

December 8, 2021

The Hon. Phil Mendelson  
Chairman  
Council of the District of Columbia  
The John A. Wilson Building  
1350 Pennsylvania Avenue, N.W.  
Washington, DC 20004

Dear Chairman Mendelson and Councilmembers:

I write to provide background information and potential questions for the Committee of the Whole public hearing December 9, 2021, entitled **Improving School Attendance: Truancy and Chronic Absenteeism Issues in the District** and ask that this be included as part of the hearing record.

In March the Office of the D.C. Auditor (ODCA) published the education data audit, [Measuring What Matters: More and Better Data Needed to Improve D.C. Public Schools](#). The Council required the data audit in the District of Columbia Education Research Practice Partnership Establishment and Audit Act of 2018. ODCA reviewed OSSE data practices and datasets over six school years, from 2014 through 2019, to document what education data are collected and how they are used. The data audit contained multiple findings relevant to attendance, truancy, and chronic absenteeism. It noted that underlying attendance data quality problems must be remedied before focusing on District-wide attendance reporting. Without the cited remediations Councilmembers and others risk acting on incorrect interpretations in ways that do not help schools and students improve. We share the findings, recommendations, and questions below to inform your participation in the Thursday hearing.

Specifically, the audit found that:

- Attendance data reviewed are fundamentally flawed, resulting in starkly different levels of unexcused and total absences by sector, with the discrepancies increasing over time.
- Flaws in attendance data raises questions regarding the District's ability to meet local and federal reporting requirements for chronic absenteeism.

In addition, enrollment data was also found to be flawed due to missing exit dates and codes. Without valid enrollment data at all points during the year, truancy and chronic absenteeism will be impossible to accurately calculate for all students. The D.C. Code includes a definition of chronic absenteeism<sup>1</sup> and requires that OSSE report on student absenteeism in an annual attendance publication.<sup>2</sup> However, as two different absenteeism metrics instead of one are reported for many charter school students in OSSE's year-end, student level data, it is not possible to create an accurate and valid chronic absenteeism metric as required by District law.

Flawed attendance and enrollment data as noted in the audit represent an urgent problem to fix, particularly in light of the pandemic. Schools nationally and locally are experiencing increased absenteeism while simultaneously tasked with catching up on lost learning time. As noted above, the audit findings showed clear differences in the quality of attendance data by sector. More specifically, a simple check of OSSE's data

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<sup>1</sup> D.C. Code § 38-201(1A)

<sup>2</sup> D.C. Code § 38-203 (k)

showed that charter school attendance data was flawed and that these flaws increased over time. The data issues we noted, due to a lack of internal controls in OSSE's ad hoc process for collection, have significant implications for all data use, documentation, and interpretation. The District's Local Education Agencies (LEAs), schools, and students cannot receive meaningful support regarding attendance from our state education agency without remediating this issue.

Along with these concerning findings the data audit also notes that there are clear solutions thanks to the volume of federal guidance of statewide longitudinal data systems. Following this guidance and best practice the audit recommends the following steps to quickly improve attendance and enrollment data.

- 1) OSSE currently does not have robust attendance data collection guidance for LEAs serving pre-K-12 students.<sup>3</sup> This guidance is needed as soon as possible. It should include the following:
  - a. A requirement that all LEAs' student information systems (SIS) and OSSE's own code used to collect these data (the automated data transfer SQL scripts) have the same default attendance data preset values. As a simplified example, all LEA SISs' must either default to "absent" or "present" before staff input new values for each student every day. As mentioned in the audit and in OSSE documentation, LEA SISs' currently have different default settings as OSSE has no mandate or guidance explaining that this is a problem. OSSE uses these data in annual reports and those documents do include technical caveats documenting some of the problems. However, the lack of proactive internal controls leads to flawed attendance data being used every year by OSSE and others.
  - b. A requirement that all LEAs serving secondary students collect attendance by course, to ensure that partial attendance is accurately recorded and the "80/20 law" is followed comparably across LEAs. Currently, partial day attendance is calculated differently by LEA as some LEAs collect attendance in every course or block and others make an aggregate determination of partial or full day attendance at the school level. Again, this lack of internal controls leads to flawed attendance data, particularly for secondary students.
- 2) Because good attendance data requires good enrollment data, the audit recommended that OSSE ensure that all student exit dates and codes are collected across the entire school year. OSSE guidance already states that these dates and codes are mandatory. To ensure that these are complete and provide accurate enrollment data, OSSE can follow the lead of other states by not permitting the submission of incomplete enrollment data, i.e., this collection simply needs enforcement. OSSE should not impute (i.e., create likely) exit dates and codes as it did last year but instead should enforce a complete collection.
- 3) In the meantime, the audit recommended that the following caveat be associated with any use of OSSE's attendance data including, for example, when reporting school in-seat attendance rates, 90% attendance rates, chronic absenteeism, or truancy, the following caveat should be added: **This metric is based on incomplete information because, while OSSE receives two different values for attendance for most charter LEAs, only one value is used to determine this metric.**

