

Student Attendance Audits and Reviews

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Presentation Goal

- **Audit/Review 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

Topic Preview

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

Current Audit/Review Status

- **2023-2024 Desk Audits – 100% Complete**
  - Notification Letters: 2/7/25
- **2023-2024 Compliance and Follow-Up Reviews – 100% Complete**
  - Notification Letters: 3/28/25
- **2024-2025 Desk Audits – In Progress – 124 Total**
  - Notification Letters: 4/2/26
- **2024-2025 Compliance and Follow-Up Reviews – 34 Total**
  - Notification Letters: 6/5/26
- **Calendar Audits**

Hot Topics

- **ADA Eligibility Coding – How is this determined?**
  - ADA 0
  - ADA 1 & ADA 2
  - Special circumstances or programs: High school continuer programs, etc.
- **Students in Residential Treatment Facilities**
  - Inside/outside your district
- **ABA Therapy and Attendance**
  - LTI?
- **Corrective Action Plan Creation and Implementation**

2024–2025 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 2024–2025 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 2023–2024 school year and continued in your LEA's bilingual/ESL program during the 2024–2025 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 **2024–2025 school year** showing student placement in a bilingual or ESL program. **This LPAC may have met at the end of the 2023–2024 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 2024–2025 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 2024–2025 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 2024–2025 school year.

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

Desk Audits: Bilingual/ESL

- **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 **specifying a language other than English**:
      - SIGNED AND DATED
      - Review TAA from July 16, 2026
    - Annual 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

2024–2025 Survey of Early Education Students Reported with More Refined Days than Special Education Days (EE No Sped)

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 and reported with more refined days than special education days in at least one six-week reporting period during the 2024–2025 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 2024–2025 school year.

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

2024–2025 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 2024–2025 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.**

Copy of a school calendar that has been revised to include any unexpected school holidays for the 2024–2025 school year.

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Desk Audits: EE Queries

- **Query 1: Early Education Students Reported with More Refined Days than Special Education Days (EE No Sped)**
  - Reporting more refined days than sped days in one or more six-week reporting periods
- **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

2024–2025 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 2024–2025 school year but were under age five on September 1st, 2024.

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 Texas Education Code (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 public 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.**

Copy of a school calendar that has been revised to include any unexpected school holidays for the 2024–2025 school year.

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

Desk Audits: Kindergarten Under Age 5

- **Kindergarten Students Under Age 5 on September 1**
  - In cases of grade level miscoding (EE or PK):
    - Submit PK qualification documentation or ARD documentation (EE)
  - 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

Desk Audits: Kindergarten Under Age 5

- **Kindergarten Students Under Age 5 on September 1**
  - Required documentation:
    - Allowable Exceptions (cont):
      - Children of active-duty foreign military servicemembers who will turn the required age during the school year
        - Local policy AND proof that parent or guardian is active-duty member of a foreign military force

2024–2025 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 2024–2025 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 2024–2025 school year.

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

Desk Audits: Pregnancy Related Services

- **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

Desk Audits: Pregnancy Related Services

- **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
  - CTE
    - Turn off indicator during CEHI if not providing same amount and type of CTE services

2024–2025 Survey of Dyslexia Students

Students reported in this survey are shown in the Public Education Information Management System (PEIMS) database as receiving dyslexia or related services during the 2024–2025 school year with a code of 02 and/or 03 but without a code of 01 from TSDS Descriptor Table C224. Code 01 is used for students receiving services for dyslexia or a related disorder with an individualized education program (IEP) developed for the student under Texas Education Code (TEC) Section 29.005; or a plan developed for the student under Section 504, Rehabilitation Act of 1973 (29 U.S.C. Section 794). TEA's Dyslexia Handbook states that LEAs must seek parental consent for a Full Individual and Initial Evaluation (FIIE) or Section 504 evaluation if a student is suspected of needing to receive dyslexia or related services. Based on this guidance, it would be rare for a student to not be receiving dyslexia or related services as part of an IEP or 504 plan. Not only must students receive services for dyslexia or a related disorder to receive funding through the dyslexia allotment, but LEAs are also responsible for ensuring students are properly coded based on how those services are provided to the students.

Provide the following documentation for this survey:

- Admission, review, and dismissal (ARD) paperwork that covers at least part of the 2024–2025 school year detailing how the student will receive dyslexia or related services.
- 504 plan from the 2022–2023, 2023–2024, or 2024–2025 school year detailing how the student will receive dyslexia or related services.
- If the student was not identified through the ARD or 504 process, provide other documentation showing how your LEA identified the student as needing to receive dyslexia or related services (Response to Intervention paperwork, etc.).

