
Audit Report

Kingston City School District
Data Accuracy and Reliability

For the Period

July 1, 2006 through June 30, 2010

SD-0311-1

November 30, 2011

The University of the State of New York
THE STATE EDUCATION DEPARTMENT
Office of Audit Services
Albany, New York 12234





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

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November 30, 2011

Mr. James F. Shaughnessy, Jr.
Board President
Kingston City School District
61 Crown Street
Kingston, NY 12401

Dear Mr. Shaughnessy:

The following is our final report (SD-0311-1) for the review of the Kingston City School District's cohort data for the period July 1, 2006 through June 30, 2010. The review was conducted pursuant to Section 305 of the Education Law in pursuit of Goal #5 of the Board of Regents/State Education Department Strategic Plan: "Resources under our care will be used or maintained in the public interest."

Ninety days from the issuance of this report, District officials will be asked to submit a report on actions taken as a result of this review. This required report will be in the format of a recommendation implementation plan and it must specifically address what actions have been taken on each recommendation.

I appreciate the cooperation and courtesies extended to the staff during the review.

Sincerely,

James A. Conway

Enclosure

c: S. Cates-Williams, K. Slentz, K. Wagner, A. Murphy, J. Delaney, C. Szuberla, A. Timoney (DOB), J. Dougherty (OSC), G. Gretzinger, C. Khoury (D.S. Ulster BOCES)

Executive Summary

Student data provides critical information to school leaders, parents, and the public. The State Education Department (Department) publishes various reports each year such as the school district report card, cohort graduation data, and results of State assessments. These reports serve as important tools to measure the success of the Board of Regents efforts to raise learning standards for all students. School districts report student enrollment and assessment data to the Department through the Student Information Repository System (SIRS).

The Kingston City School District (District) is located in Kingston, NY and served 6,979 students (grades K-12) during the 2009-10 school year. The District reported that 427 students graduated with a Regents or Local Diploma from the 2006 cohort.

This audit is one of a series of audits conducted by the Office of Audit Services to assess the reliability and accuracy of the data reported to the SIRS. We examined data reported by the District (to the SIRS) and compared it to student record documentation to verify the 2006 cohort data is accurate and reliable. We also verified the accuracy of the 2006 graduation rate.

Audit Results

We found the data to be generally accurate. However, we found the following exceptions based on review of available documentation:

- The District's reported graduation cohort for 2006 was overstated by 4 percent. The District reported a 69 percent graduation rate, but we found that the graduation rate was 65 percent.
- Records at the District did not contain documentation to support all of the students who were coded as transferred out of the District.
- Student records did not contain documentation to support all students coded as graduates. Conversely, some students coded as non-graduates met the necessary graduation requirements.

Comments of District Officials

District officials agreed with the recommendations. Their comments are included in this report as Appendix B.

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Introduction

Background

The Federal No Child Left Behind Act of 2001 requires that states develop and report on the performance of student proficiency in 1) language arts/reading, 2) mathematics, and 3) a third accountability indicator. In New York State, the third indicator is graduation rate at the secondary level.

School districts report student data to document their success in meeting State standards. Some of the data reported includes cohorts, total graduates, and State assessment results. This information is disseminated to the public through various reports published by the State Education Department (Department) each year such as the school district report card, cohort graduation data, and results of State assessments. These reports are generated from student enrollment and assessment data reported to the Department through the Student Information Repository System (SIRS). These reports are provided to policy makers, parents, and others interested in the status of schools in New York State. The Office of Audit Services (OAS) is conducting a series of audits to assess the reliability and accuracy of data reported to the SIRS.

The Kingston City School District (District) is located in Kingston, NY and serves approximately 6,979 students. The District reported 427 graduates for the 2006 cohort.

Objectives, Scope, and Methodology

The purpose of our audit was to assess the validity of the District's 2006 cohort data reported to the SIRS, verify the corresponding graduation count/rate reported for June 2010, and assess the adequacy of systems and processes to collect and report student data. To accomplish our objectives, we reviewed Department regulations, policies, and guidance; interviewed Department and District management and staff; and reviewed the SIRS data, transcripts, and other documentation that was available.

We conducted our audit in accordance with Government Auditing Standards. These 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 provides a reasonable basis for our findings, conclusions, and recommendations.

Comments of District Officials

District officials agreed with the recommendations. Their comments are included in this report as Appendix B.

ACCURACY OF GRADUATION COHORT

Enrollment information and assessment results are some of the data elements collected by the Department through the SIRS. For reporting purposes and analysis of results, students are classified into groups. These groups are referred to as cohorts. An important cohort used to produce comparative data is the total cohort for graduation rate accountability (graduation cohort). The accuracy of the data reported is critical to appropriately communicate school district performance to the public.

