Scope, Objective, and Methodology

On September 3, 2020, the Board authorized an internal audit of data reliability in the public education system, inclusive of graduation data. This report addresses the validity and reliability of graduation data for the 2021 cohort and student data for school years 2022 and 2023.

To achieve the objective of the audit, a sample of fifteen local education agencies (approximately 10% of districts and 10% of charters) was selected. For most reviews conducted throughout the audit, not all sampled LEAs were able to provide documentation; therefore, overall counts for the various analyses, though different, are accurate based on the review conducted.

It is the opinion of the Internal Audit Department that the methodology described within the report to arrive at the results included in the report is sufficient to meet the objective of the audit.

Audit Conclusions

For purposes of the audit, whether there is evidence of noncompliance, bad data, or no evidence at all the result is the same (i.e., failed). Based on the review completed, performance observations include:

Data Not Provided: Completing planned analyses proved problematic primarily due to LEAs' inability to provide records.

Data Reliability: When LEAs were able to provide data for comparison, problems were common. In some instances, the data had only minor discrepancies (i.e., <1%). In other instances, the data proved to be less accurate than accurate (i.e., >50% error rate).

Data Validity: Even though data may be reliably reported from system to system, the reported data may lack validity. In many cases, boundary data (e.g., birth certificates, LEAs student information system) did not match data reported in the Utah State Board of Education's system.

Cause: Reasons for no data, unreliable data, and invalid data vary, but may include, unclear roles and responsibilities, a lack of commitment to competency, limited accountability, unclear objectives, low data quality standards, inconsistent treatment of data, and miscommunication.

Effect: Potential effects include a potential for fraud, future data-design challenges, missed deadlines, questionable data-driven decisions, an inefficient use of limited resources, and confusion.

Recommendation: Suggestions to help promote continuous improvement of data include:

1. Evaluating current and future data objectives of the public education system, and clarifying where necessary,
2. Evaluating the organizational structure of the agency to ensure the current structure is adequate to ensure achievement of data objectives,
3. Reviewing the effectiveness of performance management of positions with assignments specific to data,
4. Assessing risk specific to data governance and data systems to identify whether risk responses are appropriate,
5. Prioritizing adequate internal control activities,
6. Reviewing data fields in the UTREx Specification Manual to identify the requirement for the field or if the field is even necessary, and
7. Monitoring internal control activities to ensure data (graduation) is reliable and supported with proper documentation.

Utah State Board of Education
Internal Audit Department

Data Reliability Audit—
Graduation and Student Data
22-01-B

Report No. 22-01-B

Graduation and Student Data

November 2, 2023

Audit Performed by:

Chief Audit Executive	Debbie Davis, CPA
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Phone: (801) 538-7639

November 2, 2023

Chair Jim Moss
Utah State Board of Education
250 East 500 South
Salt Lake City, UT 84111

Chair Moss,

On September 3, 2020, in accordance with the Bylaws of the Utah State Board of Education (Board), the Board authorized the Internal Audit Department (IA) to perform an audit of data reliability in the public education system, which specifically included graduation data. On April 7, 2022, the Board expanded the scope of the audit to include additional student data points.

Given the expanded size of the audit, and in discussion with the Board's Audit Committee and the State Superintendency, IA chose to present our findings and observations related to the assessment portion of the audit in an initial report (i.e., Data Reliability, Assessment Data 22-01-A) and this concluding report related to student and graduation data (i.e., Audit Report 22-01-B).

To conduct the student and graduation portion of the audit, IA performed the following procedures:

1. Gained an understanding, through research and inquiry, of applicable laws, regulations, guidance, systems, and policies and procedures.
2. Collected information and data from local education agencies and the Utah State Board of Education (USBE).
3. Reviewed and analyzed the collected information and data and developed conclusions.

We have identified the procedures performed during the audit; the conclusions from those procedures are included in this report. When feasible, suggestions for improvement are provided.

Internal audits are conducted in conformance with the current International Standards for the Professional Practice of Internal Auditing, consistent with Utah Code Annotated and Utah Administrative Code.

By its nature, this report focuses on performance and internal control exceptions, weaknesses, and non-compliance. This focus should not be understood to mean the programs and/or processes reviewed during this audit do not demonstrate various strengths and accomplishments. We appreciate the courtesy and assistance extended to us by Local Education Agency (LEA) and the Utah State Board of Education (USBE) staff during this audit. Consistent with Board Rule (i.e., R277-116-5 Audit Process), USBE management was notified of an opportunity to provide an audit response; however, a response was not provided.

This report is intended solely for the information and use of the Board, the USBE, and LEAs. However, pursuant to Utah Code 63G-2 Government Records Access Management Act, this report is a public record, and its distribution is not limited. If you have any questions, please contact me at (801) 538-7639.

Sincerely,

Deborah Davis, CPA
Chief Audit Executive, Utah State Board of Education

cc: Members of the Utah State Board of Education (USBE)
Sydnee Dickson, State Superintendent of Public Instruction, USBE
Scott Jones, Deputy Superintendent of Operations, USBE
Patty Norman, Deputy Superintendent of Student Achievement, USBE
Angie Stallings, Deputy Superintendent of Policy, USBE

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I.   Audit Scope and Objective

On September 3, 2020, the Board authorized an internal audit of data reliability in the public education system, which specifically included graduation data. The purpose of the audit is to determine whether student data is accurate and reliable (see III Background for additional details).

Given the size of the audit, conclusions are presented in two separate reports. The Data Reliability – Assessments Data report (22-01-A), was publicly released in August 2023, and addresses the assessment aspect of student data within the authorized objective. This report specifically addresses graduation and other student data. The scope of this portion of the audit is limited to the 2021 graduation cohort year and student data for school years 2021-2022 (SY2022) and 2022-2023 (SY2023).

II.   Audit Methodology

A. Overview

To conduct this audit, it was determined that a sample of local education agencies (LEA) would be necessary; therefore, 15 LEAs (approximately 10% of districts and 10% of charters) were selected to participate in the audit. When site visits were necessary to review supporting documentation, and an LEA had multiple schools, a sample of schools was also selected and reviewed. See V. Appendix D – Data, Sample Identification Tables for additional information regarding samples.

For most reviews conducted throughout the audit, not all sampled LEAs were able to provide documentation (see IV.B.1. Data Not Provided and V. Appendix D – Data, Data Not Provided for specific details); therefore, overall counts for the various analyses, though different, are accurate based on the review being conducted and whether the necessary data was provided. Specific context is provided as appropriate in the results below.

B. Student Data

To verify whether student data were both valid and reliable, student lists were obtained from the sampled LEAs and from the Utah State Board of Education (USBE) for SY2022 and SY2023. Student lists were then compared, and approximately 40 students found on both lists were selected for review. When discrepancies between lists were identified (i.e., a

student was not reported on both the LEA and USBE lists), additional students were selected based on risk.

To verify reliability of the student data, both school years were used to compare the data housed in the LEAs' student information system (SIS) to the data in USBE's system(s). For SY2022, finalized data was compared within both systems. However, for SY2023, a predetermined day was selected, and student data was pulled from both LEA's and USBE's data systems. This method would decrease the likelihood that data differences (i.e., days attended) were a product of when the data was reported. Using both methods would also potentially provide clarity in the reliability of live data in contrast with finalized data.

To verify validity of student records, site visits were made to selected schools of sampled LEAs. Students were verified as present or absent, and boundary information (e.g., enrollment forms, birth certificates) was reviewed to ensure data (e.g., absences, ethnicity, sex, birth date) were correctly recorded in the LEA student information system (SIS) and reported to the USBE.

C. Graduation Data

To analyze graduation data, it was necessary to select a single graduating cohort year, which would provide an opportunity to review the validity, reliability, and reporting accuracy of the data. Since the audit began in the spring of 2022, the most recent graduating class—the 2021 cohort year—was selected for review.

Given the graduation rate is calculated by dividing the number of students in a cohort who graduated by the number students in the adjusted cohort (i.e., the number of students who entered 9th grade plus any students who entered after 9th grade, minus any students who exited during or after 9th grade), work was done to examine students who graduated and exited.

Of the 15 LEAs selected for review, specific to the 2021 cohort:

- 280 students of 4,842 that graduated were reviewed (e.g., transcripts, databases) to verify whether they met all graduation requirements needed to earn their regular high school diploma, and
- 143 students of 724 that exited from the 2021 cohort were reviewed to verify whether the LEAs maintained the required documentation to support their exit codes excluding them from the graduation rate calculation.

D. Opinion

It is the opinion of the Internal Audit Department (IAD) that the methodology described herein to arrive at the results included in the report is sufficiently reliable to meet the objective of the audit.

To facilitate ease of understanding the report, please also see V. Appendix A – Glossary.

III. Background

A. Public Education System

Article X, Section 1 of the Utah Constitution establishes a (i.e., one) "public education system, which shall be open to all children of the state" and Article X, Section 2 of the Utah Constitution states that "the public education system shall include all public elementary and secondary schools and such other schools and programs as the Legislature may designate." Today, this one "public education system" is comprised of over 150 LEAs and many more "other schools and programs."

To oversee the public education system, Article X, Section 3 of the Utah Constitution vests "general control and supervision" in the USBE. Each LEA, school, and program must meet specific legal requirements while retaining a level of local control (i.e., autonomy) to ensure public education system objectives are met.

B. General Accountability and Data

The state legislature requires the public education system to create an accountability system (Utah Code Ann. 53E-5). The accountability system is intended to annually measure and report on all schools within the public education system, with few exceptions. Annual measures include indicators such as academic achievement, academic growth, and equitable educational opportunities.

To support public education, the duties of the state superintendent include "collecting and organizing education data into an automated decision support system to facilitate school district and school improvement planning, accountability reporting, performance recognition, and the evaluation of educational policy and program effectiveness" as well as "collaborating with school districts and charter schools in designing and implementing uniform data standards and definitions" (53E-3-301).

At an individual level, a "Student Achievement Backpack" (53E-3-511), was also statutorily created in 2013. The Student Achievement Backpack, which is anticipated to be fully implemented by July 2024, is intended to provide a "complete learner profile" to be available in an electronic format and readily "accessible by the student's parents or an authorized LEA user." This level of data is intended to assist in "postsecondary planning,"

"inform[ing] instruction and personaliz[ing] education," "diagnosing a student's learning needs," and "facilitating a student's parent [in] taking an active role in [their] student's education."

To meet these accountability requirements, the USBE is required to maintain a "robust, comprehensive data collection system," capable of collecting "longitudinal student transcript data" from entities within the public education system. Furthermore, the data must be "uniform" and "comprehensive," as well as "comparable across schools and school districts." Data are inclusive of information such as student demographics, course grades, course history, and statewide assessment results.

C. LEA Accountability and Data

In support of the USBE collecting and reporting data about the public education system, LEAs, schools, and other programs (e.g., Statewide Online Education Program) must also maintain robust and comprehensive data collection systems that create and store student records. LEAs are allowed to select a student information system (SIS); however, according to Utah Administrative Code (Board Rule) R277-484-6, that system must be approved by the USBE, which helps ensure the USBE will meet reporting objectives.

Currently, in lieu of a single data system, LEAs use various SISs, which include proprietary, commercially available, or a USBE-provided system. SY2023 data system use by LEA suggests that the ten largest LEAs, based on the number of students the LEA has, use either a proprietary system or a commercially available system. Conversely, of the 135 LEAs that have fewer than 5,000 students—which represents 87% of LEAs—71% use the state provided system. The following table shows SIS use by system over the last three years.

Approved SIS	2021 LEA Use	2022 LEA Use	2023 LEA Use
Aspire	105	106	101
Compass	10	10	8
Davis	1	1	1
Discovery	1	1	1
GradeQuick (Weber)	1	1	1
Infinite Campus	1	2	7
PowerSchool	31	30	31
Sevier	1	1	1
Skyward	5	5	7
Total	156	157	158

Depending on the LEA, student data is either documented on a hardcopy document and then entered into the SIS or is directly entered in the SIS. Once entered, the data is stored in the SIS. The SIS student data is then transferred, consistent with guidelines outlined in the Utah eTranscript and Record Exchange (UTREx) Specification Manual, to the USBE using various interfaces (e.g., Zone Integration Server, Data Collector) before being moved into UTREx and the Data Warehouse.

D. Demand for Public Education Data

With almost 775,000 students in SY2023, nearly 40,000 educators in SY2022, and a budget of approximately $6 billion in state fiscal year 2023, questions about public education—particularly the use of funds—exist. The perceived lack of easily accessible and easily understood public education data from the USBE has resulted in multiple external efforts to increase transparency and accountability. For example, the Office of the State Auditor (OSA), created and maintains Project KIDS using an annual legislative appropriation of approximately $800,000. According to OSA's website, "Project KIDS creates interactive visualizations to allow Utahns to explore K-12 public education spending and outcomes" using data collected and maintained by the USBE and LEAs.

The OSA is not alone as the state legislature has also taken several steps to increase transparency and accountability to public education. Similar to the OSA, the Legislative Fiscal Analyst's Office provides a Data Visualizer to allow stakeholders to review budget line items, and the Office of the Legislative Auditor General (OLAG) now provides school district data and metrics on their Education Excellence website. In support of the Education Excellence initiative, during the 2023 general legislative session, the state legislature appropriated an additional $650,000 annually to the OLAG to conduct audits of public education.

E. USBE Efforts

Efforts to increase transparency and accountability are not limited to outside entities. For example, the USBE prioritized a legislative request to fund a new information system to meet the current demands for better and more reliable educator, student, and LEA financial data. As funds have been appropriated by the state legislature, the USBE has worked to design and implement a more robust and reliable information database. The new information system—the Utah Schools Information Management System (USIMS)—is being developed with the student module scheduled for completion in July of 2024.

F. Known Risks Associated with Data

A scan of internal audits completed since 2018 reflects that every audit completed has identified concerns with data/documentation and internal control system components. For each audit, corrective action takes place to address the identified concerns. However, the prevalence of data concerns and internal control system weaknesses is a significant risk.

IV. Audit Conclusions

Performance and compliance are interrelated and drive or are driven by internal control system components and principles. Concerns related to performance and compliance must be considered in context to understand their significance (i.e., which is more concerning— poor performance or noncompliance). To enhance readability and understanding, this audit report—though it contains several observations related to performance and compliance—has been consolidated into a single conclusion using the five standard audit reporting elements.

1. Criteria: What should happen (e.g., Utah Code, Board Rule, best practices)?
2. Condition: What is happening?
3. Cause: Why did the Condition happen?
4. Effect: What is the impact? Why should you care?
5. Recommendation: What action could be considered to resolve the Cause?

Appendices with terminology, criteria, and results, are provided for transparency and greater understanding.

A. Criteria

For reference, some generic criteria are included below. Additional, more comprehensive, criteria, which specifically relates to concerns noted throughout the audit, are included in V. Appendix C – Criteria.

Data
Utah Code Annotated 63G-2-103 (emphasis added, applicable to the USBE and LEAs)
(22) (a) "Record" means a book, letter, document, paper, map, plan, photograph, film, card, tape, recording, electronic data, or other documentary material regardless of physical form or characteristics:

    (i) that is prepared, owned, received, or retained by a governmental entity or political subdivision; and

(ii) where all of the information in the original is reproducible by photocopy or other mechanical or electronic means.

<u>Retaining and Classifying Data</u>
Utah Administrative Code R277-487-4
(1) An LEA shall classify all student data collected in accordance with Section 63G-2-604.
(2) An LEA shall retain and dispose of all student data in accordance with an approved retention schedule.

<u>Submitting Data</u>
Utah Administrative Code R277-484-4
(1) An LEA shall submit student level data to the Board through UTREx.
(2) An LEA shall, by 5 p.m. Mountain Standard Time on the date specified in the Board Reporting Deadline Table, submit reports in the format specified by the Superintendent.

Utah Administrative Code R277-484-6
(7) An LEA shall submit daily updates to the Board Clearinghouse using School Interoperability Framework (SIF) objects defined in the UTREx Clearinghouse specification.

<u>Maintaining Data</u>
Utah Administrative Code R277-484-6
(1) The Superintendent shall load operational data collections into the Data Warehouse as of the submission deadlines specified.
(2) The Data Warehouse shall be the sole official source of data for annual:
      (a) school performance reports required under Section 53E-5-204;
      (b) determination of state and federal accountability reports; and
      (c) submission of data files to the U.S. Department of Education via EDEN.
(3) The Superintendent shall maintain a database of LEA and school:
(a) demographic information;
(b) openings;
(c) closures; and
(d) contact information for designated individuals.

B. Condition
1. Data Not Provided

Completing planned analyses proved problematic primarily due to LEAs' inability to provide records. For purposes of the audit, whether there is evidence of noncompliance, bad data, or no evidence at all; the result is the same (i.e., failed). However, to ensure clarity in

reporting, instances where no data was provided are reported separately. The following are examples where no documentation was provided for review; additional information is available in V. Appendix D – Data, Data Not Provided.

     i. *Graduation*

        a. Four of 15 (27%) LEAs were unable to provide the requested SIS graduation data (e.g., exit code, high school completion status) for the 2021 cohort year. Of the remaining 11 LEAs, data was not provided for 255 students of the 5,674 (4%) sampled.

        b. Ten of 15 (67%) LEAs in the sample had at least one LEA-specific graduation requirement. One of the ten (10%) LEAs did not maintain any records that the students sampled had met all LEA-specific graduation requirements.

     ii. *Student Data, SY2022*

        a. Four of 15 (27%) LEAs were unable to provide a report directly from their SIS. The only data they had available were the PDF files saved from the USBE's Data Gateway. Of the remaining 11 LEAs who did provide some data:
           1. Six (55%) did not provide student demographic data (e.g., sex, race, school ID) for each student selected, equating to 60 of 925 (6%) students not being represented.
           2. Eight (73%) did not provide student course information (e.g., core code, term) for each student selected, equating to 310 of 925 (34%) students not being represented.

     iii. *Student Data, SY2023*

        a. One of 15 (7%) LEAs was unable to provide any student or course data from their SIS.

        b. Four of 15 (27%) LEAs did not have a complete cumulative file for each student selected (i.e., the file was missing registration or demographic information), totaling 54 of 638 (8%) student records.

        c. Seven of 15 (47%) LEAs did not have a copy of a student's birth certificate, or other verification of age (i.e., affidavit, passport) for each student selected, totaling 22 of 638 (3%) student records.

        d. One of eight (13%) LEAs did not report the instructional setting for all 117 courses (100%) taken by the 40 students in the sample. Another LEA did not report the instructional setting for 129 (33%) of the courses taken by 22 of 40 students in the sample.

