



City of New York

OFFICE OF THE COMPTROLLER

Scott M. Stringer
COMPTROLLER



MANAGEMENT AUDIT

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Audit Report on the Department of
Education's Efforts to Monitor and
Address School Attendance of
Homeless Children Residing in Shelters

MG16-098A

March 12, 2018

<http://comptroller.nyc.gov>



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OFFICE OF THE COMPTROLLER
SCOTT M. STRINGER

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To the Residents of the City of New York:

My office has audited the New York City Department of Education (DOE) to determine whether it conducted adequate outreach and provided sufficient oversight of the attendance of students residing in homeless shelters operated by the New York City Department of Homeless Services (DHS).

The audit found that DOE does not engage in adequate outreach or have sufficient oversight of efforts made to track and monitor the attendance of students residing in temporary housing who are chronically absent from school, particularly those residing in DHS-operated homeless shelters. Specifically, the audit found that while DOE has established multiple protocols related to student absences that central staff and individual school employees are required to follow, it does not have adequate oversight mechanisms to ensure that these protocols are followed. In a number of instances in our audit sample, we found that they were not adhered to. In addition, DOE did not provide evidence that Family Assistants who work in the shelters themselves conducted any outreach related to absences or latenesses for all of the students in the audit sample. In addition, the audit found deficiencies in schools' response to questionnaires regarding the schools' individual 2015-2016 School Year Attendance Plans.

The audit makes 12 recommendations to DOE, including that the agency should: enhance its policies and procedures as needed to ensure that school officials immediately make the required outreach and intervention efforts and that those efforts are adequately documented; ensure that those charged with the oversight responsibilities for student attendance are familiar with their responsibilities; conduct a study to determine the adequacy of its current caseloads for Family Assistants to determine if it has sufficient staff levels to enable the Family Assistants to effectively fulfill their job responsibilities; and consider using the findings from the study as justification for increasing the number of Family Assistants overseeing the shelters.

The results of the audit have been discussed with DOE officials, and their comments have been considered in preparing this report. Their complete written response is attached to this report.

If you have any questions concerning this report, please e-mail my Audit Bureau at audit@comptroller.nyc.gov.

Sincerely,

Scott M. Stringer

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THE CITY OF NEW YORK OFFICE OF THE COMPTROLLER MANAGEMENT AUDIT

Audit Report on the Department of Education's Efforts to Monitor and Address School Attendance of Homeless Children Residing in Shelters

MG16-098A

EXECUTIVE SUMMARY

The New York City (City) Department of Education (DOE) is the largest school district in the United States, serving 1.1 million students in over 1,800 schools. One of DOE's responsibilities is to track the attendance of students and to follow up appropriately with absent students and their families. The need for adequate follow-up is especially important for chronically absent students and for students whose pattern of absences appears to be approaching a chronic level, defined by DOE to occur when a student's attendance rate is less than 90 percent. Chancellor's Regulation A-210 mandates that schools maintain a system for recognizing patterns of student absence and that they implement specific intervention strategies to reduce the number of students who are chronically absent.

Responsibility for tracking school attendance rests with the individual schools and their principals. They are given specific requirements, overall guidance, and support in their efforts by, among other things: specific Chancellor's Regulations; the DOE Office of Safety and Youth Development (OSYD); and borough-based Field Support Centers. OSYD's responsibilities include supporting students' well-being, academic achievement, and social growth through, among other things, establishing and implementing integrated policies and procedures. The Field Support Centers are independent of OSYD but work with that office and with individual schools to provide integrated supports to schools. The Field Support Centers are specifically responsible for providing assistance to help ensure that schools' attendance program requirements are met. Their responsibilities include assisting schools in the development of Attendance Plans that allow for the effective implementation of attendance tracking, outreach, follow-up and support services and reviewing such plans.¹

Incidences of poor school attendance have been found to be more prevalent among students who reside in homeless shelters than the general student population. In part to address this national phenomena, the federal McKinney-Vento Homeless Assistance Act of 2001 (the McKinney-Vento Act) mandates that homeless children be guaranteed equal access to the same free appropriate public education provided to children who are permanently housed within the community. DOE

¹ Each school's Attendance Plan is created through its response to a questionnaire that the school must submit to OSYD. Among other things, in those questionnaires the schools must identify their policies and procedures regarding attendance.

has assigned the responsibility for meeting the requirements of the McKinney-Vento Act and other related policies and procedures to its Students in Temporary Housing (STH) unit, which is a component of OSYD. In order to achieve the goals of the McKinney-Vento Act, every community school district assigns Family Assistants (DOE employees stationed at shelters) and assigned to work with the homeless families and monitor school attendance of the children in those families.

The City Department of Homeless Services (DHS) is responsible for providing short-term, emergency shelter for individuals and families who have no other available housing options.² DOE and DHS have each established their own procedures and requirements intended to ensure that school-aged children (Pre-Kindergarten through grade 12), ages 4-21, residing in City shelters attend school regularly and that outreach and intervention is conducted when necessary.

This audit focused on DOE's efforts to monitor, track and help ensure school attendance by homeless children residing in shelters.³ Specifically, the objective of this audit was to determine whether DOE conducted adequate outreach and provided sufficient oversight of the attendance of students residing in DHS-operated homeless shelters.

Audit Findings and Conclusions

DOE does not engage in adequate outreach or have sufficient oversight of efforts made to track and monitor the attendance of students residing in temporary housing who are chronically absent from school, particularly those residing in DHS-operated homeless shelters. While DOE has established multiple protocols related to student absences that central staff and individual school employees are required to follow, it does not have adequate oversight mechanisms to ensure that these protocols are followed. In a number of instances in our audit sample, we found that they were not adhered to. Since students who reside in temporary housing are known to have higher rates of absenteeism than the permanently-housed student population, DOE's oversight weaknesses could particularly increase the safety and welfare risks to this already vulnerable group of children.

For our sample of 73 students who were identified by DOE as having resided in DHS homeless shelters during the 2015-2016 School Year⁴ and who, based on data provided by DOE, we identified as being chronically absent, our analysis of activity by individual schools revealed:

- No evidence that schools conducted outreach efforts for 25 students (34 percent) who were chronically absent (12 students had *no* evidence of outreach, and 13 students had outreach efforts that were not specific to absences). In addition, there was no evidence of outreach efforts for 50 students (68 percent) with occurrences of latenesses.
- No evidence that schools conducted outreach on the first day of a student's absence in 92 percent of the instances related to absences where such outreach was required.
- No evidence that schools conducted outreach for 87 percent of the absences reported for our sampled students and for 94 percent of the latenesses reviewed.

² DHS contracts with shelter providers to house homeless families and to provide services. DHS is responsible for ensuring compliance with the contracts. Case Managers, who are shelter employees, must comply with DHS requirements in working with the families and ensuring that school-age children attend school.

³ Matters related to DHS's provision of support and outreach to homeless families with children were covered in a separate audit entitled, "Audit Report on the Controls of the Department of Homeless Services over the Shelter Placement and the Provision of Services to Families with Children" (#MG14-088A) issued by this office on December 18, 2015.

⁴ According to the list provided by DOE, our initial sample of 73 students resided in shelter during the 2015-2016 School Year. However, further analysis revealed that 15 of the 73 sampled students did not reside in shelter during this period.

In addition, DOE did not provide evidence that Family Assistants who work in the shelters themselves conducted any outreach related to absences or latenesses for 54 percent of the sampled students.⁵ We believe that the Family Assistant outreach failures we found resulted in large part from the fact that DOE has not dedicated sufficient staff necessary to adequately oversee the students.

We also found deficiencies in schools' response to OSYD questionnaires regarding the schools' individual 2015-2016 School Year Attendance Plans. In the absence of adequate controls to ensure that schools have Attendance Plans that conform to DOE regulations, there is an increased risk that they will not effectively assist students with attendance issues.

Audit Recommendations

To address the issues raised by this audit, we make 12 recommendations, including the following:

- DOE should enhance its policies and procedures as needed to ensure that school officials immediately make the required outreach and intervention efforts and that those efforts are adequately documented, in accordance with the Chancellor Regulations.
- DOE should ensure that those charged with the oversight responsibilities for student attendance are familiar with their responsibilities.
- DOE should amend its current process and ensure that all students' absence histories are fully recognized within the Automate the Schools (ATS) system, absence patterns are properly identified, and Form 407 Referrals are generated, regardless of whether or not students have transferred from other schools.
- DOE should conduct a study to determine the adequacy of its current caseloads for Family Assistants to determine if it has sufficient staff levels to enable the Family Assistants to effectively fulfill their job responsibilities.
- Based on the results of the study referred to above, DOE should consider using the findings from the study as justification for increasing the number of Family Assistants overseeing the shelters through reassignments of existing staff and/or by seeking additional funding from the City's Office of Management and Budget to hire additional Family Assistants.
- DOE should establish procedures with clear roles and responsibilities to ensure the ongoing assessment and evaluation of school-based attendance activities, including student monitoring by Superintendents and outreach efforts by responsible parties, so that students with poor attendance are identified and receive necessary outreach and intervention.

Agency Response

DOE stated that it agreed with four of the 11 recommendations directed to the agency and partially agreed with another four. However, to the extent that DOE stated that it agreed or partially agreed with five of the audit recommendations, it qualified that "agreement" by stating that it "agrees with the recommendation *in that it is current practice*." (Emphasis added.) Thus, DOE effectively rejected the auditors' recommendation that current practice should be improved in each of these instances. Of the remaining three recommendations, DOE expressly disagreed with one and did

⁵ The STH Family Assistants' outreach efforts are separate and distinct from the outreach efforts made by the schools.

not specifically address two. DOE also expressly disagreed with a number of the audit findings. We address these areas of disagreement in detail in the body of this report. After carefully reviewing DOE's arguments, we find no basis to alter any of the audit's findings.

In its response, DHS agreed to implement the one recommendation directed to the agency.

AUDIT REPORT

Background

DOE is the largest school district in the United States, serving 1.1 million students in over 1,800 schools. One of DOE's responsibilities is to track the attendance of students and to follow up appropriately with them and their families. Students who miss significant amounts of school time as a result of excessive absences and/or lateness are missing important educational time. Moreover, high rates of absences and/or latenesses can also be indications of significant health and safety issues that are not being adequately addressed.

DOE has developed multiple protocols to help ensure that students with excessive absences and/or latenesses are monitored and their attendance issues are promptly addressed. The need to adequately follow up with the students is especially important for those who are chronically absent or who have a pattern of absences that indicates they are in danger of becoming chronically absent, defined by DOE to occur when a student has an attendance rate of less than 90 percent. Chancellor's Regulation A-210 mandates that schools maintain a system for recognizing patterns of student absence and that they implement specific strategies for intervention to reduce the number of students who are chronically absent. Chancellor's Regulation A-210, III.B.2 also states that "frequent or unexcused lateness or early departures require the same follow-up and intervention procedures as absences."

Responsibility for tracking school attendance rests with the individual schools and their principals. They are given specific requirements, overall guidance, and support in their efforts by, among other things: specific Chancellor's Regulations; OSYD; and borough-based Field Support Centers. The mission of OSYD is to help schools to create and maintain a safe, orderly and supportive school environment for students. OSYD's responsibilities include supporting students' well-being, academic achievement, and social growth. Among other areas, OSYD focuses on attendance for the general student population, including those students that reside in temporary housing. In addition to OSYD's attendance responsibilities, DOE has established borough-based Field Support Centers designed to offer integrated supports to schools in areas such as instruction, operations and to assist with the efforts to track and follow up with absent students. The Field Support Centers are independent of OSYD and report to DOE's Senior Deputy Chancellor for School Support. However, OSYD works directly with the Field Support Centers and the schools to establish and implement consistently integrated policies and practices that are intended to result in a coordinated approach to student support services and school safety. The Field Support Centers are specifically responsible for providing support and assistance to schools in order to ensure that attendance program requirements are met. These responsibilities include:

1. assisting schools in the development of Attendance Plans that allow for the effective implementation of attendance tracking, outreach, follow-up and support services and reviewing such plans; and
2. facilitating training for staff involved in the attendance program, including attendance teachers, attendance coordinators, principals, assistant principals, guidance counselors, support staff, pupil accounting secretaries.

Incidence of poor school attendance have been found to be more prevalent among students who reside in homeless shelters than the general student population. As noted in a recent City Independent Budget Office (IBO) study, higher absentee rates have been found to be the result

of multiple factors, including homeless students moving away from their neighborhood schools and other social supports and the general disruption of family life that results from a lack of permanent housing.⁶ In addition, the Institute for Children, Poverty, & Homelessness (ICPH) states that homeless students are more likely than their permanently-housed classmates to drop out of high school without graduating.⁷ In part to address this national phenomena, the federal McKinney-Vento Homeless Assistance Act of 2001 (the McKinney-Vento Act) mandates that homeless children be guaranteed equal access to the same free appropriate public education provided to children who are permanently housed within the community.

