MEMORANDUM

TO: State Board of Education
FROM: Dr. Michele Walker, Director of Student Assessment and Interim Director of Accountability
RE: Accountability Update – Graduation Rate Audits
DATE: March 25, 2015

Required Graduation Rate Audits
Per IC 20-26-13-12, any school where the difference between the estimated graduation rate and the reported four-year cohort graduation rate is more than 5% must submit to an audit. Schools will submit documentation to the Indiana Department of Education (IDOE) for the required audit via an online portal from March 27, 2015, through April 24, 2015.

Voluntary Graduation Rate Audits
Any school not required to submit to an audit that identifies issues with its graduation rate, as published by the IDOE, may submit to a voluntary graduation rate audit. The IDOE will accept voluntary submissions for the graduation rate/cohort audit from March 31, 2015, through April 24, 2015.

Details
Graduation Rate Audits will be conducted by the IDOE from March 27, 2015 through May 29, 2015. The attached document provides specific information about the audit process, including submission requirements and documentation requirements. Questions concerning the graduation rate/cohort audit will be welcomed during the April 1, 2015 State Board of Education business meeting.
1. General Information
   a. Per IC 20-26-13-12, any school where the difference between the estimated graduation rate and the reported four-year cohort graduation rate is more than 5% must submit to an audit.
   b. Any school not required to submit to an audit that identifies issues with its graduation rate, as published by the IDOE, may submit to a voluntary graduation rate audit. If a school does not pursue an audit, the IDOE maintains that the school did not identify any errors with the graduation rate and the graduation rate was determined based on accurate data.
   c. REQUESTS FOR GRADUATION RATE AUDITS DURING THE A-F AUDIT THAT WILL OCCUR AFTER THE PRELIMINARY RELEASE OF 2014/2015 A-F GRADES WILL NOT BE ACCEPTED; audits taking place now represent the last opportunity for schools to have their graduation rates audited.
   d. Schools being audited must submit the required documentation for the following: 1) current “reported to mobility” students; 2) students that should have been “reported to mobility”; 3) students requesting a change in graduation status; and/or 4) students whose exit codes or graduation statuses need changed for the 2014 cohort only. (See Documenting Dropout & Mobility Students and Documentation Needed for Mobile Students below).
   e. FOR REQUIRED AUDITS ONLY: Failure to submit acceptable documentation to support the exiting of a student from the cohort will result in the student’s reentry into the cohort with an updated exit status of “unknown” (see IC 20-26-13-11(b)).
   f. FOR VOLUNTARY AUDITS ONLY: The IDOE will hold harmless any school that voluntarily submits to a graduation rate audit that results in a lowered graduation rate.
g. Corrected graduation rates will be available to the school through the Learning Connection 2014 Graduation Cohort Status Report at the completion of the audit. If the school’s graduation rate changes as a result of the audit, the school will be required to publish the corrected graduation rate in the next school year’s report required under IC 20-20-8-3.

h. The IDOE reserves the right to audit any documentation provided by the school through the audit process.

2. Timeline Information
   a. The online portal will open on March 27, 2015 for schools required to participate in the audit. The online portal will open on March 31, 2015 for schools voluntarily participating in the audit.
   b. All documentation must be submitted to the online portal and received by the IDOE no later than April 24, 2015.
   c. Audits will be conducted by the IDOE from March 27, 2015 through May 29, 2015.
   d. An extension of time for submission may be granted by the IDOE if the IDOE finds that the school has demonstrated good cause for an extension of time.

3. Submission Requirements
   b. An audit request must include the RT/EM and/or GR data correction files, as well as supporting documentation.
   c. Each piece of supporting documentation provided must be clearly labeled with the student’s STN and first and last name to be considered by the IDOE.
   d. Schools will be contacted by the IDOE if there are one or more issues identified during the submission process and/or with the documentation itself. The IDOE will inform the school of the nature of the issue(s) with the audit submission and/or documentation.
   e. For further guidance on documenting dropout and mobility students, please refer to the section on Documenting Dropout & Mobility Students.