2. Data Reliability

When LEAs were able to provide data for comparison, problems were common. In some instances, the data had only minor discrepancies (i.e., <1%). In other instances, the data proved to be less accurate than accurate (i.e., >50% error rate). The following are examples of some of the more egregious problems identified. For additional information on data reliability issues by LEA, SY, Data Point, or SIS, see V. Appendix E – Data, Data Reliability.

  i.   *Graduation*

    a. For the 2021 graduating cohort, we reviewed graduation data (i.e., high school completion status and exit code) for 5,674 students at 11 LEAs who provided data. 340 of 5674 (6%) students' data was inconsistent with that of the USBE's. Of the 340, 85 (25%) students' data did not match; the remaining were not provided as noted above.

  ii. *Student Data, SY2022*

    a. Eight of 11 (73%) LEAs had days attended totals that did not match data at the USBE. This accounted for 318 of 625 (51%) student records.
    b. Ten of 13 (77%) LEAs had student exit dates that did not match data at the USBE. This accounted for 196 of 518 (38%) student records.

  iii. *Student Data, SY2023*

    a. Twelve of 13 (92%) LEAs had days attended totals that did not match the UTREx Examine file. This accounted for 352 of 552 (64%) student records.
    b. Nine of 13 (69%) LEAs had school membership totals that did not match the UTREx Examine file. This accounted for 301 of 550 (55%) student records.
    c. Eleven of 13 (85%) LEAs had excused absences that did not match the UTREx Examine file. This accounted for 266 of 552 (48%) student records.
    d. Eleven of 13 (85%) LEAs had unexcused absences that did not match the UTREx Examine file. This accounted for 187 of 552 (34%) student records.
    e. Five of 13 (38%) LEAs had student exit dates that did not match the UTREx Examine file. This accounted for 132 of 552 (24%) student records.

f. Six of 13 (46%) LEAs had economic disadvantaged designations that did not match the UTREx Examine file. This accounted for 97 of 552 (18%) student records.

g. Eight of ten (80%) LEAs had a core code assigned to a specific student in the UTREx Examine file that did not match. This accounted for 853 of 3,423 (25%) student course records.

iv.   *SY2022 and SY2023 Compared*

As noted in II.B Audit Methodology, Student Data, the methodology for SY2022 and SY2023 data differed given only one year was finalized. In a review of 20 data fields for both years, SY2023 data was less accurate 80% of the time. For additional details on specific data fields see V. Appendix D – Data, SY2022 vs. SY2023 Data Comparison.

3.   Data Validity

Similar to the Data Reliability – Assessment Data Audit report, effort was also made to verify the validity of at least some data points. As noted with the assessment data, even though some data may be reliably reported from system to system, the reported data may lack validity. The following are examples where validity issues were identified. For additional information on data validity issues, see V. Appendix D – Data, Data Validity.

i.   *Graduation*

a. In a sample of 280 students who were reported as graduating in the 2021 cohort year, 119 (43%) students, totaling 160 errors, did not meet all the requirements of graduation. However, not all issues are of equal concern. For example, of the 119:

1. Three (3%) students did not complete any credits toward at least one graduation requirement.

2. Twenty-six (22%) students earned only part of the credits required to fulfill the necessary requirements for at least one graduation requirement. For example, four (3%) students reviewed did not complete at least two credits in the science foundation areas.

3. Twenty-three (19%) students reviewed were graduated with credits incorrectly applied to at least one graduation requirement, which is to say they took a class and were given credit, but the class did not fulfill the requirement (e.g., for ten students Health I was applied as opposed to Health II).

4. Thirteen (11%) students did not complete a basic civics exam.

5. Other examples that are potentially less concerning are as follows:

i) Forty-four (37%) students reviewed did not have a required parent opt out request on file to mitigate the need to complete Secondary Math III; however, all of the students earned three math credits by completing an applied math course.

ii) Thirty-three (28%) students tested did not complete all LEA-specific graduation requirements. When limited to students in LEAs in the sample with LEA-specific requirements, only 190 students from ten of 15 LEAs sampled have LEA-specific graduation requirements. So, 33 of 190 (17%) students with LEAs-specific graduation requirements failed to complete all LEA-specific graduation requirements.

b. Similarly, from a sample of 143 students who were exited from the 2021 cohort year (i.e., had exit codes and were not included in the graduation rate calculation), 30 (21%) had no documentation or inadequate documentation for the reported exit code justifying exclusion from the 2021 cohort required per federal regulations.

c. Another 16 of the 143 (11%) student exit codes reviewed were miscoded, meaning that the LEA maintained sufficient documentation to exclude the student from the 2021 cohort, but did not submit the correct exit code based on the retained documentation.

ii. *Student Data*

Additional work was done for SY2023 to verify the validity of data points such as attendance, sex, birth date, ethnicity, race, and enrollment validation. Given data reported in the SIS may not match data reported in USBE's system, where possible boundary data was compared to both. Examples of discrepancies between boundary data and system data include the following:

a. At two of the 15 (13%) LEAs sampled, three of 111 (3%) students who were absent were not marked as absent in the SIS system. An in-depth review of the three students revealed that two students did not attend or login to online courses within the previous ten days of the onsite visit; one of which had not logged in for over two months. These two students were designated as attendance validated even though attendance reports showed online classes. In addition, the students' attendance reports showed no excused or unexcused absences during the time frame reviewed and were still included in the LEAs enrollment count.

b. Fifteen of 15 (100%) LEAs had boundary data that did not match the LEA's SIS records or USBE's records.
   1. Examples of LEA's SIS records not matching the boundary information include:
      i) Five of 15 (33%) LEAs had a birth certificate on file with a birth date that did not match. This accounted for 14 of 531 (3%) student records.
      ii) Six of 15 (40%) LEAs had a declared sex on file that did not match. This accounted for 43 of 531 (8%) student records.
      iii) Eight of 15 (53%) LEAs had a declared ethnicity on file that did not match. This accounted for 18 of 539 (3%) student records.
   2. Examples of USBE records not matching the boundary information include:
      i) Five of 15 (33%) LEAs had a birth certificate on file with a birth date that did not match. This accounted for five of 611 (1%) student records.
      ii) Four of 15 (27%) LEAs had a declared sex on file that did not match. This accounted for five of 611 (1%) student records.
      iii) Ten of 15 (67%) LEAs had a declared ethnicity on file that did not match. This accounted for 18 of 619 (3%) student records.
c. While reviewing a sample of students and their courses for consistency of the enrollment validation with the instructional setting of the course, we noted the following during the review of eight LEAs:
   1. Two (25%) LEAs reported enrollment validations for all (100%) sample students that were inconsistent with the instructional setting for the courses taken by the students.
      i) For one LEA the instructional setting was face-to-face, while the enrollment validation was mixed rather than attendance validated.
      ii) For the other LEA, the instructional setting was online, while the enrollment validation was attendance validated rather than learner validated.
   2. Five (63%) LEAs reported enrollment validations for one or more sample students that were inconsistent (e.g., face-to-face instruction, learner validated enrollment) with the instructional setting for the courses taken by the students resulting in 41 of 191 (21%) students with inconsistent data.

C. Cause

Reasons for no data, invalid data, and unreliable data results vary. The reason why a data issue may exist may be more concerning than the discrepancy itself; therefore, causes should be carefully considered.

Causes are aligned with common principles of internal control as found in *Standards for Internal Control in the Federal Government (i.e., the Green Book)* published by the United States Government Accountability Office; causes can be interrelated and therefore may fit in several internal control components.

1. Weaknesses in the Internal Control Environment:
   i. *Organizational Structure, Assignment of Responsibility, and Delegation of Authority*

Responsibilities for data at the USBE are spread across various sections that have separate reporting lines for accountability, and between multiple advisory groups (see Board Policies 3006, 5003, 5004, and 5005). While these policies provide some direction regarding roles and responsibilities, they are not sufficiently comprehensive nor clear. Actual tasks may be based on availability of resources rather than an evaluation of data objectives and position assignments to achieve those objectives.

For example, in requesting policies and procedures regarding changes to data specifications, we noted:

- Sections would defer to one another to answer questions (i.e., no one section or person has primary responsibility for data),
- The owner of one Standard Operating Procedure (SOP) related to data specifications was unclear. One version of the SOP was provided by Student Data Privacy, and another, more updated version, was provided by a different section, stating "someone from [Data & Statistics] should really take over responsibility for these two SOPs,"
- Another draft policy identified that a specialist in the Student Data Privacy section has ultimate approval authority for updates to the UTREx Specification Manual, though the change process does call for collaboration with others. Considering changes to the UTREx Specification Manual result in a ripple effect of changes to both USBE and LEA data systems, which may require reprioritizing work, impacts to funding and reporting, etc.; final approval at a specialist position level may not be prudent.

ii. Commitment to Recruit, Develop, and Retain Competent Individuals

One potential cause may be a lack of commitment to ensure competent individuals are assigned to complete tasks (e.g., employees required to do tasks without relevant knowledge, skills, or abilities). For example, there are no state-level requirements regarding personnel knowledge, skills, and abilities for implementing, using, managing, and maintaining an SIS.

Several types of mistakes or lapses by personnel were noted. For example:

- At one LEA, the SIS appropriately provided an option for students to be enrolled but not reported. During the audit, two students were identified that should have been reported to the USBE by the LEA for SY2023 reporting but were not.
- Several other LEA personnel admitted to not being aware of data requirements, not tracking required data, not understanding data requirements and/or not understanding how to pull data from their SIS. For example, each sampled LEA was asked to provide student and course data for selected students. Of the 13 LEAs that provided usable data for SY2023, six (46%) did not submit requested data for at least one of the students selected. One LEA was asked to provide information on 40 specific students. The LEA provided 76 student files. Of the 76 files, only eight were from the list of 40 files requested.
- Despite not understanding their SIS or the data requirements, some LEA personnel are not always working towards developing competency either. To illustrate, one LEA specifically stated they are aware of SIS user groups, but they have not joined the group, neither did they clarify their questions with the USBE. So, although services are available to help develop competency, the LEA personnel was not committed, or held accountable, to pursuing competency.

Another contributing factor related to competence may be staff that are working beyond capacity; some staff serve multiple roles (e.g., data manager is also the assessment director) within an LEA.

iii. Evaluate Performance and Hold Individuals/Entities Accountable

Another potential cause is that there is limited accountability to ensure public education system data is reliable or valid. Various discussions and review of documents throughout the audit provided examples of this. For example:

- As noted in III. Background, one of the State Superintendent's duties by law is to collect and organize education data, as well as establish uniform data

standards. As reported to the Board's Finance Committee by staff working on the USIMS project, there are "no state-wide data standards" and there is "a lack of standardized flexible data structure." As noted in III.E USBE Efforts the USIMS project is intended to address this long-standing deficit.

- The USBE contracted with a company in 2019 to assess and improve data governance. In late 2020, a data governance maturity analysis was completed and in August 2022, the USBE Data Governance Charter was created and then approved by the Superintendency. Though the charter indicates "The operational procedures and policies of data governance are contained within the Data Governance Manual", this manual is currently being developed and no other documents have been adopted to further design a Data Governance program "to improve the overall management of the State's education data in regard to its security, definitions, collections, access, quality, analysis, retention, and disposal."

- According to a draft SOP for updates to the UTREx Specification Manual, the USBE generally tries to give LEAs 18 months or more—as a "courtesy"—to report data accurately before the end-state requirements of a data field are finalized (i.e., a data field that will ultimately have a fatal error if not filled out correctly, will initially be set up to only have a warning). The document also notes, "*The first year a field often has low or poor quality reporting as a result of this (as well as communication issues – a lot of LEAs just don't attend our monthly data meetings or read our emails announcing the new reporting requirements; thus it takes longer for them to realize that they have a new reporting requirement). 18 months brings us into a 2nd year of reporting, which is usually when we can hope to get better data in the new field.*"

  This appears to mean that the USBE has no expectation that data is accurate or complete for up to two years from when reporting starts.

- During one discussion with USBE staff, the individual stated, "*I think part of the reason why we don't get some responses from LEAs for the must-respond items [items that flag as a fatal error in UTREx] is that there's no actual rule or requirement other than us saying they must respond. But it is always the LEA's responsibility to ensure the accuracy of their data, which we include in every communication to them.*" This particular USBE staff further stated that LEAs not responding to must-respond-to errors is "common."

The comment highlights two potential problems. First, though the data is housed at the USBE, the USBE is not the data steward. Given there is no ownership, the probability that invalid data is acceptable increases. Second, because the data is housed at the USBE, LEAs also do not feel accountable to the level of accuracy of the data in the state's system.

- During discussions with various LEA staff, they expressed frustration with the lack of availability of USBE staff to help correct issues that occur when updates to UTREx are rolled out.

2. Weaknesses in Risk Management:
   i. *Definition of Objectives*

Objectives regarding data collection and reporting do not appear to be adequately defined in specific and measurable terms to enable comprehensive consideration, at all levels within the public education system, of barriers that might impede achievement of objectives. Additionally, risk tolerance levels (i.e., the amount of error or unreliability that is acceptable) related to data collection and reporting are not well understood and/or properly communicated.

3. Weaknesses in Control Activities:
   i. *Design and Implementation of Control Activities*

Specific causes that relate to USBE control activities identified during this audit include:

   a. The USBE data standard is to accept untimely, inaccurate, and incomplete LEA data on a data field basis. The USBE updates to the UTREx Specification Manual are done haphazardly (i.e., as prioritized as opposed to regular intervals or specific prompts) and policy surrounding standardization of communication protocols to notify SIS users of updates is insufficient.
   b. The USBE does not have formal internal policies and procedures to ensure an SIS is rigorously evaluated before it is implemented by an LEA; neither does the USBE regularly evaluate LEA SISs for on-going eligibility.
   c. A universal metadata dictionary/repository overseeing data stored within USBE systems does not exist. Instead, the following was found:
      1. USBE staff use past ticket submissions in a USBE IT system to ensure data is moved correctly from year to year for all data submissions;

2. In lieu of written policies and procedures, the USBE relies on trainings and the knowledge and skill of other employees or managers to ensure accuracy and efficiency of completed tasks; and

3. Data is stored inconsistently between tables within the Data Warehouse and cannot be updated in the current system as there is no documentation outlining how the tables are linked.

d. A single user ID and password is used by all USBE staff accessing the VRF Data Collector, which allows staff to access and change data without specifically knowing who is completing those updates/changes.

e. USBE staff provide a courtesy review to assist LEAs in submitting their data during the Year End submission. However, once the review is complete and the data is finalized by the LEA, the USBE does NOT:
   1. Verify the population submitted by an LEA to confirm all data was received.
   2. Analyze LEA errors to address recurring issues.

f. USBE staff use UTREx for storage of data instead of as a "dump and load" system as it was designed.

g. The USBE allows and maintains additional rows of data to maintain information such as multiple entry and exit dates within one school year. These additional data points are not captured within the same observation of data, but rather creates multiple "records" for the same student. In SY2022, 60 of 873 (7%) unique SSIDs were duplicates. Maintaining multiple conflicting data point as part of the student's record further complicates data analysis.

LEAs' internal control systems are not immune of the same problems. Specific causes that relate to LEA control activities include:

a. As of September 9, 2022, eight of 15 (53%) LEAs did not maintain an enrollment policy, and 11 of 15 (73 %) LEAs did not maintain an SIS policy.

b. Seven of 15 (47%) LEAs reported implementing a student specific control (e.g., checklist, registrar review) to ensure proper enrollment documentation (e.g., enrollment form, birth certificate) was collected. The remaining eight (53%) LEAs reported a control; however, it was not student specific and there was no documentation retained to verify the control was implemented. In a sample of 306 students at the seven LEAs with student specific controls, 124 (41%) of the

students' files did not contain evidence the specific control ever took place.

   c. From ten of 15 LEAs sampled, 42 of 143 (29%) students were exited to home school. Of the 42 students exited, six (14%), from four LEAs, had sufficient documentation to meet federal requirements, but not state requirements. LEAs often maintained withdrawal forms that they used to ensure items such as payment of fees, return of LEA property, and other items were addressed when a student exited. However, the documentation and processes did not typically include the step of ensuring that proper documentation to support an exit code was received and maintained.

   ii. *Design of the Information System*

Another potential cause is that public education data system appears to prioritize accommodation over reliability.

   a. As noted in III. Background, the public education data system is made up of a complex network of smaller (i.e., LEA) data systems, each potentially with its own issues. Many issues are unknown, or not timely known, to others who are also responsible for both maintaining and analyzing data within the data system. For example, while working with one LEA's data manager, they reported that their SIS was not properly reporting absences for SY2023. Throughout the entire school year, the LEA worked with the SIS vendor to correct the issue prior to the End-of-Year submission. As of April 2023, the SIS vendor still had not properly fixed how Absences Due to Suspension were being reported (i.e., assigning absences to the wrong student). For purposes of this audit, the LEA did not provide Absences due to Suspension stating the following, "I can send you the "Absences Due to Suspension" if you want. But they are WRONG!"

   Interestingly, the LEA stated, this is a "known issue." However, in visiting another LEA who used the same SIS, it was not until absence data was requested while onsite that the LEA became aware of the absence data issue. The LEA contacted the SIS and was informed— whether for the first time or not is unknown—of the issue. Unknowingly, the LEA reported error rates of 70% excused absences, 65% unexcused absences, and 3% Absences due to Suspension.

