



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

TO: P-12 Education Committee

FROM: John B. King, Jr. *John B. King, Jr.*

SUBJECT: Graduation Rate: Data Collection and Reporting Processes

DATE: January 24, 2011

AUTHORIZATION(S):

SUMMARY

Issue for Discussion

Prior to the annual release of the graduation rate planned for March 2011, the P-12 Education Committee will review and discuss the Department's procedures for collecting and reporting the cohort graduation rate, including recent audit findings and recommendations.

Proposed Handling

This item will come before a meeting of the P-12 Education Committee at its February 2011 meeting.

Background Information

Each year, the Department must release report cards that include the aggregate and disaggregated graduation rate for each school and district (Section 1111(h)(2)(B) of the Elementary and Secondary Education Act; Title 34 of the Code of Federal Regulations §200.19(b)(4)(i)). In New York, there is a one-year lag between the first release of a graduation rate and the subsequent use of that graduation rate for accountability purposes and inclusion in the school report card. For example, the Department will first report the four-year graduation rate for the 2006 cohort through June/August 2010 following the conclusion of the 2009-10 school year. Because of the one-year lag, however, these results will be used for accountability purposes and included in the school report cards after the conclusion of the 2010-11 school year.

Definition of the Graduation Rate Cohort

In general, a student will be included in a school or district's 2006 cohort for graduation rate reporting if he or she:

- First entered Grade 9 (anywhere) during the 2006-07 school year; or
- For ungraded students with a disability, the student turned 17 during the 2006-07 school year^{*}; and
- The student's last regular enrollment record in the school/district was five months or longer.

A student is excluded from a school or district's 2006 cohort for graduation rate reporting if the student's last regular enrollment record indicates that he or she:

- Transferred to a different New York public school, nonpublic school, or a school outside New York;
- Transferred to home-schooling;
- Transferred to a postsecondary school prior to earning a diploma;
- Transferred outside the district by court order^{*};
- Left the United States; or
- Died.

Complete requirements for the 2006 graduation rate cohort can be found in the Student Information Repository System (SIRS) manual at <http://www.p12.nysed.gov/irs/sirs>.

The calculated graduation rate for the 2006 cohort is equal to the number of students in the 2006 cohort who earned a Regents or local diploma divided by the total number of students in the 2006 cohort. Because General Educational Development (GED) and Individualized Education Program (IEP) credentials are not considered to be "regular high school diplomas" under federal regulation, students who earn GED or IEP diplomas cannot be included as graduates for graduation rate reporting purposes (see <http://www2.ed.gov/policy/elsec/guid/hsgrguidance.pdf>). Finally, students who are enrolled in, earned a credential from, or dropped out of a New York school or approved GED program, but who are not included in any school or district's cohort (e.g., the student's last regular enrollment record was fewer than five months), are still included in the statewide cohort for graduation rate reporting.

^{*} Cohort reporting rules will change as the Department implements the federal graduation rate cohort definition following the 2010-11 school year. Under these new rules: all students with a disability will be assigned to a cohort for graduation rate reporting based on the school year in which the student enters a 9th grade program; students will be included in a cohort based on one day of enrollment; court-placed students will be excluded from the cohort only if the student participates in a program that leads to a regular high school diploma. For a discussion of the transition plan to implement these changes, see <http://www.regents.nysed.gov/meetings/2010Meetings/October2010/1010ccra1.html>.

Required Documentation

Specific forms of written documentation are required¹ for any student who is to be excluded from the cohort for graduation rate reporting:

- *Transfer* – Required documentation includes a written request for a transcript from the receiving school, a record of sending a transcript to the receiving school, written acknowledgement from the receiving school that the student has registered, written notice of the intent to instruct at home, copy of post-secondary admission notification and schedule of courses taken, or a copy of the court order placing student out of district.
- *Left the United States* – Required documentation includes a written statement from a parent or guardian indicating a destination or written documentation from a school administrator of a conversation had with the student's parent indicating that the family is leaving the country, which the administrator includes in the student's file.
- *Deceased* – Required documentation includes a letter from a parent or an obituary.

Data Quality and Verification Processes

Despite improvements, schools and districts continue to have difficulties reporting complete and accurate credential (i.e., diploma) and enrollment records that are used to calculate graduation rate data. Consistent with the recommendations of a March 2009 audit from the Office of the State Comptroller (OSC), the Department has implemented the following procedures to assist with this important task:

Weekly Verification Reports –

- Schools and districts can access a verification report that shows the count and percentage of students reported for graduation rate and accountability purposes;
- Since the New York City Department of Education (NYCDOE) has not yet fully implemented this new reporting architecture, the Department provides this information to NYCDOE as a data file for internal distribution and verification.

"Reasonableness" Checks –

- Schools and districts can access reasonableness reports, which show current, prior-year, and year-to-year comparisons of graduate counts and other data elements;
- As the final certification deadline approaches, the Department sends additional reports to schools and districts with +/-8% changes in year-to-year graduation rates and requests that the data are checked again for completeness and accuracy.

At the close of the school year, school superintendents and charter school principals must sign a form that either: (1) certifies the completeness and accuracy of

¹ See federal guidance at <http://www2.ed.gov/policy/elsec/guid/hsgrguidance.pdf>

their district's or school's data, or (2) acknowledges that their data, although not complete and accurate, will be used for accountability and other required reporting purposes. To meet federal accountability deadlines, the end-of-year certification deadline is typically the last Friday in July.

