SAVANNAH-CHATHAM COUNTY BOARD OF EDUCATION
Internal Audit Department

TO: Board of Education

THROUGH: Thomas B. Lockamy, Jr., Ed.D. Superintendent
Dr. Ann Levett, Deputy Superintendent, Chief Academic Officer, Academic Affairs
David Feliciano, Chief Data & Accountability Officer, Data and Accountability
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FROM: Marshall Withers, Senior Director, Internal Audit

DATE: December 8, 2016

SUBJECT: Report on Audit of Overage Students (#16-09)

We have completed our Audit of Overage Students. Our audit report is presented in the sections listed below:

I. SUMMARY OF AUDIT CONDITIONS
II. AUDIT OBJECTIVES
III. AUDIT SCOPE
IV. BACKGROUND
V. AUDIT CONDITIONS
VI. BEST PRACTICES

Management's response to our report is attached in its entirety. In addition, the specific action that management has agreed to take in response to each recommendation is

included in the Management Action Plan, along with who is responsible for the action and when it will be completed.

I. SUMMARY OF AUDIT CONDITIONS

Our Audit of Overage Students has identified five conditions where improvements are needed in the District's management of overage students both in terms of prevention and recovery. These conditions are stated below with identified pages where details of the condition are presented.

Condition A. (Pages 16-26) The District does not sufficiently prioritize preventing retention and supporting alternatives to retention in order to reduce the number of overage students. *(DAS-REMI Goal I)*

Condition B. (Pages 26-28) RtI is underutilized in supporting students who are struggling academically. *(DAS-REMI Goal I)*

Condition C: (Pages 28-36) The number and type of opportunities for grade/credit recovery for overage students vary by grade level and school site, which means access is limited for some overage students. Additionally, recovery opportunities are not well publicized to eligible students. *(DAS-REMI Goal I)*

Condition D. (Pages 36-41) Transition to high school is challenging for many students. There are not enough proactive and preventative strategies to make the transition to 9th grade successful for more students. *(DAS-REMI Goal I)*

Condition E. (Pages 41-45) The majority of overage students face many nonacademic challenges that present barriers to learning. The District could address these challenges more effectively. *(DAS-REMI Goals I and IV)*

II. AUDIT OBJECTIVES

Our audit was designed to meet specific objectives. Within those objectives, we focused on areas where we identified improvements needed in preventing students from becoming overage and helping overage students with credit/grade recovery. The objectives of our audit were as follows:

1. Determine if the District is meeting Federal, State, and local laws and policies concerning overage students. Review District administrative regulations and guidance related to educating and supporting overage students to ensure they provide adequate and appropriate direction to achieve the District goals.

2. Identify and review the additional financial cost to the District for educating overage students as compared to students who graduate school on time. This includes identifying funding sources for educating overage students in alternative

learning environments to ensure funds are being spent according to District guidelines and policies.

3. Identify current District strategies, practices, and services to support overage students in both traditional and alternative schools. Determine the extent to which they are being implemented effectively.

4. Determine if any system exists to identify students at risk of becoming overage so that targeted interventions can be implemented proactively.

5. Identify "best practice" strategies in serving overage students and determine if these practices can be implemented at school sites that serve a large number of overage students.

III. AUDIT SCOPE

The Audit of Overage Students was conducted from March to September 2016. The audit was scheduled as the result of Internal Audit's risk assessment process in 2015. Overage students were a reoccurring area of concern during other District-wide academic audits, including Student Discipline and Student Data. Interviews with principals, teachers, and counselors revealed concerns related to overage students and behavior, RtI, and inconsistency in providing programs to address the needs of overage students. Additionally, Internal Audit has never conducted an audit of overage students.

The Audit of Overage Students was a District-wide performance audit, not an audit of individual schools. Our audit was performed to determine if the District is both supporting overage students in credit/grade recovery and preventing students struggling academically from becoming overage by being retained. We used the laws and regulations of the Official Code of Georgia (O.C.G.A), the Georgia State Department of Education (GaDOE), the Georgia State Board of Education (SBOE), and Savannah-Chatham County Board of Education policies and administrative regulations as guidance.

Internal Audit reviewed research related to overage students, retention, high school dropout, non-academic barriers to learning as well as best practices in preventing retention and credit recovery. Our literature review included peer-reviewed journal articles, professional organization reports, policy briefs, dissertations, school-district reports, and magazine and newspaper articles. A list of references is included at the end of this report.

