DALLAS INDEPENDENT SCHOOL DISTRICT

Internal Audit

Truancy Audit

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To: Board of Trustees
Stephanie S. Elizalde, Ed.D., Superintendent

From: Robert Rubel, MBA, CPA, CIA, CISA
Chief Internal Audit Officer

Subject: Truancy Audit

Executive Summary

The Dallas Independent School District (District) Office of Internal Audit (OIA) has completed the Truancy Audit.

The audit focused on processes and controls related to the District's truancy prevention and intervention program, including truancy prevention measures (TPMs), truancy tier identification, parent/guardian notifications, and court filings to determine if they are appropriate based on state law and District Board policies.

Overall, the Graduation, Recovery, Attendance/Advocacy and Dropout Intervention (GRAAD) department has implemented controls to mitigate risks associated with managing the truancy program.

Additionally, GRAAD has done a commendable job implementing a centralized approach to effectively and efficiently manage and track truancy activities based on previous audit observations. The department has developed a multitude of TPMs to accomplish the primary goal of identifying and addressing the root cause for truancy absences and ensuring students attend school.

Background

The GRAAD department within School Leadership manages the District's Attendance for Credit and Truancy programs. The department monitors campus compliance with attendance law, policies, and procedures, including TPMs. They collaborate with the campuses to promote student attendance, including conducting training for campus staff at the beginning of the year (August), middle of the year (January), and at the end of the year (May). GRAAD also conducts bi-weekly on-demand sessions in the fall and spring semesters.

Attendance Law

The Texas State Compulsory Attendance Law requires students ages 6 through 19 to attend school. Texas Education Code (TEC) §25.085 requires students to attend school each day for the entire school year unless exempted, and violation of this law occurs when students have unexcused absences for 10 or more full or partial days within a six-month period. Students who violate this law may receive a referral to court proceedings against the parent, guardian, or student to enforce the law.

Truancy Prevention Measures (TPMs)

State law also mandates pre-court TPMs for identified students. A TPM can be in the form of an attendance behavior improvement plan, or a referral for: counseling, mediation, mentoring, teen-court, community-based services, or other in-school or out of school service aimed at addressing the student's lack of attendance. The GRAAD department utilizes the PowerSchool Logical Attendance Tracker (LAT) platform to track TPMs to completion.

To accommodate truancy laws and encourage attendance, the GRAAD department has done a superior job to provide parent awareness of truancy and the importance of attendance. The department has developed online courses including Parent Attendance Success Initiative (PASI) and Wake Up Your Mind (WUYM). The PASI online training intervention course assists parents and guardians of K-8th grade students with identifying attendance barriers that may prevent students from attending school on a regular basis. WUYM is also an online attendance intervention course for students in grades 9-12 with five or more unexcused absences.

Truancy Notifications

The GRAAD department uses a tiered system to communicate truancy warnings to students and parents. Notifications are centrally generated based on attendance data from PowerSchool. Once a student hits the thresholds noted below, LAT will automatically generate a notice that is then reviewed by the GRAAD department prior to processing. Additionally, Communication Services generates daily School Messenger phone calls to parents/guardians at Tier II through Tier IV absence levels. Below is a summary of the tiers and associated TPMs:

- Tier I – State required attendance notice based on Texas Compulsory Attendance law is communicated to all parents through the student enrollment process at the beginning of the school year.

- Tier II – State required warning notices are processed daily for required download and printing by every campus. Campus TPMs are also applied beginning at the Tier II absence level (counseling, mediation, mentoring, teen-court, or community-based services). Additionally, they are uploaded to the PowerSchool Parent Resource Center after three full or partial days of unexcused absences within a four-week period for review and signature from the parent/guardian.

- Tier III – District imposed warning notice is centrally generated and uploaded to the PowerSchool Parent Resource Center after five full or partial days of unexcused absences within a six-month window for review and signature from the parent/guardian. Campus-based TPMs can be continued (i.e., counseling, mediation, mentoring, teen-court, or community-based services). Additionally, the online courses PASI, for grades K-through 8, and WUYM, for grades 9 through 12, are offered to students.

- Tier IV – District imposed warning notice is centrally generated and uploaded to the PowerSchool Parent Resource Center after seven full or partial days of unexcused absences within a six-month period. Campus administration will meet with the parent/guardian to document truancy issues and discuss available resources. Additionally, the campus will conduct a campus assessment to identify attendance patterns. Tier IV letters are mailed to parents/guardians from central office.

- Truancy Case Filing – ten full or partial days of unexcused absences within a six-month period, the District is required by law to refer the student to the county truancy court for truant conduct

after all TPMs are exhausted.