DOE has assigned the responsibility for meeting the requirements of the McKinney-Vento Act and other related policies and procedures to its STH unit, which is a component of OSYD. In order to achieve the goals of the McKinney-Vento Act, every community school district assigns Family Assistants (DOE employees assigned to one or more shelters) to work with the homeless families and monitor school attendance of the children in those families. When a Family Assistant becomes aware that a student is frequently absent, he or she must send a notice to the parents at the shelter directing that a conference be held to discuss steps that can be taken to help improve attendance. DOE procedures state that Family Assistants must document, in hard copy notes, all attendance-related interventions with families.

DHS is responsible for providing short-term, emergency shelter for individuals and families who have no other available housing options. DOE and DHS have each established their own procedures and requirements geared to ensuring that school-aged children (Pre-Kindergarten through grade 12), ages 4-21, residing in City shelters attend school regularly and that outreach and intervention is conducted where necessary. This audit focused on DOE's efforts to monitor, track and help ensure school attendance of homeless children residing in shelters.

In 2006, as a result of the much publicized murder of Nixzmary Brown, who prior to her death had numerous absences, the Mayor created the Interagency Task Force on Child Welfare and Safety to identify "where the systemic breakdowns occurred" in the child's welfare case. Among the recommendations implemented as a result of the Task Force's 27-page report is the requirement that each school investigate excessive unexplained absences—10 consecutive unexplained missed days or 20 in a four-month period—within 10 days after the absences are reported. These investigations are referred to as "407 investigations" because they are prompted by "Form 407 Attendance Follow-up and Outreach Referrals" (Form 407). In addition, Chancellor's Regulation A-210, IV.A calls for schools to undertake an investigation for each student who requires continued follow-up after standard outreach and intervention measures have been utilized. After the requisite number of absences has been reported, DOE's computer system, ATS,⁸ automatically generates a Form 407, prompting a required 407 investigation. School officials are required to document the results of the 407 investigations in ATS.

In addition, DOE also created a Student Intervention Screen in ATS, referred to as an ILOG, that is used to document all outreach attempts made to contact a child's family and the intervention efforts made to assist the child and the parent/guardians.⁹ Access to this screen has been given to principals, assistant principals, guidance counselors, attendance coordinators, pupil accounting

⁶ *Not Reaching the Door: Homeless Students Face Many Hurdles on the Way to School*, issued by the IBO in October 2016.

⁷ Blog by Kaitlin Greer, Policy Analyst, posted on the Institute for Children, Poverty, & Homelessness (ICPH) website, titled *What Makes the Difference Between Dropout and Graduation for Homeless Students?*

⁸ ATS is a school-based administrative system that standardizes and automates the collection and reporting of data for all students in the New York City Public Schools.

⁹ Outreach includes phone calls, letters, conferences and home visits. Intervention includes assessing the needs of the child in an effort to assist with improving attendance, such as counseling sessions.

secretaries, attendance teachers, Substance Abuse Prevention and Intervention Specialists, and other school staff responsible for providing intervention services to students. However, while shelter-based Family Assistants have access to student attendance records, they did not have access to ILOGs during the scope of our audit.¹⁰

According to DHS' records, 32,243 school-aged children resided in DHS family shelters during the 2015-2016 School Year (September 9, 2015 through June 28, 2016).

Objective

The objective of this audit was to determine whether DOE conducted adequate outreach and provided sufficient oversight of the attendance of students residing in DHS-operated homeless shelters.

Scope and Methodology Statement

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 objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective. This audit was conducted in accordance with the audit responsibilities of the City Comptroller as set forth in Chapter 5, §93, of the New York City Charter.

The scope of this audit initially covered the 2014-2015 School Year. However, because of extended delays by DOE in providing us with access to information necessary to carry out this audit, the audit scope was changed to the 2015-2016 School Year. It was not until April 2017 that DOE provided us with most of the requested information that enabled us to conduct our audit testing. Additionally, DOE took the position that records we sought contained information that auditors were prohibited from seeing under applicable privacy laws. In order to ensure that the audit could proceed in a reasonably timely fashion, the auditors relied on DOE staff to photocopy specific information we requested from responsive documents and to redact any information they believed to be confidential that we had not requested. We relied on DOE's representation that we received all of the information we requested. Please refer to the Detailed Scope and Methodology at the end of this report for the specific procedures and tests that were conducted.

Discussion of Audit Results with DOE and DHS

The matters covered in this report were discussed with DOE and DHS officials during and at the conclusion of this audit. A preliminary draft report was sent to DOE and DHS and discussed at exit conferences with DHS officials on December 13, 2017 and with DOE officials on December 15, 2017. We submitted a draft report to DOE and DHS with a request for comments and received a written response from DHS on January 31, 2018 and from DOE on February 5, 2018. In its response, DHS agreed to implement the one recommendation directed specifically to it, that it notify DOE when it receives notice of shelter openings and closings.

¹⁰ At the exit conference for this audit, officials informed us that DOE is in the process of providing Family Assistants with ILOG access. Officials did not provide an estimated implementation date.

In its response, DOE stated that it agreed with four of the 11 recommendations directed to it and partially agreed with another four. However, to the extent that DOE stated that it agreed or partially with five of the audit recommendations, it qualified that “agreement” by stating that it “agrees with the recommendation *in that it is current practice.*” (Emphasis added.) Thus, DOE effectively rejected the auditors’ recommendation that current practice should be improved in each of these instances. DOE did not agree with our recommendation that it amend its Form 407 process for students who transfer schools and did not specifically address our recommendations to conduct a study and evaluate its staffing levels for Family Assistants. Of the recommendations with which DOE agreed, at least in part, DOE claimed that it is already in compliance with the recommendations relating to enhancing its procedures for conducting outreach and ensuring that those charged with oversight are familiar with their responsibilities.

In its response, DOE additionally disagreed with several audit findings and in the process, misstated matters related to the audit’s scope and methodology. Among other things, DOE officials incorrectly argued that the audit scope was expanded to include DOE’s outreach as a whole and was not confined to the students residing in temporary housing. Based on this mistaken contention, DOE claimed that the audit report “extrapolates” its findings without adequate foundation. However, the audit scope was not expanded. Rather, for certain procedures employed by DOE, the agency itself makes no distinction between students residing in temporary housing and those who do not. Thus, any deficiencies we found with the implementation of those procedures were applicable to the population as a whole and, in accordance with generally accepted government auditing standards, we appropriately reported them as such.

DOE officials also took issue with our statements regarding the delays in the audit and cite the Family Education Rights and Privacy Act (FERPA) requirements as the reason for those delays. However, the delays to which we refer in this report were not related to our discussions regarding how to protect information covered by FERPA, but rather related to the time it took DOE to actually provide materials requested, both those containing information protected by FERPA and those that did not. For example, we asked DOE on January 22, 2016, to provide us with a population of students who resided in temporary housing, and the agency did not provide it until March 24, 2016, more than two months later. No claim was ever made that this information was covered by FERPA or was otherwise confidential. Upon review of that information, we found discrepancies and issues with the data provided, which DOE was not able to fully resolve until July 11, 2016, nearly four months later. The Memorandum of Understanding (MOU) between DOE and our office granting us access to FERPA-protected information was signed on October 27, 2016. Nevertheless, it took DOE four months to provide all of the ILOGS pertaining to the students in our sample. Notwithstanding the MOU, which in and of itself took nearly four months to complete, we were not able to begin our audit tests until a year after the start of this audit, necessitating that we move the scope of the audit to the more recent 2015-2016 School Year.

DOE’s additional arguments challenging the audit findings are addressed in detail in the body of this report. After carefully reviewing DOE’s arguments, we find no basis to alter any of the audit’s findings.

The full texts of the DHS and DOE responses are included as addenda to this report.

FINDINGS AND RECOMMENDATIONS

DOE does not engage in adequate outreach or have sufficient oversight of efforts made to track and monitor the attendance of students residing in temporary housing who are chronically absent from school, particularly those residing in DHS-operated homeless shelters. While DOE has established multiple protocols related to student absences that central staff and individual school employees are required to follow, it does not have adequate oversight mechanisms to ensure that these protocols are followed. In a number of instances in our audit sample, we found that they were not adhered to. As a result, DOE is significantly hampered in its ability to ensure the safety and welfare of the children residing in temporary housing and attending its schools.

According to Chancellor's Regulation A-210, "tracking and follow-up of attendance and chronic absenteeism is one of the Department of Education's most important responsibilities as it relates to the safety, welfare, and educational success of the students of New York City." DOE has established internal procedures designed to implement the goals set forth in the Chancellor's Regulation. In doing so, however, DOE has not established an effective centralized mechanism to monitor the outreach efforts made by schools, which consequently increases the risk that schools are not adequately engaging in outreach to students with attendance issues and that the schools' deficiencies will go unnoticed and uncorrected. Since students that reside in temporary housing are known to have higher rates of absenteeism than the permanently-housed student population, DOE's oversight weaknesses could particularly increase the safety and welfare risks to this already vulnerable group of children.

For our sample of 73 students who were identified by DOE as having resided in DHS homeless shelters during the 2015-2016 School Year and who, based on data provided by DOE, we identified as being chronically absent, our analysis of activity by individual schools revealed:

- No evidence that schools conducted outreach efforts for 25 students (34 percent) who were chronically absent (12 students had *no* evidence of outreach and 13 students had outreach efforts that were not specific to absences). In addition, there was no evidence of outreach efforts for 50 students (68 percent) with occurrences of latenesses.
- No evidence that schools conducted outreach on the first day of a student's absence in 92 percent of the instances related to absences where such outreach was required.
- No evidence that schools conducted outreach for 87 percent of the absences reported for our sampled students and for 94 percent of the latenesses reviewed.

In addition, DOE did not provide evidence that shelter-based Family Assistants conducted any outreach for 54 percent of the students. During the 2015-2016 School Year, DOE employed only 110 Family Assistants to oversee 32,243 school-aged children residing in shelters—an average of 293 children per Family Assistant. We believe that the Family Assistant outreach failures we found resulted in large part from the fact that DOE has not dedicated sufficient staff necessary for overseeing the students.

We also found deficiencies in schools' responses to OSYD's questionnaires regarding the schools' individual 2015-2016 School Year Attendance Plans. Our review found that DOE failed to ensure that 90 of the 96 schools (94 percent) attended by the students in our sample established Attendance Plans that were in compliance with the Chancellor's Regulation A-210. As a result, DOE is hindered in its ability to determine whether these schools are sufficiently

prepared to meet their obligations regarding student attendance under the Chancellor's Regulation.

These findings are discussed in greater detail in the following sections of this report.

Insufficient Evidence of Required Outreach Related to Absences and Latenesses Performed by DOE

DOE does not have evidence that school officials consistently performed the outreach required for all of the sampled students who were absent from and/or late to school. According to DOE officials, outreach efforts include telephone calls, emails, and home visits. DOE regulations specifically require that an outreach be made for each instance in which a student is inexplicably absent for one day or two or more consecutive days. Chancellor's Regulation A-210, III.F mandates that

[S]chools must contact parents to determine the cause of a child's unexplained absence and propose a resolution.¹¹ Automated calling systems may be used, wherever possible, to supplement school outreach efforts. Outreach and intervention efforts are to be entered into the ILOG system on ATS.

Chancellor's Regulation A-210, III.F also specifies that "every effort must be made to telephone parents on the first day of a student's absence."

In addition, the Chancellor's Regulation A-210 requires the same follow-up procedures be applied to "frequent or unexcused lateness or early departures."

Insufficient Evidence of Outreach for Absences

DOE records reflect that the 73 chronically absent students in our sample had a total of 3,037 absences during the 2015-2016 School Year. However, we saw evidence that DOE only made 404 outreach efforts pertaining to 48 students with a total of 2,331 days of absences. There was no evidence of required outreach efforts made for 25 students in our sample with a total of 706 absences (12 students had *no* evidence of outreach and 13 students had outreach efforts that were not specific to absences).

We identified the number of instances (i.e., one day or two or more consecutive days) of absence that occurred as a result of the 3,037 absences in order to test whether outreach efforts were made "to telephone parents on the first day of a student's absence." In doing so, we determined that there were 1,658 instances where students were absent for one day or two or more consecutive days during the 2015-2016 School Year and DOE schools should have made outreach efforts in 1,614 instances, contacting the parent/guardian on the first day—through live phone calls, automated calling systems, conferences with the family, or home visits.¹² However, we saw evidence of outreach efforts in only 123 (8 percent) of the 1,614 instances, of which only 36 were actually telephone calls. As a result, we found many chronically absent students in our

¹¹ An unexplained absence occurs when the school has not been notified on the day that the absence occurs, or beforehand, that the student would be absent.

