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DISTRICT OF COLUMBIA
PUBLIC SCHOOLS

School Year 1996-97
Enrollment Count
Vulnerable to Errors

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District of Columbia Public Schools: School Year 1996-97 Enrollment Count Vulnerable to Errors

Mr. Chairman and Members of the Committee:

I am pleased to be here today to assist the Committee in its oversight of the District of Columbia Public Schools' (DCPS) enrollment count. An accurate count of the number of enrolled students is the cornerstone of a school district's financial needs assessment. Although in the past DCPS has not received funds on the basis of the number of students enrolled, new budget initiatives will soon directly link DCPS' funding to school enrollment. Consequently, a valid enrollment count process and an accurate count are critical for DCPS' district- and school-level planning, staffing, funding, and resource allocation.

Today I will discuss our recent report¹ on the enrollment count process that DCPS used in school year 1996-97. Our report was prepared at the request of the House Committee on Government Reform and Oversight's Subcommittee on the District of Columbia. The Subcommittee's request was in response to criticisms raised over the past several years about the accuracy of DCPS' enrollment count. Specifically, the Subcommittee asked us to examine DCPS' enrollment count process to determine whether the process appeared sufficient to produce an accurate count.

The information I am presenting today is based on interviews with and documents obtained from DCPS administrative staff, city officials, officials in other urban school districts and their state departments of education, officials in the U.S. Department of Education, and education experts. We also visited 15 DCPS elementary and secondary schools, randomly selected by school level and city quadrant. During our school visits, we interviewed principals, school administrative staff, and teachers and reviewed selected documents. It is important to note that we have done no work involving DCPS' enrollment count process since issuing our report and therefore can report nothing about the process DCPS used for its school year 1997-98 enrollment count. Our comments today pertain only to the process that was used for the school year 1996-97 count.

In summary, even though DCPS changed parts of its enrollment process in school year 1996-97 to address prior criticisms, the process remained flawed. Some of the changes, such as the use of an enrollment card to verify attendance, increased complexity and work effort but did little to improve the count's credibility. Errors, including multiple enrollment records for a single student, remained in the Student Information System

¹District of Columbia Public Schools: Student Enrollment Count Remains Vulnerable to Errors (GAO/HEHS-97-161, Aug. 21, 1997).

(sis), but DCPS had only limited mechanisms for correcting these errors. For example, although Management Information Services personnel maintained sis, they had no authority to correct errors. Furthermore, DCPS' practice of allowing principals to enroll unlimited out-of-boundary students increased the possibility of multiple enrollment records for one student.

In addition, DCPS' official enrollment count included categories of students usually excluded from enrollment counts in other districts when the counts are used for funding purposes. For example, DCPS included in its enrollment count students identified as tuition-paying nonresidents of the District of Columbia and students above and below the mandatory age for public education in the District of Columbia, including Head Start participants,² prekindergarten students (age 4), preschool students (age 0 to 3), and some senior high and special education students aged 20 and older.³ In contrast, the three states that we visited reported that they exclude from enrollment counts used for funding purposes any student who is above or below mandatory school age or who is fully funded from other sources. Furthermore, even though the District of Columbia Auditor has suggested that students unable to document their residency be excluded from the official enrollment count, whether they pay tuition or not, DCPS included these students in its enrollment count for school year 1996-97.

Problems also persisted in the critical area of residency verification. In school year 1996-97, schools did not always verify student residency as required by DCPS' own procedures. Proofs of residency, when actually obtained, often fell short of DCPS' standards. Moreover, Central Office staff did not consistently track failures to verify residency. Finally, school staff and parents rarely suffered sanctions for failure to comply with the residency verification requirements.

In addition, the pupil accounting system failed to adequately track students. sis allowed more than one school to count a single student when the student transferred from one school to another. Furthermore, schools did not always follow attendance rules, and sis lacked the capability to track implementation of the rules. Finally, some attendance rules, if implemented, could have allowed counting of nonattending students.

²Head Start has its own funding source.

³The District of Columbia School Reform Act of 1995 requires separate reporting of some of these groups but does not require that they be included in aggregate counts.

Other school districts report that they use several approaches to control errors, such as the ones we identified, and to improve the accuracy of their enrollment counts. These include using centralized enrollment and pupil accounting centers and a variety of automated SIS edits and procedures designed to prevent or disallow pupil accounting errors before they occur.

Finally, the District of Columbia School Reform Act of 1995 imposed enrollment count reporting and audit requirements. The act requires the enrollment count process to produce an enrollment count that includes the number of special needs and nonresident students by grade level and the amount of tuition assessed and collected. The official enrollment count report released for school year 1996-97 did not provide this information. The act also requires the District of Columbia Financial Responsibility and Management Assistance Authority (Authority) to provide for an independent audit of the enrollment count. The Authority decided, however, that the inadequacies that led to the restructuring of the public school system would make auditing the school year 1996-97 count counterproductive. In short, the Reform Act's audit requirement was not met.

Because the enrollment count will become the basis for funding DCPS, we recommended in our report that the Congress consider directing DCPS to report separately in its annual reporting of the enrollment count those students

- fully funded from other sources, such as Head Start participants or tuition-paying nonresidents;
- above and below the mandatory age for compulsory public education, such as those in prekindergarten or those aged 20 and above; and
- for whom District residency cannot be confirmed.

We also recommended that the DCPS Chief Executive Officer/ Superintendent do the following:

- Clarify, document, and enforce the responsibilities and sanctions for employees involved in the enrollment count process.
- Clarify, document, and enforce the residency verification requirements for students and their parents.
- Institute internal controls in the student information database, including database management practices and automatic procedures and edits to control database errors.

- Comply with the reporting requirements of the District of Columbia School Reform Act of 1995.

We further recommended that the District of Columbia Financial Responsibility and Management Assistance Authority comply with the auditing requirements of the District of Columbia School Reform Act of 1995.

In commenting on a draft of our report, DCPS' Chief Executive Officer/ Superintendent stated that DCPS concurred with our major findings and recommendations and would correct the identified weaknesses. He also acknowledged that the enrollment numbers for school year 1996-97 are subject to question for the reasons we cited—especially because the enrollment count credibility hinged almost entirely on the written verification provided by local administrators. He said that no substantial checks and balances, no aggressive central monitoring, and few routine reports were in place. In addition, he said that virtually no administrative sanctions were applied, indicating that the submitted reports were hardly reviewed.

The Authority shared DCPS' view that many findings and recommendations in our report will help to correct what it characterized as a flawed student enrollment count process. Its comments did, however, express concerns about certain aspects of our report. The Authority was concerned that we did not discuss the effects of the Authority's overhaul of DCPS in November 1996.⁴ It also commented that our report did not note that the flawed student count was one of the issues prompting the Authority to change the governance structure and management of DCPS. In the report, we explained that we did not review the Authority's overhaul of DCPS or the events and concerns leading to the overhaul.

Other comments on our report by the Authority and the U.S. Department of Education dealt with technical suggestions. The complete comments of DCPS' Chief Executive Office/Superintendent, the Authority, and the Department of Education, along with our responses to the comments, are included in our report.

⁴For many years, DCPS had been governed by an elected Board of Education. In November 1996, the specially appointed Authority declared a state of emergency in DCPS and transferred DCPS management—until June 30, 2000—to the Authority's agents, a nine-member specially appointed Emergency Transitional Education Board of Trustees. The Authority also replaced DCPS' superintendent with a Chief Executive Officer/ Superintendent.

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to Errors**

Mr. Chairman, this concludes my prepared statement. I would be pleased to respond to any questions you or members of the Committee may have.

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