



New York State Office of the State Comptroller
Thomas P. DiNapoli

Division of State Government Accountability

Oversight of Chronic Absenteeism

State Education Department



Report 2017-S-52

September 2018

Executive Summary

Purpose

To determine if the New York State Education Department (Department) has taken actions to address chronic absenteeism within New York school districts. The audit covers the period April 1, 2014 through April 24, 2018.

Background

Chronic absenteeism is a widespread problem, defined by the Department as a student missing at least 10 percent of enrolled school days. Student absences, attributed to things like poor school performance, bullying, and unwelcoming school climates, increase students' risk for disengagement, low achievement, and dropping out, among other things. 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 double the rate 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, 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 2017, there were approximately 2,630,000 K–12 public school students enrolled in New York State.

Key Findings

- The Department has taken steps to address chronic absenteeism in New York school districts, by encouraging school personnel to track student absenteeism and develop strategies to increase student engagement and reduce chronic absences. The Department also incorporated chronic absenteeism into its recently approved Every Student Succeeds Act plan as one of several factors that together will measure school climate and quality. The Department's actions will require implementation over multiple years. Therefore, the results of some of those actions will not be evident for several more years.
- We identified risks to the implementation of the Department's chronic absenteeism initiatives that could negatively affect progress toward the Department's goals of increased student engagement and achievement. For example, we identified discrepancies between student attendance data in the Department's system and data provided by individual school districts for the 2016-17 school year, related to 89 of 200 (45 percent) students we tested.
- We determined that variations in collecting and reporting attendance will affect the reliability of chronic absenteeism data when using it to compare districts. For example, at the high schools we visited in one district, students who are not in attendance at the morning's homeroom period are reported as absent. In contrast, students at another high school in a different district are not considered absent until they miss more than half of the total scheduled periods in a day.

- We also determined that certain districts were more aware of the Department's expectations to address chronic absenteeism than others. Twenty-two percent (4 of 18) of districts we contacted did not recall key Department memos issued in 2016 and 2017, focusing on chronic absenteeism as an important issue.
- The Department's memos encouraged rather than required districts to take actions to address chronic absenteeism. As a result, districts placed varying priority on the actions suggested in the memos.

Key Recommendations

- Take steps to ensure the accuracy of attendance data in the Department's system used to calculate chronic absenteeism rates.
- Ensure communications to school districts and LEAs contain sufficient detail outlining expected actions to address chronic absenteeism.

Other Related Audit/Report of Interest

[State Education Department: Implementation of the Dignity for All Students Act \(2016-S-28\)](#)

**State of New York
Office of the State Comptroller**

Division of State Government Accountability

September 18, 2018

Ms. MaryEllen Elia
Commissioner
State Education Department
State Education Building
89 Washington Avenue
Albany, NY 12234

Dear Ms. Elia:

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

Following is a report of our audit entitled *Oversight of Chronic Absenteeism*. This audit was performed pursuant to the State Comptroller's authority as set forth in Article V, Section 1 of the State Constitution and Article II, Section 8 of the State Finance Law.

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

Respectfully submitted,

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

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State Government Accountability Contact Information:

Audit Director: Stephen Goss

Phone: (518) 474-3271

Email: StateGovernmentAccountability@osc.ny.gov

Address:

Office of the State Comptroller
 Division of State Government Accountability
 110 State Street, 11th Floor
 Albany, NY 12236

This report is also available on our website at: www.osc.state.ny.us

Background

Chronic absenteeism is a widespread problem that increases students' risk for disengagement, low achievement, and dropping out. Chronic absenteeism is defined as missing at least 10 percent of enrolled school days in a year for any reason. It has been associated with negative consequences, according to key data reported by the U.S. Department of Education (DoE):

- Children who are chronically absent in preschool, kindergarten, and first grade are much less likely to read at grade level by the third grade.
- Students who cannot read at grade level by the end of third grade are four times more likely than proficient readers to drop out of high school.
- Chronically absent students are more likely to drop out of high school, which has been linked to poor outcomes later in life, from poverty and diminished health to involvement in the criminal justice system.
- Nationally, 6 million students (about one of every seven students) missed three weeks or more of school in 2013-14. That translates to approximately 98 million school days lost.