¹² There were 44 instances where schools were aware beforehand as to why the student was absent and as a result, outreach was not required.

sample for whom, based on its records, DOE appears to have failed to make required efforts to determine the reasons for prolonged absences. For example:

- According to the *Individual Student Attendance History Report* (RISP) for a homeless first grader in our sample, who had attended two schools during the 2015-2016 School Year, the student was absent 55 of the 178 days enrolled in school (70 percent attendance) and late on 101 occasions. At the first school, the student was absent for six consecutive school days and based on the evidence provided, it was not until the fifth day that the school performed any type of outreach, and that was merely to send a letter to the parent stating that the student had a pattern of chronic absenteeism during the *prior* school year. There is no evidence that the school attempted to actually reach out to the parent/guardian to ascertain the reason for the existing absence. Shortly thereafter, the student transferred to the second school and was absent for 49 days from October 2, 2015 through June 28, 2016. However, according to DOE records, it was not until March 3, 2016, at which point the student had already accumulated 27 days of absences and 51 latenesses, that this school performed an outreach to the parent/guardian.¹³
- A homeless third grader in our sample had been absent 41 out of the 178 days enrolled in school and late on 17 occasions during the 2015-2016 School Year. During one instance, the student was absent for 10 days from September 9, 2015 to November 23, 2015 and DOE had no evidence that outreach efforts had been made. Based on the evidence provided, it was not until the student was absent again on November 30, 2015, that an outreach was made, with no reference to the prior 10-day absence. The only other outreach DOE provided was a “promotion in doubt” letter sent to the parent/guardian after the student had been absent 22 days during the school year. DOE had no evidence that the school reached out and offered assistance to remedy the issues relating to the student’s absences.

We note that even where there is evidence of outreach efforts, DOE does not require outreach attempts to involve actual interaction with the parents. Rather, DOE counts automated calling systems and mailing “promotion-in-doubt letters,” which do not consistently mention the absences, as outreach efforts for students with excessive unexcused absences. Accordingly, for one of the students in our sample where pursuant to DOE’s protocols, there was evidence of outreach efforts being made, we found that although the student had a total of 21 absences and 63 latenesses, the 12 outreach attempts made by the school consisted of 10 promotion-in-doubt letters mailed to the student’s home informing the parent that the child was at risk of failure, one phone call from the parent, and a voicemail message left for the family. In addition, for 10 of the students, the initial outreach was a promotion-in-doubt letter mailed to the students’ homes. For three of the 10 students—who had absences ranging from 17 to 51 days—the only evidence of outreach provided by DOE was promotion-in-doubt letters. For another three students, the only other evidence of outreach was auto-generated letters.

DOE Response: “The Report also repeatedly states that when they looked at absences there was a ‘lack of evidence’ of parental outreach and then attempts to equate the lack of evidence to no outreach occurring. This characterization is misleading and points to the Comptroller’s misunderstanding of the depths of the DOE’s outreach efforts.”

Auditor Comment: In its response, DOE misstates the audit findings and then criticizes them without presenting relevant facts to rebut them. The actual finding that there is

¹³ According to the ILOGS, the Guidance Counselor from the school held a conference with the parents to discuss the student’s absences and latenesses.

inadequate evidence in DOE's records of required outreach to students with unexplained absences and latenesses remains unaddressed. DOE's response misses the essential concern that the absence of evidence of outreach efforts is a clear indication that adequate outreach efforts might not have been made. It also ignores the fact that all evidence of outreach provided by DOE, regardless of the party who performed such outreach, was considered in our analysis and that it provided sufficient basis for our conclusions.

DOE Response: "It is also inaccurate to expect that the number of parental outreach attempts be equivalent to the number of absences. For example, if the parent informs the school and/or Family Assistant that the child has chicken pox, it would be reasonable to expect that the student would be absent for several days. Outreach on each of those subsequent days following notification of illness is meaningless and the school's time is better spent on outreach to families where the school has not heard from the parent regarding their child's absence."

Auditor Comment: Contrary to DOE's assertion, we did not state that DOE should have made a parental outreach attempt each and every day after being informed that a child would be absent for several days due to an illness. As noted in a footnote on page 10 of this report, DOE provided us with evidence in 44 instances that schools were aware beforehand as to why students were absent, and we acknowledged that no outreach was required for those absences. Not counting those 44 instances, the 73 students in our audit sample logged a total of *1,614 separate instances of absence from school* of 1 day or longer that, under DOE's rules, required DOE to attempt at least one outreach for each instance of absence. However, DOE documented *only 404 outreach efforts in total* related to those students' absences, rather than 1,614 as required. Construing the facts most favorably to DOE's benefit, if each of its 404 outreach efforts related to a separate instance of absence by the 73 students, DOE failed to make required outreach efforts in 75 percent of the absences, that is, in *1,210 separate instances of absence by chronically-absent students*. We therefore find no basis for altering this finding.

Insufficient Evidence of Outreach for Lateness

Chancellor's Regulation A-210, III.B.2 states that

School policy will define what constitutes a late arrival and define which late arrivals are excused and not excused. Schools are to keep records of late arrivals and early departures in accordance with school-defined policies. Frequent or unexcused lateness or early departures require the same follow-up and intervention procedures as absences.

Consistent with this Chancellor's Regulation, when we asked DOE officials how many latenesses are considered "frequent," they responded that schools have to make that judgment based on knowledge of the student.

With regard to outreach to students with latenesses, 67 of our sampled students, all of whom had been deemed chronically absent, also had a total of 1,857 latenesses; however, we did not see evidence of outreach efforts in 1,744 (94 percent) of the occurrences. We saw that schools made only 113 of the outreach and intervention efforts pertaining to 17 students who had a total of 683

occurrences of lateness and we saw no outreach and intervention efforts made pertaining to the lateness of 50 students with 1,174 occurrences of lateness in total.¹⁴

However, in addition to the outreach efforts noted above, we also reviewed documents for an additional 328 outreach efforts where, based on the documentation provided by DOE, we were not able to determine the reasons for the outreach efforts or even to ascertain whether they were related to attendance. For example, for one student, an ILOG note states that school staff called a guardian regarding the student. However, the note did not specify the purpose of the call. In another example for the same student, the note states that the school staff contacted the guardian regarding the student's current residence status. Thus, DOE's records were insufficient to enable us to determine whether these 328 outreach efforts were for student latenesses, absences or for some other reason.

DOE Response: "...lateness was tested against a single standard despite no centralized lateness policy for the district in existence. The DOE directs each school to create a lateness policy that meets the needs of its community. The Comptroller did not collect evidence of each school's lateness policy and therefore, the Comptroller did not gather the required records to conduct the audit test."

Auditor Comment: As noted in the report, Chancellor's Regulation A-210, III.B.2 states that "School policy will define what constitutes a late arrival and define which late arrivals are excused and not excused." DOE's argument is baseless in that—as evidenced by the schools' attendance records—the determination of lateness was made not by us but by the schools themselves. It should also be noted that all of the students in question had already been classified as chronically absent and were missing school days in addition to those days that they were marked late by their schools.

Schools Did Not Record All Outreach Efforts in ILOGs

Chancellor's Regulation A-210, III.F, requires that

[A]ll parent contacts and attempted contacts must be documented and kept on file in the school. Outreach and intervention efforts are to be entered into the ILOG system on ATS.

Most of the school principals, Field Support Center personnel, and OSYD officials that we interviewed—all charged with absentee oversight responsibilities—indicated familiarity with this requirement, stating that outreach and interventions conducted by the attendance staff must be entered into ILOGs. Some of those OSYD officials even went as far as stating that "if an outreach effort wasn't ILOGed then it wasn't done." Others affirmed that if they did not see anything documented in either a student's ILOG or documents maintained at the schools, as far as they were concerned, no outreach occurred. Since multiple DOE personnel located at various offices and potentially multiple schools must be able to review a student's attendance history and related

¹⁴ For lateness information, we principally reviewed ILOGs. Other records we reviewed included ATS reports and documents we received from the schools such as automated call logs, medical/parent notes, schools' internal phone logs, 407 form.

DOE follow-up and intervention efforts, it is essential that all the relevant information be maintained in these ATS files.

According to DOE's Principal's Portal,¹⁵

[W]ith the ATS ILOG function, schools build a comprehensive account of outreach and intervention for a student and family. An ILOG report can be promptly generated by a school staff member, school administrator, or DOE official for documentation of the entire school's efforts for a particular case. The ILOG report is also available to an ACS caseworker on cases of suspected educational neglect.

However, we found that a number of outreach efforts made by DOE personnel were not recorded in ILOGs. Specifically, our review of the documents provided by the schools and the Individual Student Attendance History Reports obtained from DOE revealed that 80 additional outreach and intervention efforts had been conducted that had not been documented in ILOGs for 16 sampled students. Further, there were no entries made in the ILOGs to indicate outreach or intervention efforts for the absence of 12 students, while there was at least some evidence recorded in the ILOGs that outreach and intervention efforts were made for 48 of the 73 sampled students. (Thirteen students had outreach efforts that were not specific to absences.)

The lack of documentation can have negative consequences, especially when a student transfers schools, since as a result of missing ILOG documentation, the new school might not be fully aware of the student's attendance history, living circumstances or the types of interventions needed to successfully return the student to school. For example, when one student in our sample transferred to another school, the staff at the new school sent an e-mail to the student's prior school questioning why there were no anecdotal notes in ATS for this family. The staff further questioned why there were no mailings, no home visits, telephone calls, entries of medical or parent notes for the student's absences. This student had accumulated 38 absences at the time he transferred to the new school. In total, at the end of the 2015-2016 School Year this student had accumulated 80 absences with an attendance rate of 35 percent, which is well below the threshold DOE considers chronically absent (below 90 percent). We received no evidence from the prior school that would indicate whether any outreach had been conducted.

DOE officials' statements indicate that school personnel do not consistently make required outreach and intervention efforts or document them in ILOGs when they do make them for the following reasons:

- *Lack of Access to ILOGs* - According to DOE officials, Family Assistants stationed at the shelters, as well as other attendance staff, are not granted access to ILOGs because the ILOGs contain sensitive information that is protected by Federal student privacy law. Therefore, not every individual who is part of the attendance team can necessarily have access to confidential information.
- *Inconsistent Interpretations of Chancellor's Regulations* - According to Chancellor's Regulation A-210, "Schools must contact parents to determine the cause of a child's unexplained absence and propose a resolution. Every effort must be made to telephone parents on the first day of a student's absence." However, some Family Support Center staff stated that they expect schools to call the student's parent/guardian on the first day that the student is absent so as to immediately determine the reason for the absence,

¹⁵ The Principal's Portal is an online tool that allows school leaders to quickly and easily find the tools, resources, and systems needed to make a meaningful improvement in their students' achievement.

whereas others expected a call *after* the first or even second day of a student's absence. In another example of inconsistent interpretations of Chancellors Regulations related to documentation of outreach and intervention in the ILOG system in ATS, the Chancellor's Regulations state that "outreach and intervention efforts are to be entered into the ILOG system on ATS." However, some Field Support Center personnel stated that *all* outreach and intervention efforts need to be recorded in an ILOG while others stated that not everything needed to be. Further, the Director of Attendance Policy and Planning stated that she would not expect all outreach efforts to be noted in an ILOG, but rather entries needed to be made only when the school actually makes contact with the parent/guardian.

Recording all outreach into ILOGs is essential for central oversight of the adequacy of efforts to address excessive absence and lateness issues. And it is especially important if there is a change of staff at a school or if a student transfers to a different school so that the current staff and/or current school are able to review all past outreach efforts in order to make better informed decisions. Where students are homeless, they are likely to have an increased number of school transfers and so these requirements for documentation are all the more important for this group of students.

Subsequent to the exit conference, DOE provided documentation for four students in our sample that showed evidence of 19 additional outreach efforts. However, these documents were provided nine months after our initial request and DOE provided no reason for its failure to produce them with the other records it previously supplied. Consequently, we have no assurance that school officials who were responsible for monitoring these students attendance had access to them or of the reliability of the information provided.

DOE Response: "The Report focuses a great deal on the ILog function in Automate the Schools (ATS) as the sole repository of attendance outreach information. While the DOE encourages ILOG, the use of the ILOG function itself is not required. Specifically, schools' document parental outreach in the manner that best meets the needs of their community including but not limited to: 407 forms, a database of the school's creation, or on a contact sheet."

Auditor Comment: Chancellor's Regulation A-210, III.F clearly states that "[o]utreach and intervention efforts are to be entered into the ILOG system on ATS." The multiple DOE officials we interviewed during the course of our audit stated that they understood this Chancellor's Regulation to establish a requirement that all "outreach and intervention efforts be entered into the ILOG system," as stated. Moreover, as clearly set forth in this report, in addition to the information recorded in the ILOGs, we also considered additional sources of information indicating that outreach efforts had been made, including various documents provided by the schools and the Individual Student Attendance History Reports. Where appropriate, we modified our audit findings and shared those modifications with DOE. DOE has provided no new evidence to refute our analysis. Consequently, we find no basis for altering this finding.

Recommendations

1. DOE should enhance its policies and procedures as needed to ensure that school officials immediately make the required outreach and intervention efforts and that those efforts are adequately documented, in accordance with the Chancellor's Regulations.

