff when data submitted to the statewide repository appears to be outside reasonable parameters. SED will not change district data, but will alert districts that their data may warrant additional scrutiny in time to make any necessary changes.

Recommendation 6: Based on our findings and those in the school district audits, determine the need for future audits of school district reporting of graduation and dropout rates, as resources permit.

We agree and have done so. The Office of Audit Services (OAS) will incorporate audits of graduation and dropout rates into its two-year audit plan. Districts will be selected for audit based on a risk assessment process. The OAS conducts audits based on a two-year audit plan reviewed by the Regents Subcommittee on Audits and approved by the Commissioner.

Recommendation 7: Develop a new report to identify false student transfers and determine the proper status.

We agree with this recommendation and have done so. The nySTART system contains a series of reports as part of the Unique Identifier Audit System (UIAS) that districts can use to correct issues related to:

- Simultaneous enrollment - identifies instances where the same unique ID is associated with enrollments in more than one district during the same time period.

- False dropouts and transfers - identifies students who were reported as dropouts by one district, but the students subsequently enrolled in another district; also indicates whether students who are reported as transfers to another district did in fact transfer.

- Missing students - identifies instances where a student has not been reported as ending enrollment in the district during one school year, but is not reported as enrolled in the district in the following school year.

In addition, training materials are being developed that will be shared with districts, enabling them to make the best use of these tools to ensure the accuracy of data, while protecting student privacy, as required by law.

Should you have any questions regarding this letter, please contact Mr. Alan Ray at (518) 473-6466.

Sincerely,

Richard P. Mills

c: Alan Ray