Chronic absenteeism is defined as missing at least 10 percent of enrolled school days in a year for any reason – excused or unexcused.

According to figures from the New York State Education Department (Department), about 19 percent of students in the State's public school districts were considered chronically absent during the 2016-17 school year. However, as noted later in our report, we question the reliability of the Department's available data.

Increased student absences have been attributed to factors like transportation obstacles, bullying, poor school performance, and unwelcoming school climates. 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 double the rate 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. Because ADA tracks trends at the school level, it fails to identify some students who miss a significant number of days of school. Chronic absence, in contrast, places emphasis on the individual students by tracking missed instructional time, which takes into account both excused and unexcused absences, to identify at-risk students who may otherwise be overlooked. To raise awareness about the impact of chronic absenteeism on academic outcomes, the Department has promoted the "Every Student Present" campaign. The campaign was developed by the Council on Children and Families and provides information and resources via its website to help families, school leaders, and communities understand the impact of multiple school absences on children's learning.

Department regulations require school districts and other local education agencies (LEAs) such as charter schools and Boards of Cooperative Educational Services (BOCES) to each develop their own comprehensive attendance policy that ensures adequate records are maintained to verify student attendance. Since the 2013-14 school year, the Department has required school districts

to submit student daily attendance records. This daily attendance information is used by the Department to calculate chronic absenteeism rates for individual students, schools, and districts by dividing absences by enrolled days.

In December 2015, the federal Every Student Succeeds Act (ESSA) was signed into law, which reauthorized the Elementary and Secondary Education Act (known as the No Child Left Behind Act since 2002). Part of the new ESSA requires states to include chronic absenteeism data on the state report card sent to the federal government. ESSA also required states to submit a plan to the DoE that outlines how they will measure student success and school quality. Under ESSA, states have more flexibility to determine the standards they will use for these measurements. One such standard states may choose to incorporate as a measure of school quality is chronic absenteeism. Under New York State's plan, which was formally approved by DoE in January 2018, schools will be eligible for targeted or comprehensive supports including funding and training based, in part, on performance measures including chronic absenteeism.

As of June 2017, approximately 2,630,000 K–12 students were enrolled in the State's 733 public school districts.

Audit Findings and Recommendations

We found the Department has taken steps to address chronic absenteeism in New York school districts since 2016. The Department issued communications to school districts and incorporated chronic absenteeism measures into its ESSA plan, which was approved by the DoE in January 2018. However, the Department told us their efforts to address chronic absenteeism are still relatively new and involve implementation and improvements over an extended period of time. Therefore, the results of some of those actions will not be evident for several more years. For example, schools in need of assistance will be identified based on 2017-18 data, with some training and planning resources available in the 2018-19 school year. Other resources will not be available until the 2019-20 school year.

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.