2. DOE should ensure that those charged with the oversight responsibilities for student attendance are familiar with their responsibilities.

DOE Response to Recommendations 1 and 2: “The DOE agrees with the recommendations in that current policies and procedures already exist to ensure school outreach and intervention as well as appropriate notice of responsibilities is provided. . . .

The benefits of added compliance reviews to certify documentation of all outreach, and the necessary time and effort these would take at schools, may not serve the purpose of enhancing actual outreach services for students in shelters. The interactions between a teacher and parent at arrival to school, or a Parent Coordinator and parent on the corner, or a Family Worker and student at a bus stop, are all unlikely to be documented but no less impactful than a documented conference or phone call.

The Office of Field Support conducts monthly meetings to discuss responsibilities of Attendance Managers and continues to set directives that build consistency among the FSCs. The Principals’ Portal is the common repository of FAQs, tools, ‘How To’ guides, and definitions of roles used by Attendance Managers and school leaders in support of fulfilling their responsibilities.”

Auditor Comment: With regard to recommendation #1, in the absence of documentary evidence, we do not know the basis for DOE’s claim that the above-mentioned interactions are taking place. DOE’s own regulations require that outreach efforts be performed *and* documented and DOE fails to present a compelling argument for not instituting adequate controls to ensure that this is done. In the absence of such controls, DOE has limited assurance that the required outreach is performed.

With regard to recommendation #2, notwithstanding the various means that DOE uses to disseminate information, our audit found that DOE has not established a monitoring mechanism, such as oversight by Superintendents, to ensure that individuals charged with the oversight of attendance are familiar with those responsibilities. Accordingly, we urge DOE to reconsider its position and implement this recommendation.

3. DOE should ensure that all staff involved with the oversight function of attendance is able to review and to make relevant entries related to outreach and intervention efforts into ILOGs or if that is not feasible because of system constraints and applicable privacy laws, that others with full ILOG access communicate necessary information to all relevant staff and make such entries so that all outreach and intervention efforts are recorded in ILOGs as required.

DOE Response: DOE partially agrees with the recommendation, stating, “The DOE agrees with the concept of the recommendation in that ILOG could include additional information but does not agree with the Comptroller’s identified means for that information being entered.”

Auditor Comment: DOE does not identify the reason for its disagreement so we are unable to evaluate the merits of its objection. DOE’s procedures require that outreach and intervention efforts be recorded in ILOGs. Consequently, we urge DOE to reconsider its position and implement the procedures necessary to ensure compliance with this requirement.

DOE Does Not Have Evidence That It Consistently Conducted Outreach for Students Approaching Chronic Absenteeism

Schools conduct “407 investigations” to identify the reasons students with attendance issues remain absent. The goal of these investigations is to ensure that the students return to school as promptly as possible and that any health and safety issues that might be affecting their attendance have been appropriately addressed. According to Chancellor’s Regulation A-210, IV.A,

Form 407 Attendance Follow-up and Outreach Referral ensures that a documented investigation is undertaken for every student who requires continued follow-up after standard outreach and intervention measures have been utilized.

ATS automatically generates a Form 407 Attendance Follow-up and Outreach Referral at the school level under the following conditions:

- when a student has been absent for 10 consecutive days.
- where there has been a prior “407 investigation” for a student, when such student has been absent for 8 consecutive days or 15 aggregate days.
- for students in pre-kindergarten through grade 8, when a student has been absent for 20 aggregate days over a four-month period.

In accordance with Chancellor’s Regulation 210.IV.D, after the Form 407 has been generated, the school is required to record all information, outreach efforts, and interventions in either the ILOG System on ATS, directly on the Form 407, and/or as a comment code in ATS.¹⁶ If the student’s case cannot be resolved at the school level, the Form 407 is given to a district-based Field Support Center to be assigned to an “attendance teacher” for further investigation.¹⁷ According to the Chancellor’s Regulations, when the investigation is complete, school attendance staff must enter the resolution code and date of closure into the ATS System and file the Form 407 at the school.¹⁸

During the 2015-2016 School Year, ATS generated a total of 69 Form 407s for 39 of our sampled students. The generation of a Form 407 is automatic and must result in an investigation if the schools are not already aware of the reason for the absence. We found numerous deficiencies with the “407 investigations” we reviewed, including that some were never opened in cases where they should have been. Among other things, we found that DOE provided no evidence that school officials conducted “407 investigations” for 10 (14 percent) of the 69 “407 referrals” generated by the system, relating to 9 students.

According to DOE officials, investigating student absences prior to the issuance of a Form 407 may help identify the reason for the absences, assess if there are any additional health and safety concerns, and determine the types of support that may be useful to help the student attend school on a regular basis. However, DOE provided no evidence that schools made any required outreach or intervention prior to opening the “407 investigations” for 14 (20 percent) of the investigations, relating to 12 students. In addition, the outreach conducted by the schools prior to starting the “407 investigations” were insufficient for 14 investigations (relating to 12 students) in that DOE

¹⁶ Comment codes define the various situations with regards to the completion of an investigation. For example, the code LIL refers to a student illness. Comment codes can also be used to update progress on a 407 investigation.

¹⁷ “Attendance teachers” do not work for specific schools; they are supervised by the Attendance Supervisors at the Field Support Centers.

¹⁸ There is a specific component within ATS for the 407 investigations – this is not within the ILOG section of ATS.

provided no evidence that the investigations attempted to identify the underlying reasons why the students were absent.

Accordingly, in the case of one student in our sample, the student had been absent for 20 aggregate days (from November 6, 2015 through January 27, 2016) before ATS generated a Form 407 on January 29, 2016 (the second day *after* the student's return to school). However, the only evidence that the school staff spoke with the parent occurred when the school held Parent-Teacher conferences on January 11, 2016, after the student had already been absent for 12 aggregate days. DOE provided no evidence that the school made any effort to ascertain that the child was safe or to see if the family needed help the other days the student was absent, as is required.

Moreover, for 54 (78 percent) of the 69 Form 407s related to our sampled students that were generated during the 2015-2016 School Year, DOE provided no evidence that the Form 407s were maintained at the students' respective schools. Although the results of these 54 investigations were entered in ATS using codes, the codes entered into ATS do not provide detailed information regarding the reason for the students' absences. By contrast, the actual 407 forms should have provided additional critical details. For example, based on the codes entered into ATS, the reason that four students with "407 investigations" were absent was identified by the code for "Unlawfully Absent – Obstructed by Adult (UAO)." There was no additional information in ATS and specifically in the students' ILOGs indicating the specific reasons why the students were absent. Neither were there any details as to what "obstructed by adult" meant or if an assessment had been made as to whether the child was at risk. Consequently, failure to file the forms at the schools increases the risk that students who are determined to have health and safety concerns that need to be addressed are far more likely to remain in unsafe situations without getting the assistance that they need.

Furthermore, we note that given the way that ATS is designed, a "407 investigation" will not be triggered for a student with 20 aggregate absences within a four-month period if the student transfers to a different school during the school year. Instead, students effectively start with a "clean slate" for attendance upon their transfer, and the number of absences they accumulated in the first school is not counted for the purpose of generating a Form 407. This apparent weakness in DOE's system for tracking student attendance is of particular concern for students who are homeless, since they have a higher risk of transferring schools as a result of their lack of permanent housing.

Indeed, in our sample, we found five students who, pursuant to DOE's protocols, had absences that should have resulted in the generation of a Form 407, but because these students transferred schools, the absences that occurred while they attended other schools were not taken into account by DOE's system and no Forms 407 were generated. Thus, the purpose of automatically causing "407 investigations" to be triggered by excessive absences was undermined by DOE's operational protocols. Accordingly, in the case of one of the five students, the student, a second grader, had accumulated 20 aggregate days of absence in a three-month period; however, because the student also transferred to three different schools during this time period (March to May 2016), no Form 407 was ever generated. In total, this student transferred to five different schools and moved to seven different shelters during the 2015-2016 School Year.

In failing to properly take into account the purpose of generating a Form 407 for a student's absences that occurred prior to the student's transfer to another school, DOE has increased the risk that the pattern of absences will not be observed and so will be ignored, that the necessary

investigation will not be conducted, and that risks to these children's health and safety will not be detected and adequately addressed.

Subsequent to the exit conference, DOE provided three additional Form 407 referrals (for two students) that had not been produced in response to our original request, made nine months earlier. DOE provided no explanation for the delayed production or any information that might assure us of the reliability of the information provided.

Recommendations

4. DOE should ensure that school officials immediately investigate all "407 referrals" when required and ensure that the Form 407s are maintained at the student's respective school.

DOE Response: "The DOE agrees with the recommendation in that it is current practice, although the purpose of a 407 referral is not accurately represented in the Comptroller's Report. . . .

Chancellor's Regulation A-210 defines school requirements for completing 407 procedures and storing 407 documentation. As defined within the regulation, not all 407s referrals require an investigation. 407s will be issued based on absences when the school may be aware of the reason for missed school and in these cases, investigations are not required and will not be documented on the 407."

Auditor Comment: The recommendation is that DOE investigate all "407 referrals" that require an investigation. As illustrated by the audit findings, DOE did not do so, and its staff did not document the codes to note the reasons for the absences. By failing to conduct investigations in all cases that require them, it is more difficult for school officials to recognize students' patterns of absences that may alert them to potentially dire situations.

In addition, contrary to DOE's claim, the report does describe the purpose of the "407 referral" in accordance with the Chancellor's Regulations (beginning on page 17). The report also acknowledges that an investigation is required "if the schools are not already aware of the reason for the absence." We shared the results of our finding with DOE officials, who have provided no evidence to indicate that the schools were aware of the reasons for any of the cited absences. Thus, we find no basis to alter our finding that investigations were required but not performed. However, we did modify the language of the recommendation in this final report to more clearly state this requirement.

5. DOE should amend its current process and ensure that all students' absence histories are fully recognized within the ATS system, absence patterns are properly identified, and Form 407 referrals are generated, regardless of whether or not the students have transferred from other schools.

DOE Response: DOE disagreed with this recommendation, stating, "The DOE . . . respectfully disagrees to a change to Form 407 referrals.

Schools have tools in ATS to know the attendance of students who transfer in during the year and are responsible for monitoring attendance from admission date. . . . Adding another administrative layer to Form 407 referrals would divert staff time from daily outreach and student supports."

Auditor Comment: With this recommendation, we do not advocate the creation of an additional administrative layer. Rather, the change we recommend is primarily to DOE's automated process. Currently, DOE's system is not designed to recognize all patterns of absences that would generate a Form 407 referral in the event that a student transfers schools. As a result, school officials may not be alerted to the fact that an investigation is required due to a student's cumulative pattern of absences at both the student's previous and current schools. We urge DOE to reconsider its response and implement this recommendation.

Inadequate Outreach Performed by DOE Family Assistants

DOE's STH (Students in Temporary Housing) Family Assistants did not consistently make outreach efforts for our sampled homeless students residing in DHS shelters. Based on the audit, we determined that this failure was primarily due to an inadequate number of Family Assistants. DOE was able to provide evidence of outreach efforts for only 11 percent of the absences for the students in our sample.

STH Family Assistants are required to monitor STH students on a daily basis to help improve their attendance.¹⁹ Daily monitoring includes conducting visits to shelter rooms to determine the reason why any school age children did not leave for school on a given day. Each school day, students in Tier II shelters and Hotels are required to sign out in a log upon their leaving to attend school. Family Assistants are required to review the logs and visit the family units of the students who have not signed out that day. Family Assistants are responsible for documenting their visits in hardcopy notes that they maintain at the shelters. Content Experts, who supervise the Family Assistants, send monthly attendance reports to the Family Assistants for all students in their assigned shelters. Family Assistants maintain a binder with these reports to review as needed to help identify those students with absences.

During the scope of our audit, 57 of our sampled 73 students resided in shelter while attending a DOE school and 54 of these students had issues with attendance.²⁰ In School Year 2015-2016, these 54 students had a combined total of 1,518 days absent while residing in shelter, ranging from two days for one student to 94 for another student. However, DOE had no evidence that Family Assistants conducted outreach for 1,357 (89 percent) of the 1,518 absences.

Among other things, we found:

- For 29 of the 54 students with attendance issues, DOE had no evidence of any outreach efforts made by the Family Assistants. These students had a combined total of 797 absences during the school year. Of these 29 students, 18 resided in at least one shelter

¹⁹ According to Students in Temporary Housing Family Assistant Guide for school year 2015-2016, a family assistant "monitors students on a daily basis and improves the attendance of STH students by conferring with attendance teachers and or school based staff to provide interventions. All efforts should be in collaboration with STH Content Expert." Based on discussions with various DOE officials, DOE uses outreach and intervention interchangeably. For example, a home visit for an unexplained absence that results in a conference with the parent could be considered both outreach and intervention.