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<sup>3</sup> Unlike the guidance documentation available for other collections, OSSE's attendance guidance consists of only memos, letters, and Excel templates. For example, this year's new [attendance guidance letter](#) is only two-and-a-half pages long and does not cover the recommended best practices above.

## Recommended Questions

1. What steps has OSSE taken to remedy the attendance data flaws identified in the data audit? Why do only PCS schools have two attendance data values in OSSE's data files? Which attendance element does OSSE believe to be correct, and which is used in summative reporting and why (days present or unexcused, excused days absent, or something else)?
2. Has OSSE required all LEA SISs to have the same attendance defaults to ensure comparable data? Similarly, has OSSE conducted its own investigation to determine the difference between attendance data submitted from SISs that have different default settings? What were the results of this investigation?
3. Has OSSE considered requiring all secondary schools to collect attendance by course or block? How does OSSE confirm that LEAs that do not collect attendance data by course or block are in compliance with the 80/20 attendance rule?<sup>4</sup>
4. The data audit replicated OSSE's own findings regarding sector differences in chronic absenteeism and truancy rates by sector. Has OSSE investigated and determined a cause for the implausible chronic absenteeism and truancy rates in DCPS high schools?
5. The Statewide Longitudinal Grant Program technical assistance documentation states the need for robust data governance including data stewards responsible for every data element. Has OSSE established a data steward for attendance, chronic absenteeism, and truancy data? Who is the data steward for all attendance data? Who is the data steward for all enrollment data, including exit dates and codes?
6. OSSE's September LEA Data Meeting documentation shows that again for school year 20-21 OSSE was missing significant numbers of enrollment exit codes and dates, specifically, more than 90,000 exit codes were missing.<sup>5</sup> The data audit shows similar amounts of missing exit dates and codes in other years. What is OSSE's plan to ensure that the District's state education agency is collecting complete enrollment data for all students?
7. Will OSSE commit to including the recommended attendance data caveat until these data are remediated? The caveat reads as follows: **"This metric is based on incomplete information because, while OSSE receives two different values for attendance for most charter LEAs, only one value is used to determine this metric."**

## Excerpt on Attendance Data from the Audit

Below in italics are excerpts from the education data audit including findings from OSSE's student data files that show data collected and aggregated annually to be inconsistent with OSSE's own stated collection requirements.

*These analyses show strong patterns of data invalidated by structural decisions to allow for non-standard and inefficient data collection, aggregation, or editing rules that in some instances clearly differ by public school sector (i.e., whether traditional or charter). This is a critical undermining of OSSE's automated data transfer (ADT) investment. If the determination of whether a student is recorded in final data as absent, suspended, transferred, engaged (versus dropped out), etc., differ by a reporting unit, such as by sector, the student records will be invalid, and data used for accountability, equity analysis, and continuous improvement will not only be imprecise but statistically biased. For example, we analyze definitions for absenteeism that differ by sector which has resulted in systematically higher recorded rates of chronic absenteeism for students in the traditional public-school sector.*

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<sup>4</sup> 5-A DCMR § 2199.1

<sup>5</sup> OSSE's [September 16, 2021 LEA Data Discussion Meeting](#)