Department Actions on Chronic Absenteeism

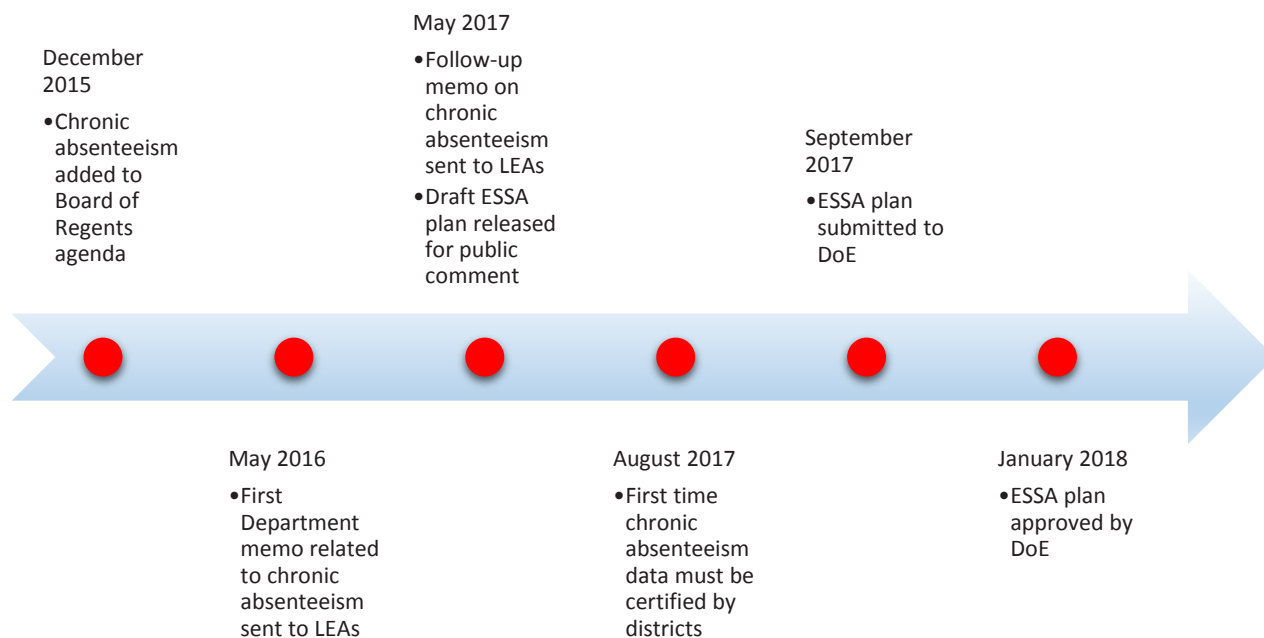
Beginning in May 2016, the Department began to take a number of steps to address chronic absenteeism, as shown in the Figure. In May 2016, the Department issued a memo to school districts and other LEAs encouraging school personnel to track student absenteeism and develop strategies to increase student engagement and reduce chronic absences. In the memo, the Department defined chronic absenteeism, described how it is calculated, and provided resources related to research and intervention strategies. In addition, the Department requested that school districts and other LEAs continue to report student daily attendance to the Department (as they have done since the 2013-14 school year), which the Department uses to calculate chronic absenteeism rates. The Department also informed the school districts and other LEAs of new attendance reports, available online through the Department's system, which may be used as a resource for the early identification of chronically absent students.

A year later, in May 2017, the Department issued a follow-up memo that cited the importance of submitting accurate attendance data. The Department referenced proposals included in its draft ESSA plan that would include chronic absenteeism data within certain measures of school climate and student success. The memo also noted the DoE requirement that the Department report school-level chronic absenteeism data. To help ensure the validity of this information, the Department required districts and other LEAs to certify the accuracy of chronic absenteeism data in the Department's system beginning with the 2016-17 school year.

In January 2018, the Department's ESSA plan was approved by the DoE. The Department elected to incorporate chronic absenteeism into its ESSA plan as part of a matrix that it will use to measure school climate and as an indicator of school quality and student success. These accountability standards will be measured beginning with 2017-18 school year data.

Figure

Timeline of Department Actions



Risks to the Department's Initiatives on Chronic Absenteeism

During our audit, we met with representatives of 18 school districts with different characteristics and chronic absenteeism rates. The 18 school districts contacted are shown in the Exhibit at the end of this report. At five of them, we performed more detailed reviews of attendance policies and documentation of actions taken to address absences for a sample of students who were chronically absent or at risk of being chronically absent. We also compared student absence data from the Department's system with data from these school districts. We identified risks that could adversely affect the Department's implementation of its chronic absenteeism initiatives at the school and district levels.