District data was generally accurate and appropriately documented. However, we found the 2006 graduation cohort contained 649 students, 27 more than what was published by the Department based on District reported information. The reasons for the difference in cohort numbers are: some students were reported in incorrect cohort years, some students transfer status could not be supported by documentation, and one student should have been excluded as a transfer.

2006 Graduation Cohort

The graduation cohort consists of all students regardless of their current grade level who first entered grade nine during the 2006-07 school year, but excludes among others, students that transfer to another school district. The graduation cohort is the basis used in the SIRS to calculate the percentages of students that graduated, earned an IEP diploma, are still enrolled, transferred to a GED preparation program, or dropped out. Section 185.12 of the Commissioner's Regulations (Regulations) requires that cohort documentation such as registration, correspondence, and transfer or discharge notices should be retained for six years after a student graduates or would have graduated from high school.

Based on the published cohort graduation data released by the Department on June 14, 2011, the District reported 622 students in the graduation cohort.¹ During our audit, the

¹ Number was based on data submitted by school districts to the SIRS for the 2009-10 school year. Students are reported based on their date of entry in grade 9 and their last enrollment status as reported in the SIRS on October 1, 2010 (2006 Cohorts as of June 2010).

District provided us with a report showing 630 students (as of April 1, 2011) in the cohort. However, eight of these students only attended the District less than five months and has to be subtracted to arrive at the graduation cohort. Therefore, both reports show consistent graduation cohort counts of students.

A.) Students in Incorrect Cohorts

Not all students were included in the correct cohort. We identified three students that should have been included in the 2006 cohort but were not. We also found three students in the 2006 cohort who should have been reported as part of other cohort years.

B.) Student Transfers

We examined student records for documentation verifying the reason used for leaving the District.² The District reported 68 students transferred out of the District in the 2006 cohort. We found that 27 of these students' files did not have support to confirm the transfer.

C.) Dropouts

The District reported 109 students in the 2006 cohort have dropped out. We found that one of the students was actually a transfer (and should be removed from the graduation cohort).

D.) Still Enrolled

The District reported 69 students in the 2006 cohort were still enrolled. We found that 11 of these 69 are drop-outs based on documentation and confirmation from District personnel. Although this does not affect the graduation cohort count, it demonstrates the inconsistency between the reported status of students and the documentation available to support the statuses.

² Referred to as reason for ending enrollment code. This code indicates the reason the student's enrollment ended. Each student must have at least one enrollment record. If a student leaves during the school year or finishes the school year but is not expected to return for the next school year, the student's enrollment record must have an ending date and an appropriate reason code that indicates the reason for leaving.

Summary

According to District's record, there were 630 students in the 2006 cohort; however, eight of these students only attended the District less than five months. Our calculation which accounted for the adjustments mentioned above resulted in the District's graduation cohort to be 648 as shown below.

Total number of students in the 2006 Cohort per District	630
Less: students attended District less than 5 months	8
Graduation Cohort	622
Audit Adjustments:	
A) +) Students belonging to the 2006 Cohort but unreported	3
A) -) Students reported in the 2006 Cohort but belong to another cohort year	3
B) +) Undocumented transfers	27
C) -) Student reported as dropout but was a transfer	1
Audited Graduation Cohort	648

Source: OAS Analysis of District Student Files

Recommendation

Recommendation 1: Periodically review the accuracy of the cohort data reported in the SIRS and confirm that they are supported by student records. Correct inconsistencies.

Accuracy of Graduation Status

Students must earn a minimum of 22 credits and achieve successful scores on 5 Regents exams to earn a New York State Regents or local high school diploma. Regents exam scores and credits earned in subject areas dictate the type of diploma awarded; this information is reported in the SIRS and is essential in gauging district performance.

We found five students identified by the District as graduates that did not meet the graduation requirements, while two were not reported as graduates even though they met the graduation requirements to receive a diploma.

Verification of Reported Graduation Status and Diploma Awards

Students coded as graduates in the SIRS earned a Regents or local high school diploma. Section 100.5(a)(3) of the Regulations states that students who entered grade 9 between 2001-2007 must have earned at least 22 credits to receive either a Regents or local high school diploma. Credits include:

- English - four credits;
- Social Studies - four credits including one credit in American history, one-half credit in Participation in Government, and one-half credit in economics;
- Science - three credits;
- Mathematics - three credits, which shall be at a more advanced level than grade eight;
- The Arts - one credit;
- Health - one-half credit; and
- Physical Education – two credits.