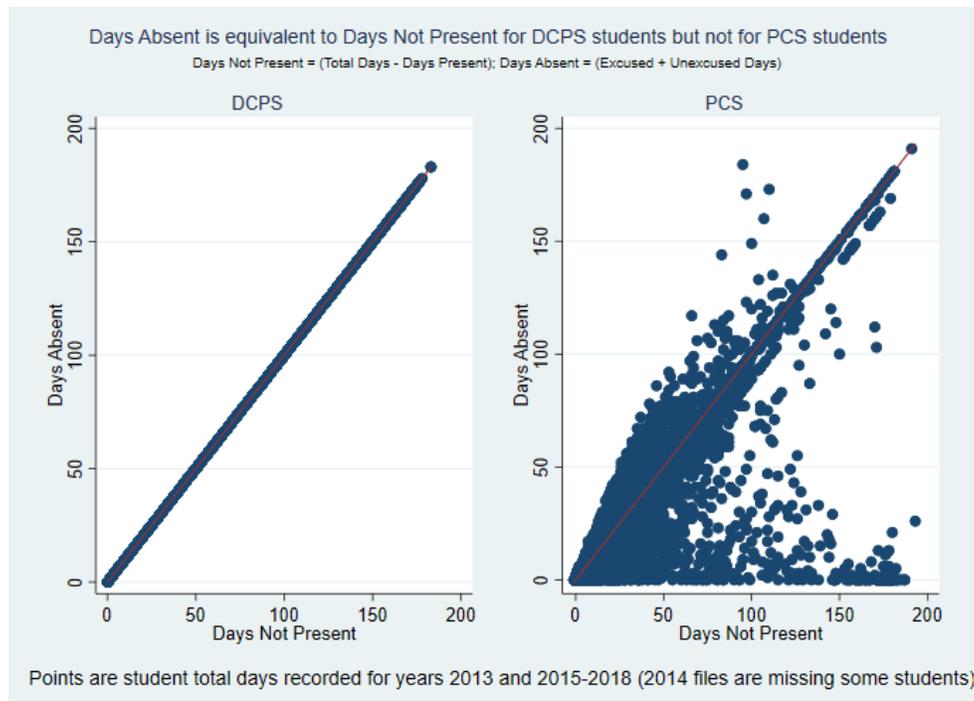
By logic, and confirmed in OSSE documentation, the values for total days enrolled minus days present—effectively, total days not present—should equal total days absent (i.e. unexcused plus excused days absent), as follows:

$$\text{Total Days Enrolled} - \text{Days Present} = \text{Unexcused} + \text{Excused Days Absent}$$

$$\text{Days Not Present} = \text{Days Absent}$$

These two sets of potential values are equal for all students enrolled in DCPS schools in each file, each year—as they should be, since “days absent” are equivalent to “days not present.” But almost all charter schools in OSSE’s data have several values for student total days absent that do not equal the difference between total days enrolled and days present. Figure 1.3 shows the volume and magnitude of these data discrepancies between what should be complementary variables for the same student in the same year. These are shown for all K-12 students in each year 2013 and 2015-2018.<sup>6</sup> (The 2014 student attendance data file was missing a number of enrolled K-12 students, so we omit that year from our analysis.)

