



# Student Attendance Audits and Reviews

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- **Audit Experience**
  - Accountability
  - Learning Opportunity
    - Weaknesses AND Strengths
- **THE goal: Pass your desk audit or review with flying colors! We want you to be successful!**
  - TRANSPARENCY

- **Current Audit/Review Status**
- **Overview of the Audit Process**
- **Tips and Best Practices: ALL ABOUT DOCUMENTATION**
  - Desk Audits
  - Compliance and Follow-Up Reviews
  - Calendar Audits
- **Discussion on Current Hot Topics**
- **Q&A**

- **2019-2020 Desk Audits 99% Complete**
- **2020-2021 Desk Audits Currently Working**
  - Notification Letters: 2/10/23
- **2021-2022 Compliance and Follow-Up Reviews**
  - Notification Letters: 3/31/23
- **2021-2022 Calendar Audits**
  - Notification Letters: 6/23/23
- **2021-2022 Desk Audits**
  - Notification Letters: 8/11/23

- **2022-2023 Desk Audits**
  - Notification Letters: Nov/Dec 2023 (Normal Cycle)
- **2022-2023 Compliance and Follow-Up Reviews**
  - Notification Letters: Jan/Feb 2024 (Normal Cycle)

- **Risk Analysis and Selection**
  - Notification letters, student data, and query instruction sheets:
    - Superintendent does NOT get the student data and query instruction sheets
    - Student data includes the regular and special program attendance that was submitted to PEIMS
    - Seven different queries for 19-20
    - Five different queries for 20-21, 21-22, and 22-23
    - Planning for six different queries for 23-24

- **YOUR Turn**
  - Gather documentation and provide it to your assigned auditor:
    - Your auditor will more than likely be in touch with you as they review your documentation
  - Documentation submission:
    - Prefer electronic submission

- **Auditors Review Submitted Documentation**
  - Generate findings for students who are out of compliance
  - Issue preliminary report:
    - Chance for a response from the LEA
    - Mandatory CAP for all findings
  - Issue final report:
    - Copy to board president
  - Adjustment submission to State Funding Division:
    - Reduction to future FSP payments

- **Bilingual/ESL Query**

- Objective: Looks for students who were reported without parental consent in the Fall PEIMS Submission who were then reported with eligible bilingual/ESL days in the Summer PEIMS Submission
- Required documentation:
  - Home language survey containing a language other than English:
    - SIGNED AND DATED
  - LPAC recommendation placing student into a bilingual or ESL program:
    - Ensure you're sending the LPAC docs for the school year being audited
  - Documented parental consent:
    - SIGNED AND DATED
    - Don't forget: Properly documented verbal consent now allowable

## 2021–2022 Survey of Bilingual/ESL Eligibility

It is the responsibility of the Bilingual/English as a second language (ESL) staff to provide attendance personnel with names and coding information of students who are eligible for and being served in a bilingual/ESL program. Coding of bilingual/ESL students should be reviewed each six-week reporting period for possible errors. To participate in a bilingual/ESL program, a student must be classified as an English Learner (EL) and placed into the program by the Language Proficiency Assessment Committee (LPAC). Additionally, to place the student in the program, approval must be obtained from the parent in writing. The parent approval form must contain a "date completed by parent" or "date received by LEA". Funding for bilingual/ESL may not be claimed unless the parental approval is on file.

The Public Education Information Management System (PEIMS) data shows the attached student(s) to be enrolled in the bilingual/ESL program but did not show a code of parental consent at the fall PEIMS snapshot. In all cases, bilingual/ESL attendance funding was claimed during the 2021–2022 school year.

**Provide the following documentation regarding the student's eligibility status for bilingual/ESL funding:**

**For newly identified ELs or ELs who were enrolled in your LEA during the 2020–2021 school year and continued in your LEA's bilingual/ESL program during the 2021–2022 school year:**

- Home language survey (HLS) that contains a language other than English that is signed and dated OR proof your LEA tried to obtain a copy of the HLS from the student's previous LEA if it wasn't originally completed with your district or charter school.
- LPAC recommendation for the 2021–2022 school year showing student placement in a bilingual or ESL program. This LPAC may have met at the end of the 2020–2021 school year.
- Signed and dated parental consent form.