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

Desk Audits: Dyslexia

- **Dyslexia Query**
  - Query identifies all students coded 02 and/or 03 who were not also coded 01
  - 2025-2026 will be the final year for this query in desk audits

Table ID	Name	Date Issued	Date Updated
C224	DyslexiaServices	08/26/2019	03/01/2022

Descriptor	Short Description	Long Description
00	Stu identify dyslexia or a related disorder under TEC§48.009 no services.	Student identified with dyslexia or a related disorder under TEC§48.009 does not receive services.
01	Receiving Services For Dyslexia Or A Related Disorder IEP Or Section 504	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	Rec Instr Meets Dyslexia Criteria SBOE and Svc By Person W/ Specific Instr	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	Modifications In Class Permitted Basis of Dyslexia Or Related Disorder	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.

Desk Audits: Dyslexia

- **Required Documentation:**
  - ARD/IEP for audited school year, OR
  - 504 plan, OR
  - Other identifying documentation
    - Example: RTI: Response to Intervention

Desk Audits: Prekindergarten

2024–2025 Survey of Prekindergarten Eligibility

Students reported in this survey are shown in the Public Education Information Management System (PEIMS) database to have been enrolled in prekindergarten and claimed for eligible days without being reported with an indicator in the fall PEIMS submission showing they qualified for the prekindergarten program during the 2024–2025 school year.

Provide the following documentation to verify proper enrollment:

- Economically disadvantaged students: PK application or NSLP form certified by a school official.
- Emergent bilingual (EB) students: LPAC recommendation that covers the 2024–2025 school year.
- Homeless students: Affidavit from the LEA's homeless liaison.
- Current or former foster students: Copy of annual DFPS letter.
- Military-connected students: Statement from a school official that they viewed a parent's military ID or copies of orders.
- Student whose parent is a military member injured or killed in the line of duty: Purple Heart citation, line of duty determination, death certificate, or DOD form indicating death as reason for separation.
- Head start students: A roster of students who were participating in a Head Start program.
- Migrant students: Migrant Education Program Certificate of Eligibility or a letter from the LEA's migrant education director/coordinator.
- Star of Texas Award: Award certificate or website screenshot.
- Previously eligible for and enrolled in public school PK3: Proof of attendance and proof of eligibility from the PK3 year.
- **For early education students who may have been miscoded: ARD documentation to support their eligibility for the EE grade level.**

Copy of a school calendar that has been revised to include any unexpected school holidays for the 2024–2025 school year.

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

Desk Audits: Prekindergarten

- **Prekindergarten (April 1 or later)**
  - Educationally disadvantaged (eligible for the NSLP):
    - Ecodis per NSLP Guidelines: PK application or NSLP form
      - PK application preferred
      - Both forms must be certified and dated by a school official
    - Head Start: Documentation showing student acceptance at any time during audited school year
    - Migrant:
      - Migrant Education Program Certificate of Eligibility
      - List of migrant students served by the LEA
      - A letter from the LEA's migrant education director/coordinator
    - Homeless Under McKinney-Vento: Statement from LEA's Homeless Liaison
    - Current or Former Foster child: DFPS letter
      - Texas AND other states

Desk Audits: Prekindergarten

- **Prekindergarten (cont.)**
  - EB: LPAC recommendation for the audited school year
    - Parental consent is not required for PK eligibility
  - Child of active-duty military:
    - Must keep underlying document and that document must be signed and dated by school official (no copies of military IDs)
  - Child of military member injured or killed:
    - Death: Death certificate or DOD form indicating death as reason for separation
    - Injured: Purple Heart citation or line of duty determination
  - 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**.

Desk Audits: Prekindergarten

- **Prekindergarten (cont.)**
  - Child of a classroom teacher:
    - New hire letter
    - Letter from LEA HR department confirming staff position as classroom teacher
    - Other docs
      - Goal is to prove parent is a classroom teacher in the LEA the student is trying to attend

Future Desk Audit Item: TRA

****Disclaimer: This could change as we are currently working on an audit plan and procedures****

- **Teacher Retention Allotment**
  - Pay increase for classroom teachers with 3+ years of experience
    - Classroom teacher eligibility: 4 hours of instruction daily (3 instructional hours and one planning period)
  - Amount of individual allotment depends on size of LEA
  - Goal: To ensure that teachers who met requirements for the TRA are receiving the correct amount and that the LEA has adjusted their salary schedules in line with statute

Future Desk Audit Item: TRA

- **Teacher Retention Allotment (cont.)**
  - Auditors will sample a group of teachers who are reported as TRA eligible (probably from the Fall Collection TSDS PEIMS Staff Roster)
  - Auditors could request the following:
    - Payroll detail reports or pay stubs for selected teachers
    - HR documentation supporting reported years of service
    - Salary schedules or compensation plans
    - Classroom schedules

Calendar Audits

- **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.

Calendar Audits

- **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

Compliance/Follow-Up Reviews

- **Career and Technical Education**
  - Now that TEA is assigning coding, this is a lot easier from an audit perspective
  - Regular 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

Compliance/Follow-Up Reviews

- **State Compensatory Education**
  - Eligibility (July 1 or later)
    - NSLP form certified and dated by a school official
    - Local income survey signed and dated by a parent (CEP)
    - 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



Questions?

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