²⁰ As noted above, according to the list provided by DOE, all of our initial sample of 73 students resided in shelter during 2015-2016 school year. However, further analysis of the students on DOE's list revealed that 15 of the 73 sampled students did not reside in shelter during the audit period. In addition, one student in our sample did not attend a DOE school and live in a DHS shelter at the same time during the school year. Of the 57 students in shelter, three students did not require outreach to be made by the Family Assistants during our scope period. Although these three students were absent during the school year, the absences did not occur at the time that the students were residing in shelter. As a result, only 54 of our sample of 73 students were concurrently living in shelter, enrolled in a DOE school at some point during school year 2015-2016, and in need of intervention by a Family Assistant as a result of issues with attendance.

(some students were relocated to multiple shelters during our audit scope) where there was no Family Assistant assigned to work on-site.

- For 25 of the 54 students with attendance issues, DOE had evidence of some outreach efforts conducted by the Family Assistants. However, while these 25 students had a combined total of 721 absences over the period, there was evidence of outreach efforts for only 161 of those absences.
- In addition, these 54 students had 892 latenesses. DOE provided evidence that STH Family Assistants made 103 outreach efforts during our scope period; however, only 56 (six percent) appeared to be related to the latenesses. For the remaining 47 outreach efforts, the documentation obtained from DOE did not indicate the reasons for the outreach efforts or whether they were even related to attendance.

As discussed below, a significant reason for the above deficiencies appears to be inadequate staffing of Family Assistants.

Inadequate Staffing and Oversight of Family Assistants

During the 2015-2016 School Year, there were 110 Family Assistants responsible for overseeing 32,243 students residing in DHS family shelters – averaging a caseload of 293 students per Family Assistant. The responsibilities of the Family Assistants include:

- Identifying and interviewing all STH families and students, conducting intake and move-out interviews, distributing and collecting questionnaires, and maintaining intake and move-out logs.
- Assisting STH families and unaccompanied youth with school enrollment and transfers, informing families of their educational choices, contacting school officials and DOE's Office of Student Enrollment to assist the STH family and unaccompanied youth to obtain all necessary documents needed for enrollment.
- Coordinating with schools and DOE's Office of Pupil Transportation to arrange transportation for students. This could include overseeing school bus pick up and drop off at shelters, as well as distributing, managing, and tracking all metro cards given to parents used to accompany their children to school.
- Acting as a liaison between schools, parents and faculty in an effort to help meet the educational needs of STH children and youth.
- Assisting students with attendance issues by conducting home visits and participating in systematic room checks to assess the reasons why the students failed to attend school.
- Reviewing the ATS Weekly Attendance Report and the Monthly Facility Rosters to ensure that:
 - (1) all students living at the facility have all been identified;
 - (2) all families have been interviewed upon moving into the shelter;
 - (3) all school-age children are registered and attending school; and
 - (4) all students no longer residing in a shelter have been removed from the roster.

In addition to carrying out these responsibilities for children in DHS shelters, Family Assistants are required to identify and monitor students who are "doubled-up," that is, individuals and families that are homeless and temporarily residing with friends or family.

Given the number of responsibilities assigned to Family Assistants, combined with the vast number of students, and the enormous caseloads they are responsible for, the Family Assistants' actions are often extremely delayed. These delays can increase the risks to the safety and welfare of the children they are responsible for. This is especially a concern in instances where attendance problems occur with children who are abused or neglected since shelter room visits made in a timely manner could increase the chances that indications of abuse and neglect are identified and addressed.

Family Assistants who we interviewed during our audit raised concerns that staff levels are inadequate, and stated that they are overwhelmed with their responsibilities. DOE Content Experts and officials from DOE's STH Unit within OSYD confirmed that there are an insufficient number of Family Assistants and that more are needed to provide adequate support for homeless families. A review of the scope of work required of Family Assistants and the magnitude of their responsibilities strongly supports these concerns. Notably, despite an increase reported by DOE of 3,813 homeless students between the 2014-2015 School Year and the 2015-2016 School Year, there was no increase made to the number of Family Assistants.

According to DOE, it is responsible for tracking and overseeing the attendance of students who reside in shelters. The Content Experts are responsible for scheduling the Family Assistants' shelter visits. DOE asserted that Family Assistant coverage is provided in all DHS shelters, with individual Family Assistants being assigned to cover multiple sites during the 2015-2016 School Year. However, the Family Assistant schedules that DOE provided indicate otherwise. Specifically, we found that of the 519 shelters in which students were residing²¹ at the time the schedule was prepared, 23 had no assigned coverage and 402 had inconsistent assignments of Family Assistants, that is, there were no set schedules and the Family Assistants were assigned on an "as needed" basis. Only 94 (18 percent) of the shelters had a Family Assistant scheduled to visit the shelter on a regular basis.

In reviewing the assignments for the Family Assistants we found that most of the Content Experts did not include the specific work hours in their Family Assistant schedules and that the Family Assistants are often assigned to cover multiple sites in one day. We also found that even when the Content Experts identify specific amounts of time for the Family Assistants to work at each location, the hours on the schedules only indicate the Family Assistants' work hours, not the hours that they are in any one particular shelter. DOE cited two reasons for the irregular scheduling of Family Assistants: (1) insufficient number of Family Assistants; and (2) the fact that DHS opens and closes shelters without notifying DOE.

While poor attendance can have a negative impact on all students, those residing in shelter are particularly vulnerable. As the IBO report issued in October 2016 states, "Attendance rates are much lower for students in shelters and a much greater share are categorized as 'chronically absent.'" Further, the IBO report states, "[t]emporarily housed students had attendance rates about 5 percentage points lower than permanently housed students." Due to the deficiencies cited above, DOE has limited assurance that relevant issues with regards to a student's absence are satisfactorily resolved in a timely manner, if at all.

DOE Response: "The Comptroller has chosen to separately analyze and report on outreach from school staff and shelter-based Family Assistants. Supporting attendance policies and procedures is the work of *all* educators: including but not limited to Family

²¹ According to DOE officials, the needs of homeless families and the resources of DHS result in shelters opening and closing at any given time during the year and as a result, the number of shelters that DOE has recorded may also fluctuate.

Assistants, Attendance Coordinators, classroom teachers, school counselors, and school administrators. The DOE is fortunate to have resources specifically dedicated to STH with shelter-based Family Assistants and STH school based liaisons, however, all school personnel are expected to provide support to our STH families with this effort and to document it when required.” (Emphasis in original.)

Auditor Comment: DOE’s specific assertion that the work of the shelter-based Family Assistants and the school staff should not have been analyzed separately in the report is belied by the facts. School-based personnel, such as Attendance Coordinators, classroom teachers, school counselors and school administrators, each have their own responsibilities, procedures, and a school-based reporting structure. By contrast, Family Assistants have distinctly different responsibilities, procedures and a shelter-based reporting structure. DOE appears to argue that the school-based personnel and shelter-based Family Assistants should be considered a single collaborative entity, but our audit reflects that is not always the case. In fact, close to 20 percent of the school officials we communicated with during our audit stated that they have *no* interaction with the Family Assistants related to absent students. Further, as discussed previously in this report, DOE policy prevented the Family Assistants from accessing all of the relevant screens in ATS and from entering records of their outreaches into those ATS screens. This further reduced the likelihood that school personnel would be aware of outreaches made by Family Assistants, or even if any were made.

Finally, even when we counted the number of outreach efforts made by *both* Family Assistants and DOE school-based personnel for the days that the 54 students were absent while in shelter, we found that DOE’s documentation reflected that outreach efforts had been made for only 31 percent of the total number of those absences.²² We therefore find no basis for altering this finding.

Recommendations

6. DOE should conduct a study to determine the adequacy of its current caseloads for Family Assistants to determine if it has sufficient staff levels to enable the Family Assistants to effectively fulfill their job responsibilities.
7. Based on the results of the study referred to in Recommendation 6, DOE should consider using the findings from the study as justification for increasing the number of Family Assistants overseeing the shelters through reassignments of existing staff and/or by seeking additional funding from the City’s Office of Management and Budget to hire additional Family Assistants.

DOE Response to Recommendations 6 and 7: DOE does not specifically address these recommendations in its response but stated, “The DOE annually assesses our ability to provide additional supports by considering the best use of our funding and staff resources.”

Auditor Comment: DOE does not indicate whether it intends to conduct a study, consider its results, and increase the number of Family Assistants or take other appropriate action in response to the study’s results. On several occasions during

²² The 31 percent of total outreach efforts was derived by adding together the outreach efforts of Family Assistants (161) plus the outreach efforts of the schools, for a total of 474 outreach efforts conducted by both parties for the 1,518 days that the students were absent while in shelter.

the course of this audit, including after the exit conference, we asked DOE to provide us evidence of any studies or analyses relating to staff resources, as well as evidence of any efforts made to request additional funding. None was provided.

8. Once DHS receives notice that a shelter will be opening or closing, DHS should immediately notify DOE's STH unit so that DOE could plan how to reallocate its STH staff.

DHS Response: DHS agrees with this recommendation, stating, "A process is already in place to address this recommendation.

Protocol to inform DOE of the opening and closing of shelters:

- a) Email notifications are sent from the DHS Director of Education to DOE regarding shelter openings or closings. This is currently a manual process.
- b) DHS ITS also transmits a daily shelter feed to DOE, which includes all current shelter building IDs (unique identifiers) and address information. The building ID is also included on the daily student file transmitted to DOE."

DOE Allowed Schools to Implement Procedures in Their Attendance Plans That Were Not in Compliance with Chancellor's Regulation A-210

DOE failed to ensure that 90 of the 96 schools (94 percent) attended by the students in our sample established Attendance Plans that were in compliance with the Chancellor's Regulation A-210.

According to Chancellor's Regulation A-210, III.A, every year on or before October 31st, each school is required to submit an annual Attendance Plan to OSYD in which the schools set forth their policies and procedures regarding attendance. The Field Support Centers are responsible for approving the Attendance Plans before they are submitted to OSYD. The schools' Attendance Plans are required to state how the schools intend to: (a) maintain accurate records of student attendance; (b) monitor patterns of student lateness and absence; and (c) use effective intervention strategies to improve attendance. According to the Senior Director of Attendance Policy and Planning, the Attendance Plan is meant to help schools fulfill their obligation under Chancellor's Regulation A-210.

We reviewed the 96 Attendance Plans produced by the schools that the students in our sample attended and selected six areas to review that best reflect policies and procedures related to outreach and intervention in accordance with Chancellor's Regulation A-210. These areas pertained to: (1) selecting an attendance coordinator; (2) strategies for addressing chronic absences; (3) initial outreach efforts; (4) maintaining current contact information; (5) documentation of outreach efforts; and (6) strategies to improve the attendance of students in temporary housing. The responses for 94 percent of the schools we reviewed either did not adequately address some of the questions or they failed to respond in a manner that complied with the Chancellor's Regulations. The breakdown for each area is summarized in Table I below.

Table I

**Results of Auditor Analysis of 96
Attendance Plans**

Area	Response Complied with Requirement	Response Did Not Comply with Requirement or Address the Question
Selection of an Attendance Coordinator	66	30
Strategies for addressing chronic absences	88	8
Initial outreach	69	27
Maintaining current contact information	21	75
Documentation	91	5
Strategies to improve attendance of students in temporary housing	77	19

The following is a more detailed description of the issues we found related to the Attendance Plans.

Some Schools Did Not List an Administrator or Pedagogue as Their Attendance Coordinator.

Chancellor's Regulation A-210, III.D states,

At each school, an attendance coordinator (administrator or pedagogue) is responsible for the overall operation of the school attendance program, under the supervision of the principal or his/her designee. This includes but is not limited to ensuring that student attendance is recorded accurately, all documentation is appropriately signed and available for review, parents are contacted following a student's absence, all documents related to attendance tracking are filed appropriately, and all 407 procedures are followed.

Personnel within the school who may be designated attendance coordinators are principals, assistant principals, guidance counselors, and teachers. The Field Support Center attendance supervisors we spoke with confirmed that the attendance coordinator must be a pedagogue or "administrator" in a title such as those mentioned above, and that the person in this position should have authority over others and be able to lead.

However, the responses for 30 of the 96 schools (31 percent) indicate that they did not assign either a pedagogue or an administrator as their attendance coordinator. Instead, they listed school staff with other titles as their attendance coordinators, such as: pupil accounting secretary, office manager, attendance teacher, school aide, truant officer, family worker, and paraprofessional. The Senior Director of Attendance Policy and Planning confirmed that these titles were not appropriate for the position of Attendance Coordinator.

Some Schools Did Not Identify Strategies for Students with Chronic Absences.

Chancellor's Regulation A-210, III.C states,

Schools must establish and maintain a system for recognizing patterns of student absence. Schools are to establish and implement specific interventions to reduce the number of students who are chronically absent.

Our review of the responses found that 8 of the 96 schools (8 percent) did not specify the efforts that would be made early on in the school year for students who had been considered chronically absent during the previous school year. According to DOE, "Students with less than 90 percent attendance (chronically absent) are more likely to have lower test scores and not graduate from high school." It is important for schools to implement a plan at the start of the school year so that they could help prevent previous chronically absent students from becoming chronically absent once again.