**For previously identified EL students who transferred into your LEA from another Texas public school during the 2021–2022 SY:**

- HLS that contains a language other than English that is signed and dated. If the previous LEA did not provide a copy of the student's home language survey, provide proof that you attempted to obtain it.
- LPAC documentation from your LEA showing that the records from the previous LEA were analyzed and a placement recommendation was made for the 2021–2022 school year into a bilingual or ESL program.
- Signed and dated parental consent form OR documented parental approval in the LPAC documentation.

**Copy of a school calendar that has been revised to include any unexpected school holidays for the 2021–2022 school year.**

**Incomplete or inaccurate data will result in attendance not being allowed.**

- Query 1: Early Education Students with No Special Education
- Query 2: Early Education Students Reported as Speech Therapy Only
  - ARD paperwork:
    - Ensure the ARD paperwork covers the entirety of the attendance claimed:
      - Might have to pull ARDs from the prior school year
  - In cases of grade level miscoding (PK):
    - Submit PK qualification documentation

## 2021–2022 Survey of Early Education Students with an Instructional Setting of Speech Therapy Only

Students reported in this survey are shown in the Public Education Information Management System (PEIMS) database to have been enrolled the early education (EE) grade level with a special education instructional setting code of speech therapy only during the 2021–2022 school year.

EE students who are ages 3 through 5 may be eligible for half-day or full-day regular and special education attendance dependent upon the type of special education services they receive and the amount of time they spend with a special education teacher. All EE students reported with eligible attendance must be receiving special education services and must have admission, review, and dismissal (ARD) committee documentation and an individual education plan (IEP) on file. An EE student can only receive funding for speech therapy contact hours if they are provided in combination with his or her primary instructional setting.

**Provide the following documentation for each student to determine the correct eligibility code for funding purposes:**

- Documentation supporting student eligibility for EE grade level:
  - Copy of the ARD committee documentation/IEP (include cover, schedule of services, modifications/accommodations, and deliberations pages) showing the date of the meeting, the type of special education services the student received, and the amount of daily services provided. **Please ensure the ARD paperwork covers the entirety of the student’s reported attendance. This means you may need to send ARD paperwork from the previous school year.**
- For prekindergarten students who may have been miscoded: Documentation to support prekindergarten eligibility.

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## 2021–2022 Survey of Early Education Students with No Special Education Instructional Setting

Students reported in this survey are shown in the Public Education Information Management System (PEIMS) database to have been enrolled in the early education (EE) grade level with no special education instructional setting code during the 2021–2022 school year.

EE students who are ages 3 through 5 may be eligible for half-day or full-day regular and special education attendance dependent upon the type of special education services they receive and the amount of time they spend with a special education teacher. All EE students reported with eligible attendance must be receiving special education services and must have admission, review, and dismissal (ARD) committee documentation and an individual education plan (IEP) on file.

**Provide the following documentation for each student to determine their eligibility for funding:**

- Documentation supporting student eligibility for EE grade level:
  - Copy of the ARD committee documentation/IEP (include cover, schedule of services, modifications/accommodations, and deliberations pages) showing the date of the meeting, the type of special education services the student received, and the amount of daily services provided. **Please ensure the ARD paperwork covers the entirety of the student’s reported attendance. This means you may need to send ARD paperwork from the previous school year.**
- For prekindergarten students who may have been miscoded: Documentation to support prekindergarten eligibility.

**Copy of a school calendar that has been revised to include any unexpected school holidays for the 2021–2022 school year.**

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- **Kindergarten Students Under Age 5 on September 1**
  - **Required documentation:**
    - Typo: Birth certificate or other official record showing student's DOB
    - Allowable Exceptions:
      - Local policy AND proof that the student passed the 3rd Grade STAAR
      - Military-connected (Interstate Compact):
        - If student continued to live with the military member: Orders showing military member was assigned to state where student was previously enrolled AND proof of attendance or grade completion
        - If student was residing with someone else: Family care plan/proof of guardianship/other docs AND proof of attendance or grade completion
  - **In cases of grade level miscoding (EE or PK):**
    - Submit PK qualification documentation or ARD documentation (EE)

## 2021–2022 Survey of Kindergarten Students Enrolled Under Age Five

Students reported in this survey are shown in the Public Education Information Management System (PEIMS) database to have been enrolled in kindergarten during the 2021–2022 school year but were under age five on September 1st, 2021.