Contrary to what was previously stated, not everyone is aware of ongoing problems within their own system.

b. In many instances, examples were provided by LEAs of how data was not properly transferred, overlapped, etc. and not noticed (i.e., flagged as a fatal error) for days, weeks, or even months. In many of these cases, steps could be, and were, taken to fix or replace the data. However, in other cases, fixes or even explanations were not available. For example, while reviewing SSID data, one student was identified to have inconsistencies within the various data storage locations as noted in the table below. Though asked, USBE staff could not explain why the student's data did not reconcile amongst data sources.

Data Source	SY of Earliest Record	Grade Level
Data Gateway	2018	4th grade
Mainstream Membership Generation Report	2014	Kindergarten
Data Warehouse	2013	Pre-kindergarten
UTREx	2017	3rd grade

c. As further evidence of how the public education data system prioritizes accommodation over reliability, one can simply look at the flexibility—or lack of maintenance—offered within the data system. While reviewing 2021 cohort graduation data, several codes were identified that were either 1) discontinued (e.g., G1, high school completion status code, discontinued in 2010) or 2) invalid (e.g., RS, high school completion status).
     1. One LEA in the audit sample used the invalid code for 3% of their high school completion statuses.

In summary, not all data appears to be treated consistently which creates the perception that reliability is not the priority. Some data is required but not used, other data is stipulated, but immediately manipulated, some data is stipulated but not regulated, and some data is required but not collected.

4. Weaknesses in Information and Communication:

   i. *Communicate Necessary Information, Internally and Externally*

Another cause may be attributed to miscommunication or a lack of appropriate communication. For example:

- The USBE reportedly (i.e., not verified) instructed LEAs throughout SY2023 (e.g., training, and multiple emails), that once they finalize their Year End data, they should not submit any new data into UTREx for the new school year until the USBE has rolled over the system for the new year. When the rollover was completed, the USBE identified 12 LEAs (district and charter) who had submitted new data during this time frame. As a result, their data was wiped and must be restored.
- Additionally, a draft USBE SOP notes that *"Many LEAs miss meetings or miss/forget important items from data meetings."* LEA personnel expressed frustration during the audit over not being notified of updates made to the UTREx Specification Manual and the steps they had to undertake to correct issues that occurred due to sporadic updates. USBE staff noted that the relevant individuals at LEAs may not know about or attend data meetings; it was reported that district staff may attend trainings when school staff should attend.

Also see communication issues noted throughout IV.C. Cause.

D. Effect
1. Potential for Fraud

Whether or not the USBE and LEAs are held accountable to high data validity standards does not mean they will not be held accountable for the reported results by external entities. Consider for example the audit completed in 2018 by the Office of Inspector General for the US Department of Education on *Calculating and Reporting Graduation Rates* that identified LEAs submitted inaccurate data.

Holding entities accountable to reported results, but not verifying said results, may create an incentive to report invalid results, thus perpetuating potential data problems and masking areas that should be focused on to help students succeed. This may explain why, in a sample of final enrollment records of 4,976 students excluded from the 2021 cohort, 34 (1%) students enrolled in adult education within seven days of exiting an LEA, but the LEA assigned an exit code that excluded them from the 2021 cohort graduation rate calculation instead of using the adult education exit code, which does not exclude them from the graduation rate calculation.

One of the incentives for fraud is pressure. USBE staff questioned during the audit whether the graduation rate as a metric has backfired as it has potentially changed the focus from supporting students to accountability (i.e., pressure to perform). Currently, the data shows that the Utah's graduation rate has improved; however, this audit casts doubt on the reliability of that data, which could have significant impacts (see IV.B.3. Data Validity).

2. Future Data-Design Challenges

Existing problems will only perpetuate future problems or require extensive and costly work to fix what was previously allowed, ignored, or identified but not properly addressed. For example, the USBE USIMS development team identified several concerns while working to build the student module in USIMS, including:

- "Discrepancies in data between student information systems and what is captured in current USBE systems."
- "When a student moves from one LEA to another often-disparate records are created thus making it difficult to reconcile the data."
- "No state-wide data standards which causes data synch issues, unnecessary auditing of information, etc."
- "A lack of standardized flexible data structure makes it hard to meet different reporting needs."
- "Reconciling learner profile data across USBE systems and SIS systems can be inaccurate and take hours of manual work."

3. Missed Deadlines

An overly complex data system makes everything more difficult and may lead to increased reporting and increased reputational risk with taxpayers, stakeholders, and policymakers. For example, the USBE did not wholly achieve the initial deadline of June 30, 2017, to have the USBE Student Record Store integrated with each LEA SIS. The USBE was requested to report, and did report, to the legislative Administrative Rules and General Oversight Committee regarding the missed deadline during the 2023 General Session. As reported in the August 4, 2023, Finance Committee meeting, the USBE sees challenges achieving the new legislative deadline of July 1, 2024, due to various issues (e.g., staffing, funding, data reliability).

4. Data-Driven Decision Making

When student data is not reliable or valid, research and decisions based on the data may waste resources and harm those they are intended to help. Funding, policy, and

compliance (e.g., school accountability, post-secondary readiness) are all examples of decisions detrimentally effected when based on invalid data or research.

Another data point currently of significance is that chronic absenteeism has reportedly increased from 13% in 2018 to 27% in 2022; USBE staff presented this reported data to the legislative Education Interim Committee on August 9, 2023. However, this audit casts doubt on the reliability and validity of that data, which could have significant implications for policymaking and use of resources (see IV.B.2. Data Reliability and IV.B.3 Data Validity).

Similarly, during the audit one LEA reported all of their students at one location (i.e., school ID). In actuality, the students attended five different geographical locations across the state. Given some funding formulas provide a minimum amount per location (e.g., School Land Trust), the LEA may have missed an opportunity to receive additional funding to support five locations as opposed to one.

5. Inefficient Use of Limited Resources

Bad data inevitably leads to an inefficient use of limited resources. USBE and LEA staff are required to do and/or fix things that could have otherwise been prevented resulting in additional data system problems (i.e., data constantly being added to, changed, revised, resubmitted and/or removed from systems) and an unnecessary use of resources.

6. Confusion

One common effect of inadequately designed control activities, especially if they are not clearly documented in policy and procedures, is confusion. Confusion inevitably perpetuates more problems (e.g., bad data). Several examples of confusion that may be a product of unclear guidance and/or policy were identified during the audit.

The need to obtain and retain birth certificates was one area of confusion. USBE staff provided guidance to LEAs that they only need to obtain the required information from the birth certificate and then return it. However, Utah Code (53G-6-603(2)) states that an enroller "shall provide" an LEA with a "certified copy" of a student's birth certificate. In addition, Board Rule states that an LEA is responsible to "verify the accuracy and validity of enrollment verification data" (R277-419-13(5)) and "shall ensure enrollment verification data is collected, transmitted, and stored" (R277-419-13(6)). However, neither Utah Code nor Board Rule designate how long an LEA is required to retain copies of student birth certificates.

Additionally, USBE guidance included in the SY2021-2022 UTREx Specification manual indicates that an LEA may rely on a prior LEA's verification of the accuracy and validity of enrollment verification data, rather than requiring the "enroller" to provide the required information as is stipulated in Utah Code. The guidance in the UTREx Specification Manual

states: "The transferee LEA should be able to rely on the transferring LEA's prior corroboration of the previously submitted birth certificate. Courts in different states do that all the time regarding an order or judgment rendered in one state court and imported into another state's court (called "full faith and credit"). I see no reason why LEAs can't do the same."

If an LEA relies on the prior LEA rather than the enroller this could violate the law, which was intended, at least in part to mitigate the potential of child trafficking.

Another example of confusion may be with regards to the use of learner validated enrollment validation measures. One LEA stated that they did not know or understand what enrollment validation is, how to enter it, or what qualifies. Board Rule R277-419 defines "attendance validated program" and "learner validated program" as two separate types of education programs that LEAs may utilize, the latter may consist of a blended learning program (i.e., online and brick and mortar), online program, or personalized, competency-based program. LEAs are directed to use the appropriate learner validated enrollment measures based on the type of program(s) the students are enrolled; however, if a student is enrolled in both types of programs—for purposes of measurement—the student is to be assigned an enrollment measurement status of learner validated enrollment. The Board Rule then provides direction for students "primarily" enrolled in an attendance validation program. The language of the Board Rule could be considered confusing, as follows:

- The use of "learner validated" for enrollment measures applying to both an "attendance validated program" and a "learner validated program" is confusing, as one might think "learner validated enrollment measures" would only apply to a "learner validated program."
- The use of the word "primarily" is also confusing given anything less than entirely would insinuate a blended program and thus a learner validated program."
- The use of the learner validated enrollment measurement for an attendance validated program only indicates which students not to include rather than explaining which students should be included.
- The statement, "For a student who participates in both attendance validated, and learner validated programs, the LEA shall designate the student's status as learner validated enrollment" does not make sense because "learner validated enrollment measures" apply to both attendance validated and learner validated programs. Or possibly this intended to mean there is an attendance validated program enrollment and a learner validated program enrollment and "learner validated program enrollment" falls under the latter.

E. Recommendations

To address the condition and causes identified above, the following may be considered:

1. Evaluating current and future data objectives of the public education system with LEAs and the state legislature to consider if the objectives are, and can be, met with the current data model (i.e., a complex system of individual student information systems requiring individual programming and maintenance, integration and reconciliation with state systems and retention of data at both the local and state levels) and given requirements for data security and data privacy.
   i. While evaluating objectives, the USBE should consider areas of confusion (e.g., R277-419, UTREx Specification Manual, Board Policy 5005) and determine whether changes in policy or guidance and/or training could provide needed clarity.
2. Evaluating the organizational structure of the agency, including reporting lines to the Board, expected competencies, positions and position assignments, delegated authority, etc. to consider if the current structure is adequate to ensure achievement of the data objectives of the public education system. Specifically, while evaluating organizational structure, the board should consider:
   i. As a direct report, a chief data officer, with a master's level educational attainment in data and experience commensurate with the data profile of the public education system, who would oversee data governance and management of the agency.
   ii. Key personnel and succession plans for those positions, position workloads, task priorities (e.g., data infrastructure and governance improvements such as the metadata dictionary) and reasonable timelines to achieve tasks, staffing of positions (e.g., part-time vs. full-time) and staff retention, as well as the working environment should be considered.
3. Reviewing performance management of positions with assignments specific to data, to consider if the performance management is effective to hold individuals accountable for their critical tasks and functions, such as complying with legislative requirements, Board Rules, and internal policies and procedures; effectively supervising staff performance; effectively monitoring and utilizing contractors; and ensuring timely collaboration and communication internally and externally.
   i. Staff and LEAs should be held accountable for a lack of communication and responsiveness, and for untimely, inaccurate, incomplete, and non-compliant data.

4. Assessing risk specific to data governance and data systems to comprehensively identify barriers to achieving related objectives and consider appropriate risk responses.
5. Prioritizing and establishing adequate internal control activities, properly documented in policies and procedures, to ensure data systems are properly designed, implemented, and maintained.
    i. Priorities include data dictionaries, data standards, data governance plans, maintenance schedules, and established roles and responsibilities.
    ii. Additional priorities may include the approval and on-going eligibility of LEA SISs, data manager requirements at LEAs, and frequent (i.e., monthly) required trainings of data managers.
6. Reviewing each data field in the UTREx Specification Manual to identify the requirement for the field or if it is necessary for data analytics.
    i. Data fields required by law (e.g., Utah Code) should be aligned with law. As legal requirements change, so should the data requirements.
    ii. If a data field or code is no longer required or valid, the USBE should remove the requirement to collect the data and/or update data validations to no longer accept invalid codes.
7. Monitoring internal control activities to ensure 1) all students meet graduation requirements, including LEA-specific graduation requirements, and 2) when graduation requirements are met, proper documentation is retained.

V.   Appendices

Appendix A – Glossary

Term or Acronym	Term or Acronym Description
Accountability System	A system established to monitor, analyze, and improve performance.
Board	Utah State Board of Education's constitutionally established and elected body of 15 members.
Competency	"Competence is the qualification to carry out assigned responsibilities. It requires relevant knowledge, skills, and abilities…" *The Green Book 4.02*
Control Activities	The actions management establishes through policies and procedures to achieve objectives and respond to risks in the internal control system, which includes the entity's information system. *Green Book OV2.04*
Control Environment	"The foundation for an internal control system. It provides the discipline and structure to help an entity achieve its objectives." *The Green Book OV2.04*
Data System	A system used to collect, retain, and/or analyze data.
Design	A plan to achieve established objectives (i.e., to show the look and function or workings of a system before it is implemented); should be comprehensive and documented, including identification of necessary forms, personnel, tools, etc. Plans may be documented as rules, policies, procedures, processes.
Documentation	"Documentation is a necessary part of an effective internal control system. The level and nature of documentation vary based on the size of the entity and the complexity of the operational processes the entity performs. Management uses judgment in determining the extent of documentation that is needed. Documentation is required for the effective design, implementation, and operating effectiveness of an entity's internal control system. The Green Book includes minimum documentation requirements…" *The Green Book OV4.08*
IAD	USBE Internal Audit Department

Implementation	Put a plan into effect; execute the previously designed plan
Information & Communication	"The quality information management and personnel communicate and use to support the internal control system." *The Green Book OV2.04*
Internal Control System	A system implemented by management to help an entity achieve its objectives.
IT	Information Technology
LEA	Local Education Agency (i.e., school district or charter school)
Monitoring for Operating Effectiveness	Formally review, inspect, or examine the operation of a designed and implemented plan to achieve objectives
Objectives	"In the government sector, objectives related to compliance with applicable laws and regulations are very significant. Laws and regulations often prescribe a government entity's objectives, structure, methods to achieve objectives, and reporting of performance relative to achieving objectives. Management considers objectives in the category of compliance comprehensively for the entity and determines what controls are necessary to design, implement, and operate for the entity to achieve these objectives effectively." *The Green Book OV2.22*
OLAG	Office of the Legislative Auditor General
OSA	Office of the State Auditor
Public Education System	One system, comprised of many entities (e.g., local education entities), which is open to all students in the state, and provides K-12 instruction.
Risk Assessment	"Assesses the risks facing the entity as it seeks to achieve its objectives. This assessment provides the basis for developing appropriate risk responses." *The Green Book OV2.04*
SFY	State Fiscal Year (July 1 – June 30)
SIS	Student Information System
SOP	Standard Operating Procedure
SSID	Statewide Student Identifier
SY	School Year

The Green Book	*Standards for Internal Control in the Federal Government* (Issued September 2014 by the Comptroller General of the United States.
	"The Green Book defines the standards for internal control in the federal government…The standards provide criteria for assessing the design, implementation, and operating effectiveness of internal control in federal government entities to determine if an internal control system is effective. Nonfederal entities* may use the Green Book as a framework to design, implement, and operate an internal control system." *The Green Book OV2.01* **The Green Book is the standard the federal government indicates nonfederal entities (e.g., the USBE, LEAs) should use for federal grants management (see 2 CFR 200.303). The Board also indicates it as the standard for LEAs (R277-113-6).*
USBE	Utah State Board of Education office
USDB	Utah Schools for the Deaf and the Blind
USIMS	Utah Schools Management Information System
UTREx	Utah eTranscript and Record Exchange. The UTREx Clearinghouse specification or UTREx Specification Manual details the information, including required codes, LEAs are to send to the USBE.

Appendix B - Graduation Requirements

Language Arts - Three Courses from the Foundations **Plus** one CREDIT from the Applied and Advanced List		
FoundationCourses	**Applied and Advanced Courses**	
English 9 or 9H (required) English 10 or 10H (required) English 11, 11H, or courses listed below* Concurrent Enrollment Courses** InternationalBaccalaureateClasses** AP Literature and Composition* * AP Language and Composition**	12th Grade Language Arts Basic Writing Skills Basic Reading Skills Business Communication College Prep Language Arts Creative Writing 1 and 2 Debate Mythology	Humanities Journalism 1 and 2 Literature Literary Magazine Technical & Professional Communication World Languages 3, 4, or AP
Language Arts Notes: ** These courses can also be used for the one credit in Applied and Advanced.		

Mathematics – 3.0 credits: Secondary I, II, and III. Secondary III can be replaced by an Applied Course with written parent request (opt out form recognizing not being prepared for college).		
FoundationCourses	**Advanced Courses (Secondary III Pre-requisite)**	**Applied Courses (Alternative Selections for Secondary III Opt out) (Secondary II Pre-Requisite)**
Secondary I or Secondary IH Secondary II or Secondary IIH Secondary III or Secondary IIIH Pre-calculus	AP Calculus AB or BC AP Statistics College Prep Math IntroductoryCalculus Concurrent Enrollment* 1010, 1030, 1040, 1050, or 1060 InternationalBaccalaureate	Accounting I and II Mathematical Decision Making for Life (non-CE course) Mathematics of Personal Finance Medical Math ModernMathematics IntroductoryStatistics Computer Programming

Science – A total of 2.0 credits from two of the five areas of science on the Foundation Courses list **plus** 1.0 credit from the Foundation Courses list or Applied and Advanced Courses list		
FoundationCourses		

Biology
- Biology
- Human Biology (including CE)
- Biology: Agricultural Science & Technology[+]
- AP or IB Biology
- Biology with Lab CE

Chemistry
- Chemistry
- AP or IB Chemistry
- Chemistry with Lab CE

Computer Science
- AP Computer Science[+]
- Computer Science Principles[+]
- Computer Programming[+] II

Earth Science
- Earth Science
- AP Environmental Science
- IB Environmental Systems

Physics
- Physics
- AP or IB Physics
- Physics with Lab CE

Applied or Advanced Courses

Aerospace Aeronautics Agricultural Biotechnology[+] Agricultural Science[+] I, II, III, IV Aquaculture[+] Anatomy and Physiology** Animal Science[+] I or II Astronomy** Biotechnology[+] Botany Electronics[+] 1,2 ,3 Engineering Principles[+] 1, 2	Engineering Capstone[+] Environmental Science** Equine Science[+] Genetics** Geology** Human Physiology Marine Biology/Oceanography Materials Science[+] Medical Anatomy and Physiology[+]** Medical Forensics[+] Meteorology** Natural Resource Science[+] I, II	Plant and Soil Science[+] I**, II Robotics[+] 1, 2 Veterinary Assistant[+] 1, 2 Wildlife Biology Zoology [+] CTE Courses ** Include Applied/Advanced CE Courses

NOTE: *Concurrent enrollment courses offered from college/university language arts, mathematics, or science departments.