Some Schools Did Not Initiate Initial Outreach Timely.

Chancellor's Regulation A210 III.F states that

Schools must contact parents to determine the cause of a child's unexplained absence and propose a resolution. Every effort must be made to telephone parents on the first day of a student's absence.

Our review of the responses revealed that the procedures for 23 of the 96 schools (24 percent) called for the child's parent/guardian to be contacted *after* the first day of absence, rather than on the first day of an absence. One school responded that "After the first day of absence a phone call is made by the classroom teacher" and another school responded that, "Generally, after 3 absences a phone call is made." Four schools offered responses that did not address the issue. For example, one schools' response focused on the intervention efforts made upon a student's return to school. Contact with a parent on the first day of absence is important because it may help school officials determine whether intervention efforts are necessary.

Some Schools Did Not Delineate a Process to Update Contact Information.

According to Chancellor's Regulation A-210, III.F, "Schools are responsible for maintaining up-to-date parent contact information (address and phone numbers) in ATS." Attendance supervisors and principals we interviewed stated that a problem prevalent with the homeless population is difficulty contacting the parents, explaining that this is typically a transient population, often moving multiple times during the school year. Under these circumstances, locating the student's whereabouts could take days. Our review of the responses revealed that 75 of the 96 schools (78 percent) did not address the question regarding how they checked and updated family contact information to ensure that family members can be reached. A failure to adequately plan for and perform this function increases the risk that school officials will experience difficulties and delays in reaching parents/guardians when the need arises. For example, a school that a student in our sample attended had problems contacting the student's parent/guardian. According to ILOG entries, the school continued calling a non-working number for nearly four months, from December 3, 2015 through March 29, 2016. By the time a home visit was attempted on May 12, 2016, school officials learned that the student's family had moved elsewhere. Overall, the student had been absent for 49 school days (December 3, 2015 through May 12, 2016) before the school confirmed that the family moved, whereabouts unknown.

Some Schools Did Not Affirm That All Outreach and Intervention Efforts Would Be Systematically Documented.

According to Chancellor's Regulation A-210, III.F, "Outreach and intervention efforts are to be entered into the ILOG system on ATS." Our review of the responses found that five of the 96 schools did not address the manner in which phone calls, conferences, home visits and letters are documented and maintained. Documenting outreach and intervention efforts in ILOGs would enable schools to determine what student support services and parent engagement initiatives are needed to help the child reduce the number of absences. This is especially necessary if the student transfers schools, because it helps the attendance team in the new school to be aware of the student's history and the type of support and intervention efforts that have been provided.

DOE Response: "The Report . . . discusses whether the schools' Attendance Plans are consistent with Chancellor's Regulations, specifically testing if schools' Attendance Plans adequately document schools' STH outreach. . . . The Comptroller incorrectly points to the Chancellor's Regulation as its audit standard for testing if the Attendance Plan adequately documents school STH outreach."

Auditor Comment: DOE's assertion that we tested whether the schools' Attendance Plans adequately documented the schools' STH outreach is incorrect. There is no requirement that Attendance Plans should contain references to specific outreach efforts and we make no such argument in this report. As we clearly state in this report, we reviewed the responses in the Attendance Plans solely to ascertain whether the schools recognized and articulated their procedures and responsibilities regarding documenting their outreach efforts to the STH population.

Some Schools Did Not Identify Strategies to Facilitate Improved Attendance among Students Living in Temporary Housing.

The plan asks schools to describe their efforts and strategies to facilitate improved attendance among English Language Learners (ELL) students, students with Individualized Education Programs (IEP), students living in temporary housing, or any other students in the school who may need additional outreach for attendance purposes. Our audit revealed that 19 of the 96 schools (20 percent) did not specify strategies to improve attendance among students living in temporary housing. One school responded that the "Attendance teacher works with the ELL teachers to ensure there are no language barriers with communicating student attendance concerns to parents," but did not address the needs of any other groups within the student population.

DOE's Explanations of Responsibilities with Regard to Oversight

We reviewed the requirements for Attendance Plans with OSYD officials who are responsible for setting attendance policies, and with Field Support Center officials based on the Principals' assertions that Field Support Centers were responsible for ensuring that responses in the Attendance Plans complied with the regulations. When we asked OSYD officials if they rely on the Field Support Centers to ensure that the responses in the Attendance Plans comply with regulations, their response was "no comment." When we asked the Field Support Centers how they ensure that schools conduct the minimum attendance outreach and intervention efforts as set forth by Chancellor's Regulations, we were told that they reviewed the Attendance Plans. However, we were also told that their role was only to provide support and that they do not have any power to mandate that schools change their responses. One Field Support Center official

said that schools with a pattern of non-compliance are referred to the Superintendents, who have the power to enforce the regulations.

Currently, there are eight Field Support Centers tasked with helping approximately 1,535 schools (for an average of 191 schools per Field Support Center) complete the Attendance Plans, review the plans, and approve the final version before it is submitted to OSYD. Consequently, a Field Support Center's ability to perform a meaningful review and offer constructive feedback to a specific school is limited. While we did see evidence that some Field Support Centers provided feedback to the schools and advised that they modify responses, we noted that the modifications were not always made, largely due to the fact that the Field Support Centers have no authority to enforce their edits or suggestions.

In the absence of adequate controls to ensure that schools have Attendance Plans that conform to DOE regulations, there is an increased risk that they will not effectively assist students with attendance issues.

Recommendations

9. DOE should stress the importance of the Field Support Centers reviewing the Attendance Plans and ensuring that the schools' policies and procedures are in compliance with the attendance requirements set forth in Chancellor's Regulations. Staff from the Field Support Centers should work with those schools to provide feedback well in advance of the due date so as to provide ample time to complete the Attendance Plans.
10. DOE should provide the Field Support Center Attendance Supervisors with additional training in reviewing and approving Attendance Plans.

DOE Response to Recommendations 9 and 10: DOE partially agreed with these recommendations, stating, "The DOE agrees that enhanced guidance can be provided to Attendance Supervisors to help them review attendance plans, but disagrees with the characterization that plans are 'approved' or that plans can be used to ensure compliance to all school policies and procedures."

The review of the whole Consolidated Plan is stressed by the FSCs through the dedication of time and knowledge based sessions in September and October each year that address Attendance Plans. FSC attendance Supervisors do not approve Attendance Plans, but rather use their review of plans to provide feedback and to identify support opportunities for schools. Schools are responsible for their plans, which are documents that schools can update throughout the year. While the plans must be completed by schools in September, this activity serves as a check and confirmation that schools recognize and articulate their attendance responsibilities."

Auditor Comment: DOE's claim that the FSCs do not approve Attendance Plans is contradicted by its own official statements. According to the OSYD Safety & Youth Development Opening Day Packet for School Year 2015-2016, "Schools are now required to update and submit your plan online to your Borough Field Support Center (BFSC) for review by September 30, so that all plans can be *approved* by your BFSC deputy director of student services by the Chancellor's mandated deadline of October 31." This was also confirmed in an April 28, 2017 email from

OSYD's Senior Director of Attendance Policy and Planning, who stated, "Field Support staff read and *approve* the plans." (Emphasis added.)

DOE Failed to Provide Adequate Oversight of School Outreach Efforts for Students with Unexplained Absences

DOE has failed to create an effective monitoring system that would allow it to ensure that consistent and adequate oversight is provided by individual schools of their students' attendance. As a result, DOE is much less able to be reasonably assured that schools are making necessary efforts to assist students with excessive unexplained absences, including most notably, for students who reside in temporary housing.

According to Comptroller's Directive #1, *Principles of Internal Control*,

[A] sound internal control system must be supported by ongoing monitoring of activities at various organizational levels in the course of normal operations. Such monitoring should be performed continually and be ingrained in an agency's operations. It should include appropriate measurements on regular management and supervisory activities, comparisons, reconciliations, and other actions taken by employees in performing their duties. Agency management must perform continual monitoring of activities and programs.

DOE officials stated that school principals are responsible for ensuring that their schools' attendance programs meet minimum standards mandated by State requirements and as delineated in the Chancellor's Regulations and other DOE guidelines and that their school attendance teams adhere to Chancellor's Regulations. At each school, under the supervision of the principal or his/her designee, an attendance coordinator (who can be either a pedagogue or an administrator) is responsible for the overall operation of the school attendance program.²³

According to the Principals we interviewed, they rely on their attendance coordinators to ensure that the attendance team is conducting the necessary outreach and intervention for students with excessive absences.²⁴ The Principals stated that they receive updates during their frequent meetings with the coordinators to obtain assurance that the required outreach and intervention efforts are performed in the case of excessive and/or chronic absences.

Based on our interviews with various officials within DOE, there is confusion regarding who, if anyone, is ultimately responsible beyond the local schools for ensuring compliance with DOE's various mandated absence-related outreach and intervention requirements. Principals stated that the Field Support Centers are responsible for ensuring that individual schools comply with the regulations. However, the Field Support Centers officials we spoke with stated that they engage in a support function only and *do not* monitor whether schools are conducting required daily outreach efforts to families. They stated that they monitor overall school attendance and only become involved on an "as-needed" basis if the schools request their assistance.

²³ This includes, but is not limited to, ensuring that: (1) student attendance is recorded accurately; (2) all documentation is appropriately signed and available for review; (3) parents are contacted following students' absences; (4) all documents related to attendance tracking are filed appropriately; and (5) all applicable procedures are followed.

²⁴ The attendance team consists of personnel in each school selected by the principal, and can include a school aide, pupil accounting secretary, guidance counselor, or other administrative or pedagogical staff.

Further, Field Support Center officials stated that the schools' Compliance Officers²⁵ and Superintendents are responsible for ensuring that necessary outreach is conducted by the schools. However, the Compliance Officers and Superintendents we spoke with stated that they do not monitor the schools' daily attendance outreach efforts at all. Rather, the Compliance Officers stated that they are not involved in any aspect of reviewing reports relating to attendance. While the Superintendents stated that they do review attendance reports for overall school attendance, they stated that they *are not* concerned with the individual student's attendance rates and instead conduct reviews that focus primarily on aggregate attendance data reported on a citywide, district, or school level.

Thus, DOE has failed to charge any entity with responsibility for monitoring and ensuring that schools conduct the necessary outreach related to students with excessive unexplained absences. This failure necessarily increases the risk that those students who are most in need of assistance could be overlooked.

During the exit conference, DOE officials stated that the Superintendents' lack of concern regarding individual student attendance was troubling and they emphasized the significance of OSYD meeting more frequently with the Superintendents to discuss attendance related issues.

Recommendations

11. DOE should establish procedures with clear roles and responsibilities to ensure the ongoing assessment and evaluation of school-based attendance activities, including student monitoring by Superintendents and outreach efforts by responsible parties, so that students with poor attendance are identified and receive necessary outreach and intervention.

DOE Response: DOE partially agrees with this recommendation, stating, "[t]he DOE agrees with having clear roles and responsibilities in that this reflects current practices. However, the Comptroller asking that Superintendents monitor students' daily attendance would be a duplication of effort. OSYD, FSC Attendance Managers and Superintendents all have a role in overseeing and supporting attendance. Student level monitoring, however, is not something the Superintendents are currently overseeing. The DOE has clear escalation protocols when student specific cases are escalated to the Superintendent's Office. The DOE's network of staff from OSYD, FSCs and schools provide robust student based oversight."

Auditor Comment: As indicated in the report, DOE failed to assign any particular entity the responsibility for monitoring and ensuring that schools conduct the necessary outreach related to students with excessive unexplained absences, which we believe was a major contributing factor to the deficiencies we identified in DOE's outreach efforts. The escalation protocols referred to by DOE are designed to deal with attendance issues after they have occurred. Conversely,

²⁵ The Office of Compliance, part of DOE's Office of General Counsel, has a mission to continue to foster an organizational culture that embraces the notion that effective compliance can strengthen school operations by providing a safe and nurturing educational environment, while fostering optimal learning outcomes, for students. The Office of Compliance supports principals, schools, and program offices across the NYC school system to ensure compliance with Federal and State laws, Chancellor's Regulations and DOE policies. This is accomplished by building awareness of those obligations and providing the necessary support tools to achieve compliance.

this recommendation is for DOE to improve its ongoing monitoring and oversight to help prevent such escalations from taking place.

12. To help ensure that attendance and monitoring efforts are being properly conducted, Attendance Supervisors from the Field Support Centers should be provided with tasks and responsibilities that would allow them to ensure that the schools are conducting the necessary outreach and intervention, such as selecting a sample of students from ATS reports that indicate declining attendance on the part of those students and review the schools' records to ensure compliance.

DOE Response: "The DOE agrees with the concept of the recommendation, that enhanced guidance can be provided to Attendance Supervisors to help them support schools with outreach and intervention. Currently the monthly Attendance Supervisor meetings are used to identify attendance patterns for STH. The DOE will continue to look for ways to enhance the tools."