### Provide the following documentation for this survey:

- Copy of student birth certificate, hospital birth record, or other official records showing birth date, or
- A copy of the district or charter school policy for admitting students younger than five years of age in accordance with TEC §48.003(d), and documentation that the student performed satisfactorily on the assessment instrument administered to students in the third grade (STAAR).
- If the student is a child from a military family who moved to your district or charter school from another state, please provide:
  - Military orders showing that the military member was assigned to the state where the student was previously enrolled and attending school and proof that the parent is still active military or has retired/been medically discharged within the last year.
  - Proof of attendance in public school kindergarten from the prior state or proof of completion from a public-school prekindergarten program in the prior state.
- For prekindergarten students who may have been miscoded: Documentation to support prekindergarten eligibility.
- For early education students who may have been miscoded: ARD documentation to support their eligibility for the EE grade level.

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- **Pregnancy Related Services**

- **Documented dates:**

- PRS entry date
    - Pregnancy end date
    - Dates of CEHI (or homebound for special education students)
    - PRS exit date
    - Return to school date
    - BEST PRACTICE: Try to record all these dates in a single place:
      - Create a local form to keep in the student's folder

- **If prenatal CEHI or postpartum extended CEHI was provided:**

- A doctor's note FOR EACH INSTANCE that states the medical necessity and recommended length of confinement

- **Pregnancy Related Services (cont.)**
  - **CEHI logs:**
    - Must show the amount of instruction provided each day
  - **Special education students:**
    - Contingency or annual ARD that documents change to homebound when student goes on home confinement
    - Logs from a certified special education teacher showing the amount of instruction provided each day
    - Copy of the special education certification for the teacher providing the homebound instruction

## 2021–2022 Survey of Pregnancy Related Services (PRS)

Students reported in this survey are shown in the Public Education Information Management System (PEIMS) database to have been served in pregnancy related services (PRS) in your district or charter school during the 2021–2022 school year.

**Provide all of the following information for each student listed:**

- PRS entry date
- Pregnancy end date
- PRS services end date
- Date student returned to school after home confinement, if applicable
- Dates of compensatory education home instruction (CEHI) and:
  - Copy of CEHI teacher visitation log showing days and hours served by week, if applicable. **If the student was served remotely, there may not be CEHI logs for that student.**
  - If applicable, a doctor's statement showing a valid medical need for prenatal CEHI and/or an extension of the postpartum period beyond the standard six-week recovery period for each instance.
- For special education students, a copy of the admission, review, and dismissal (ARD) committee documentation that details the appropriate PRS services for the student, including how services will be provided during homebound instruction.
  - Copy of special education teacher log showing days and hours served each week while the student was homebound and a copy of the special education teacher's certification who provided the services. **If the student was served remotely, there may not be homebound logs for that student.**
- **CAREER AND TECHNICAL EDUCATION (CTE) CONTACT HOURS:** Copy of CTE teacher log showing that the student continued to receive the same amount and type of CTE service that was provided before entering CEHI.

**NOTE:** The above data may be submitted on a spreadsheet showing all PRS students and required dates. The spreadsheet must be signed by a school official who can verify the accuracy of the data submitted. Teacher logs, doctor's statements, and ARD paperwork will still need to be submitted along with the spreadsheet.

**Copy of a school calendar that has been revised to include any unexpected school holidays for the 2021–2022 school year.**

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The Dyslexia Handbook 2021 update ensures compliance with federal child find requirements.

## Single Entry Point for Dyslexia and Related Disorders Identification

2018

The 2018 Dyslexia Handbook **outlined two pathways** for the identification of children suspected of having dyslexia:

Section 504 dyslexia evaluation or an IDEA evaluation.



2021

The 2021 Dyslexia Handbook requires that anytime the LEA suspects the student has dyslexia or a related disorder, and needs services, the LEA must seek parental consent for a **Full Individual Initial Evaluation (FIIE) under the IDEA**.