NOTE: Teachers currently meeting state license and endorsement requirements for an approved applied or advanced course are qualified to teach that course

Social Studies – A total of 3.0 credits, 2.5 from the required course list (or their equivalent) and .5 elective from any course from the social studies area, which could include an additional half credit added to any of the required half- credit courses.

Foundation Courses

World History	World Geography	U.S. History 2	U.S. Government and Citizenship
• World Civilization • World History • AP European History • AP World History • HIST 1100 & 1110 CE* if both taken	• Geography for Life • World Geography • AP Human Geography • World/Cultural Geography CE*	• U.S. History 2 • AP US History • HIST 1700 CE*, if offered in a full year • HIST 2700 & 2710 CE* if both taken	• U. S. Government and Citizenship • AP US Government & Politics • Political Science 1100 CE

Elective Courses (not a comprehensive list)

Advanced Geography Advanced Psychology American Government and Law Anthropology Psychology AP Economics-Macro AP Economics-Micro	AP Psychology Civics Criminal Justice Current Issues Economics Economics Elective CE* Geography II Introduction to Philosophy Introduction to Philosophy CE* Native American Studies	Navajo Culture, Language, and Government Political Science Political Science Elective CE* Psychology Sociology Sociology CE* Student Government World Civilizations II

NOTE: *Concurrent enrollment courses offered from college/university language arts, mathematics, science, or social studies departments.

NOTE: Teachers currently meeting state license and endorsement requirements for an approved applied or advanced course are qualified to teach that course

Applied, advanced, or equivalent courses may be added to the list using the following procedure and criteria.

Language Arts
Determined by the local school board and approved by Utah State Board of Education (USBE), using the following criteria.
- (i) courses are within the field/discipline of language arts with a significant portion of instruction aligned to language arts content, principles, knowledge, and skills; and
- (ii) courses provide instruction that leads to student understanding of the nature and disposition of language arts; and
- (iii) courses apply the fundamental concepts and skills of language arts; and
- (iv) courses provide developmentally appropriate content; and
- (v) courses develop skills in reading, writing, listening, speaking, and presentation.

Mathematics
Determined by the local school board and approved by Utah State Board of Education (USBE), using the following criteria.
- (i) courses are within the field/discipline of mathematics with a significant portion of instruction aligned to mathematics content, principles, knowledge, and skills; and
- (ii) courses provide instruction that leads to student understanding of the nature and disposition of mathematics; and
- (iii) courses apply the fundamental concepts and skills of mathematics; and
- (iv) courses provide developmentally appropriate content; and
- (v) courses include the five process skills of mathematics: problem solving, reasoning, communication, connections, and representation.

Science
Determined by the local school board and approved by Utah State Board of Education (USBE), using the following criteria.
- (i) courses are within the field/discipline of science with a significant portion of instruction aligned to science content, principles, knowledge, and skills; and
- (ii) courses provide instruction that leads to student understanding of the nature and disposition of science; and
- (iii) courses apply the fundamental concepts and skills of science; and
- (iv) courses provide developmentally appropriate content; and
- (v) courses include the areas of physical, natural, or applied sciences; and
- (vi) courses develop students' skills in scientific inquiry.

Social Studies
Determined by the local school board and approved by Utah State Board of Education (USBE), using the following criteria.
- (i) courses are within the field/disciplines of social studies with a significant portion of instruction aligned to social studies content, principles, knowledge, and skills; and
- (ii) courses provide instruction that leads to student understanding of the nature and disposition of social studies disciplines; and
- (iii) courses apply the fundamental concepts and skills of social studies; and
- (iv) courses provide developmentally appropriate content; and
- (v) courses develop students' skills in social studies inquiry.

Appendix C – Criteria

General Note: The most current reference for each criterion is shown below. However, there is historical criterion that was also effective during the scope of this audit that was reviewed; historical criterion is not included herein.

I.   **Utah Code Annotated**

   A. **53E-3-511**. Student Achievement Backpack. *(Effective May 3, 2023)*

   (1) As used in this section:

   (a) "Authorized LEA user" means a teacher or other person who is:

   (i) employed by an LEA that provides instruction to a student; and

   (ii) authorized to access data in a Student Achievement Backpack through the Utah Student Record Store.

   (b) "Statewide assessment" means the same as that term is defined in Section 53E-4-301.

   (c) "Student Achievement Backpack" means, for a student from kindergarten through grade 12, a complete learner profile that:

   (i) is in electronic format;

   (ii) follows the student from grade to grade and school to school; and

   (iii) is accessible by the student's parent or an authorized LEA user.

   (d) "Utah Student Record Store" means a repository of student data collected from LEAs as part of the state's longitudinal data system that is:

   (i) managed by the state board;

   (ii) cloud-based; and

   (iii) accessible via a web browser to authorized LEA users.

   (2)

   (a) The state board shall use the state board's robust, comprehensive data collection system, which collects longitudinal student transcript data from LEAs and the unique student identifiers as described in Section 53E-4-308, to allow the following to access a student's Student Achievement Backpack:

   (i) the student's parent; and

   (ii) each LEA that provides instruction to the student.

   (b) The state board shall ensure that a Student Achievement Backpack:

   (i) provides a uniform, transparent reporting mechanism for individual student progress;

   (ii) provides a complete learner history for postsecondary planning;

(iii) provides a teacher with visibility into a student's complete learner profile to better inform instruction and personalize education;

(iv) assists a teacher or administrator in diagnosing a student's learning needs through the use of data already collected by the state board;

(v) facilitates a student's parent taking an active role in the student's education by simplifying access to the student's complete learner profile; and

(vi) serves as additional disaster mitigation for LEAs by using a cloud-based data storage and collection system.

(3) Using existing information collected and stored in the state board's data warehouse, the state board shall create the Utah Student Record Store where an authorized LEA user may:

(a) access data in a Student Achievement Backpack relevant to the user's LEA or school; or

(b) request student records to be transferred from one LEA to another.

(4) The state board shall implement security measures to ensure that:

(a) student data stored or transmitted to or from the Utah Student Record Store is secure and confidential pursuant to the requirements of the Family Educational Rights and Privacy Act, 20 U.S.C. Sec. 1232g; and

(b) an authorized LEA user may only access student data that is relevant to the user's LEA or school; and

(c) except as provided in Section 53E-9-308, an authorized LEA user shared only aggregate or de-identified data.

(5) A student's parent may request the student's Student Achievement Backpack from the LEA or the school in which the student is enrolled.

(6) An authorized LEA user may access student data in a Student Achievement Backpack, which shall include the following data, or request that the data be transferred from one LEA to another:

(a) student demographics;

(b) course grades;

(c) course history; and

(d) results of a statewide assessment.

(7) An authorized LEA user may access student data in a Student Achievement Backpack, which shall include the data listed in Subsections (6)(a) through (d) and the following data, or request that the data be transferred from one LEA to another:

(a) section attendance;

(b) the name of a student's teacher for classes or courses the student takes;

(c) teacher qualifications for a student's teacher, including years of experience, degree, license, and endorsement;
(d) results of statewide assessments;
(e) a student's writing sample that is written for a writing assessment administered pursuant to Section 53E-4-303;
(f) student growth scores on a statewide assessment, as applicable;
(g) a school's performance as reported in accordance with Chapter 5, Part 2, School Accountability System;
(h) results of benchmark assessments of reading administered pursuant to Section 53E-4-307; and
(i) a student's reading level at the end of grade 3.
(8) No later than July 1, 2024, the state board shall ensure that data collected in the Utah Student Record Store for a Student Achievement Backpack is integrated into each LEA's student information system and is made available to a student's parent and an authorized LEA user in an easily accessible viewing format.

B. **53E-4-308**. Unique Student Identifier. (*Effective May 3, 2023*)
(1) As used in this section, "unique student identifier" means an alphanumeric code assigned to each public education student for identification purposes, which:
(a) is not assigned to any former or current student; and
(b) does not incorporate personal information, including a birth date or Social Security number.
(2) The state board, through the state superintendent, shall assign each public education student a unique student identifier, which shall be used to track individual student performance on achievement tests administered under this part.
(3) The state board and the Utah Board of Higher Education, in collaboration with the Utah Data Research Center created in Section 53B-33-201, shall:
(a) coordinate public education and higher education information technology systems to allow individual student academic achievement to be tracked through both education systems in accordance with this section and Section 53B-1-109; and
(b) coordinate access to the unique student identifier of a public education student who later attends an institution within the state system of higher education.
(4)

(a) The state board and the Department of Workforce Services shall coordinate assignment of a unique student identifier to each student enrolled in a program described in Title 35A, Chapter 15, Preschool Programs.

(b) A unique student identifier assigned to a student under Subsection (4)(a) shall remain the student's unique student identifier used by the state board when the student enrolls in a public school in kindergarten or a later grade.

(c) The Governor's Office of Economic Opportunity, the state board, the Department of Workforce Services, and a contractor as defined in Section 63N-20-101, shall coordinate access to the unique student identifier of a preschool student who later attends an LEA.

C. **53E-9-301.** Definitions. (*Effective May 3, 2023*)

(6) "Data governance plan" means an education entity's comprehensive plan for managing education data that:

(a) incorporates reasonable data industry best practices to maintain and protect student data and other education-related data;

(b) describes the role, responsibility, and authority of an education entity data governance staff member;

(c) provides for necessary technical assistance, training, support, and auditing;

(d) describes the process for sharing student data between an education entity and another person;

(e) describes the education entity's data expungement process, including how to respond to requests for expungement;

(f) describes the data breach response process; and

(g) is published annually and available on the education entity's website.

(11) "Metadata dictionary" means a record that:

(a) defines and discloses all personally identifiable student data collected and shared by the education entity;

(b) comprehensively lists all recipients with whom the education entity has shared personally identifiable student data, including:

(i) the purpose for sharing the data with the recipient;

(ii) the justification for sharing the data, including whether sharing the data was required by federal law, state law, or a local directive; and

(iii) how sharing the data is permitted under federal or state law; and

(c) without disclosing personally identifiable student data, is displayed on the education entity's website.

(12) "Necessary student data" means data required by state statute or
   federal law to conduct the regular activities of an education entity,
   including:
(a) name;
(b) date of birth;
(c) sex;
(d) parent contact information;
(e) custodial parent information;
(f) contact information;
(g) a student identification number;
(h) local, state, and national assessment results or an exception from
   taking a local, state, or national assessment;
(i) courses taken and completed, credits earned, and other transcript
   information;
(j) course grades and grade point average;
(k) grade level and expected graduation date or graduation cohort;
(l) degree, diploma, credential attainment, and other school exit
   information;
(m) attendance and mobility;
(p) race;
(q) ethnicity;
(y) English language learner status;

D. **53E-9-307.** Securing and cataloguing student data. (*Effective May 3, 2023*)

In accordance with Title 63G, Chapter 3, Utah Administrative Rulemaking Act, the state board shall make rules that:

(1) Using reasonable data industry best practices, prescribe the maintenance and protection of stored student data by:
(a) an education entity;
(c) a third-party contractor; and
(2) state requirements for an education entity's metadata dictionary.

E. **53F-2-102**. Public education code definitions. (*Effective January 24, 2018*)
(4)
(a) "Minimum School Program" means the state-supported public school programs for kindergarten, elementary, and secondary schools as described in this Subsection (4).

(b) The Minimum School Program established in school districts and charter schools shall include the equivalent of a school term of nine months as determined by the state board.

(c)

(i) The state board shall establish the number of days or equivalent instructional hours that school is held for an academic school year.

(ii) Education, enhanced by utilization of technologically enriched delivery systems, when approved by an LEA governing board, shall receive full support by the state board as it pertains to fulfilling the attendance requirements, excluding time spent viewing commercial advertising.

(d)

(i) An LEA governing board may reallocate up to 32 instructional hours or four school days established under Subsection (4)(c) for teacher preparation time or teacher professional development.

(ii) A reallocation of instructional hours or school days under Subsection (4)(d)(i) is subject to the approval of two-thirds of the members of an LEA governing board voting in a regularly scheduled meeting:

(A) at which a quorum of the LEA governing board is present; and

(B) held in compliance with Title 52, Chapter 4, Open and Public Meetings Act.

(iii) If an LEA governing board reallocates instructional hours or school days as provided by this Subsection (4)(d), the school district or charter school shall notify students' parents of the school calendar at least:

(A) 90 days before the beginning of the school year; or

(B) for the 2021-2022 and 2022-2023 school years, due to circumstances within the LEA or a given school due to the COVID-19 pandemic, at least 14 calendar days before the reallocated instructional hours or school days.

(iv) Instructional hours or school days reallocated for teacher preparation time or teacher professional development pursuant to this Subsection (4)(d) is considered part of a school term referred to in Subsection (4)(b).

F. **53G-6-201**. Definitions. (*Effective September 1, 2021*)

(1)

(a) "Absence" or "absent" means the failure of a school-age child assigned to a class or class period to attend a class or class period.

(b)"Absence" or "absent" does not mean multiple tardies used to calculate an absence for the sake of a truancy.

(8)

    (a) "Truant" means a condition in which a school-age child, without a valid excuse, and subject to Subsection (8)(b), is absent for at least:

        (i) half of the school day; or

        (ii) if the school-age child is enrolled in a learner verified program, as that term is defined by the state board, the relevant amount of time under the LEA's policy regarding the LEA's continuing enrollment measure as it relates to truancy.

    (b) A school-age child may not be considered truant under this part more than one time during one day.

(10)

    (a) "Valid excuse" means:

        (i) an illness, which may be either mental or physical, regardless of whether the school-age child or parent provides documentation from a medical professional;

        (ii) mental or behavioral health of the school-age child;

        (iii) a family death;

        (iv) an approved school activity;

        (v) an absence permitted by a school-age child's:

            (A) individualized education program; or

            (B) Section 504 accommodation plan;

        (vi) an absence permitted in accordance with Subsection 53G-6-803(5); or

        (vii) any other excuse established as valid by a local school board, charter school governing board, or school district.

    (b) "Valid excuse" does not mean a parent acknowledgment of an absence for a reason other than a reason described in Subsections (10)(a)(i) through (vi), unless specifically permitted by the local school board, charter school governing board, or school district under Subsection (10)(a)(vi).

G. 53G-6-204. School-age children exempt from school attendance.
(*Effective May 3, 2023*)

    (2)

        (a)

            (ii) Except as provided in Subsection (2)(a)(iii), a local school board shall excuse a school-age child from attendance, if the school-age child's

parent or legal guardian files a signed and notarized affidavit with the school-age child's school district of residence, as defined in Section 53G-6-302, that:

(A) the school-age child will attend a home school; and

(B) the parent or legal guardian assumes sole responsibility for the education of the school-age child, except to the extent the school-age child is dual enrolled in a public school as provided in Section 53G-6-702.

H. **53G-6-206**. Report to state board. (*Effective September 1, 2021; Superseded May 3, 2023*)

(6) Each LEA shall annually report the following data separately to the state board:

(a) absences with a valid excuse; and

(b) absences without a valid excuse.

I. **53G-6-603**. Requirement of birth certificate for enrollment of students - Procedures. (*Effective May 4, 2022*)

(2) Except as provided in Subsection (3), upon enrollment of a student for the first time in a particular school, that school shall notify the enroller in writing that within 30 days the enroller shall provide to the school either:

(a) a certified copy of the student's birth certificate; or

(b)

(i) other reliable proof of the student's:

(A) identity;

(B) biological age; and

(C) relationship to the student's legally responsible individual; and

(ii) an affidavit explaining the enroller's inability to produce a copy of the student's birth certificate.

J. **63G-2-103**. Government Records Access and Management Act. General Provision. Definitions. (*Effective May 5, 2021*)

(21) "Public record" means a record that is not private, controlled, or protected and that is not exempt from disclosure as provided in Subsection 63G-2-201(3)(b).

(22)

(a) "Record" means a book, letter, document, paper, map, plan, photograph, film, card, tape, recording, electronic data, or other documentary material regardless of physical form or characteristics:

(i) that is prepared, owned, received, or retained by a governmental entity or political subdivision; and

(ii) where all of the information in the original is reproducible by photocopy or other mechanical or electronic means.

(23) "Record series" means a group of records that may be treated as a unit for purposes of designation, description, management, or disposition.

II. Utah Administrative Code (Rule)

A. **R277-419**. Pupil Accounting. (*Effective July 1, 2023*)

R277-419-2. Definitions.

(3) "Attendance validated program" means a program within an LEA that consists of eligible, enrolled public school students who physically attend school in a brick and mortar school.

(4) "Blended learning program" means a formal education program under the direction of an LEA in which a student learns through an integrated experience that is in part:

(a) through online learning, with an element of student control over time, place, path, or pace; and

(b) in a supervised brick and mortar school away from home.

(5) "Brick and mortar school" means a school where classes are conducted in a physical school building.

(15) "Learner validated enrollment measurement" means a methodology used to establish a student's membership or enrollment status for purposes of generating membership days.

(16) "Learner validated program" means a program within an LEA that consists of eligible, enrolled public school students where the student receives instruction through:

(a) an online learning program;

(b) a blended learning program; or

(c) a personalized, competency-based learning program.

(17)

(a) "Membership" means a public school student is on the current roll of a public school class or public school as of a given date.

(b) A student is a member of a class or school from the date of entrance at the school and is placed on the current roll until official removal from the class or school due to the student having left the school.

(c) Removal from the roll does not mean that an LEA should delete the student's record, only that the student should no longer be counted in membership.