Accuracy of Chronic Absenteeism Data

In its 2016 and 2017 memos, the Department emphasized the importance of accurate attendance data in identifying and addressing chronic absenteeism. Toward this end, it also required school districts and other LEAs to certify the accuracy of chronic absenteeism data beginning with the 2016-17 school year. Of the 18 districts contacted during our audit, 16 submitted and certified the data they reported to the Department for the 2016-17 school year. The other two districts submitted their data but did not certify it as required.

Further, despite the certification requirements, we identified significant discrepancies between the attendance data in the Department's system and the data provided by individual schools

and districts. At five districts, we performed a more detailed review of attendance data for 200 students who were chronically absent or at risk of being so. The results of our test are shown in the following table:

District	Number of Students Tested	Students With Variances in 2016-17 School Year Attendance Data	
		Number of Students	Percent
Albany	40	7	18
Rochester	40	7	18
Peekskill	40	35	88
Hadley-Luzerne	40	36	90
Amsterdam	40	4	10
Totals	200	89	45

Overall, we found that the number of absences reported in the Department's system and the district's own system did not match for 89 of 200 students (45 percent). Notably, 71 of the 89 students with discrepancies (80 percent) occurred in two of the five districts. Additionally, the variances included students who were considered chronically absent per one set of records but not the other. For example, 13 students who were listed in the Department's system with a chronic absenteeism rate above the 10 percent threshold were not considered chronically absent based on the data in the district's system. Eleven other students were identified as chronically absent in the district's system but not in the Department's system. Additionally, two students we identified as chronically absent based on the schools' records were not listed in the Department's system at all.

Department officials stated they were unsure of what accounted for the differences in the absenteeism data. We believe, however, that these errors are attributable, at least in part, to insufficient Department guidance and oversight regarding the certification of chronic absenteeism data. Although the Department requires school districts and other LEAs to certify the accuracy of chronic absenteeism data beginning with the 2016-17 school year, it has not established clear guidelines regarding efforts they should take to ensure the data is accurate prior to the certification. Further, once reporting discrepancies occur, they are not discovered by the Department due to the limited resources assigned to ensure data accuracy. As of April 2018, one person was assigned part-time responsibility to oversee the chronic absenteeism data for the State's roughly 2,630,000 K-12 students.

Our tests of student attendance records during our visits identified instances of improperly coded absences, resulting in data errors. At one district, for example, 33 of 36 students had a total of 256 instances of absences that did not match between the Department and school systems. In all instances, the students were identified as absent in the Department's system but as present in the district records. In these cases, the district used local attendance codes that provide more detailed explanations of student absences (e.g., student on field trip, in nurse's office, or at off-campus school event). According to the district's attendance officer, the attendance records with these local codes should not have been considered absences. Department officials indicated that local data systems were designed to meet local needs and that the district would need to set up local

codes to translate to Department codes. We determined that the local attendance codes used by the district were not set up properly at the district level to translate correctly to the Department's system. As a result, the calculated chronic absenteeism rate in the Department's system for those students was increased, and potentially increased the calculated chronic absenteeism rate for the school and the district.

During our audit, we also identified that variations in collecting and reporting attendance will affect the reliability of chronic absenteeism data. Department officials acknowledged that a comparison of chronic absenteeism across districts will be affected by local attendance policies. They cited Department regulations that require each district and LEA to establish its own comprehensive attendance policies that will lead to differences in how absenteeism data is collected and reported. For example, at the high schools we visited in one district, students who are not in attendance at the morning's homeroom period are reported as absent. In contrast, students at another high school in a different district are not considered absent until they miss more than half of the total scheduled periods in a day.

Regardless of the cause, inaccurate or inconsistent data will negatively impact the Department's implementation of its new ESSA plan, which incorporates chronic absenteeism into its accountability measures. The Department's ESSA plan relies on chronic absenteeism data, in part, to assess things such as school climate and school quality. Under the plan, schools will be eligible for targeted or comprehensive supports, including funding and training based, in part, on these measures. If inaccurate chronic absenteeism data is used for these determinations, there is a risk the additional supports won't be applied where they are most needed.