**Figure 1.3: 2013-2018 Student Annual Days Absent Over Days Not Present, By Sector**

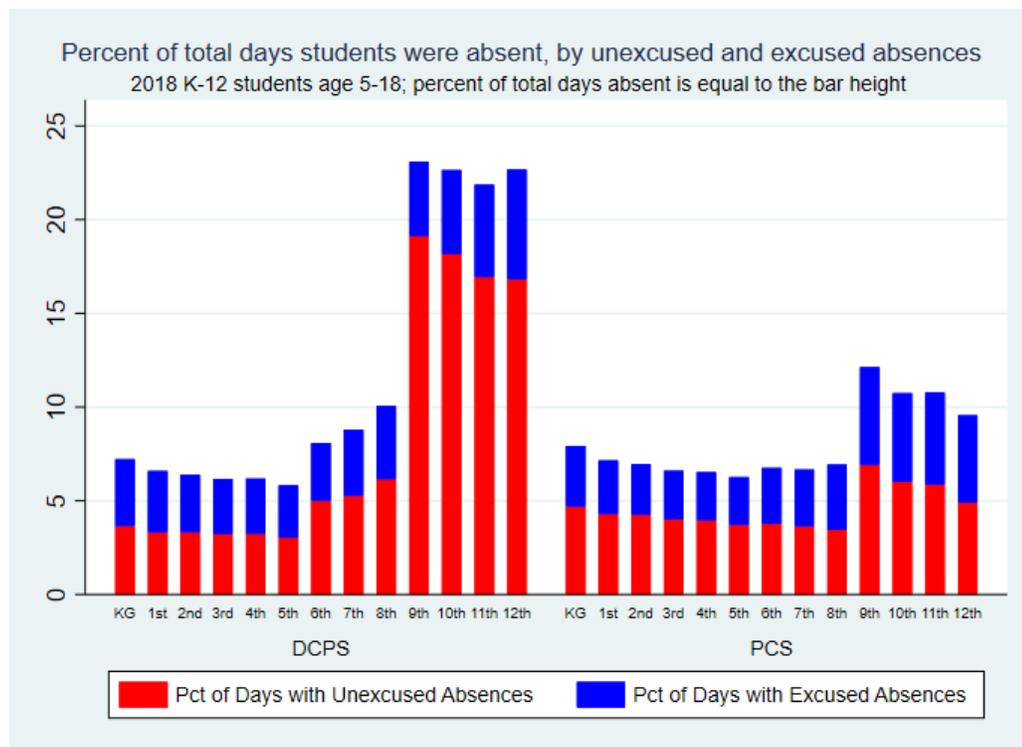


<sup>6</sup> The attendance data files do not include grades, so enrollment data files were used to identify grades for all students in the full enrollment files from 2016-2018 and almost all students prior to 2016. Our findings for the full sample prior to 2016, without limiting by grades, were also very similar.

The DCPS student records for all students each year align exactly, as shown by the graph's 45-degree line indicating these are equal values as would be expected. However, the PCS student records contain tens of thousands of disparate measures of the same student's absenteeism in the same year. The incidents of this discrepancy can be seen in the volume of points off the 45-degree line. Importantly, most instances where "days absent" is greater than "days not present" are in either 2013 or 2015. In fact, in those early years these differences were both above and below the 45-degree line. However, in 2016 through 2018, the vast majority of the values are in only one direction, indicating a shift in reporting.

These differences are substantial, and the potential impact is meaningful because the D.C. STAR report cards and the OSSE attendance analysis reports draw on these invalid data to derive their metrics for accountability and continuous improvement.

**Figure 1.4: Student Days Absent, By Type, as a Percentage of Total Days, by Grade and Sector**



A full-day absence is recorded for any student missing 20% or more of a school day. The attendance definition clarifications also determined that each full-day absence be recorded as an unexcused absence unless a valid written excuse is provided within five days. A District-wide common definition for student truancy was also established to be 10 or more full days absent in a school year.<sup>7</sup> Figure 1.4 shows the share of days for which all 2018 K-12 students age 5-18 in each grade and sector were absent on average, in total, and broken out by unexcused and excused absences.<sup>8</sup>

<sup>7</sup> See the OSSE annual attendance reports referenced in footnotes above for the changing attendance data legal definitions or see our Part 2 excerpts and references of the source documents.

<sup>8</sup> We follow the OSSE attendance reports focus on the sample of K-12 compulsory school-age students.

*For DCPS students the share of days absent increase in the middle grades relative to PCS students and drastically increase in high school. The total bar heights for high school grades indicate DCPS students are absent, on average, more than one day a week for every week of the school year (i.e., more than 20% of their enrolled days). This is more than twice the rate of the PCS high school students. The greatest share of these absences for the DCPS students are unexcused full-day absences. For instance, DCPS 9<sup>th</sup> graders, on average, were absent 23% of the year. They were recorded as absent without an excuse for a full 20% of the year, compared to 8% for PCS students. On average, DCPS students' unexcused absences were over 70% of their total absences, compared to just over half for PCS students.*

*This unusually high volume of days recorded as unexcused absences leads to implausibly high rates of truancy—for DCPS students and DCPS schools, in addition to the higher rate of chronic absenteeism relative to PCS. Because of the relatively high rate of unexcused absences for DCPS students, their truancy rate was 29.0%, compared to the PCS student truancy rate of 22.3%. The stark differences in levels of unexcused absences for DCPS students, especially high school students, raises serious questions about OSSE's data processes for ensuring consistent data collection rules across reporting units.*