DETAILED SCOPE AND METHODOLOGY

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 objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective. This audit was conducted in accordance with the audit responsibilities of the City Comptroller as set forth in Chapter 5, §93, of the New York City Charter.

The scope of this audit initially covered School Year 2014-2015. However, because of extended delays by DOE in providing us with access to requested information necessary to carry out this audit, the audit scope was modified to School Year 2015-2016. It was not until April 2017 that DOE provided us with most of the requested information and we were enabled to conduct our audit testing. Additionally, DOE took the position that records we sought contained information that auditors were prohibited from seeing under applicable privacy laws. In order to ensure that the audit could proceed in a reasonably timely fashion, the auditors relied on DOE staff to photocopy specific information we requested from responsive documents and to redact any information they believed to be confidential that we had not requested. We relied on DOE's representation that we received all of the information we requested.

To gain an understanding of DOE's policies and procedures regarding attendance, we reviewed and used information obtained from the agency's website and from various DOE personnel as criteria, including the following:

- McKinney-Vento Homeless Assistance Act, Subtitle VII-B;
- Chancellor's Regulation A-210 – Minimum Standards for Attendance Programs, 9-20-13 and Chancellor's Regulation A-780 – Students in Temporary Housing;
- Students in Temporary Housing, Family Assistant Guide School Year 2015-2016;
- Form 407 Management and Actions;
- The Form 407 Tracking System on ATS 'Generation of Form 407 and Attendance Procedures';
- OSYD Chronically Absent Criteria;
- Various Documents Regarding Attendance Policies on the Principal Portal;
- OSYD Students in Temporary Housing ATS Training Manual;
- Addendum to Memorandum of Understanding Between the New York City Department of Homeless Services (Including Designated Shelter Providers Under Contract With the Department of Homeless Services) and the New York City Department of Education, Dated 9-7-16; and
- DOE Memorandums: Attendance Law and Policy and School Responsibilities Student Attendance Calendar; Clearance of Register Procedures; Register Monitoring Procedures; Chronic Absenteeism; 407 and School Absence Alert; Requirements for Reporting Educational Neglect Student Intervention Screen (ILOG); Transfer, Discharge and Graduation Code Guidelines Planning Interview Procedures. Dated 9-1-10.

We interviewed the following DOE staff to obtain an understanding of how DOE identifies students with absences and latenesses, and how DOE personnel conduct outreach and intervention for those students in accordance with Chancellor's Regulations and DOE's internal attendance policies and procedures:

- OSYD's Director of Attendance Policy and Planning and Attendance Policy Manager;
- Individuals from the school attendance teams: eight principals, three assistant principals, an attendance coordinator, two guidance counselors, two pupil accounting secretaries, two school aides, and two school-based liaisons;
- A Data Analyst;
- The Director of the student population unit;
- Two Field Support Center directors, two deputy directors, and seven attendance supervisors;
- Three community and high school Superintendents;
- Seven Compliance Officers;
- Four attendance teachers;
- An STH Director Senior Program Manager;
- Four STH Content Experts; and
- Six STH Family Assistants.

To gain an understanding of DHS' functions associated with monitoring and tracking school attendance for students residing in temporary housing, we interviewed the DHS Director of Education, Deputy Commissioner for Family Services, Associate Commissioner for Transitional Services, and Assistant Commissioner for Policy & Planning. Based on these interviews, we learned that DHS has its own set of related procedures that are outside the scope of this audit as they are promulgated by DHS and are carried out separate and apart from those procedures established and followed by DOE personnel. In addition, we discussed with DHS officials the agency's student population data and its data-matching processes.²⁶

To assess the accuracy and reliability of the data shared between DOE and DHS with regards to homeless students, we requested from DOE a list of all students residing in homeless shelters who were enrolled in DOE public school during the 2014-2015 and 2015-2016 School Years and compared it to the data obtained from DHS' list of all families with school-aged children residing in shelters during the period August 2014 through January 22, 2016 (the date that the request was made) and noted discrepancies between the two lists. Based on DHS' list, there were 32,243 students who resided in family shelters and attended DOE schools during our scope period and based on DOE's list, there 33,336 students for that same time period.

To assess the accuracy and reliability of DOE's computerized ATS data, we judgmentally selected to visit five shelter locations from each of the five boroughs (Manhattan Acacia Cluster, Hospitality

²⁶ As part of DOE and DHS' process of ensuring that school-aged children (age 4-21) who reside in DHS homeless shelters are identified so as to provide any necessary outreach and intervention, there is a monthly data exchange between the two agencies, which consists of two parts. DHS initially sends a monthly roster to DOE that identifies students housed in DHS facilities who attend DOE schools. DOE uses this data to perform a monthly data match against the students in its ATS database. After performing its data match, DOE sends educational information, including student ID numbers, back to DHS. DHS includes these numbers in its data that is sent back to DOE in the ensuing months.

House, The Landing, Pulaski Family Residence and Bridge Haven) and compared the hard copy student data obtained from the Family Assistant files for the 339 DOE students residing in these five shelters with the contents of the ATS data base to verify whether all student biographical information had been accurately recorded in the ATS database.

We reviewed DOE's list of 33,336 students who resided in homeless shelters during the 2015-2016 School Year and identified 19,390 students who we determined chronically absent. To test whether DOE's attendance teams carried out their responsibilities according to the Chancellor's Regulations and DOE's internal guidelines with regard to the chronically absent students, we randomly selected a sample of 60 of the 19,390 students; however, upon review of the records, we learned that 13 of the students did not reside in shelter during the 2015-2016 School Year and were miscoded on DOE's database. As a result, we randomly selected an additional 13 students. Further analysis revealed that two students never lived in shelter at any point during their lives and one student lived in shelter but was not enrolled in school while living in shelter. Accordingly, only 57 students out of 73 students lived in shelter and attended DOE schools at some point during the 2015-2016 School Year. However, since DOE's attendance policies and procedures are the same for all students, regardless of their housing situation, we decided to review the attendance records and outreach and intervention efforts conducted by DOE for all 73 students (the initial sample of 60 and the 13 that we selected as a replacement).

To test whether DOE attendance teams at the schools and DOE personnel stationed at the shelters conducted outreach and intervention efforts in accordance with Chancellor's Regulations for students with absences, we requested for each student in our sample the RISP, each student's Student Intervention Log Report (RSIV), also known as ILOGs, Students 407 History Reports, and any documents maintained by the schools that indicate outreach and intervention conducted by the schools relating to the students' absences during the 2015-2016 School Year. Additional documents that we reviewed included:

- All "Form 407 Absentee Report" pertaining to 407 investigations conducted during the 2015-2016 School Year;
- Documentation (letters/notes/correspondence) indicating follow-up action taken by school officials for daily absences;
- Logs of automated calls (e.g. via School Messenger) made to the student's parent/guardian regarding school absences each day the student was absent;
- Medical notes, notes requesting excused absences, etc., obtained from parent/guardian;
- School conference notes if the parent/guardian and/or student met with school staff; and
- Paperwork filed with external sources (e.g. ACS) for assistance in addressing absences.

To determine the number of absences and latenesses that each student in our sample had, we reviewed the students' RISPs and noted the following information for each student:

- The number of days that the student was enrolled in school during the school year;
- Each day that the student was absent from school during the school year;
- Each day that the student was marked late; and
- The number of instances of absence (one day or two or more consecutive days of absence) the student had during the school year.

To determine whether school attendance teams conducted outreach and intervention in accordance with Chancellor's Regulations for the students who were absent and/or late, we reviewed the ILOG entries, documents received from the schools, and notations made on the RISP. We noted the number of times the school made a phone call on the first day of the student's absence, the number of times an automated call was made, and the total number of general outreach and intervention efforts made for each student in order to help them increase their attendance rate.

To determine whether an investigation was undertaken and documented for every student who required continued follow-up after standard outreach and intervention measures have been utilized, and whether schools identified the reasons these students remained absent, we reviewed the list provided by DOE of the 407 investigations that were triggered by ATS based on a student's pattern of absence for the students in our sample and we reviewed the ILOG entries and any documents received from the schools to determine whether: outreach efforts were conducted or support services were provided to the student prior to the Form 407 generating; outreach efforts were conducted to investigate the 407 and documented in accordance with the Chancellor's Regulations and the Form 407 was filed in the school in accordance with Chancellor's Regulation A-210, IV.E.

In addition, to determine whether Family Assistants conducted outreach and intervention in accordance with Chancellor's Regulations for the students who were absent and/or late, we requested all relevant documentation (e.g., letters/notes/correspondence indicating follow-up action taken by Family Assistants, Anecdotal logs, transportation requests). As part of our review of redacted documents, we noted the number of times that the Family Assistants conducted room visits, made intervention efforts related to student transportation, such as distributing Metro Cards and coordinating bussing, held conferences with the parent/family, and contacted outside agencies such as ACS or DHS caseworkers.

To determine whether the schools fully responded to and addressed all the questions in the Annual Attendance Plan for each school that the students in our sample attended, we reviewed the Attendance Plans for 96 schools. We selected the five questions from the Attendance Plans that reflect policies and procedures stipulated in Chancellor's Regulation A-210 and compared the school's responses to the regulations set forth in Chancellor's Regulation A-210 to determine whether the procedures delineated by the respondents were in compliance with regulations.

The results of the above tests, while not projectable to their respective population of students, provided a reasonable basis for us to assess whether DOE has adequate oversight over its schools' and Family Assistants' outreach and intervention efforts, and whether DOE school staff and Family Assistants conducted adequate outreach and intervention efforts regarding the follow-up and tracking of students residing in the City's DHS homeless shelters in accordance with Chancellor's Regulations and DOE's internal procedures and guidelines.

Elizabeth A. Rose
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February 2, 2018

Ms. Marjorie Landa
Deputy Comptroller for Audits
New York City Office of the Comptroller
1 Centre Street, Room 1100
New York, NY 10007-2341

Re: Audit Report on the Department of Education's
Efforts to Monitor and Address School Attendance
of Homeless Children Residing in Shelters (MG16-
098A)

Dear Ms. Landa:

This letter will serve as the New York City Department of Education's (DOE) formal response to the New York City Office of the Comptroller's (Comptroller) draft audit report of the *Department of Education's Efforts to Monitor and Address School Attendance of Homeless Children Residing in Shelters* (Report). It is our understanding that the New York City Department of Homeless Services (DHS) will submit a separate response to address the recommendation directed to DHS.

Introduction

Thank you for undertaking your audit of the DOE's efforts to monitor and address school attendance of homeless children residing in shelters. Addressing the needs of this vulnerable population is of utmost concern to this administration and we are very proud of our efforts in this area. Over the last two years, we have invested \$10 million to expand services to students residing in shelters and have expanded transportation options for students in grades K-6. These new supports are intended to facilitate school continuity and regular attendance as well as support academic achievement. While we are extremely proud of these efforts, we acknowledge individual school variations as pointed out by the Report and they remind us that we still have work to do.

While the DOE appreciates the opportunity to focus on the issues surrounding attendance support for Students in Temporary Housing (STH), there are instances where the Report steps outside the stated scope of the audit and accordingly, outside of what was tested, making inferences and recommendations that are not supported by the audit. Specifically, the

intended area of focus was on attendance support and outreach for a specific subset of our student population: students in temporary housing. However, the Report extrapolates and makes comments and recommendations regarding the DOE's attendance practices as a whole. Consequently, the DOE does not have confidence that the conclusions and recommendations stemming from this audit are appropriately supported by the audit tests. For example, there is a section in the Report that discusses whether the schools' Attendance Plans are consistent with Chancellor's Regulations, specifically testing if schools' Attendance Plans adequately document schools' STH outreach. The Chancellor's Regulation, however stresses the requirement to complete an Attendance Plan without specifically stating what the Attendance Plan should contain. The Chancellor's Regulation instead grants each school the authority to create an Attendance Plan that supports the attendance needs of its student population. The Comptroller incorrectly points to the Chancellor's Regulation as its audit standard for testing if the Attendance Plan adequately documents school STH outreach. In another example, lateness was tested against a single standard despite no centralized lateness policy for the district in existence. The DOE directs each school to create a lateness policy that meets the needs of its community. The Comptroller did not collect evidence of each school's lateness policy and therefore, the Comptroller did not gather the required records to conduct the audit test.

The Report focuses a great deal on the ILog function in Automate the Schools (ATS) as the sole repository of attendance outreach information. While the DOE encourages ILOG, the use of the ILOG function itself is not required. Specifically, schools' document parental outreach in the manner that best meets the needs of their community including but not limited to: 407 forms, a database of the school's creation, or on a contact sheet. The Comptroller also appears to standardize the data elements that schools should record regarding outreach attempts, not only beyond what our regulations require, but also beyond the specified target population of this audit.