School District Implementation

The Department established the importance of initiatives to address chronic absenteeism in its 2016 and 2017 memos. The memos alerted school districts and LEAs to new reports available in the Department's system to help identify students who are chronically absent as well as students at risk of being chronically absent. In addition, the Department included links to two key resources related to chronic absenteeism best practices: "Every Student Present" and "Attendance Works." Each resource contains examples of actions to address chronic absenteeism, such as building awareness, engaging students and parents, using data to determine where prevention and early intervention are needed, and making personalized early interventions.

We note that, with the exception of the requirement in the Department's 2017 memo to certify data, the Department's memos encouraged, rather than required, districts to take actions to address chronic absenteeism and generally did not direct specific actions. As a result, districts placed varying priority on the activities suggested in the memo. Some districts told us they focus their resources by assigning a higher priority to specifically mandated initiatives and efforts. Additionally, the Department has not yet performed any oversight or monitoring to determine the extent to which districts implemented strategies to address chronic absenteeism.

To assess the actions taken by a sample of school districts in response to the Department's memos, we interviewed district officials, reviewed attendance policies, and reviewed actions

taken to address absences for a sample of students. We found officials at 14 of 18 districts (78 percent) surveyed during our audit were aware of chronic absenteeism as an important issue and recalled the Department's memos on the subject. At the remaining four districts, officials did not recall these memos. We also found that 11 of 18 school districts (61 percent) did not use the new attendance reports the Department listed in the memos because they didn't find them useful. Instead, district officials stated they use their own data because it is more detailed.

Of the five districts for which we performed a more detailed review, one district had an attendance policy that specifically addressed chronic absenteeism. This policy required the district to monitor students at risk for chronic absenteeism and to outline actions that should be taken to reduce instances. At the other four districts, the attendance policies did not yet specifically address chronic absenteeism.

Department officials informed us their efforts to address chronic absenteeism are still relatively new. An official at one of the districts without a policy to specifically address chronic absenteeism noted the district was in the early stages of evaluating and understanding the issue. The official noted that 2017-18 is the first school year that an effort is being made to address chronic absenteeism.

We also reviewed documentation of actions taken for 100 students (20 at each district) who were identified as chronically absent or at risk of being so. We found evidence of some action taken for 62 of 100 students reviewed, but no documentation for the remaining 38. Four of the districts we reviewed had documentation of the interventions they took related to student absences, but the remaining district did not provide any documentation. The districts' actions typically included sending letters to the student's home, phone calls or emails to the parent or guardian if absences continued, and eventually a meeting with the parent or guardian. For example, of the 100 students we reviewed, 47 had evidence of a letter sent home, and 42 had evidence that calls, emails, or other direct contact was made with the parent or guardian. We also determined that districts largely took the same actions to address student attendance whether the student was chronically absent or at risk of being so.

We identified two districts that provided evidence of interventions above and beyond the typical letters home and phone calls to parents or guardians. One such intervention involved a monthly effort of district personnel and community volunteers to visit the homes of students with past attendance issues and known to be at risk of being chronically absent. This effort began early in the school year. Another district worked with two families to resolve students' transportation obstacles as a way to improve attendance. However, we found that actions such as these were generally the exception at the districts we visited.

Absent stronger direction from and oversight by the Department, school districts' efforts to address chronic absenteeism may fall short of the expected goal of increased student engagement and achievement. Department officials acknowledged they expect improved outcomes for students and schools as a result of their actions on chronic absenteeism. However, without establishing clearer, more specific standards and improving its oversight of districts' actions, the likelihood of achieving their desired outcomes is diminished. Further, there is an increased risk that inconsistent

implementation of actions to address chronic absenteeism will limit the potential for improved student performance.

Recommendations

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.
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.
3. Work with school districts to develop guidance for certifying chronic absenteeism data.
4. Ensure communications to school districts and LEAs contain sufficient detail outlining expected actions to address chronic absenteeism.
5. Monitor school districts' and LEA efforts to address chronic absenteeism; identify and share best practices.