*There are several possible reasons the student data collections could result in so many more unexcused full-day absences for DCPS students. The DCPS school block-schedules could cause more students to be recorded as full-day absences, since missing even one class puts them over the 20% cutoff for the 80/20 rule. However, such sharp differences would still be unlikely. It would mean that almost one third of students across all DCPS schools—including the selective (or application) high schools—missed 10 or more classes each grade without a written excuse.*

*Some of this difference could be due to the different data collection systems between the sectors that OSSE does not reconcile in the ADT process or in data quality assurance steps after the ADT collection. OSSE's documentation, excerpted in Part 2 of the audit, notes that the attendance data collected by OSSE through the ADT will vary with the LEA system field defaults. While OSSE does not produce attendance data collection guidance documentation, OSSE's annual attendance data template lists 11 possible values for each student's daily Attendance Status, including either Present Partial Unexcused or Absent Partial Unexcused.<sup>9</sup> Without the normal collection guides, however, there is no further explanation of how or why these fields would be allowed to default differently by LEA or sector, how those different defaults would lead to different values, or what steps OSSE takes to ensure the final student attendance data are correct and consistent across the District.*

*Data collection business rules, such as these data field defaults, should be consistent across LEAs, but can occur unintentionally as SEAs work with different LEAs to bring their different local data systems into alignment with the statewide definitions. Therefore, looking at these problematic attendance results over time can tell us whether the errors we are seeing are a result of SEA improvement work and are steadily improving or if there is a different pattern.*

*However, again, we see these time trend results differ by sector. The average percentage of days recorded as unexcused absences increases for DCPS students at the time of the rule changes for definitions and reporting but decreases for PCS. From 2013 to 2015, the DCPS mean percentage of unexcused days absent as a total of days enrolled went from 5.7% to 8.7% and stayed at roughly 8.5%*

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<sup>9</sup> OSSE, 2017-18 School Year LEA Data Collection Template, Excel workbook file accessed July 4, 2020 (by searching "attendance data template 2017-18" on the OSSE website).

*through 2016-2018. The mean percentage for PCS students went from 5.9% in 2013 (similar to DCPS) to 4.1% in 2015 and stayed at roughly 4.5% through 2016-2018. This trend is similar to our finding above regarding the chronic absenteeism and underlying percentages of total days absent. Data system flaws leading to invalid data are typically corrected by SEAs as they are discovered and resolved over time. High stakes data elements found to be increasingly divergent by reporting unit over time, on the other hand, raise questions about systematic bias in the system design or implementation. This question is particularly relevant when these changes in the recorded data coincide with new public reporting requirements.*

As an additional check on the above findings from the data audit, we provide inferential evidence below from two statistical models, a student fixed effects regression model and an ordinary least squares regression model that all show the same finding as was found above in the logical audit check.

*These models find that the differences in absenteeism between sectors is not simply reflecting different absenteeism rates on average between students served by each sector. And, as a third check, we estimate any differences in test score growth by sector as one might expect to see a small positive difference if students are attending school more often, controlling for all else. In fact, we find the opposite pattern across the first regression controlling for student characteristics and the second regression additionally controlling for student mobility. In both sets of regressions, controlling for student characteristics and mobility, public charter schools are associated with less test score growth than DCPS schools.*

In sum, using a variety of different mechanisms, including OSSE's own documentation, logical audit checks, and inferential statistics, the audit shows that there is a difference in the data reporting process for PCS schools in OSSE data. Valid attendance data is crucial for state education efforts to support and improve student and school performance. This type of improvement and support from OSSE is not possible for any LEA or school, across sectors, until underlying data problems are fixed.

Councilmembers, I hope this background, suggested questions, and excerpt from the education data audit are useful in the Committee of the Whole hearing on attendance. Please let me or Education Research Director Erin Roth know if you have questions. Thank you.

Sincerely yours,



Kathleen Patterson  
D.C. Auditor

cc: D.C. Councilmembers  
Dr. Christina Grant, State Superintendent of Education  
Dr. Lewis Ferebee, Chancellor, DCPS  
Dr. Michelle Walker-Davis, Executive Director, DCPCSB