4. Review Process
   a. There will be two (2) tiers of reviews in an audit. The Tier I review is an initial review of the documentation. Based on this review, a primary determination will be made as to whether the documentation sufficiently demonstrates the student’s mobility. The Tier II review examines the documentation alongside the primary determination to ensure accuracy and consistent determinations, and confirms or denies the Tier I findings.
   b. A final determination will be made for each STN to be audited as follows:
      (1) **Sufficient**: Documentation provided meets the requirements to support STN status. No further action will be taken by the IDOE for students whose documentation is determined to be sufficient.
      (2) **Insufficient**: Documentation provided did not meet the requirements to support STN status. The cohort statuses will be changed to dropout for students whose
documentation is determined to be insufficient. IDOE will amend the school’s graduation rate. The IDOE will notify the school of any student whose status changed, provide the reasoning behind the decision, and share the amended graduation rate that results from the changes.

c. Any reviewer that may have a conflict of interest (including, but not limited to, having family members employed with the school or school corporation being audited, or having a child that attends the school or school corporation being audited) will not be assigned to that school’s audit.

d. Reviewers maintain confidentiality of all audits, and do not discuss or disclose the contents of audits with anyone during the audit other than the IDOE staff necessary to the completion of the audit.

e. Please note that audit results may be deemed partially or fully sufficient or insufficient. Additionally, the findings of an audit may not alter the school’s graduation rate or the final outcome as it relates to A-F accountability calculations.

f. All findings and determinations from the audits will be used in the calculation of A-F grades. These grades will be taken to the SBOE for final placement based on the findings of the audits.

g. Audits will be conducted as received. Questions concerning the audits should be submitted to gradrate@doe.in.gov.

5. Documenting Dropout & Mobility Students

a. COHORT MEMBERSHIP
(1) Students are placed into a graduation cohort when they are first reported in high school on the Pupil Enrollment report (DOE-PE), which is a snapshot taken from Real Time/Enrollment Mobility data. For example, a student entering 9th grade in the 2010-2011 school year would be placed into the 2014 cohort. Students never change cohorts once they are placed into one.

(2) For the 2011 cohort and beyond, the Real Time/Enrollment Mobility report is used. Schools are responsible for reporting all students who exit the school on the Real Time/Enrollment Mobility report.

b. DROPOUTS
(1) Students who formally drop out via exit interview: A student who officially drops out (by exit interview) and provides no indication of continuing his/her secondary school career should be reported on the Real Time (RT) report, or Enrollment Mobility (EM) report for nonpublic schools with the appropriate dropout code. The student’s status on the graduation cohort report will be “dropout.”

(2) Students who drop out and cannot be located: If the student is under the age of 18 and did not drop out for one of the legislatively permitted reasons, the student should be reported as truant (code 15) and attempts should be made to locate the student or formally report the student to the school corporation attendance officer. If the student is over the age of 18, his/her whereabouts are unknown and the school has attempted to locate the student, then the student should be reported as unknown (code 14). The student’s status on the graduation cohort report will be “dropout.” Note that unless the student has been officially reported to the Clearinghouse for Information on
Missing Children, and the school has appropriate documentation that the student has been reported (see Missing Child Letter 6.9.14), the student MAY NOT be reported as a mobility code 26, missing and reported to the Clearinghouse for Information on Missing Children. A school that is reporting a student to the Clearinghouse for Information on Missing Children must have reported the student by October 1 of the following school year in which the student was reported missing.

(3) Students who complete a term of expulsion and do not return to school: “Expulsion” is not an approved mobility reason under state law, and a student who completes the terms of an expulsion and does not return to school MAY NOT be reported as mobile. Any student who completes an expulsion and does not return to school or does not transfer to another school to pursue a high school diploma (via transcript request OR signed acknowledgement of enrollment on the receiving school or program’s letterhead) must be reported as a dropout (code 16). This student’s status on the graduation cohort report will be “dropout.”