Audit Scope, Objective, and Methodology

We audited the Department's oversight of efforts to address chronic absenteeism during the period April 1, 2014 through April 24, 2018. The objective of our audit was to determine whether the Department has taken actions to address chronic absenteeism within New York State school districts.

To accomplish our audit objective, we reviewed relevant New York State laws and regulations. We also assessed the Department's internal controls as they related to oversight of chronic absenteeism. We interviewed Department personnel to obtain an understanding of chronic absenteeism and relevant data used to calculate chronic absenteeism rates. Additionally, we analyzed the available Department data related to chronic absenteeism. We selected a judgmental sample of 18 school districts, which are identified in the Exhibit at the end of this report, based on factors such as chronic absenteeism rates, school needs index, and geographic location, and surveyed them to assess the actions they took in response to the Department's memos. We further judgmentally selected 5 of the 18 districts (same criteria) for a more detailed review of each district's attendance policies and the actions taken to address absences. For each of the five districts, we selected a random sample of 20 students from the Department's system to evaluate the actions taken by the school in response to the absences. The sample at each district included 10 chronically absent students (5 high school and 5 elementary) and 10 students at risk of being chronically absent (5 high school and 5 elementary). For the sampled students, we also compared attendance data from the Department's system to data in the schools' system for the 2016-17 school year. To further test the reliability of attendance data, during our visits, we selected an additional 100 students (20 per district with same breakdown between chronically absent, at risk of being chronically absent, high school and elementary as above) from the schools' records to

compare attendance data from the schools' system to data in the Department's system.

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 objective. We believe that the evidence obtained provides a reasonable basis for the limited findings and conclusions we made based on our audit objective.

In addition to being the State Auditor, the Comptroller performs certain other constitutionally and statutorily mandated duties as the chief fiscal officer of New York State. These include operating the State's accounting system; preparing the State's financial statements; and approving State contracts, refunds, and other payments. In addition, the Comptroller appoints members to certain boards, commissions, and public authorities, some of whom have minority voting rights. These duties may be considered management functions for purposes of evaluating organizational independence under generally accepted government auditing standards. In our opinion, these functions do not affect our ability to conduct independent audits of program performance.

Authority

The audit was performed pursuant to the State Comptroller's authority as set forth in Article V, Section 1 of the State Constitution and Article II, Section 8 of the State Finance Law.

Reporting Requirements

We provided a draft copy of this report to Department officials for their review and formal comment. We considered their comments in preparing this final report and have appended them in their entirety at the end. In their response, Department officials agreed with our audit recommendations and indicated the actions they will take to address them.

Within 90 days of the final release of this report, as required by Section 170 of the Executive Law, the Commissioner of Education 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 if the recommendations were not implemented, the reasons why.

Contributors to This Report

Stephen Goss, CIA, CGFM, Audit Director
Ed Durocher, CIA, Audit Manager
Brian Krawiecki, Audit Supervisor
Lauren Bizzarro, Examiner-in-Charge
David Brickman, Senior Examiner
Jonathan Julca, Senior Examiner
Mary McCoy, Supervising Editor
Andrea Majot, Senior Editor

Division of State Government Accountability

Andrew A. SanFilippo, Executive Deputy Comptroller
518-474-4593, asanfilippo@osc.ny.gov

Tina Kim, Deputy Comptroller
518-473-3596, tkim@osc.ny.gov

Ken Shulman, Assistant Comptroller
518-473-0324, kshulman@osc.ny.gov

Vision

A team of accountability experts respected for providing information that decision makers value.

Mission

To improve government operations by conducting independent audits, reviews, and evaluations of New York State and New York City taxpayer-financed programs.