(19) "Online learning program" means a program:
(a) that is under the direction of an LEA; and
(b) in which students receive educational services primarily over the internet.

(38) "Unexcused absence" means an absence charged to a student when:
(a) the student was not physically present at the school at any of the times attendance checks were made in accordance with Subsection R277-419-11(5); and
(b) the student's absence could not be accounted for by evidence of a legitimate or valid excuse in accordance with local board policy on truancy as defined in Section 53G-6-201.

R277-419-4. Minimum School Days.

(1)(a) Except as provided in Subsection (1) and Subsection 53F-2-102(4), an LEA shall provide educational services over a minimum of 180 school days each school year.
(4) Minimum standards apply to a public school in all settings unless Utah law or this rule provides for a specific exception.

R277-419-5. Student Membership Eligibility and Learner Validated Enrollment Measurements.

(3) To generate membership for funding through the Minimum School Program on any school day, an LEA shall ensure that a student being counted by the LEA in membership:
(c) does not have unexcused absences, which are determined using one of the learner validated enrollment measurements described in Subsection (4);
(f)
(i) is expected to attend a regular learning facility operated and recognized by an LEA on each regularly scheduled school day, if enrolled in an attendance validated program;
(iv) is enrolled in a learner validated program under the direction of an LEA that:
(A) is consistent with the student's Plan for College and Career Readiness;
(B) has been approved by the student's counselor; and

(C) includes regular instruction or facilitation by a designated employee of an LEA.

(4) An LEA shall use one of the following learner validated enrollment measures:

    (a) For a student primarily enrolled in an attendance validated program, the LEA may not count a student as an eligible student if the eligible student has unexcused absences during the prior ten consecutive school days.

    (b) For a student enrolled in a learner validated program, an LEA shall;

        (i) adopt a written policy that designates a learner validated enrollment measurement to document the learner validated membership or enrollment status for each student enrolled in the learner validated program consistent with this section;

        (ii) document each student's continued enrollment status in compliance with the learner validated enrollment policy at least once every ten consecutive school days; and

        (iii) appropriately adjust and update student membership records in the student information system for students that did not meet the learner validated enrollment measurement, consistent with this section.

    (c) For a student enrolled in a learner validated program, the LEA may not count a student as an eligible student if the LEA has not personally engaged with the student during the prior ten consecutive school days.

(6) The learner validated enrollment measurement described in Subsection (4)(b) may include the following components, in addition to other components, as determined by an LEA:

    (a) a minimum student login or teacher contact requirement;

    (b) required periodic contact with a licensed educator;

    (c) a minimum hourly requirement, per day or week, when students are engaged in course work; or

    (d) required timelines for a student to provide or demonstrate completed assignments, coursework or progress toward academic goals.

(7)

    (a) Beginning with the 2021-2022 school year, an LEA shall submit each student's attendance validated or learner validated enrollment status through the UTREx or Data Clearinghouse.

    (b) For a student who participates in both attendance validated, and learner validated programs, the LEA shall designate the student's status as learner validated enrollment.

R277-419-8. Reporting Requirements and LEA Records.
  (1) An LEA shall report aggregate membership for each student via the School
      Membership field in the S1 record and special education membership in
      the SCRAM Membership field in the S2 record and YIC membership in the
      S3 record of the Year End upload of the Data Clearinghouse file.
  (2) In the Data Clearinghouse, aggregate membership is calculated in days of
      membership.
  (3) To determine student membership, an LEA shall ensure that records of
      daily student attendance or student engagement are maintained in each
      school which clearly and accurately show for each student the:
      (a) entry date;
      (b) exit date;
      (c) exit or high school completion status;
      (d) whether or not an absence was excused;
      (e) disability status, resource or self-contained, if applicable; and
      (f) YIC status, ISI-1, ISI-2 or self-contained, if applicable.

R277-419-10. Student Identification and Tracking.
  (1)
      (a) Pursuant to Section 53E-4-308, an LEA shall:
          (i) use the SSID system maintained by the Superintendent to assign
              every student enrolled in a program under the direction of the
              Board or in a program or a school that is supported by public school
              funding a unique student identifier; and
          (ii) display the SSID on student transcripts exchanged with LEAs and
              Utah public institutions of higher education.
      (b) The unique student identifier:
          (i) shall be assigned to a student upon enrollment into a public school
              program or a public school-funded program;
          (ii) may not be the student's social security number or contain any
              personally identifiable information about the student.
  (2)
      (a) An LEA shall require all students to provide their legal first, middle, and
          last names at the time of registration to ensure that the correct SSID
          follows students who transfer among LEAs.
      (b) A school shall transcribe the names from the student's birth certificate
          or other reliable proof of the student's identity and age, consistent
          with Section 53G-6-603;

(c) The direct transcription of student names from birth certificates or other reliable proof of student identity and age shall be the student's legal name for purposes of maintaining school records; and

(d) An LEA may modify the order of student names, provide for nicknames, or allow for different surnames, consistent with court documents or parent preferences, so long as legal names are maintained on student records and used in transmitting student information to the Superintendent.

(3) The Superintendent and LEAs shall track students and maintain data using students' legal names.

(4) If there is a compelling need to protect a student by using an alias, an LEA should exercise discretion in recording the name of the student.

(5) An LEA is responsible to verify the accuracy and validity of enrollment verification data, prior to enrolling students in the LEA, and provide students and their parents with notification of enrollment in a public school.

(6) An LEA shall ensure enrollment verification data is collected, transmitted, and stored consistent with sound data policies, established by the LEA as required in Rule R277-487.

B. **R277-484.** Data Standards. (*Effective July 11, 2023*)

R277-484-4. Deadlines for Data Submission.

(1) An LEA shall submit student level data to the Board through UTREx.

(2) An LEA shall, by 5 p.m. Mountain Standard Time on the date specified in the Board Reporting Deadline Table, submit reports in the format specified by the Superintendent.

(4) An LEA shall assign an individual to oversee compliance with this rule.

R277-484-6. Official Data Source and Required LEA Compatibility.

(1) The Superintendent shall load operational data collections into the Data Warehouse as of the submission deadlines specified.

(2) The Data Warehouse shall be the sole official source of data for annual:
   (a) school performance reports required under Section 53E-5-204;
   (b) determination of state and federal accountability reports; and
   (c) submission of data files to the U.S. Department of Education via EDEN.

(3) The Superintendent shall maintain a database of LEA and school:
   (a) demographic information;
   (b) openings;
   (c) closures; and

(d) contact information for designated individuals.
    (4)(a) An LEA shall use an SIS approved by the Superintendent to ensure compatibility with Board data collection systems.
    (7) An LEA shall submit daily updates to the Board Clearinghouse using School Interoperability Framework (SIF) objects defined in the UTREx Clearinghouse specification.

C. **R277-487**. Public School Data Confidentiality and Disclosure. (*Effective November 8, 2019*)

R277-487-2. Definitions.
    (9) "Enrollment verification data" includes:
      (a) a student's birth certificate or other verification of age;

R277-487-3. Data Privacy and Security Policies.
    (2) An LEA shall ensure that school enrollment verification data, student performance data, and personally identifiable student data are collected, maintained, and transmitted:
      (a) in a secure manner; and
      (b) consistent with sound data collection and storage procedures based on the LEA's cyber security framework.

R277-487-4. Retention of Student Data.
    (1) An LEA shall classify all student data collected in accordance with Section 63G-2-604.
    (2) An LEA shall retain and dispose of all student data in accordance with an approved retention schedule.
    (3) If no existing retention schedule governs student disciplinary records collected by an LEA:
      (a) An LEA may propose to the State Records Committee a retention schedule of up to one year if collection of the data is not required by federal or state law or Board rule; or
      (b) An LEA may propose to the State Records Committee a retention schedule of up to three years if collection of the data is required by federal or state law or Board rule, unless a longer retention period is prescribed by federal or state law or Board rule.
    (4) An LEA's retention schedules shall take into account the LEA's administrative need for the data.

D. **R277-550.** Charter School Definitions. *(Effective February 9, 2021)*

R277-550-2. Definitions.

(16) "Satellite school" means a charter school affiliated with an existing charter school physically located within the state of Utah that:

(a) has the same governing board as the existing charter school;

(b) has the same authorizer as the existing charter school;

(c) may have a similar or different program of instruction or grades served from the existing charter school;

(d) is located at a different site or in a different geographical area than the existing charter school; and

(e) has a separate school number than the existing charter school.

E. **R277-700.** The Elementary and Secondary School General Core. *(Effective August 12, 2021)*

R277-700-6(5-20, 22). High School Requirements.

(5) Language Arts (4.0 units of credit from the following):

(a) Grade 9 level (1.0 unit of credit);

(b) Grade 10 level (1.0 unit of credit);

(c) Grade 11 level (1.0 unit of credit); and

(d) Grade 12 level (1.0 Unit of credit) consisting of applied or advanced language arts credit from the list of Board-approved courses using the following criteria and consistent with the student's Plan for College and Career Readiness:

(i) courses are within the field/discipline of language arts with a significant portion of instruction aligned to language arts content, principles, knowledge, and skills;

(ii) courses provide instruction that leads to student understanding of the nature and disposition of language arts;

(iii) courses apply the fundamental concepts and skills of language arts;

(iv) courses provide developmentally appropriate content; and

(v) courses develop skills in reading, writing, listening, speaking, and presentation.

(6) Mathematics (3.0 units of credit) shall be met minimally through successful completion of a combination of the foundation or foundation extended courses, Secondary Mathematics I, Secondary Mathematics II, and Secondary Mathematics III.

(7)

(a) A student may opt out of Secondary Mathematics III if the student's parent submits a written request to the school.

(b) If a student's parent requests an opt out described in Subsection (6)(a), the student is required to complete a third math credit from the Board-approved mathematics list.

(8) A 7th or 8th grade student may earn credit for a mathematics foundation course before 9th grade, consistent with the student's Plan for College and Career Readiness if:

(a) the student is identified as gifted in mathematics in accordance with the procedures outlined in Rule R277-707;

(b) the student is enrolled at a middle school or junior high school and a high school;

(c) the student qualifies for promotion one or two grade levels above the student's age group and is placed in 9th grade; or

(d) the student takes the Board competency test in the summer prior to 9th grade and earns high school graduation credit for the course.

(9) A student who successfully completes a mathematics foundation course before 9th grade is required to earn 3.0 units of additional mathematics credit by:

(a) taking the other mathematics foundation courses described in Subsection (5); and

(b) an additional course from the Board-approved mathematics list consistent with:

(i) the student's Plan for College and Career Readiness; and

(ii) the following criteria:

(A) courses are within the field/discipline of mathematics with a significant portion of instruction aligned to mathematics content, principles, knowledge, and skills;

(B) courses provide instruction that lead to student understanding of the nature and disposition of mathematics;

(C) courses apply the fundamental concepts and skills of mathematics;

(D) courses provide developmentally appropriate content; and

(E) courses include the Standards for Mathematical Practice as listed in the Utah secondary mathematics core.

(10) A student who successfully completes a Calculus course with a "C" grade or higher has completed mathematics graduation requirements, regardless of the number of mathematics credits earned.

(11) Science (3.0 units of credit):

(a) shall be met minimally through successful completion of 2.0 units of credit from two of the following five science foundation areas:

(i) Earth Science (1.0 units of credit);
   (A) Earth Science;
   (B) Advanced Placement Environmental Science; or
   (C) International Baccalaureate Environmental Systems;
(ii) Biological Science (1.0 units of credit);
   (A) Biology;
   (B) Biology: Agricultural Science and Technology;
   (C) Advanced Placement Biology;
   (D) International Baccalaureate Biology; or
   (E) Biology with Lab Concurrent Enrollment;
(iii) Chemistry (1.0 units of credit);
   (A) Chemistry;
   (B) Advanced Placement Chemistry;
   (C) International Baccalaureate Chemistry; or
   (D) Chemistry with Lab Concurrent Enrollment;
(iv) Physics (1.0 units of credit);
   (A) Physics;
   (B) Advanced Placement Physics (1, 2, C: Electricity and Magnetism,
      or C: Mechanics);
   (C) International Baccalaureate Physics; or
   (D) Physics with Lab Concurrent Enrollment; or
(v) Computer Science (1.0 units of credit):
   (A) Advanced Placement Computer Science;
   (B) Computer Science Principles; or
   (C) Computer Programming 2; and
(b) one additional unit of credit from:
   (i) the foundation courses described in Subsection(10)(a); or
   (ii) the applied or advanced science list:
      (A) determined by the LEA board; and
      (B) approved by the Board using the following criteria and consistent
         with the student's Plan for College and Career Readiness:
     (i) courses are within the field/discipline of science with a significant
       portion of instruction aligned to science content, principles,
       knowledge, and skills;
     (ii) courses provide instruction that leads to student understanding of
       the nature and disposition of science;
     (iii) courses apply the fundamental concepts and skills of science;
     (iv) courses provide developmentally appropriate content;
     (v) courses include the areas of physical, natural, or applied sciences;
       and

(vi) courses develop students' skills in scientific inquiry.

(12) Social Studies (3.0 units of credit) shall be met minimally through successful completion of:

(a) 2.5 units of credit from the following courses:

(i) World Geography (0.5 units of credit);

(ii) World History (0.5 units of credit);

(iii) U.S. History (1.0 units of credit); and

(iv) U.S. Government and Citizenship (0.5 units of credit);

(b) Social Studies (0.5 units of credit per LEA discretion); and

(c) a basic civics test or alternate assessment described in R277-700-8.

(13) The Arts (1.5 units of credit from any of the following performance areas):

(a) Visual Arts;

(b) Music;

(c) Dance;

(d) Theatre; or

(e) Media Arts.

(14) Health Education (0.5 units of credit).

(15)

(a) Physical Education (1.5 units of credit from each of the following):

(i) Participation Skills (0.5 units of credit);

(ii) Fitness for Life (0.5 units of credit); and

(iii) Individualized Lifetime Activities (0.5 units of credit);

(b) Notwithstanding Subsection (15)(a), a student may earn 0.5 units of credit per sport for team sport/athletic participation up to a maximum of 1.0 units of credit with LEA approval to replace participation skills and individualized lifetime activities requirements.

(16) Career and Technical Education (1.0 units of credit from any of the following):

(a) Agriculture, Food and Natural Resources;

(b) Architecture and Construction;

(c) Arts, Audio/Visual Technology and Communications;

(d) Business, Finance and Marketing;

(e) Computer Science and Information Technology;

(f) Education and Training;

(g) Engineering and Technology;

(h) Health Science;

(i) Hospitality and Tourism;

(j) Human Services;

(k) Law, Public Safety, Corrections and Security;

  (l) Manufacturing; or

  (m) Transportation, Distribution, and Logistics.

(17) Digital Studies (0.5 units of credit).

(18) Library Media Skills (integrated into the subject areas).

(19) General Financial Literacy (0.5 units of credit).

(20) Electives (5.5 units of credit).

(22) An LEA board may require a student to earn credits for graduation that exceed the minimum Board requirements described in this rule.

III. USBE Internal Policies and Documents

A. **Internal Policy 05-01**. Acceptable Use of Information Technology Resources. (*Effective June 7, 2022*)

IV. Confidentiality

 9. A USBE employee shall maintain the confidentiality of security authorizations (user IDs, passwords, electronic keys, smartcards, security badges, etc.) and be personally accountable for all work performed under security authorizations.

V. A USBE Employee May Not:

 2. Share a user ID(s) and password(s) or electronic keys or smart cards with anyone;

B. **USBE Data Governance Charter.** (*Effective August 20, 2022*)

Data Governance Vision and Mission

Data governance supports the Utah State Board of Education's vision via strategy 4A of the USBE mission: empower USBE, educators, parents, and students with access to timely, useful, safeguarded data.

Objectives

The goals for USBE Data Governance are to
- Protect the privacy of student information.
- Foster a 'culture of data' where the accuracy, security, utility, and timeliness of data are at the forefront of any discussions about data at the agency.
- Provide data support for agency staff in the form of professional development and clear documentation of data processes.

- Enable the use of data to improve educational outcomes and technology to transform education experiences.
- Identify, map, document, increase visibility of institutional data resources and systems, and create policy and agreements for sharing data resources.
- Develop policy and procedures to ensure consistency in how data is sourced and used across departmental units to ensure data quality and integrity.
- Develop, implement, maintain, and help enforce agency-wide data management policies, standards, guidelines, and operating procedures related to USBE data assets.
- Define and maintain clear roles and responsibilities that govern the management of institutional data.
- Identify and document the proper disclosure avoidance measures and aggregations of data.
- Communicate so that education stakeholders are aware of data governance standards and the available resources for the accurate reporting of agency data. This will foster knowledge exchange among USBE staff.
- Build and maintain an extensive central metadata repository for information about institutional data assets that can be systematically used with confidence in business applications across the agency.

IV. Utah General Retention Schedule

A. **Utah General Retention Schedule 1501.** Student enrollment and registration. (*Effective August 2013*)

Description

These records capture the necessary information to enroll a student in a particular school and document their attendance and course of study. The application process of those seeking to home school or participate in alternative programs is included in this schedule.

Retention and Disposition

Retain until superseded, and then destroy records. OR Retain for 4 years, and then destroy records.

V. Other Guidance

A. Standards for Internal Control in the Federal Government

(The Green Book) (*Best Practice*)

2.02 The entity determines an oversight structure to fulfill responsibilities set forth by applicable laws and regulations, relevant government guidance, and feedback from key stakeholders.

2.09 The oversight body oversees management's design, implementation, and operation of the entity's internal control system.

3.03 Management develops an organizational structure with an understanding of the overall responsibilities, and assigns these responsibilities to discrete units to enable the organization to operate in an efficient and effective manner, comply with applicable laws and regulations, and reliably report quality information.

4.02 Management establishes expectations of competence for key roles, and other roles at management's discretion, to help the entity achieve its objectives. Competence is the qualification to carry out assigned responsibilities.