(4) Students who leave school prior to earning a diploma to enlist in the military or obtain jobs: Students who leave school prior to earning a diploma in order to enlist in the military or obtain jobs should be coded either with the appropriate dropout code (01-09, 11) or with code 12 (Armed Services Enlistment). Because the students have not earned diplomas, their graduation cohort statuses will be “dropout.” Even if the student indicates that s/he will pursue a GED while working or serving in the military, the student must be reported as a dropout unless the school has evidence that a GED was obtained (in which case the student must be reported as code 30, earned GED).

(5) Students who leave school to pursue a GED: A student who leaves school to pursue a GED diploma must be coded as a dropout under all circumstances, NOT CODED AS A TRANSFER. Even if the student goes to a “home school,” adult education, or Job Corps setting to pursue a GED diploma, the student must be coded as a dropout. This student’s status in the graduation cohort report will be “dropout” unless additional information is reported indicating that the student has earned a GED by October 1 (e.g., a student whose expected graduation year was 2014 must earn a GED by October 1, 2014). If you have or receive evidence that the student who dropped out of school to pursue a GED diploma has obtained the GED diploma by no later than October 1 of the next school year (e.g., for a student in the class of 2014, by October 1, 2014), then you may recode the student as a code 30 (earned GED) on the RT/EM report. This student’s status in the graduation cohort report will be “earned GED.” Note that GED recipients are not considered graduates; they are considered GED recipients.

c. MOBILE STUDENTS

(1) Students who transfer to another public or accredited nonpublic school in Indiana: A student who is reported as a code 19, transfer by transcript request, may be removed from a school’s graduation cohort. (In order to mark a student as a code 19, you should have a transcript request from the transferee school OR signed acknowledgement of enrollment on the receiving school’s letterhead, which you should maintain for auditing purposes). However, typically a code 19 student, since s/he is
transferring within Indiana, should be incorporated into the second school’s data reporting. Once the student is reported by the transferee school on an RT/EM or GR report, the student will no longer appear in the first school’s cohort list since a student cannot appear on two schools’ cohort lists. However, if a student that your school reported as a code 19 is still showing up on your school’s cohort list, this means that no other Indiana public or nonpublic school has reported that student. To protect your school in case of an audit, it is recommended that you contact the school to which the student transferred and request a signed (by the principal, guidance counselor, registrar, or other school official) transcript request OR a signed (by a school official) acknowledgement of enrollment on the receiving school’s letterhead.

(2) **Students who leave school to pursue a high school diploma track at an adult secondary program or Job Corps diploma program:** If a student leaves the high school to pursue a diploma through Job Corps or an adult education program, the student may be listed as a transfer. The appropriate code to use in these situations would be code 19, transfer. Remember that like any other transfer student, appropriate documentation should be maintained. Appropriate documentation for a code 19 transfer student is a signed transcript request (by the principal, guidance counselor, registrar, or other school official) from the transferee school OR a signed (by a school official) acknowledgement of enrollment on the receiving program’s letterhead. In the case of a transfer to Job Corps or adult education, a student may only be marked as a transfer if the student is transferring to pursue a high school diploma. If the student has left school to pursue a GED through adult education or Job Corps, the student should be given the appropriate dropout code. If the student earns a GED by October 1, the student should be reported as a code 30, earned GED (e.g., a student whose expected graduation year was 2014 has until October 1, 2014 to earn a GED and still be reported as a GED recipient for the graduation year).

(3) **Students who transfer to other high schools out of state:** A student who transfers to an out-of-state high school to continue pursuing a diploma may be reported as a code 25. The school from which the student is transferring should maintain a copy of the transferee school’s signed transcript request OR a signed acknowledgement of enrollment on the receiving school or program’s letterhead to verify that the student enrolled in the out-of-state school.