The GRAAD department has implemented multiple ways to communicate truancy warnings. Notifications are uploaded to the PowerSchool Parent Resource Center, where parents can view truancy notifications issued to their child. Letters are mailed to the address on the student's file. Additionally, daily processing of truancy warning letters by the GRAAD department are saved in LAT for the campus to print and provide to the students. The School Messenger application provides notifications to parents regarding student truancy. Reports are also made available that show the number of automated phone calls, push notifications and voicemails sent to parents regarding their student so the District can adequately track and document efforts.

Truancy Case Filings

When a student reaches the ten-day unexcused absence level within a six-month period, the District is required to initiate the truant affidavit process. After a thorough review by campus and central staff to verify the student does not meet any of the exception requirements, the case and affidavit are electronically transmitted to the Dallas County Truancy Court for determination and approval by the judge. A notice is then issued by the court to the student and/or parent to appear in court.

The GRAAD department represents the District at all truancy court hearings and serves as the District's attendance officers who attend court on a weekly basis and work through an average of 400 cases per week.

Truancy case filings for 2020-2022 school years were suspended due to COVID, however truancy warning letters were issued to truant students and their parents. In November 2022, GRAAD department truancy officers began to manually file cases for the 2022-2023 school year. The GRAAD department is currently working with a software vendor to enhance the LAT reporting functionality and to revamp a previous system used to file truancy cases with the Dallas County Court System. The new application will allow the District to file cases with the county, track TPMs, retain documentation for extenuating circumstances, and track student attendance in a more efficient manner. Additionally, the truancy court is currently making system reporting updates that will automatically communicate any system rejections due to filing or input errors to LAT.

Scope

The audit focused on processes from the current fiscal year (FY) and FY 2022-2023.

Objective

The objective of the audit was to review the processes and controls pertaining to the District's truancy prevention and intervention program.

Methodology

OIA reviewed process, controls, and supporting documentation related to truancy. Auditors interviewed key personnel, conducted walkthroughs, and performed the following:

1. Truancy Prevention Measures (TPMs) – To determine whether the department has adequate TPMs in place, auditors reviewed the department's strategy, goals, and key performance indicators (KPIs) to determine if they are aligned to TEC 25.0915 as well as best practices.

Auditors reviewed the following:

- District has documented TPMs as required by TEC 25.0915 and reasonable timelines for completion of TPMs.
  No observations were noted.

- Annual training is conducted by the GRAAD department for campus staff responsible for TPMs and that TPMs were adequately monitored.
  No observations were noted.

2. Truancy Identification and Notification – To determine if processes and controls are in place to properly identify truant students and implement TPMs, auditors conducted a walkthrough with GRAAD personnel of the PowerSchool LAT platform and verified it is properly configured to manage the following:

   - Properly identify truant students and their associated tiers.
   - Generate truancy warning letters based on attendance thresholds.
   - Track and document truancy communication efforts.
   - Properly track and maintain documentation for affidavit-level cases.

   No observations were noted.

Primary criteria used for this audit were the following with state codes as of this report date:

1) TEC §25.085 Compulsory School Attendance
2) FEA (LEGAL), Attendance: Compulsory Attendance, Issued November 19, 2023
3) FED (LEGAL), Attendance: Attendance Enforcement, Issued November 19, 2023
4) TEC §25.0915 Truancy Prevention Measures
5) Texas Family Codes §65.001 through §65.065 Truancy Court Proceedings
6) Texas Family Codes §65.101 through §65.109 Adjudication Hearing and Remedies
7) Texas Education Agency Commissioner's Rules Concerning Truancy, Chapter 129 Student Attendance, Subchapter BB, §129.1043. Minimum Standards.
8) Texas Education Agency Commissioner's Rules Concerning Truancy, Chapter 129 Student Attendance, Subchapter BB, §129.1045. Best Practices

Audit Observations and Recommendations

No observations or recommendations were identified for this Truancy Audit.

Conclusion

The mission of the GRAAD department is to inspire, educate, and empower students to engage in life-long learning that promotes self-advocacy and the pursuit of academic and personal development. The truancy prevention and intervention program helps to fulfill an integral element of this mission.

Overall, the District has processes and controls in place to track truancy prevention and intervention activities. Additionally, GRAAD has taken great efforts to centralize truancy processes by employing innovative technology, which allows them to manage and track truancy cases more effectively and efficiently so the focus can be on increasing attendance for Dallas ISD students.

We would like to thank the GRAAD department for their cooperation and assistance with this audit.

The audit was conducted in accordance with the Institute of Internal Auditors' *International Standards for the Professional Practice of Internal Auditing.* Those standards require OIA to plan and perform the audit to obtain sufficient and appropriate evidence to provide a reasonable basis for our observations and conclusions based on our audit objectives. OIA believes the evidence obtained provides a reasonable basis for our observations and conclusions based on our audit objectives.

Respectfully submitted,

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