Exhibit

List of School Districts Contacted
Albany City School District*
Amsterdam City School District*
Binghamton City School District
Buffalo City School District
Cobleskill-Richmondville School District
Greenville Central School District
Hadley-Luzerne Central School District*
Monticello Central School District
North Colonie Central School District
Peekskill Central School District*
Plattsburgh City School District
Rochester City School District*
Skaneateles Central School District
Syracuse City School District
Union Springs Central School District
Utica City School District
Victor Central School District
Webutuck Central School District

**five districts where more detailed testing was performed*

Agency Comments



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

DEPUTY COMMISSIONER
Office of Performance Improvement and Management Services
O: 518.473-4706
F: 518.474-5392

August 21, 2018

Stephen Goss
Audit Director
Office of the State Comptroller
Division of State Government Accountability
110 State Street - 11th Floor
Albany, NY 12236-0001

Dear Mr. Goss:

The following is the New York State Education Department's (Department) response to the draft Office of the State Comptroller (OSC) audit report, 2017-S-52: Oversight of Chronic Absenteeism Audit Draft Report.

In general, the Department agrees with the recommended actions to improve data accuracy and implementation at the district and school levels. However, in the report, the Office of the State Comptroller (OSC) states that in the Department's memos to the field, the Department "encouraged" rather than "required" schools and school districts to take actions to address chronic absenteeism. It is important to note that the Department began its efforts to raise awareness of the impact of chronic absenteeism, as part of a larger initiative to improve student engagement and promote school climates in response to recommendations set forth by the New York State Safe Schools Task Force. Directly following the tragedy in an elementary school in Newtown, Connecticut, the Board of Regents immediately directed the Department to re-establish the NYS Safe Schools Task Force and charged them with making recommendations to improve safety in New York's schools. In June 2014, the Task Force presented 36 recommendations to the Board of Regents and Department for consideration on ways to improve students' health and safety in schools. The 36 recommendations all shared a common theme—improvement in school climate and student engagement to improve school safety.

Like nationwide efforts to raise awareness about the effects and reasons for chronic absence, the Department chose to raise awareness of chronic absenteeism as a way to identify students who are disengaged (or at-risk of becoming so) and who are academically at risk as well. In May 2016, the Department officially announced the statewide capability for schools and school districts to run student-specific reports to identify students who are chronically absent and those who are at-risk of becoming chronically absent using a standardized statewide

definition. In this May 2016 announcement, the Department encouraged schools to begin using these reports during the 2016-17 school year and thereafter to engage students with an overall goal to improve academic outcomes. Chronic absenteeism reports were designed to be a tool for school administrators to use to identify students who are at risk. The chronic absenteeism reports were not, at the time, intended for any other purpose.

The Department's response to the specific Recommendations in the Comptroller's report are below.

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.

Response: The audit team compared district submitted data that is stored in the Department's data warehouse, to data stored in district data systems used for tracking and monitoring student attendance. The data in the Department's data warehouse accurately reflects the data submitted by Local Education Agencies (LEAs). The issue of concern is really a combination of things noted in recommendations 2 and 3 - LEAs must adopt data quality procedures to ensure the data in their local systems are accurately submitted to the Department using the Department required attendance codes (recommendation 2) and that the data in Department's data warehouse are complete and accurate prior to the reporting and certification deadlines (recommendation 3).

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.

Response: In the 2018-19 school year, the Department will work with district, school, and Regional Information Center staff to develop guidance for LEAs regarding mapping of local attendance codes to Department collected attendance codes to improve LEA accuracy in reporting.

Recommendation 3

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

Response: In the 2018-19 school year, to improve accuracy in LEA reporting, the Department will work with district, school, and Regional Information Center staff to develop guidance for LEAs regarding verifying and certifying chronic absenteeism data that are reported to the Department's statewide data repository.

Recommendation 4

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

Response: In the 2018-19 school year, the Department will develop and distribute guidance to LEAs on best practices regarding district attendance and chronic absenteeism policies.

Recommendation 5

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

Response: In the 2018-19 school year, the Department will develop and distribute guidance to LEAs on best practices regarding district attendance and chronic absenteeism policies.

Yours truly,



Sharon Cates-Williams
Deputy Commissioner

cc: Renee Rider
Kathleen DeCataldo