(4) **Students who transfer to home schooling:** A student who transfers to a home school setting to pursue the equivalent of the instruction being provided in the public school may be reported as a transfer to home school (code 20, removed by parents to provide home schooled instruction). Note that per Indiana Code (IC 20-26-13-10), the home school setting must “provide instruction equivalent to that given in the public schools.” To protect your school in case of an audit, school officials should obtain (at a minimum) the signature of the parent indicating that home schooling will be provided, and that home schooling will be “equivalent to that given in the public schools” (and documenting that the student’s plan is to pursue a high school diploma). It is recommended (but not required) that the parent register with the state as a homeschooling parent. A student who is planning to pursue a GED through an online program at home, self-study, parental assistance, or through another type of GED program IS NOT a transfer, regardless of the setting in which the student will pursue a GED.
6. Documentation Needed for Mobile Students

IMPORTANT NOTE: Each piece of documentation provided must be clearly labeled with the student’s STN and first and last name to be considered by the IDOE. This table specifies the only documentation that the IDOE considers sufficient to show mobility.

<table>
<thead>
<tr>
<th>Code</th>
<th>Documentation</th>
</tr>
</thead>
<tbody>
<tr>
<td>10 = Poor Health</td>
<td>Signed statement from physician</td>
</tr>
</tbody>
</table>
| 19 = Transferred | On the receiving school’s official letterhead:  
 Signed transcript request (by a school official) OR  
 Signed acknowledgment of enrollment (by a school official) |
| 20 = Removed by parents to provide home schooled instruction | Signed statement from parent, including address, if student under 18 years of age OR  
 Signature of student if 18 years of age or over when student exits school |
| 21 = Deceased | Obituary OR  
 Signed letter from parent                                                                                                                   |
| 22 = Incarcerated or placed by court order in Dept. of Child Services (Student placed in protective custody) | Court/DCS/DOC order AND  
 Evidence of student absence for at least 20 school days due to incarceration OR  
 Signed transcript request (by a school official) on the school's official letterhead |
| 23 = Placement by court order in another corporation where education continues | Court order OR  
 Signed transcript request (by a school official) on the school's official letterhead |
| 24 = Enrollment in a public virtual school | Signed statement from parent AND  
 On the receiving school’s official letterhead:  
 Signed transcript request (by a school official) OR  
 Signed acknowledgment of enrollment (by a school official) |
| 25 = Transferred out of state | On the receiving school’s official letterhead:  
 Signed transcript request (by a school official) OR  
 Signed acknowledgment of enrollment (by a school official)  
 Signed statement from parent interview with the name and location of school, including name of country (acceptable only for transfer outside U.S.) |
<table>
<thead>
<tr>
<th>Code</th>
<th>Description</th>
<th>Verification Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>26</td>
<td>Missing students who cannot be located within boundaries, and have been</td>
<td>U.S. Registered Mail Receipt by October 1 of the year that the student was reported missing <strong>AND</strong> Clearinghouse e-mail verification</td>
</tr>
<tr>
<td></td>
<td>reported to the Clearinghouse for Information on Missing Children</td>
<td></td>
</tr>
<tr>
<td>27</td>
<td>Foreign exchange student that returns to country of origin</td>
<td>Exchange program agreement <strong>OR</strong> Signed transcript request (by a school official) on the school's official letterhead</td>
</tr>
<tr>
<td>28</td>
<td>Religious beliefs (e.g., Amish) removes this student from further public</td>
<td>Signed statement from parent interview</td>
</tr>
<tr>
<td></td>
<td>education</td>
<td></td>
</tr>
<tr>
<td>31</td>
<td>Transferred to a non-accredited non-public school</td>
<td>Signed transcript request (by a school official) on the school’s official letterhead, which includes the name and location of the school</td>
</tr>
</tbody>
</table>