New York was granted a federal waiver to extend the deadline for the certification of 2009-10 school year data to October 1, 2010. In order to reset cut scores according to new proficiency standards aligned with college-ready performance, elementary/middle-level English Language Arts (ELA) and math scores were released one month later than typical (July 28). Rather than extend the new data verification deadline by one month (to the end of August, immediately prior to the opening of school), New York requested and was granted a two-month waiver extension so that school personnel could finalize data verification after the opening of schools in September. Since the data system cannot "freeze" secondary-level data on a different date than elementary/middle-level data, the verification of secondary-level data (including graduation rate) was extended to October 1 as well.

A data snapshot taken on August 26, 2010 – five weeks before the final October 1 verification window – provides a view into the verification processes that occur after the school year has completed, but prior to the final verification deadline. Typically, schools may change their graduation rate data prior to the close of a verification window in order to (1) report diplomas for additional June graduates or (2) correct data inaccuracies in student cohort assignment, enrollment records, or reported credentials.

During this five-week pre-certification period, 227 school districts (35% of the statewide total) made data changes that adjusted their reported graduation rate. Of the 227 districts that made changes:

- o 171 (26% of the statewide total) made changes that lowered their reported graduation rate;
- o 56 (9% of the statewide total) made changes that raised their reported graduation rate;
- o 31 (5% of the statewide total) made changes that raised or lowered their reported graduation rate by 4 percentage points or greater.

Of the 56 school districts that made changes that raised their reported graduation rate, 16 (2% of the statewide total) made changes that raised their reported graduation rate by 4 percentage points or greater.

Reported Data vs. Valid Data

The Department relies on schools and districts to report complete and accurate data. Although it is incumbent on the Department to provide data collection and reporting processes to make this task as error-free as possible, it is also incumbent on schools and districts to have trained staff and formalized procedures in place to ensure that only high quality data are used for accountability and other reporting purposes.

Various control agencies engage in audit activities to verify the validity of submitted data, including the Department's Office of Audit Services, the Office of the State Comptroller (OSC), and the New York City Comptroller. Graduation rate audits typically ask schools and districts to provide written documentation to justify the validity of the reported counts of graduates, dropouts, and cohort members.

In March 2009, the OSC issued an audit report entitled *Accuracy of Graduation and Dropout Data in Annual Report Cards for Selected High Schools* (see <http://osc.state.ny.us/audits/allaudits/093009/08s45.pdf>). Results indicated that reported vs. documented graduation rates were discrepant by more than five percentage points in two of the 12 schools subject to the audit. Reported vs. documented dropout rates were discrepant by more than five percentage points in four of the schools. Finally, OSC determined that, while the Department had some controls in place to ensure the accuracy of the graduation information in the report cards, these controls were not sufficient. OSC recommended that the Department:

- 1) Follow-up with schools to resolve the detected discrepancies and update the data system as appropriate;
- 2) Remind schools of documentation retention requirements;
- 3) Require school districts to have all employees responsible for maintaining student files and determining the status of students be trained in the SIRS manual requirements;
- 4) Remind school district superintendents to review data for their students prior to signing the end-of-year data 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) 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.

A follow up OSC report, issued in December 2010, found that the Department had partially implemented Recommendation (1) and fully implemented Recommendations (2) through (7). In addition, the Department has provided reports that identify students who are incorrectly reported as dropouts, reported as simultaneously enrolled in more than one district, as well as identify students who are reported in one school year without a subsequent enrollment the following year in that district or any other district in the State.

The New York City Comptroller issued an audit report in July 2009 entitled *Audit Report on the [New York City] Department of Education's Calculation of High School*

Graduation Rates (see http://www.comptroller.nyc.gov/bureaus/audit/07-21-09_ME09-065A.shtm)². Key findings included that, in New York City:

- The graduation status of some students is not adequately supported in permanent records;
- NYCDOE does not require schools to ensure that student permanent records are accurate and complete;
- NYCDOE has inadequate controls in place for some procedures (e.g. annualization, multiple credits for same course, grade changes, attendance);
- Schools did not maintain sufficient evidence to support classification of students as discharges.

The NYC Comptroller recommended that NYCDOE:

- Establish that data in the NYCDOE transcript system reflect that a student has met graduation requirements before a diploma is granted;
- Implement controls to ensure that transcripts and permanent records of graduates meet credit and assessment requirements;
- Better monitor grade and exam score changes;
- Better monitor discharge practices and records;
- Improve follow up with students who do not attend school.

Recommendations

It is recommended that the Board of Regents direct Department staff to:

- Continue to refine its data collection and reporting system to assist schools and districts in their efforts to submit complete and accurate graduation rate data;
- While leveraging the Department's partnerships with regional data centers, continue to work with school and district personnel to ensure that data are thoroughly reviewed before they are certified as complete and accurate;
- Continue to engage with auditors to periodically verify the validity of reported data;
- As the Department's data collection expands, consider developing the means to distinguish between students who are "eligible" vs. "ineligible" for graduation, whereby students who appear ineligible for graduation could be excluded from graduation rate reporting until the data system records have been updated accordingly.

² The NYC Comptroller's report brief stated that "In its response, DOE generally agreed with nine recommendations, disagreed with one, and did not address two. However, DOE disagreed with many of the findings upon which the recommendations are based." In a follow-up letter, NYCDOE indicated that it had made progress in implementing corrective actions regarding the documentation of student progress toward and completion of graduation requirements; documenting student discharges; and oversight enhancements for credit annualization, credit accumulation policies and practices, and approval of grade and exam score changes. NYCDOE has also issued regulatory clarification of its attendance considerations vs. requirements for promotion.