10.01 Management should design control activities to achieve objectives and respond to risks.

11.03 Management designs the entity's information system to obtain and process information to meet each operational process's information requirements and to respond to the entity's objectives and risks. An information system is the people, processes, data, and technology that management organizes to obtain, communicate, or dispose of information. An information system represents the life cycle of information used for the entity's operational processes that enables the entity to obtain, store, and process quality information.

11.04 Management designs the entity's information system and the use of information technology by considering the defined information requirements for each of the entity's operational processes. Information technology enables information related to operational processes to become available to the entity on a timelier basis. Additionally, information technology may

enhance internal control over security and confidentiality of information by appropriately restricting access.

12.01 Management should implement control activities through policies.

13.02 Management designs a process that uses the entity's objectives and related risks to identify the information requirements needed to achieve the objectives and address the risks. Information requirements consider the expectations of both internal and external users. Management defines the identified information requirements at the relevant level and requisite specificity for appropriate personnel.

13.04 Management obtains relevant data from reliable internal and external sources in a timely manner based on the identified information requirements. Relevant data have a logical connection with, or bearing upon, the identified information requirements. Reliable internal and external sources provide data that are reasonably free from error and bias and faithfully represent what they purport to represent. Management evaluates both internal and external sources of data for reliability. Sources of data can be operational, financial, or compliance related. Management obtains data on a timely basis so that they can be used for effective monitoring.

13.05 Management processes the obtained data into quality information that supports the internal control system. This involves processing data into information and then evaluating the processed information so that it is quality information. Quality information meets the identified information requirements when relevant data from reliable sources are used. Quality information is appropriate, current, complete, accurate, accessible, and provided on a timely basis. Management considers these characteristics as well as the information processing objectives in evaluating processed information and makes revisions when necessary so that the information is quality information.

13.06 Management processes relevant data from reliable sources into quality information within the entity's information system. An information system is the people, processes, data, and technology that management organizes to obtain, communicate, or dispose of information.

14.04 Management receives quality information about the entity's operational processes that flows up the reporting lines from personnel to help management achieve the entity's objectives.

14.05 The oversight body receives quality information that flows up the reporting lines from management and personnel. Information relating to internal control communicated to the oversight body includes significant matters about adherence to, changes in, or issues arising from the internal control system. This upward communication is necessary for the effective oversight of internal control.

15.03 Management communicates quality information externally through reporting lines so that external parties can help the entity achieve its objectives and address related risks. Management includes in these communications information relating to the entity's events and activities that impact the internal control system.

15.04 Management receives information through reporting lines from external parties. Information communicated to management includes significant matters relating to risks, changes, or issues that impact the entity's internal control system. This communication is necessary for the effective operation of internal control. Management evaluates external information received against the characteristics of quality information and information processing objectives and takes any necessary actions so that the information is quality information.

15.05 The oversight body receives information through reporting lines from external parties. Information communicated to the oversight body includes significant matters relating to risks, changes, or issues that impact the entity's internal control system. This communication is necessary for the effective oversight of internal control.

B. **DAMA DMBOK** (Data Management Book of Knowledge) (*2nd Edition*) (*Best Practice*)

Chapter 1 Data Management Principles

- It takes Metadata to manage data: Managing any asset requires having data about that asset (number of employees, accounting codes, etc.) The data used to manage and use data is called *Metadata*. Because data cannot be held or touched, to understand what it is and how to use it requires

definition and knowledge in the form of Metadata. Metadata originates from a range of processes related to data creation, processing, and use, including architecture, stewardship, governance, Data Quality management, systems development, IT and business operations, and analytics.

Chapter 12 Metadata Management

- *Business metadata*, which are metadata generally created by a business unit, and includes nontechnical concepts and attributes (e.g., business definitions, business rules, provenance and lineage, constraints, security/privacy classifications, etc.).
- *Technical metadata*, which provides technical details of data, the systems that store data, and the processes that move it between systems (e.g., properties, permissions, keys and indexes, ETL details, etc.)
- *Operational metadata*, which describes details of the processing (e.g., audit and error logs, technical roles, and responsibilities)

VI. Elementary and Secondary Education Act (ESEA) *(Enacted December 10, 2015)*

A. ESEA Sec. 8101(25)(A)(i)

(A) IN GENERAL.—The term "four-year adjusted cohort graduation rate" means the fraction—

(i) the denominator of which consists of the number of students who form the original cohort of entering first-time students in grade 9 enrolled in the high school

(I) adding the students who joined that cohort, after the date of the determination of the original cohort; and

(II) subtracting only those students who left that cohort, after the date of the determination of the original cohort, as described in subparagraph (B); and

(ii) the numerator of which—

consists of the sum of—

(aa) the number of students in the cohort, as adjusted under clause (i), who earned a regular high school diploma before, during, or at the conclusion of—

(AA) the fourth year of high school; or

(BB) a summer session immediately following the fourth year of high school; and

(bb) all students with the most significant cognitive disabilities in the cohort, as adjusted under clause (i), assessed using the alternate assessment aligned to alternate academic achievement standards under section 1111(b)(2)(D) and awarded a State-defined alternate diploma

B. **ESEA Sec. 8101(25)(B)**
COHORT REMOVAL. —To remove a student from a cohort, a school or local educational agency shall require documentation, or obtain documentation from the State educational agency, to confirm that the student has transferred out, emigrated to another country, or transferred to a prison or juvenile facility, or is deceased.

C. **ESEA Sec. 8101(25)(C)(ii)(I)**
DOCUMENTATION REQUIRED.—The confirmation of a student's transfer to another school or educational program described in clause (i) requires documentation of such transfer from the receiving school or program in which the student enrolled.

D. **ESEA Sec. 8101(25)(i)(II)**
LACK OF CONFIRMATION. —A student who was enrolled in a high school, but for whom there is no confirmation of the student having transferred out, shall remain in the adjusted cohort.

For CH and TH:
ESSA High School Graduation Rate Non-Regulatory Guidance B-12
With respect to a home-schooled student, official written documentation may include, for example, a letter of withdrawal or other written confirmation from the parent or guardian; any documentation that meets the homeschool notification or compulsory attendance requirements in the State; or any other written documentation accepted in the State to verify a child is homeschooled. A conversation with a parent or neighbor of a student, for instance, would not be considered official written documentation of a transfer.

For TC:
ESSA High School Graduation Rate Non-Regulatory Guidance B-13

A school or LEA must have written confirmation that a student has emigrated to another country but need not obtain official written documentation. (ESEA section 8101(23)(B) and (25)(B); 34 C.F.R. § 200.34(b)(3)(ii)). For example, if a parent informs a school administrator that the family is leaving the country, the school administrator may document this conversation in writing and include it in the student's file. The regulations do not require written documentation to be "official" for a student who emigrates to another country because the Department recognizes that it may be difficult, if not impossible, to obtain transcripts or other official documentation from another country confirming that the student is enrolled in school.

For TO and TP:
ESSA High School Graduation Rate Non-Regulatory Guidance B-12
To confirm that a student transferred out, a school or LEA must have "official written documentation" that a student has transferred to another high school or to an educational program from which the student is expected to receive a regular high school diploma or State-defined alternate diploma that meets the requirements described in question A-16. (ESEA section 8101(23)(C)(ii) and (25)(C); 34 C.F.R. § 200.34(b)(3)(i)). In the case of a student who moves to another public school within the State, that transfer would most likely be officially documented and recorded in the State's data system; thus, a record from the State's data system would be considered official written documentation. Other examples of official written documentation include: a request for student records from a receiving public or private high school or an educational program (that offers a regular high school diploma or alternate diploma that meets the requirements described in question A-16); or a written record of a response from an official in the receiving school or program acknowledging the student's enrollment.

VII. ESSA High School Graduation Rate Non-Regulatory Guidance B-12 (As of January 2017)

With respect to a home-schooled student, official written documentation may include, for example, a letter of withdrawal or other written confirmation from the parent or guardian; any documentation that meets the homeschool notification or compulsory attendance requirements in the State; or any other written documentation accepted in the State to verify a

child is homeschooled. A conversation with a parent or neighbor of a student, for instance, would not be considered official written documentation of a transfer.

Appendix D – Data Tables

Sample Identification Tables
- Sample LEA Count by LEA Size
- Sample SIS Use by School Year
- SY2022 Sample Size by LEA
- SY2023 Sample Size by LEA
- SY2022 Sample Size by SIS
- SY2023 Sample Size by SIS

Data Not Provided Tables
Graduation Data
- SY2021 Cohort Graduation Data Not Provided by LEA
- SY2021 Cohort Graduation Data Not Provided by SIS

Student Data
SY2022
- SY2022 Data Not Provided by Data Field
- SY2022 Course Data Not Provided
- SY2022 Data Not Provided by LEA, by Count of Students
- SY2022 Data Not Provided by LEA, by Percentage
- SY2022 Data Not Provided by SIS, by Count of Students

SY2023
- SY2023 Data Not Provided by Data Field
- SY2023 Course Data Not Provided by LEA
- SY2023 Instructional Setting Data Not Provided by LEA
- SY2023 Data Not Provided by LEA, by Count of Students
- SY2023 Data Not Provided by LEA, by Percentage
- SY2023 Data Not Provided by SIS, by Count of Students

Data Reliability Tables
Graduation Data
- SY2021 Cohort Graduation Data Errors by LEA
- SY2021 Cohort Graduation Data Errors by SIS

Student Data
SY2022
- SY2022 Data Errors by Data Field
- SY2022 Data Errors by LEA by Count
- SY2022 Data Errors by LEA by Percentage
- SY2022 Data Errors by SIS
- SY2022 Course Data Errors
- SY2022 Course Data Errors by LEA by Count
- SY2022 Course Data Errors by LEA by Percentage
- SY2022 Course Data Errors by SIS by Count
- SY2022 Course Data Errors by SIS by Percentage

SY2023
  SY2023 Data Errors by Data Field
  SY2023 Data Errors by Count of LEA
  SY2023 Data Errors by LEA by Count
  SY2023 Data Errors by LEA by Percentage
  SY2023 Data Errors by SIS
  SY2023 Course Data Errors by LEA
  SY2023 Instructional Setting Errors by LEA

Data Reliability: SY2022 vs SY2023 Data Comparison
  Demographic Errors by LEA
  Demographic Errors by SIS
  Demographic Errors by Data Field

Data Validity Tables
Graduation Data
  SY2021 Cohort Documentation Validity
  SY2021 Cohort Exit Documentation Validity by LEA
  SY2021 Cohort Graduation Credit Validity by LEA

Student Data
  SY2023 Boundary Data Reviewed Onsite
  SY2023 Boundary Data Errors by Count of LEA
  SY2023 Boundary Data Errors by Data Field

Sample Identification Tables

Sample LEA Count by LEA Size

LEA Enrollment Count	Count of LEAs
> 5,000 Students	2
≤ 5,000 - ≥ 1,000 Students	4
<1,000 Students	9
Total	15

SY2022 Sample Size by LEA

LEA	Total Population
LEA 1	173
LEA 2	109
LEA 3	54
LEA 4	46
LEA 5	44
LEA 6	64
LEA 7	48
LEA 8	47
LEA 9	46
LEA 10	40
LEA 11	53
LEA 12	57
LEA 13	41
LEA 14	40
LEA 15	52
Total	914

SY2023 Sample Size by LEA

LEA	Total Population
LEA 1	41
LEA 2	44
LEA 3	47
LEA 4	40
LEA 5	40
LEA 6	43
LEA 7	40
LEA 8	48
LEA 9	44
LEA 10	42
LEA 11	40
LEA 12	40
LEA 13	44
LEA 14	45
LEA 15	40
Total	638

Sample SIS Use by School Year

SIS	SY2021 Count of Sample LEAs	SY2022 Count of Sample LEAs	SY2023 Count of Sample LEAs
SIS 1	7	6	6
SIS 2	7	6	6
SIS 3	0	1	1
SIS 4	0	1	1
SIS 5	1	1	1
Total	15	15	15

SY2022 Sample Size by SIS

SIS	Total Population
SIS 1	437
SIS 2	335
SIS 3	46
SIS 4	44
SIS 5	52
Total	914

SY2023 Sample Size by SIS

SIS	Total Population
SIS 1	263
SIS 2	255
SIS 3	40
SIS 4	40
SIS 5	40
Total	638

Data Not Provided Tables
Graduation Data

SY2021 Cohort Graduation Data
Not Provided by LEA

LEA	Count of Student Not Provided	Percent of Student Not Provided	Total Count of Students
LEA 1	209	7%	3046
LEA 2	10	5%	184
LEA 3	19	1%	1591
LEA 6	5	2%	288
LEA 8	3	4%	78
LEA 9	1	1%	100
LEA 10	1	3%	37
LEA 11	0	0%	96
LEA 12	5	4%	122
LEA 14	1	4%	26
LEA 15	1	1%	106
Total	255	4%	5674

Note: LEAs 4, 5, 7, and 13 did not provide any data, so counts could not be provided.

SY2021 Cohort Graduation Data
Not Provided by SIS

SIS	Count of Student Not Provided	Percent of Student Not Provided	Total Count of Students
SIS 1	237	5%	5199
SIS 2	17	5%	369
SIS 5	1	1%	106
Total	255	4%	5674

Note: LEAs 4, 5, 7, and 13 did not provide any data, thereby impacting SISs 2, 3, and 4.

Student Data
SY2022

SY2022 Data Not Provided by Data Field

Data Field	# Not Provided	Total Students Tested	% Not Provided
Location	57	873	7%
LEA Student ID	57	873	7%
Grade	57	873	7%
Date of Birth	57	873	7%
Sex	57	873	7%
Ethnicity	93	873	11%
American Indian / Alaskan Native	146	873	17%
Asian	146	873	17%
Black or African American	146	873	17%
Hawaiian / Pacific Islander	146	873	17%
White	146	873	17%
Entry Date	59	821	7%
Exit Date	355	873	41%
Limited English	207	873	24%
Economic Disadvantaged	207	873	24%
Resident Status	155	873	18%
Migrant	149	873	17%
Days Attended	248	873	28%
School Membership	207	873	24%
Enrollment Validation	244	873	28%
Cumulative GPA	168	391*	43%

Course Grade Data cannot be analyzed for students in grades K-8.

SY2022 Course Data Not Provided

Description	Course Data	Instructional Setting Data	Course Grade Data
Records Not Analyzed	5015	5210	7042*
Percent of Records Not Analyzed	54%	56%	76%

Course Grade Data cannot be analyzed for students in grades K-8.

SY2022 Data Not Provided by LEA, by Count of Students

LEA	Location	LEA Student ID	Grade	Date of Birth	Sex	Ethnicity	American Indian / Alaskan Native	Asian	Black or African American	Hawaiian / Pacific Islander	White	Entry Date	Exit Date	Limited English	Economic Disadvantaged	Resident Status	Migrant	Days Attended	School Membership	Enrollment Validation	Cumulative GPA
LEA 1	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	79
LEA 2	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	65	✓	✓	✓	✓	2	✓	✓	5
LEA 3	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
LEA 4	5	5	5	5	5	5	11	11	11	11	11	7	43	5	5	6	5	5	5	42	3
LEA 5	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	30	✓	✓	✓	✓	✓	✓	✓	✓
LEA 6	1	1	1	1	1	✓	13	13	13	13	13	1	1	2	2	1	1	1	1	1	✓
LEA 7	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	1
LEA 8	✓	✓	✓	✓	✓	✓	2	2	2	2	2	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
LEA 9	1	1	1	1	1	1	10	10	10	10	10	1	35	1	1	1	1	1	1	1	1
LEA 10	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	40	1	✓	12
LEA 11	✓	✓	✓	✓	✓	✓	53	53	53	53	53	✓	✓	✓	✓	✓	✓	✓	✓	53	14
LEA 12	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	57	57	57	57	✓	57	57	57	52
LEA 14	✓	✓	✓	✓	✓	37	3	3	3	3	3	✓	34	40	40	40	40	40	40	40	1
LEA 15	✓	✓	✓	✓	✓	✓	4	4	4	4	4	✓	40	52	52	✓	52	52	52	✓	✓
Total	57	57	57	57	57	93	146	146	146	146	146	59	355	207	207	155	149	248	207	244	168

Notes: LEA 13 did not provide any data, therefore counts could not be provided.

Checkmark (✓) indicates data was provided for all students

65

SY2022 Data Not Provided by LEA, by Percentage

LEA	Location	LEA Student ID	Grade	Date of Birth	Sex	Ethnicity	American Indian / Alaskan Native	Asian	Black or African American	Hawaiian / Pacific Islander	White	Entry Date	Exit Date	Limited English	Economic Disadvantaged	Resident Status	Migrant	Days Attended	School Membership	Enrollment Validation	Cumulative GPA
LEA 1	22%	22%	22%	22%	22%	22%	22%	22%	22%	22%	22%	22%	22%	22%	22%	22%	22%	22%	22%	22%	34%
LEA 2	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	59%	✓	✓	✓	✓	2%	✓	✓	5%
LEA 3	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
LEA 4	11%	11%	11%	11%	11%	11%	23%	23%	23%	23%	23%	15%	91%	11%	11%	13%	11%	11%	11%	89%	6%
LEA 5	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	65%	✓	✓	✓	✓	✓	✓	✓	✓
LEA 6	2%	2%	2%	2%	2%	✓	20%	20%	20%	20%	20%	2%	2%	3%	3%	2%	2%	2%	2%	2%	✓
LEA 7	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	2%
LEA 8	✓	✓	✓	✓	✓	✓	4%	4%	4%	4%	4%	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
LEA 9	2%	2%	2%	2%	2%	2%	22%	22%	22%	22%	22%	2%	76%	2%	2%	2%	2%	2%	2%	2%	2%
LEA 10	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	100%	3%	✓	30%
LEA 11	✓	✓	✓	✓	✓	✓	100%	100%	100%	100%	100%	✓	✓	✓	✓	✓	✓	✓	✓	100%	26%
LEA 12	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	100%	100%	100%	100%	✓	100%	100%	100%	91%
LEA 14	✓	✓	✓	✓	✓	93%	8%	8%	8%	8%	8%	✓	85%	100%	100%	100%	100%	100%	100%	100%	3%
LEA 15	✓	✓	✓	✓	✓	✓	8%	8%	8%	8%	8%	✓	75%	98%	98%	✓	98%	98%	98%	✓	✓

Notes: LEA 13 did not provide any data, therefore counts could not be provided.