- **Were Students who Received the Dyslexia Allotment Properly Identified?**
  - Query identifies all students coded 02 and/or 03 who were not also coded 01

Code Table Id	Name	XML Name	Date Issued	Date Updated
C224	DYSLEXIA-SERVICES-CODE	TX-DyslexiaServicesCode	08/26/2019	
Code	Translation			
00	Does not receive services for dyslexia or a related disorder.			
01	Receiving services for dyslexia or a related disorder with an individualized education program developed for the student under Section 29.005; or a plan developed for the student under Section 504, Rehabilitation Act of 1973 (29 U.S.C. Section 794).			
02	Receiving instruction that meets applicable dyslexia program criteria established by the State Board of Education; and is provided by a person with specific training in providing that instruction.			
03	The student is permitted, on the basis of having dyslexia or a related disorder, to use modifications in the classroom or accommodations in the administration of assessment instruments under Section 39.023.			

- **Coding reminder: If services are provided as part of IEP or 504 plan, don't forget the 01 dyslexia services code (TWEDS Code Table C224)**
  - **Documentation:**
    - ARD/IEP for audited school year, OR
    - 504 plan, OR
    - Other identifying documentation (RTI: Response to Intervention)

- **Prekindergarten**

- **Ecodis: PK application or NSLP form**
  - Both forms must be certified and dated by a school official
- **EL: LPAC recommendation for the audited school year**
  - Parental consent is not required for PK eligibility
- **Head Start: Documentation showing student acceptance at any time during audited school year**
- **McKinney-Vento: Statement from LEA's Homeless Liaison**
- **Child of active-duty military: Statement of viewing military ID or copy of orders**

- **Prekindergarten (cont.)**

- **Child of military member injured or killed:**
  - Death: Death certificate and DOD form indicating death as reason for separation
  - Injured: Purple Heart citation or line of duty determination
- **Foster child: DFPS letter**
  - Texas AND other states
- **Star of Texas Award: Award certificate or reference website**
- **Previously enrolled in public school PK3: Proof of attendance (report card) and proof of eligibility from the PK3 year.**

- **Career and Technical Education**

- Now that TEA is assigning coding, this is a lot easier from an audit perspective
- Bell schedule to ensure all class periods are at least 45 minutes in length each day
  - If not, auditor will request student schedules to ensure coding is correct
- **Work-based learning experiences:**
  - Training plan
  - Instructor worksite visit logs
    - Once per grading period

- **State Compensatory Education**

- **Eligibility**

- NSLP form certified and dated by a school official
    - Local income survey signed and dated by a parent
    - Direct certification documents:
      - Download/viewed/signature date prior to fall snapshot OR
      - Data showing when the LEA certified the students' ecodis status

- **Census Block**

- Registration form or enrollment document that shows student's physical address during school year being reviewed

- **HB2610 (2015-2016) and HB 2442 (2018-2019)**
  - 75,600 operational minute requirement
  - Carveouts for certain programs
- **TAA Letter: 3/29/22**

## Reporting

LEAs should not adjust their reported instructional days or scheduled operational minutes in their student information system, nor should LEAs adjust this data when reporting it through the Public Education Information Management System (PEIMS). LEAs must continue to ensure that all calendar tracks meet the operational minute and/or instructional minute requirements set forth in TEC, §25.081(a) and §48.005(i-m). Beginning with the 2021-2022 summer PEIMS submission, agency auditors will be reviewing the calendar tracks that LEAs submit to ensure they meet these requirements. Any calendar tracks that do not meet the required minute requirements will have proportional funding reductions applied to those tracks.

- **Important to ensure that calendars meet requirements and are correctly reported in PEIMS**
  - Daily minutes/waiver minutes/instructional program types
  - Apply for necessary waivers
- **Query tracks by program type (TWEDS Code Table C215)**
  - Tracks that are out of compliance could result in a proportional adjustment to all regular and special program ADA/FTEs reported on that track

- Submission accuracy
- Enrollment rules
- Pre-coding attendance
- OAT cannot change



# Questions?

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