In addition, students must pass Regents examinations in English, mathematics, United States history and government, science, and global history and geography. Section 100.5(c)(6)(i) of the Regulations states that students who first enter grade nine in September 2006 must attain a score of 65 or above on 3 of the 5 required Regents examinations and a score of 55 or above on the remaining 2 required Regents examinations to attain a local diploma.

Inaccurate Graduation Counts

The District reported a total of 427 graduates for the 2006 cohort. We found that the records of five students indicate that they did not have adequate course credits and/or Regents exams or passing exam scores to support their graduate status. We also found two students met graduation requirements, but were coded as non-graduates in the SIRS.

As a result, there are a total of 424 graduates in the 2006 cohort as shown in Table 2.

Table 2 Audited Graduation Count Calculation	
District Reported Graduates	2006 427
Audited Adjustments:	
Coded as graduates but not met graduation requirements	(5)
Coded as non-graduates but met graduation requirements	2
Audited Student Graduates	424

Source: OAS Analysis of District Student Files

Recommendation

Recommendation 2: For each graduate, ensure the necessary graduation requirements have been met and documented in the student records.

Recommendation 3: Correct data in the District's student management system and ensure that corrected data is forwarded to the SIRS.

Graduation Rate

Graduation rate is calculated by taking the number of graduates reported by the District and dividing it by the graduation cohort. According to the published cohort graduation data released by the Department on June 14, 2011, the District reported a 69 percent graduation rate for the 2006 cohort (4 year outcome as of June 2010).

Based on the results of our audit, we calculated that the District's graduation rate is 65 percent for the 2006 cohort as shown below.

Table 3
Graduation Rate Calculation

	<u>2006</u>
Audited Graduation Cohort	648
Audited Student Graduates	424
Audited Graduation Rate	65%

Source: OAS Analysis of District Student Files

Recommendation

Recommendation 4: Implement a system to analyze the accuracy of graduation rate data submitted to the Department.

Condition of Student Records

Districts are responsible for maintenance and security of student records. Cumulative achievement record equivalents (permanent record cards), which are the official source for enrollment data, assessment scores, and credentials awarded, must be retained permanently. In addition, districts must maintain other student records for six years after a student graduates or would have graduated from high school.

Section 185.12 of the Regulations requires that school districts retain student academic records for various lengths of time depending on the kind of record. Cumulative achievement record equivalent (sometimes known as “Permanent Record Card”) for elementary and secondary school including but not limited to information on school entry, withdrawal and graduation, and on subjects taken and grades received from examinations should be retained permanently.

Student records in the District are generally filed in folders at the Guidance Office. During our review of the graduation cohort’s student records, the District was unable to provide thirty-six student folders. In addition, there was no transcript for six students.

Recommendation

Recommendation 5: Maintain the necessary student records according to the Regulations.

Contributors to the Report
Kingston City School District

- Maria C. Guzman, CPA, Manager
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JAMES F. SHAGNESSY, JR.
PRESIDENT-BOARD OF EDUCATION

GERARD M. GRETZINGER
SUPERINTENDENT

October 19, 2011

Mr. James A. Conway
Director
Office of Audit Services, Room 524 EB
The State Education Department
The University of the State of New York
Albany, NY 12234

Dear Mr. Conway,

We are in receipt of the draft report of your audit of the Kingston City School District's cohort data for the 2006 cohort year: "Kingston City School District Data Accuracy and Reliability for the Period July 1, 2006 through June 30, 2010" (SD-0311-1). The time we spent with the auditors definitely helped us to re-evaluate our process for students leaving Kingston High School with documentation and emphasized even more the importance of accuracy in what is reported to State Education Department.

We note that page four of the draft report includes the statement "District data was generally accurate and appropriately documented." Nonetheless, we have carefully reviewed the findings communicated in the report, the data underlying those findings, and the enclosed recommendations from the auditors. We have discussed this information with key staff and we have prepared our response, as requested.

Student data for the 2006 cohort was contained in the district's legacy student management system, SASI. During the spring of 2011 when your office's auditors were working in the Kingston City School district, they were investigating data and data reporting practices that had already been revised and updated as part of our transition to the district's current student management system, eSchoolData.