Checkmark (✓) indicates data was provided for all students

SY2022 Data Not Provided by SIS, by Count of Students

SIS	Location	LEA Student ID	Grade	Date of Birth	Sex	Ethnicity	American Indian / Alaskan Native	Asian	Black or African American	Hawaiian / Pacific Islander	White	Entry Date	Exit Date	Limited English	Economic Disadvantaged	Resident Status	Migrant	Days Attended	School Membership	Enrollment Validation	Cumulative GPA
SIS 1	52	52	52	52	52	51	128	128	128	128	128	52	86	53	53	52	52	52	52	105	94
SIS 2	✓	✓	✓	✓	✓	37	3	3	3	3	3	✓	156	97	97	97	40	139	98	97	71
SIS 3	5	5	5	5	5	5	11	11	11	11	11	7	43	5	5	6	5	5	5	42	3
SIS 4	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	30	✓	✓	✓	✓	✓	✓	✓	✓
SIS 5	✓	✓	✓	✓	✓	✓	4	4	4	4	4	✓	40	52	52	✓	52	52	52	✓	✓
Total	57	57	57	57	57	93	146	146	146	146	146	59	355	207	207	155	149	248	207	244	168
SIS 1	12%	12%	12%	12%	12%	12%	29%	29%	29%	29%	29%	12%	20%	12%	12%	12%	12%	12%	12%	24%	22%
SIS 2	✓	✓	✓	✓	✓	13%	1%	1%	1%	1%	1%	✓	53%	33%	33%	33%	14%	47%	33%	33%	24%
SIS 3	11%	11%	11%	11%	11%	11%	24%	24%	24%	24%	24%	15%	93%	11%	11%	13%	11%	11%	11%	91%	7%
SIS 4	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	68%	✓	✓	✓	✓	✓	✓	✓	✓
SIS 5	✓	✓	✓	✓	✓	✓	8%	8%	8%	8%	8%	✓	77%	100%	100%	✓	100%	100%	100%	✓	✓

Notes: An LEA using SIS 2 did not provide any data, thereby impacting SIS 2.

Checkmark (✓) indicates data was provided for all students, except as noted for SIS 2.

SY2023

SY2023 Data Not Provided by Data Field

Data Field	# Not Provided	Total Students Tested	% Not Provided
Location	124	638	19%
LEA Student ID	125	638	20%
Grade	84	638	13%
Date of Birth	84	638	13%
Sex	124	638	19%
Ethnicity	84	638	13%
American Indian / Alaskan Native	132	638	21%
Asian	132	638	21%
Black or African American	132	638	21%
Hawaiian / Pacific Islander	132	638	21%
White	132	638	21%
Entry Date	84	638	13%
Exit Date	84	638	13%
Limited English	124	638	19%
Economic Disadvantaged	92	638	14%
Resident Status	84	638	13%
Migrant	84	638	13%
Days Attended	124	638	19%
School Membership	124	636	20%
Excused Absences	124	638	19%
Unexcused Absences	124	638	19%
Absences Due to Suspension	124	638	19%
Enrollment Validation	124	638	19%

SY2023 Course Data Not Provided by LEA

LEA	Records Not Provided	Total Record Count	Percentage
LEA 8			
LEA 10	These LEAs did not provide any course data, therefore counts could not be calculated.		100%
LEA 13			
LEA 14			
LEA 15			

SY2023 Instructional Setting Data Not Provided by LEA

LEA	Instructional Setting Not Provided	Total Records	Percentage
LEA 1	✓	459	0%
LEA 2	✓	313	0%
LEA 3	✓	598	0%
LEA 4	✓	1395	0%
LEA 5	129	387	33%
LEA 6	✓	229	0%
LEA 7	✓	230	0%
LEA 9	✓	1148	0%
LEA 11	117	117	100%
LEA 12	✓	1124	0%

Note: LEAs 8, 10, 13, 14, and 15 did not provide any data, therefore counts could not be provided.
Checkmark (✓) indicates data was provided for all students.

SY2023 Data Not Provided by LEA, by Count of Students

LEA	Location	LEA Student ID	Grade	Date of Birth	Sex	Ethnicity	American Indian / Alaskan Native	Asian	Black or African American	Hawaiian / Pacific Islander	White	Entry Date	Exit Date	Limited English	Economic Disadvantaged	Resident Status	Migrant	Days Attended	School Membership	Excused Absences	Unexcused Absences	Absences Due to Suspension	Enrollment Validation
LEA 1	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
LEA 2	✓	1	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
LEA 3	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
LEA 4	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
LEA 5	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
LEA 6	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
LEA 7	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
LEA 8	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
LEA 9	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
LEA 10	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
LEA 11	✓	✓	✓	✓	✓	✓	8	8	8	8	8	✓	✓	✓	8	✓	✓	✓	✓	✓	✓	✓	✓
LEA 12	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
LEA 13	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44	44
LEA 14	40	40	✓	✓	40	✓	40	40	40	40	40	✓	✓	40	✓	✓	✓	40	40	40	40	40	40
LEA 15	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40
Total	124	125	84	84	124	84	132	132	132	132	132	84	84	124	92	84	84	124	124	124	124	124	124

Notes: Checkmark (✓) indicates data was provided for all students.

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SY2023 Data Not Provided by LEA, by Percentage

LEA	Location	LEA Student ID	Grade	Date of Birth	Sex	Ethnicity	American Indian / Alaskan Native	Asian	Black or African American	Hawaiian / Pacific Islander	White	Entry Date	Exit Date	Limited English	Economic Disadvantaged	Resident Status	Migrant	Days Attended	School Membership	Excused Absences	Unexcused Absences	Absences Due to Suspension	Enrollment Validation
LEA 1	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
LEA 2	✓	2%	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
LEA 3	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
LEA 4	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
LEA 5	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
LEA 6	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
LEA 7	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
LEA 8	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
LEA 9	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
LEA 10	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
LEA 11	✓	✓	✓	✓	✓	✓	20%	20%	20%	20%	20%	✓	✓	✓	20%	✓	✓	✓	✓	✓	✓	✓	✓
LEA 12	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
LEA 13	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
LEA 14	89%	89%	✓	✓	89%	✓	89%	89%	89%	89%	89%	✓	✓	89%	✓	✓	✓	89%	89%	89%	89%	89%	89%
LEA 15	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%

Notes: Checkmark (✓) indicates data was provided for all students.

SY2023 Data Not Provided by SIS, by Count of Students

SIS	Location	LEA Student ID	Grade	Date of Birth	Sex	Ethnicity	American Indian / Alaskan Native	Asian	Black or African American	Hawaiian / Pacific Islander	White	Entry Date	Exit Date	Limited English	Economic Disadvantaged	Resident Status	Migrant	Days Attended	School Membership	Excused Absences	Unexcused Absences	Absences Due to Suspension	Enrollment Validation
SIS 1	✓	✓	✓	✓	✓	✓	8	8	8	8	8	✓	✓	✓	8	✓	✓	✓	✓	✓	✓	✓	✓
SIS 2	84	85	44	44	84	44	84	84	84	84	84	44	44	84	44	44	44	84	84	84	84	84	84
SIS 3	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
SIS 4	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
SIS 5	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40	40
Total	124	125	84	84	124	84	132	132	132	132	132	84	84	124	92	84	84	124	124	124	124	124	124
SIS 1	✓	✓	✓	✓	✓	✓	3%	3%	3%	3%	3%	✓	✓	✓	3%	✓	✓	✓	1%	✓	✓	✓	✓
SIS 2	33%	33%	17%	17%	33%	17%	33%	33%	33%	33%	33%	17%	17%	33%	17%	17%	17%	33%	33%	33%	33%	33%	33%
SIS 3	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
SIS 4	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
SIS 5	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%

Notes: Checkmark (✓) indicates data was provided for all students.

Data Reliability Tables
Graduation Data

SY2021 Cohort
Graduation Data Errors by LEA

LEA	Count of Unreliable Data	Percent of Unreliable Data	Total Count of Students
LEA 1	21	1%	2837
LEA 2	9	5%	174
LEA 3	8	1%	1572
LEA 6	6	2%	283
LEA 8	4	5%	75
LEA 9	2	2%	99
LEA 10	6	17%	36
LEA 11	11	11%	96
LEA 12	1	1%	117
LEA 14	6	24%	25
LEA 15	11	10%	105
Total	85	2%	5419

SY2021 Cohort
Graduation Data Errors by SIS

SIS	Count of Unreliable Data	Percent of Unreliable Data	Total Count of Students
SIS 1	52	1%	4962
SIS 2	22	6%	352
SIS 5	11	10%	105
Total	85	2%	5419

Student Data
SY2022

SY2022 Data Errors by Data Field

Data Field	# of Exceptions	Total Tested	Error Rate
Location	13	816	2%
LEA Student ID	0	816	0%
Grade	1	816	0%
Date of Birth	3	816	0%
Sex	2	816	0%
Ethnicity	6	780	1%
American Indian / Alaskan Native	2	727	0%
Asian	2	727	0%
Black or African American	6	727	1%
Hawaiian / Pacific Islander	4	727	1%
White	4	727	1%
Entry Date	3	762	0%
Exit Date	196	518	38%
Limited English	68	666	10%
Economic Disadvantaged	63	666	9%
Resident Status	5	718	1%
Migrant	65	724	9%
Days Attended	318	625	51%
School Membership	238	666	36%
Enrollment Validation	10	629	2%
Cumulative GPA	77	223*	35%
Total	1086	14692	7%

Course Grade Data cannot be analyzed for students in grades K-8.

SY2022 Data Errors by LEA by Count

LEA	Location	LEA Student ID	Grade	Date of Birth	Sex	Ethnicity	American Indian / Alaskan Native	Asian	Black or African American	Hawaiian / Pacific Islander	White	Entry Date	Exit Date	Limited English	Economic Disadvantaged	Resident Status	Migrant	Days Attended	School Membership	Enrollment Validation	Cumulative GPA
LEA 1	12	-	-	-	-	-	-	-	-	1	-	-	2	3	11	1	-	41	14	7	-
LEA 2	-	-	-	-	-	-	1	2	5	2	-	1	43	3	-	-	2	58	67	-	33
LEA 3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	7	-	-	-	1	3	4
LEA 4	-	-	1	1	1	-	-	-	-	-	1	1	2	-	1	1	-	40	7	-	7
LEA 5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	6	1	-	-
LEA 6	1	-	-	-	-	2	-	-	-	1	2	-	41	57	4	1	63	56	54	-	12
LEA 7	-	-	-	1	-	-	-	-	-	-	-	-	47	5	-	-	-	24	47	-	-
LEA 8	-	-	-	1	-	4	-	-	1	-	1	1	1	-	2	-	-	40	-	-	-
LEA 9	-	-	-	-	-	-	1	-	-	-	-	-	-	-	2	-	-	-	-	-	17
LEA 10	-	-	-	-	1	-	-	-	-	-	-	-	5	-	-	-	-	-	-	-	-
LEA 11	-	-	-	-	-	-	-	-	-	-	-	-	37	-	36	-	-	53	47	-	-
LEA 12	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
LEA 14	-	-	-	-	-	-	-	-	-	-	-	-	6	-	-	-	-	-	-	-	-
LEA 15	-	-	-	-	-	-	-	-	-	-	-	-	12	-	-	2	-	-	-	-	4
Total	13	0	1	3	2	6	2	2	6	4	4	3	178	68	63	3	65	318	238	10	73

Notes: Hyphen (-) indicates no errors were identified at the LEA when comparing SIS to UTREx data.

SY2022 Data Errors by LEA by Percentage

LEA	Location	LEA Student ID	Grade	Date of Birth	Sex	Ethnicity	American Indian / Alaskan Native	Asian	Black or African American	Hawaiian / Pacific Islander	White	Entry Date	Exit Date	Limited English	Economic Disadvantaged	Resident Status	Migrant	Days Attended	School Membership	Enrollment Validation	Cumulative GPA
LEA 1	92%	-	-	-	-	-	-	-	-	25%	-	-	1%	4%	17%	33%	-	13%	6%	70%	-
LEA 2	-	-	-	-	-	-	50%	100%	83%	50%	-	33%	24%	4%	-	-	3%	18%	28%	-	45%
LEA 3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	11%	-	-	-	-	30%	5%
LEA 4	-	-	100%	33%	50%	-	-	-	-	-	25%	33%	1%	-	2%	33%	-	13%	3%	-	10%
LEA 5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2%	-	-	-
LEA 6	8%	-	-	-	-	33%	-	-	-	25%	50%	-	23%	84%	6%	33%	97%	18%	23%	-	16%
LEA 7	-	-	-	33%	-	-	-	-	-	-	-	-	26%	7%	-	-	-	8%	20%	-	-
LEA 8	-	-	-	33%	-	67%	-	-	17%	-	25%	33%	1%	-	3%	-	-	13%	-	-	-
LEA 9	-	-	-	-	-	-	50%	-	-	-	-	-	-	-	3%	-	-	-	-	-	23%
LEA 10	-	-	-	-	50%	-	-	-	-	-	-	-	3%	-	-	-	-	-	-	-	-
LEA 11	-	-	-	-	-	-	-	-	-	-	-	-	21%	-	57%	-	-	17%	20%	-	-
LEA 12	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
LEA 14	-	-	-	-	-	-	-	-	-	-	-	-	3%	-	-	-	-	-	-	-	-
LEA 15	-	-	-	-	-	-	-	-	-	-	-	-	7%	-	-	67%	-	-	-	-	5%

Notes: Hyphen (-) indicates no errors were identified at the LEA when comparing SIS to UTREx data.

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SY2022 Data Errors by SIS

SIS	# of Errors	Error Rate	Total # Tested	Percent of Representation
SIS 1	645	59%	7347	50%
SIS 2	353	33%	5062	34%
SIS 3	63	6%	737	5%
SIS 4	7	1%	863	6%
SIS 5	18	2%	683	5%
Total	1086	100%	14692	7%

SY2022 Course Data Errors

	Course Data	Instructional Setting	Course Grade
Total Analyzed Records	4219	4024	2192
Percent of Records Analyzed	46%	44%	24%
Total Errors	195	1	99
Error Rate	5%	0%	5%

SY2022 Course Data Errors by LEA by Count

	LEA 1	LEA 2	LEA 3	LEA 4	LEA 5	LEA 6	LEA 7	LEA 9
# Course Data Errors	-	50	-	10	-	86	2	47
# Course Data Records Analyzed	997	665	738	84	212	450	262	811
# Instructional Setting Errors	-	-	-	-	-	1	-	-
# Instructional Settings Records Analyzed	997	615	738	74	212	364	260	764
# Course Grade Errors	-	6	3	7	-	10	2	71
# Grade Records Analyzed	455	348	462	19	151	226	138	393

Notes: Hyphen (-) indicates no errors were identified at the LEA.

SY2022 Course Data Errors by LEA by Percentage

	LEA 1	LEA 2	LEA 3	LEA 4	LEA 5	LEA 6	LEA 7	LEA 9
# Course Data Errors	-	26%	-	5%	-	44%	1%	24%
# Course Data Records Analyzed	24%	16%	17%	2%	5%	11%	6%	19%
# Instructional Setting Errors	-	-	-	-	-	100%	-	-
# Instructional Settings Records Analyzed	25%	15%	18%	2%	5%	9%	6%	19%
# Course Grade Errors	-	6%	3%	7%	-	10%	2%	72%
# Grade Records Analyzed	21%	16%	21%	1%	7%	10%	6%	18%

Notes: Hyphen (-) indicates no errors were identified at the LEA.

SY2022 Course Data Errors by SIS by Count

	SIS 1	SIS 2	SIS 3	SIS 4
# Course Data Errors	133	52	10	-
# Course Data Records Analyzed	2996	927	84	212
# Instructional Setting Errors	1	-	-	-
# Instructional Settings Records Analyzed	2863	875	74	212
# Course Grade Errors	84	8	7	-
# Grade Records Analyzed	1536	486	19	151

Notes: Hyphen (-) indicates no errors were identified for the SIS.

SY2022 Course Data Errors by SIS by Percentage

	SIS 1	SIS 2	SIS 3	SIS 4
# Course Data Errors	68%	27%	5%	-
# Course Data Records Analyzed	71%	22%	2%	5%
# Instructional Setting Errors	100%	-	-	-
# Instructional Settings Records Analyzed	71%	22%	2%	5%
# Course Grade Errors	85%	8%	7%	-
# Grade Records Analyzed	70%	22%	1%	7%

Notes: Hyphen (-) indicates no errors were identified for the SIS.