The Report also repeatedly states that when they looked at absences there was a "lack of evidence" of parental outreach and then attempts to equate the lack of evidence to no outreach occurring. This characterization is misleading and points to the Comptroller's misunderstanding of the depths of the DOE's outreach efforts. The Comptroller has chosen to separately analyze and report on outreach from school staff and shelter-based Family Assistants.¹ Supporting attendance policies and procedures is the work of *all* educators: including but not limited to Family Assistants, Attendance Coordinators, classroom teachers, school counselors, and school administrators. The DOE is fortunate to have resources specifically dedicated to STH with shelter-based Family Assistants and STH school based liaisons, however, all school personnel are expected to provide support to our STH families with this effort and to document it when required.

It is also inaccurate to expect that the number of parental outreach attempts be equivalent to the number of absences. For example, if the parent informs the school and/or Family Assistant that the child has chicken pox, it would be reasonable to expect that the student would be absent for

¹ In the Report the titles "Family Assistants" and "Family Workers" appear to have been used interchangeably. However, at the DOE "Family Assistants" are actually a subset of "Family Workers".

several days. Outreach on each of those subsequent days following notification of illness is meaningless and the school's time is better spent on outreach to families where the school has not heard from the parent regarding their child's absence.

Of note, during the audit scope period, shelter-based Family Assistants did not have ILOG access in large part, due to the very nature of their work locations. These Family Assistants are DOE employees who work in DHS and DHS Shelter Providers' shelter locations. In many cases, consistent internet access is not available to this staff. Therefore, these transient work locations do not always allow for safe access to DOE's systems, including ATS. Consequently, we have not imposed a requirement to document in ILOG by the Family Assistants unilaterally because it is not actionable given their shelter-based work locations.

Several times in the Report it states that the Comptroller wanted to investigate school year 2014-15 but that the DOE delayed the process by not providing requested information in a timely way. The DOE is legally charged with safeguarding student information by federal and state law and we informed the Comptroller of that obligation during the entrance conference and again when requests for information protected under the Family Education Rights and Privacy Act (FERPA) were made. We believe that our response time reflected our obligation and responsibility to protect confidential student record information in accordance with FERPA. In addition, other information requested was protected under the Social Services Law and it was necessary for the DOE and the Comptroller to reach out to the Office of Children and Family Services (OCFS) before this information could be shared. The implication that we delayed the audit is inaccurate and does not reflect the joint obligation to comply with the provisions of FERPA. Given the scope of the document and information requests for this audit, the Comptroller and the DOE executed a Memorandum of Understanding outlining how information would be protected and/or shared. While we did not provide the FERPA protected information pending execution of this agreement and until we received authority from OCFS, the DOE did respond to numerous other requests from the audit team while the FERPA concerns were addressed.

In the initial stages of this audit, we were informed that this would be an evaluation of attendance support by both the DOE and DHS. The DHS component has since been dropped from the audit. However, in the methodology section of the Report there is reference to data shared by DHS and the Comptroller compares the number of students in shelters (DHS data) against DOE data. What is not mentioned is that DOE students can and do reside in shelters that are not managed by DHS, such as DYCD (Unaccompanied Minors) and HRA (Domestic Violence shelters). Given the multiple agencies that provide shelter, it is not unexpected that the DOE's count of students residing in shelters and the DHS student shelter population numbers do not match.

Response to Recommendations

This Response to Recommendations addresses only those recommendations that the Report directs to the DOE (recommendation 8 points to DHS).

RECOMMENDATION 1. *DOE should enhance its policies and procedures as needed to ensure that school officials immediately make the required outreach and intervention efforts and that those efforts are adequately documented, in accordance with the Chancellor's Regulations.*

RECOMMENDATION 2. *DOE should ensure that those charged with the oversight responsibilities for student attendance are familiar with their responsibilities.*

Response. The DOE agrees with the recommendations in that current policies and procedures already exist to ensure school outreach and intervention as well as appropriate notice of responsibilities is provided.

The DOE works to strengthen its attendance outreach practices to adapt to the needs of our students, particularly students in shelters. We develop and deliver new guidance and tools based on feedback from schools and offices collaborate to strengthen attendance supports. Completing the required Attendance Plan of the Office of Safety and Youth Development (OSYD) Consolidated Plan ensures that every school leader demonstrates familiarity with attendance responsibilities. OSYD publishes an Annual Memo also outlining requirements and responsibilities. Additionally, OSYD publishes the Attendance Agenda, a summary of attendance roles and requirements for schools and Field Support Centers (FSCs).

The benefits of added compliance reviews to certify documentation of all outreach, and the necessary time and effort these would take at schools, may not serve the purpose of enhancing actual outreach services for students in shelters. The interactions between a teacher and parent at arrival to school, or a Parent Coordinator and parent on the corner, or a Family Worker and student at a bus stop, are all unlikely to be documented but no less impactful than a documented conference or phone call.

The Office of Field Support conducts monthly meetings to discuss responsibilities of Attendance Managers and continues to set directives that build consistency among the FSCs. The Principals' Portal is the common repository of FAQs, tools, "How To" guides, and definitions of roles used by Attendance Managers and school leaders in support of fulfilling their responsibilities.

RECOMMENDATION 3. *DOE should ensure that all staff involved with the oversight function of attendance is able to review and to make relevant entries related to outreach and intervention efforts into ILOGs or if that is not feasible because of system constraints and applicable privacy laws, that others with full ILOG access communicate necessary information to all relevant staff and make such entries so that all outreach and intervention efforts are recorded in ILOGs as required.*

Response. The DOE agrees with the concept of the recommendation in that ILOG could include additional information but does not agree with the Comptroller's identified means for that information being entered.

ILOG is a meaningful way to record and share information about outreach and interventions for students and is very widely used. ILOG instances for DOE students has increased with 2.2 million

entries in SY 15-16 and 2.4 million entries in SY 16-17. In materials and tools provided to schools in support of their attendance activities, during presentations and professional development, and in annual messages to principals, the use of ILOG is promoted and encouraged.

RECOMMENDATION 4. *DOE should ensure that school officials immediately investigate all 407 referrals and ensure that the Form 407s are maintained at the student's respective school.*

Response. The DOE agrees with the recommendation in that it is current practice, although the purpose of a 407 referral is not accurately represented in the Comptroller's Report.

To ensure that schools respond to 407 referrals in a timely manner, the DOE has instituted a compliance metric for schools serving grades PK-8. For High School students, the required actions to be taken for 407s are the same; however, for this subset of the DOE student population different outreach strategies are employed.

Chancellor's Regulation A-210 defines school requirements for completing 407 procedures and storing 407 documentation. As defined within the regulation, not all 407s referrals require an investigation. 407s will be issued based on absences when the school may be aware of the reason for missed school and in these cases, investigations are not required and will not be documented on the 407.

RECOMMENDATION 5. *DOE should amend its current process and ensure that all students' absence histories are fully recognized within the ATS system, absence patterns are properly identified, and Form 407 referrals are generated, regardless of whether or not the students have transferred from other schools.*

Response. The DOE agrees with the recommendation in that it is current practice that absence histories are available in ATS, yet respectfully disagrees to a change to Form 407 referrals.

Schools have tools in ATS to know the attendance of students who transfer in during the year and are responsible for monitoring attendance from admission date. Each week, reports automatically print to schools with all students who have reached five or 10 aggregate days of absences, so a pattern of absences for a new admit would be captured through this report, if not through normal school practices of daily calls and daily review of absentee data. Additionally, STH school based liaisons are responsible for ensuring the delivery of supports and removing barriers that impede educational programs for students in temporary housing. Paramount to this effort is, of course, support for regular student attendance. Adding another administrative layer to Form 407 referrals would divert staff time from daily outreach and student supports.

RECOMMENDATION 6. *DOE should conduct a study to determine the adequacy of its current caseloads for Family Assistants to determine if it has sufficient staff levels to enable the Family Assistants to effectively fulfill their job responsibilities.*

RECOMMENDATION 7. *Based on the results of the study referred to in Recommendation 6, DOE should consider using the findings from the study as justification for increasing the number of Family Assistants overseeing the shelters through reassignments of existing staff and/or by seeking additional funding from the City's Office of Management and Budget to hire additional Family Assistants.*

Response. The DOE annually assesses our ability to provide additional supports by considering the best use of our funding and staff resources.

RECOMMENDATION 9. *DOE should stress the importance of the Field Support Centers reviewing the Attendance Plans and ensuring that the schools' policies and procedures are in compliance with the attendance requirements set forth in Chancellor's Regulations. Staff from the Field Support Centers should work with those schools to provide feedback well in advance of the due date so as to provide ample time to complete the Attendance Plans.*

RECOMMENDATION 10. *DOE should provide the Field Support Center Attendance Supervisors with additional training in reviewing and approving Attendance Plans.*

Response. The DOE agrees that enhanced guidance can be provided to Attendance Supervisors to help them review attendance plans, but disagrees with the characterization that plans are "approved" or that the plans can be used to ensure compliance to all school policies and procedures.

The review of the whole Consolidated Plan is stressed by the FSCs through the dedication of time and knowledge based sessions in September and October each year that address Attendance Plans. FSC Attendance Supervisors do not approve Attendance Plans, but rather use their review of plans to provide feedback and to identify support opportunities for schools. Schools are responsible for their plans, which are documents that schools can update throughout the year. While the plans must be completed by schools in September, this activity serves as a check and confirmation that schools recognize and articulate their attendance responsibilities.

OSYD provides sample responses, guides to answering questions, support for the Attendance Supervisors and when necessary and timely, the monthly meetings with Attendance Supervisors focus on Attendance Plans.

RECOMMENDATION 11. *DOE should establish procedures with clear roles and responsibilities to ensure the ongoing assessment and evaluation of school-based attendance activities, including student monitoring by Superintendents and outreach efforts by responsible parties, so that students with poor attendance are identified and receive necessary outreach and intervention.*

Response. The DOE agrees with having clear roles and responsibilities in that this reflects current practices. However, the Comptroller asking that Superintendents monitor students' daily attendance would be a duplication of effort. OSYD, FSC Attendance Managers and Superintendents all have a role in overseeing and supporting attendance. Student level monitoring, however, is not something the Superintendents are currently overseeing. The DOE has clear escalation protocols when student specific cases are escalated to the Superintendent's Office. The DOE's network of staff from OSYD, FSCs and schools provide robust student based oversight.



**Department of
Education**

Carmen Fariña, Chancellor

RECOMMENDATION 12. *To help ensure that attendance and monitoring efforts are being properly conducted, Attendance Supervisors from the Field Support Centers should be provided with tasks and responsibilities that would allow them to ensure that the schools are conducting the necessary outreach and intervention, such as selecting a sample of students from ATS reports that indicate declining attendance on the part of those students and review the schools' records to ensure compliance.*

Response. The DOE agrees with the concept of the recommendation, that enhanced guidance can be provided to Attendance Supervisors to help them support schools with outreach and intervention. Currently, the monthly Attendance Supervisor meetings are used to identify attendance patterns for STH. The DOE will continue to look for ways to enhance the tools. Additionally, Compliance Officers discuss 407 compliance metrics when visiting schools with K-8 grades where, when necessary, data points to schools not documenting investigations in a timely manner.

We are very proud of the joint efforts and look forward to our continued partnership.

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth A. Rose".

Elizabeth A. Rose
Deputy Chancellor



**Department of
Social Services**

Human Resources
Administration

Department of
Homeless Services

**Office Of Audit &
Quality Assurance**

January 30th, 2018

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Re: Draft Audit Report on Department of
Education's Efforts to Monitor and Address
School Attendance of Homeless Children
Residing in Shelters MG16-098A dated
1/19/2018

Dear Ms. Landa:

Thank you for sharing with us the draft report of your findings and recommendations pertaining to your audit of Department of Education's Efforts to Monitor and Address School Attendance of Homeless Children Residing in Shelters dated January 19th, 2018. We have reviewed the referenced report, and our responses are enclosed.

It is our mission to serve New York City's most vulnerable population in the most compassionate, efficient and effective manner, while adhering to all applicable rules, regulations and laws by which we are bound.

We are confident that our responses demonstrate the agency's commitment to continually improving our operations. Should you have any questions, please contact Klara Shoumacker, Director of the DSS Bureau of Audit Coordination at 929-221-7063.

Sincerely,

Maria Ciniglio

Enclosures

Auditor's Recommendations	Agency Response	Responsible Unit	Agency Corrective Action	Target Date
Recommendation 8: Once DHS receives notice that a shelter will be opening or closing, DHS should immediately notify DOE's STH unit so that DOE could plan how to reallocate its STH staff.	<p>A process is already in place to address this recommendation.</p> <p>Protocol to inform DOE of the opening and closing of shelters:</p> <ul style="list-style-type: none">a) Email notifications are sent from the DHS Director of Education to DOE regarding shelter openings or closings. This is currently a manual process.b) DHS ITS also transmits a daily shelter feed to DOE, which includes all current shelter building IDs (unique identifiers) and address information. The building ID is also included on the daily student file transmitted to DOE.c) The daily student file transmitted to DOE includes a “change type indicator” in the file, which captures when a student transfers from one shelter facility to another (also capturing when a student enters or leaves shelter).			