After reviewing the findings in the report, we would like to reference some information that we believe to be inaccurate. When asked for the specific student detail information supporting the audit report, we were provided with a spreadsheet which we investigated in student records at Kingston High School, in our current and legacy student management systems, and Level 1 of the SIRS. Specifically, in the student detail section which states that "12 students in the acknowledged cohort of 630 whose status was changed to drop-out based on documentation and further inquiry of KHS staff" we found the following errors and/or discrepancies in the data underlying the report's recommendations and conclusions:

Student 609818	Level 1 data indicates the student received a GED diploma
Student 601735	Level 1 data does have a gap in his record from 2009-10, but in 1/11/10 the student transferred to an "other" GED program.
Student 618576	Level 1 data indicates the student belongs to the 2005 cohort, and is not a 2006 cohort drop out.
Student 602918	Level 1 data indicates exit as a "long term absence."
Student 601515	Level 1 data indicates 11/24/09 transfer to GED and 12/30/09 GED diploma
Student 008366	Level 1 data entries conclude with a local diploma as of 6/24/11
Student 610225	Level 1 data has a series of entries, including 2010-11 enrollment in BOCES
Student 007873	The student named in the detail report is not the student who holds this ID number.

See Auditor's Note 1 in Appendix C.

In addition, as part of our regular review of district data, three corrections were submitted last spring while the report was still pending:

Student 605098	Student's cohort was corrected to 2007 last spring
Student 607191	Student's graduation 6/30/10 was entered retroactively
Student 602596	Student's graduation 6/30/10 was entered retroactively

Auditors did identify areas where our data accuracy could be improved. Over the course of the past two years, we have already completed several trainings and supported data verification sessions toward this end. These sessions include:

Fall-Winter 2009-10: 2005 Student Cohort clean up (historical errors)

Spring 2010: Lisa Pullaro (MHRIC) provided training to HS administrators on data verification and cleaning.

Fall 2010: Liz Ten Dyke and Robin Alessi met with Principal Marie Anderson and KHS guidance counselors to initiate 2006 cohort clean up and verification.

Spring 2011: Liz Ten Dyke and Robin Alessi met with Principal Marie Anderson and KHS administrators to review and verify preliminary accountability data available on Level 2.

Summer 2011: Liz Ten Dyke and Robin Alessi remained in close communication with KHS administrators as they continued/complete accountability data verification.

August 31, 2011: Alexis Campion (MHRIC) completed ½ day training with elementary office managers and secondary attendance personnel on correct application of exit codes for all transfers, completers, and non-completers.

2011-12:

Robin Alessi is participating in the 12-session “Data Administrator Institute” offered by the Mid Hudson Regional Information Center (MHRIC). After each session she and Liz Ten Dyke will meet to discuss practical applications of the content for implementation in Kingston. The Data Administrator Institute also provides the KCSD with three on-site visits from MHRIC for any training or tasks related to improved data accuracy.

Education data management is a complex task involving offices and personnel at all levels in the district. For this reason it is critical that the district’s approach to data management is characterized by a cooperative, team effort, guided by clearly articulated expectations for professional excellence. Specifically, the Kingston City School District will implement the following steps:

- the Assistant Superintendent for Student Services, the Assistant Superintendent for Curriculum and Instruction, Kingston High School building administrators, guidance counselors, guidance secretaries, attendance secretaries, and the central office data team (including the registrar and support personnel) will work together on clearly defined tasks, according to a regular annual cycle, to ensure that student information is entered and maintained correctly at all times. A calendar detailing this cycle is attached.
- the Kingston City School District will develop forms for signed documentation of these verification tasks. In addition, when specific reports are verified on sources such as Level 2, the reports will be printed and copies filed for two years so that it is possible to revisit original sources of information if questions emerge subsequently.
- the Kingston City School District will improve oversight of “out of district” students who are placed by the CSE. These students’ histories, and the unique circumstances of their placements, present the district with special challenges in maintaining accurate enrollment and assessment information.
- the Kingston City School District will review and revise registration and enrollment procedures, as cohort membership rules have changed and we are now accountable for students in our data system for a minimum of one day (formerly five months).

Specific responses to each of the recommendations included in the audit report are as follows:

Recommendation 1: Periodically review the accuracy of the cohort data reported in the SIRS and confirm that they are supported by student records. Correct inconsistencies.

District response: addressed in annual cycle of shared data verification tasks.

Recommendation 2: For each graduate, ensure the necessary graduation requirements have been met and documented in the student records.

District response: address internally in improved guidance/graduation verification procedures.

Recommendation 3: Correct data in the district's student management system and ensure that corrected data is forwarded to the SIRS.

District response: This work is already completed on an on-going basis. Adopting the recommended annual cycle of data verification will improve the regularity of corrections.

Recommendation 4: Implement a system to analyze the accuracy of graduation rate data submitted to the Department.

District response: Already initiated in 2010-11, and included in the annual cycle of data verification.

Recommendation 5: Maintain the necessary student records according to the Regulations.