SY2023

SY2023 Data Errors by Data Field

Data Field	# of Exceptions	Total Tested	Error Rate
School ID	46	552	8%
LEA Student ID	43	552	8%
Grade	0	552	0%
Birth Date	11	552	2%
Sex	47	552	9%
Ethnicity	8	552	1%
American Indian / Alaska Native	55	552	10%
Asian	57	552	10%
Black or African American	58	552	11%
Hawaiian / Pacific Islander	55	552	10%
White	59	552	11%
Entry Date	33	552	6%
Exit Date	132	552	24%
Limited English	92	552	17%
Economic Disadvantaged	97	552	18%
Resident Status	1	552	0.2%
Migrant	0	552	0%
Days Attended	352	552	64%
Days in School Year	296	552	54%
School Membership	301	550	55%
Excused Absences	266	552	48%
Unexcused Absences	187	552	34%
Absences Due to Suspension	45	552	8%
Enrollment Validation	40	552	7%
Total	2281	13246	17%

SY2023 Data Errors by Count of LEA

LEA	School ID	LEA Student ID	Grade	Date of Birth	Sex	Ethnicity	American Indian / Alaskan Native	Asian	Black or African American	Hawaiian / Pacific Islander	White	Entry Date	Exit Date	Limited English	Economic Disadvantaged	Resident Status	Migrant	Days Attended	Days in School Year	School Membership	Excused Absences	Unexcused Absences	Absences Due to Suspension	Enrollment Validation	Total
LEA 1	x	-	-	-	-	-	-	-	-	-	-	x	-	x	-	-	-	x	x	x	x	x	-	-	8
LEA 2	-	x	-	-	x	-	-	-	x	-	-	x	x	x	-	x	-	x	x	x	x	x	-	-	12
LEA 3	-	-	-	-	-	-	-	-	-	-	-	-	-	x	x	-	-	-	-	-	-	-	-	-	2
LEA 4	-	-	-	-	x	-	-	-	-	-	x	-	-	x	-	-	-	x	x	-	x	x	-	-	7
LEA 5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	x	-	x	-	-	-	-	2
LEA 6	-	-	-	x	x	-	-	-	-	-	-	-	-	x	x	-	-	x	-	-	x	x	-	-	7
LEA 7	-	-	-	-	-	-	-	-	-	-	-	-	x	x	-	-	-	x	x	x	x	x	x	-	8
LEA 8	-	-	-	-	-	x	-	x	x	-	x	x	-	-	-	-	-	x	-	-	x	x	-	-	8
LEA 9	-	-	-	-	x	-	-	-	-	-	x	-	-	-	x	-	-	x	x	x	x	x	x	-	9
LEA 10	-	-	-	-	-	-	x	x	x	x	x	x	x	x	x	-	-	x	x	x	x	x	-	-	14
LEA 11	-	-	-	x	-	-	x	x	x	x	x	-	x	x	x	-	-	x	-	x	x	x	x	-	14
LEA 12	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	x	x	x	x	x	x	-	6
LEA 14	x	x	-	x	x	-	x	x	x	x	x	-	x	x	x	-	-	x	x	x	x	x	x	x	19
% of LEAs	15%	15%	0%	23%	38%	8%	23%	31%	38%	23%	46%	31%	38%	69%	46%	8%	0%	92%	62%	69%	85%	85%	38%	8%	
Total	2	2	0	3	5	1	3	4	5	3	6	4	5	9	6	1	0	12	8	9	11	11	5	1	116

Notes: Hyphen (-) indicates no errors were identified at the LEA when comparing SIS to UTREx data.

"x" indicates errors were identified.

SY2023 Data Errors by LEA by Count

LEA	School ID	LEA Student ID	Grade	Date of Birth	Sex	Ethnicity	American Indian / Alaskan Native	Asian	Black or African American	Hawaiian / Pacific Islander	White	Entry Date	Exit Date	Limited English	Economic Disadvantaged	Resident Status	Migrant	Days Attended	Days in School Year	School Membership	Excused Absences	Unexcused Absences	Absences Due to Suspension	Enrollment Validation	Total
LEA 1	1	-	-	-	-	-	-	-	-	-	-	1	-	1	-	-	-	21	41	8	19	8	-	-	100
LEA 2	-	3	-	-	1	-	-	-	2	-	-	1	44	1	-	1	-	44	44	44	11	2	-	-	198
LEA 3	-	-	-	-	-	-	-	-	-	-	-	-	-	1	1	-	-	-	-	-	-	-	-	-	2
LEA 4	-	-	-	-	1	-	-	-	-	-	1	-	-	2	-	-	-	25	40	-	17	15	-	-	101
LEA 5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	40	-	40	-	-	-	-	80
LEA 6	-	-	-	2	4	-	-	-	-	-	-	-	-	38	8	-	-	20	-	-	40	12	-	-	124
LEA 7	-	-	-	-	-	-	-	-	-	-	-	-	4	2	-	-	-	39	40	40	21	20	2	-	168
LEA 8	-	-	-	-	-	8	-	2	1	-	5	29		-	-	-	-	1	-	-	9	2	-	-	57
LEA 9	-	-	-	-	1	-	-	-	-	-	3	-	-	-	1	-	-	34	44	2	41	11	1	-	138
LEA 10	-	-	-	-	-	-	2	2	2	2	2	2	42	1	38	-	-	40	42	42	32	33	-	-	282
LEA 11	-	-	-	8	-	-	8	8	8	8	8	-	40	1	28	-	-	8	-	40	28	26	1	-	220
LEA 12	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	35	1	40	5	14	1	-	96
LEA 14	45	40	-	1	40	-	45	45	45	45	40	-	2	45	21	-	-	45	44	45	43	44	40	40	715
Total	46	43	0	11	47	8	55	57	58	55	59	33	132	92	97	1	0	352	296	301	266	187	45	40	2281

Notes: *Hyphen (-) indicates no errors were identified at the LEA when comparing SIS to UTREx data.*

SY2023 Data Errors by LEA by Percentage

LEA	School ID	LEA Student ID	Grade	Date of Birth	Sex	Ethnicity	American Indian / Alaskan Native	Asian	Black or African American	Hawaiian / Pacific Islander	White	Entry Date	Exit Date	Limited English	Economic Disadvantaged	Resident Status	Migrant	Days Attended	Days in School Year	School Membership	Excused Absences	Unexcused Absences	Absences Due to Suspension	Enrollment Validation
LEA 1	2%	-	-	-	-	-	-	-	-	-	-	2%	-	2%	-	-	-	51%	100%	20%	46%	20%	-	-
LEA 2	-	7%	-	-	2%	-	-	-	5%	-	-	2%	100%	2%	-	2%	-	100%	100%	100%	25%	5%	-	-
LEA 3	-	-	-	-	-	-	-	-	-	-	-	-	-	2%	2%	-	-	-	-	-	-	-	-	-
LEA 4	-	-	-	-	3%	-	-	-	-	-	3%	-	-	5%	-	-	-	63%	100%	-	43%	38%	-	-
LEA 5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	100%	-	100%	-	-	-	-
LEA 6	-	-	-	5%	9%	-	-	-	-	-	-	-	-	88%	19%	-	-	47%	-	-	93%	28%	-	-
LEA 7	-	-	-	-	-	-	-	-	-	-	-	-	10%	5%	-	-	-	98%	100%	100%	53%	50%	5%	-
LEA 8	-	-	-	-	-	17%	-	4%	2%	-	10%	60%	-	-	-	-	-	2%	-	-	19%	4%	-	-
LEA 9	-	-	-	-	2%	-	-	-	-	-	7%	-	-	-	2%	-	-	77%	100%	5%	93%	25%	2%	-
LEA 10	-	-	-	-	-	-	5%	5%	5%	5%	5%	5%	100%	2%	90%	-	-	95%	100%	100%	76%	79%	-	-
LEA 11	-	-	-	20%	-	-	20%	20%	20%	20%	20%	-	100%	3%	70%	-	-	20%	-	100%	70%	65%	3%	-
LEA 12	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	88%	3%	100%	13%	35%	3%	-
LEA 14	100%	89%	-	2%	89%	-	100%	100%	100%	100%	89%	-	4%	100%	47%	-	-	100%	98%	100%	96%	98%	89%	89%

Notes: Hyphen (-) indicates no errors were identified at the LEA when comparing SIS to UTREx data.

SY2023 Data Errors by SIS

SIS	# of Errors	Error Rate	Total # Tested	Percent of Representation
SIS 1	641	28%	6262	47%
SIS 2	1459	64%	5064	38%
SIS 3	101	4%	960	7%
SIS 4	80	4%	960	7%
Total	2281	100%	13246	17%

SY2023 Course Data Errors by LEA

LEA	Records Not Found	Total Record Count	Percentage
LEA 1	0	307	0%
LEA 2	124	145	86%
LEA 3	0	399	0%
LEA 4	25	495	5%
LEA 5	4	191	2%
LEA 6	80	286	28%
LEA 7	22	186	12%
LEA 9	116	523	22%
LEA 11	456	523	87%
LEA 12	26	368	7%
Total	853	3423	25%

SY2023 Instructional Setting Errors by LEA

LEA	Records Not Found	Total Record Count	Percentage
LEA 1	-	312	0%
LEA 2	-	-	NA
LEA 3	-	400	0%
LEA 4	-	470	0%
LEA 5	-	187	0%
LEA 6	1	206	0%
LEA 7	-	164	0%
LEA 9	-	407	0%
LEA 11	15	67	22%
LEA 12	5	350	1%
Total	21	2563	1%

Notes: Hyphen (-) indicates no errors were identified at the LEA when comparing SIS to UTREx data.

Data Reliability: SY2022 vs SY2023 Data Comparisons

Demographic Errors by LEA

LEA	Count of Data Fields with Errors		Percent of Data Fields with Errors	
	SY2022	SY2023	SY2022	SY2023
LEA 1	9	8	43%	33%
LEA 2	11	12	52%	50%
LEA 3	4	2	19%	8%
LEA 4	11	7	52%	29%
LEA 5	2	2	10%	8%
LEA 6	12	7	57%	29%
LEA 7	5	8	24%	33%
LEA 8	8	8	38%	33%
LEA 9	3	9	14%	38%
LEA 10	2	14	10%	58%
LEA 11	4	14	19%	58%
LEA 12	0	6	0%	25%
LEA 13	NA	NA	NA	NA
LEA 14	1	19	5%	79%
LEA 15	3	NA	14%	NA

Notes: NA indicates no useable data was provided for analysis for the designated school year.

Demographic Errors by SIS

SIS	Error Rate		Percent of Representation	
	SY2022	SY2023	SY2022	SY2023
SIS 1	59%	28%	50%	47%
SIS 2	33%	64%	34%	38%
SIS 3	6%	4%	5%	7%
SIS 4	1%	4%	6%	7%
SIS 5	2%	NA	5%	NA

Notes: NA indicates no useable data was provided for analysis for the designated school year.

Demographic Errors by Data Field

Data Field	SY2022 Error Rate	SY2023 Error Rate	Year with Greater Error Rate
Location	2%	8%	SFY2023
LEA Student ID	0%	8%	SFY2023
Grade	0%	0%	SFY2022
Date of Birth	0%	2%	SFY2023
Sex	0%	9%	SFY2023
Ethnicity	1%	1%	SFY2023
American Indian / Alaskan Native	0%	10%	SFY2023
Asian	0%	10%	SFY2023
Black or African American	1%	11%	SFY2023
Hawaiian / Pacific Islander	1%	10%	SFY2023
White	1%	11%	SFY2023
Entry Date	0%	6%	SFY2023
Exit Date	38%	24%	SFY2022
Limited English	10%	17%	SFY2023
Economic Disadvantaged	9%	18%	SFY2023
Resident Status	1%	0%	SFY2022
Migrant	9%	0%	SFY2022
Days Attended	51%	64%	SFY2023
School Membership	36%	55%	SFY2023
Enrollment Validation	2%	7%	SFY2023

Year	Count	Percent
SFY2022	4	20%
SFY2023	16	80%
Total Data Fields	20	100%

Data Validity Tables
Graduation Data

SY2021 Cohort Documentation Validity

ErrorDescription	Count	Percent of Sample
Inadequate Documentation	30	21%
Miscoded	16	11%
Homeschool Lacking State Requirements	6	4%
Total Errors	52	36%
Total Sample	143	

SY2021 Cohort Exit Documentation Validity by LEA

LEA	Inadequate documentation	Miscoded	Homeschool Lacking State Requirements	Total Tested
LEA 1	-	-	-	11
LEA 2	2	4	-	15
LEA 3	2	1	-	15
LEA 4	1	2	-	4
LEA 5	1	1	1	3
LEA 6	-	-	-	15
LEA 7	5	-	-	13
LEA 8	-	1	-	5
LEA 9	1	-	1	9
LEA 10	-	-	-	2
LEA 11	8	-	-	10
LEA 12	1	-	2	15
LEA 13	4	-	-	11
LEA 14	4	5	-	10
LEA 15	1	2	2	5
Total	30	16	6	143
LEAs with Errors	11	7	4	
LEAs Tested	15	15	15	
% of LEAs with Errors	73%	47%	27%	

Notes: Hypen (-) indicates no errors were identified at the LEA.

SY2021 Cohort Graduation Credit Validity by LEA

LEA	Missing Math Opt Out Request	Partial Credits	Incorrectly Applied Credits	No Credit Earned	Health I instead of Health II	Missing LEA-specific	Inadequate Science Foundations Credit	Missing Basic Civics Exam	Total Tested
LEA 1	6	1	-	-	-	-	-	-	22
LEA 2	1	-	1	-	-	3	-	-	25
LEA 3	1	10	1	1	-	1	-	2	25
LEA 4	7	2	1	-	-	1	-	3	19
LEA 5	4	-	-	-	4	-	2	-	15
LEA 6	1	1	-	-	-	2	1	-	17
LEA 7	3	3	-	-	3	-	-	3	21
LEA 8	-	-	-	-	-	-	-	-	15
LEA 9	-	-	-	-	-	3	-	-	15
LEA 10	3	1	-	2	-	5	-	-	15
LEA 11	-	2	6	-	-	1	-	-	25
LEA 12	8	3	-	-	-	11	-	3	20
LEA 13	-	1	-	-	-	1	-	-	15
LEA 14	8	-	-	-	3	5	-	2	14
LEA 15	2	2	4	-	-	-	1	-	17
Total Errors	44	26	13	3	10	33	4	13	280
LEAs with Errors	11	10	5	2	3	10	3	5	
LEAs Tested	15	15	15	15	15	15	15	15	
% of LEAs with Errors	73%	67%	33%	13%	20%	67%	20%	33%	

Notes: Hypen (-) indicates no errors were identified at the LEA.

Student Data

SY2023 Boundary Data Reviewed Onsite

Onsite Test	Errors	Total Tested	% Errors	LEAs with Errors	LEAs Tested	% of LEAs with Errors
Birth Certificate Birth Date	22	638	3%	7	15	47%
SIS Birth Date	1	638	0%	1	15	7%
Sex on Enrollment Form	22	638	3%	5	15	33%
Race/Ethnicity on Enrollment Form	15	638	2%	4	15	27%
Student present in classroom	111	638	17%	-	15	0%
Absence verified	3	111	3%	2	15	13%
LEA Control over enrollment forms	456	638	71%	7	15	47%
Enrollment form in CUM file	54	638	8%	4	15	27%
CUM file contains Birth Certificate	22	638	3%	7	15	47%
Total	706	5215	14%	37	135	27%

Notes: Hyphen (-) indicates no errors were identified.

SY2023 Boundary Data Errors by Count of LEA

LEA	SIS Birth Date Match	SIS Sex Match	SIS Ethnicity Match	SIS American Indian / Alaskan Native Match	SIS Asian Match	SIS Black or African American Match	SIS Hawaiian / Pacific Islander Match	SIS White Match	UTREx Birth Date Match	UTREx Sex Match	UTREx Ethnicity Match	UTREx American Indian / Alaskan Native Match	UTREx Asian Match	UTREx Black or African American Match	UTREx Hawaiian / Pacific Islander Match	UTREx White Match
LEA 1	-	-	x	-	-	x	x	x	-	-	x	-	-	x	x	x
LEA 2	-	x	-	-	-	-	-	-	-	-	-	-	-	x	-	-
LEA 3	-	-	-	-	-	-	-	x	-	-	-	-	-	-	-	x
LEA 4	-	x	x	-	-	-	-	x	-	-	x	-	-	-	-	-
LEA 5	-	-	x	-	x	-	-	x	-	-	x	-	x	-	-	x
LEA 6	x	x	x	-	-	-	-	-	x	-	x	-	-	-	-	-
LEA 7	x	-	-	-	-	-	-	-	x	-	-	-	-	-	-	-
LEA 8	-	-	x	-	x	x	-	x	-	-	x	-	-	-	-	x
LEA 9	-	-	x	-	-	-	-	-	-	x	x	-	-	-	-	x
LEA 10	x	x	-	x	x	x	x	x	x	x	-	-	-	-	x	-
LEA 11	x	-	-	x	x	x	x	x	-	-	-	x	-	x	-	-
LEA 12	-	x	x	-	-	-	-	-	-	x	x	-	-	-	-	-
LEA 13	NA	NA	NA	NA	NA	NA	NA	NA	x	-	x	x	x	x	-	x
LEA 14	x	x	x	x	x	x	x	x	-	-	x	x	-	-	-	x
LEA 15	NA	NA	NA	NA	NA	NA	NA	NA	x	x	x	x	-	-	-	x
% of LEAs with Errors	33%	40%	53%	20%	33%	33%	27%	53%	33%	27%	67%	27%	13%	27%	13%	53%
LEAs with Errors	5	6	8	3	5	5	4	8	5	4	10	4	2	4	2	8

Notes: NA indicates the LEA did not submit usable data from the SIS that could be compared to the boundary data obtained during onsite visits.
   Hyphen (-) indicates no errors were identified at the LEA when comparing the boundary data to SIS/UTREx data.
   "x" indicates errors were identified.

SY2023 Boundary Data Errors by Data Field

SY2023 Boundary Data Fields	# of Errors	Total # Tested	Error Rate
SIS Birth Date Match	14	531	3%
UTREx Birth Date Match	5	611	1%
SIS Sex Match	43	531	8%
UTREx Sex Match	5	611	1%
SIS Ethnicity Match	18	539	3%
UTREx Ethnicity Match	18	619	3%
SIS American Indian / Alaskan Native Match	54	539	10%
UTREx American Indian / Alaskan Native Match	5	619	1%
SIS Asian Match	56	539	10%
UTREx Asian Match	2	619	0%
SIS Black or African American Match	55	539	10%
UTREx Black or African American Match	5	619	1%
SIS Hawaiian / Pacific Islander Match	54	539	10%
UTREx Hawaiian / Pacific Islander Match	2	619	0%
SIS White Match	56	539	10%
UTREx White Match	18	619	3%
Total	410	9232	4%
LEAs Tested	15	15	15
% of LEAs with Errors	73%	47%	27%