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May 1, 2013

Mr. Paresh Patel  
Board President  
Yonkers City School District  
One Larkin Center  
Yonkers, NY 10701

Report: Unique Student Identifier

Dear Mr. Patel:

I am writing to transmit the final results of our recently completed audit of student data for the 2011-12 school year at Yonkers City School District (District). The audit was conducted pursuant to the Commissioner of Education's authority under Section 305 of the Education Law. Our audit objectives were to: assess the adequacy of the systems and processes to collect and report student data and verify the reliability and accuracy of the assigned unique student identifiers (ID).

To accomplish our objectives, we interviewed District officials to determine how student data is collected, maintained, and processed at the District; reviewed District policies and procedures, and tested District's student data resolutions. We obtained an understanding of the applicable computer systems and the processes and controls in place at the District to assess the adequacy in providing reasonable assurance that the assigned IDs in the New York State Student Identification System (NYSSIS) are reliable.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

## **Background**

The Student Information Repository System (SIRS) is the primary system that provides a single source of standardized individual student records for analysis at the local, regional, and State levels to track student performance and to meet State and federal reporting and accountability requirements. Local Education Agencies (LEAs) must use this system to report certain data to the State Education Department (Department). NYSSIS is a key element of SIRS that was developed by the Department to assign a unique ID to every pre-kindergarten through grade 12 student in New

York State. The IDs assigned by NYSSIS are used by LEAs to report student-level data to SIRS. Unique IDs enhance student data reporting, improve data quality, and ensure that important educational records are associated with the correct students as they transfer between LEAs. Through NYSSIS, LEAs obtain new IDs for students who do not have an existing one and retrieve IDs that have been previously assigned. Data accuracy is paramount to ensuring that LEAs do not create new records in error or match two unique student records in error.

In NYSSIS, when a student's demographic data is entered for processing, the system checks the database to determine whether that data matches any existing records. If no match is found, a new unique ID is created. If a match is found, the existing ID is assigned to the student. A "Near Match" results if the system cannot determine if the data submitted matches an existing record. A Near Match record is made up of the newly submitted student record and one or more records that are already in the database that contain many similar data elements but not enough to determine if the records are for the same student. As such, the newly submitted record is placed in a Hold Queue with the records from the system it nearly matches. Authorized LEA personnel must then review and resolve these Near Matches by determining if the student record should be matched with an existing ID or issue a new ID.

## **Audit Results**

### Internal Control Over Student Data

A strong system of internal control would include formal policies and procedures for functions that occur on a periodic basis to ensure compliance with State requirements and completion in a timely manner. In addition, policies and procedures can provide guidance to assist changes in personnel or new assignments. Strong control would be established if procedure required a second review of decisions made in order to ensure accuracy. The District has not established formal written procedures governing the review and resolution of students identified in the NYSSIS Hold Queue.

### Accuracy and Reliability of IDs

The District accurately resolved most of the Near Match records in the Hold Queue for the 2011-12 school year. We tested all 165 records and found that the District accurately resolved all but four records and could not provide documentation to support the decision regarding another student. As discussed in detail below, one new ID was created for a student with an existing ID, and three students were inaccurately matched to records with existing IDs.

A new ID was created in error for one record that should have been matched to an existing ID. The existing ID had the same name, guardian, place of birth, and the grade level agreed. Also, the date of birth appeared to be similar, if not for a possible typographical error (2/12/1998 and 1/12/1998). In addition, based on the District's Student Management System (SMS), the student transferred from a school building in the Bronx in eighth grade while the existing ID record shows the student at another school building in the Bronx in sixth grade, which according to a District official is reasonable to expect since students change schools within the City of New York.

The District matched three students to records with existing IDs but should have been issued new IDs. Based on information in the District's SMS, two of the students did not enroll in the District until they entered the United States and therefore could not have been enrolled in another State school nor have an existing ID in NYSSIS. A District official confirmed that all three records should have been issued a new ID and were matched to existing IDs in error. A second District review of the decisions made in resolving the Near Match records would most likely have detected the errors.

Lastly, we also found one record matched to an existing ID; however, the District does not have documentation for us to verify the accuracy and reliability of the match. The name and date of birth was in agreement; however, almost all of the remaining demographic data did not match or was in disagreement.

### **Recommendations**

1. Establish a formal procedure for resolving the NYSSIS Hold Queue. This may include protocols for confirming with other schools, acceptable documentation and maintenance of such documents.
2. Ensure that appropriate actions are taken to resolve the NYSSIS Hold Queue and that all IDs are accurately assigned to students.
3. Take the necessary steps to correct the ID incorrectly assigned and matched.

The results of this audit have been discussed with District officials and their comments have been considered in preparing this report. The District did not provide a written response to the draft audit report.

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.

Sincerely,

A handwritten signature in cursive script that reads "James A. Conway". The signature is written in black ink and is positioned above the printed name.

James A. Conway

c: S. Cates-Williams, K. Slentz, K. Moorhead, C. Szuberla, J. Delaney, J. Conroy, A. Timoney (DOB), J. Dougherty (OSC), D. Weinberger, B. Pierorazio (Superintendent), Dr. J. Langlois (Interim DS Southern Westchester BOCES)