District response: address internally in improved guidance/attendance office procedures.

We look forward to receiving the final report and welcome the opportunity to engage in further dialogue about strategies for improving data accuracy in the Kingston City School District. We appreciate the efforts of the audit committee and are grateful for the time they spent working with our administrative staff to look at ways to improve our district data accuracy and reliability.

Sincerely,



Gerard M. Gretzinger
Superintendent of Schools

KCSO Annual Data Verification Cycle

Month	Department	Data Review
July	Guidance	Compile list of students in next yr's graduating cohort who are missing key assessments
	Building Admin	Complete required tested/not tested verification
	Attendance	Run/verify exit codes and documentation in Jan-June exits/transfers
August	Building Admin	Complete required AOR/Accountability Reviews; submit corrections to Central
September		
October	Guidance	Follow up with students in graduating cohort who are missing key assessments. Plan remediation, testing in consultation with students, parents, teachers, APs
	Attendance	Run/verify exit codes and documentation in July-Sept exits/transfers
	Central Data Admin	Run grade entry/cohort matching query; follow up on any errors
November		
December		
January	Guidance	Ensure graduating cohort students who are missing assessments sit for January exams
	Attendance	Run/verify exit codes and documentation in Oct-Dec exits/transfers
February	Central Data Admin	Run grade entry/cohort matching query; follow up on any errors
	Guidance	During scheduling process, verify cohort membership by checking 1st year in grade 9 courses for all students
March	Guidance	During scheduling process, verify cohort membership by checking 1st year in grade 9 courses for all students
April	Building Admin	Verification of preliminary accountability data on Level 2
	Guidance	During scheduling process, verify cohort membership by checking 1st year in grade 9 courses for all students
May	Building Admin	Continue verification of preliminary accountability data on Level 2
June	Central Data Admin	Run grade entry/cohort matching query; follow up on any errors

Auditors Note 1

We reviewed additional information provided by the District in its response to the draft report (which is Appendix B to this report). As a result, we modified the final report to reflect a change in our findings related to one student (618576).

See Appendix D for “Disposition of Audit Findings Related to 12 Students Whose Status Was Changed to Dropout.” Any resulting adjustment was already reflected in the report.

Kingston City School District
Data Accuracy and Reliability Audit
2006 Cohort

DISPOSITION OF AUDIT FINDINGS RELATED TO 12 STUDENTS WHOSE STATUS WAS CHANGED TO DROP OUT
(12 Students in the Acknowledged Cohort of 630 Whose Status was Changed to Drop-out Based on Documentation and Further Inquiry of Kingston staff)

ID #	Kingston's Oct 19 Letter States:	Auditor's Response, Disposition:
609818	Level 1 date indicates the student received a GED diploma	Spent 2 weeks in GED class in Sep 09, then dropped out, <u>as per guidance counselor</u> . Got GED in jail in 2011 after our reporting period. Finding is ACCURATE.
601735	Level 1 data does have a gap in his record from 2009-2010, but in 1/11/10 transferred to an "other" GED program.	Guidance counselor said he dropped out, did not complete GED in 2010. Finding is ACCURATE.
618576	Level 1 data indicates the student belongs in the 2005 cohort, and is not a 2006 cohort dropout.	Incomplete transcript that does not account for the 2008-09 SY but does report attendance at Liberty High School in 2005-06. Will REMOVE FROM FINDINGS.
602918	Level 1 indicates exit as a "long term absence."	SIRS manual states that "long-term absence" is counted as a dropout. Finding is ACCURATE.
601515	Level 1 data indicates 11/24/09 transfer to GED and 12/30/09 GED diploma	Kingston HS personnel wrote on transcript: "dropout→GED" Finding is ACCURATE.
008366	Level 1 data entries conclude with a local diploma as of 6/24/2011	Transcript ends June 2009. Enrollment records show leaving on 9/4/09 but re-enrolling on 9/8/09 until 6/30/2010. No evidence of attendance anywhere in 09-10 was presented. Therefore she was a dropout as of June 30, 2010. Finding is ACCURATE.
610225	Level 1 data has a series of entries including 2010-11 enrollment in BOCES	Transcript shows no attendance in 2009-2010 after grade 11 was completed in June. No evidence of attendance anywhere in 09-10 was presented. Therefore is a dropout as of June 30, 2010. Attendance elsewhere in 2011 is not relevant. Finding is ACCURATE.
007873	The student named in the detail report is not the student who holds this ID number.	Auditor used the wrong ID# in the report. However, the correct student record was reviewed. The correct ID # is 009035. The number will be changed, but the finding stands. Finding is ACCURATE.