Internal Audit also reviewed budget and expenditures for FY15 and FY16 for any funds related to overage students and found there were no funds identified specifically for overage students.

We interviewed District management in the divisions of Academic Affairs, Finance, and Data and Accountability. We interviewed sixteen principals (six elementary, three K-8,[1] four middle, and four high schools) at the schools that have had the highest percentage of overage students in at least two of the school years between SY 2012-13 and SY 14-15. We interviewed center leaders at Building Bridges Academy High School and Fresh Start Program, a selection of academic specialists, Gateway to Success teachers and support staff, the skills lab teacher at Windsor Forest High School, and the teacher of the transition classroom at Port Wentworth Elementary. We met with community organization leaders, including the Executive Directors of Communities in Schools and Savannah Graduates. We also interviewed District management at Gwinnett County Public Schools regarding their early warning detection system.

We conducted an anonymous survey via SelectSurvey.net of the teachers teaching at the schools where the percentage of overage students has been highest in at least two of the school years between SY 2012-13 and SY 14-15.[1] We also surveyed all District school counselors and social workers. Many of the questions overlapped between the three surveys, but some questions were specific to the professional role of the position within the school. Surveys were sent via email using staff groups on Outlook in April 2016, and respondents were given at least a month to respond. Survey completion rates were adequate for each population (social workers 67%, counselors 46%, and teachers 24.7%). Teachers from all levels responded to the survey: 37% from elementary, 30% from middle, 26% from high, and 7% from K-8 schools. Of the teacher respondents, 60% of them teach in an Impact school. As for experience, 28% of them have between one and six years of teaching experience while 58% of them have ten or more years of teaching experience. Seventy-five percent of the teachers who answered the survey said they have overage (two or more years) students in their classes.

We also anonymously surveyed all high school principals regarding their opinions of 9th grade academies. Seven of the eleven principals completed the survey.

With support and guidance from analysts in Accountability, Assessment, and Reporting and Student Information Systems, we conducted several analyses of student data. Data sources included Student Records and PowerSchool. The literature review, interviews, surveys, and data results helped us identify the District's current challenges to effectively serving overage students, as well as supported our recommendations for

[1] The only exception to the selection was Rice Creek. This school was included because Port Wentworth Elementary was changed into a K-2 school for SY 2015-16, and students grades 3-5 were transferred to Rice Creek.

improving credit recovery opportunities for overage students and preventing retention for students struggling academically.

We designed our audit with specific strategies to gather the necessary information to identify areas where improvement is needed. We identified conditions and made recommendations to District management for consideration in making these necessary improvements.

Our recommendations are made to District management in order to improve services to overage students and support students at risk of becoming overage. We based our opinions on reviewed research, interviews, surveys, and data analyses conducted during the course of our audit work.

The Board's District Accountability System (DAS) lists five goals:

I. To ensure all students are college and career ready.
II. To provide a safe, healthy, and clean environment that is conducive to teaching and learning.
III. To maximize and promote opportunities to build strong relationships with stakeholders that contribute to the advancement of student success and community pride.
IV. To build capacity to achieve a premier workforce that fosters a professional and supportive teaching and learning environment.
V. To maximize resource stewardship and fiscal responsibility by ensuring District resources are used efficiently, effectively, economically, and equitably.

At the end of each Condition statement, we have identified the DAS goals that are most likely affected by the findings identified in the Condition. Internal Audit has made recommendations to help support the achievement of these goals.

Internal Audit conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that the audit be planned and performed to obtain sufficient, appropriate evidence to provide a reasonable basis for the findings and conclusions based on the audit objectives. Internal Audit believes that the evidence obtained provides a reasonable basis for the findings and conclusions based on the audit objectives.

IV. BACKGROUND

District Profile of Overage Student Population

The District considers a student overage if he or she has been retained two or more times.[2] During SY 2012-13 through 2014-15, approximately five percent of the student population is overage, equating to more than 2,000 students (Table 1). The number of overage students has remained steady during this time period. The grade with the highest number of overage students is the 9th grade, which will be discussed in more detail in another section of this report. Though not the focus of this Audit, during the same period, 23% of students (more than 9,000 students) have been retained at least one time. This is worth noting since these students are more at risk of becoming overage than a student who has never been retained. As the State does not collect data specifically on overage students, it is difficult to compare the number of overage students in our District to other comparable districts.

Table 1. SCCPSS Overage students by grade level, SY 2012-15

	Overage students by grade level					
	SY 2012-13		SY 2013-14		SY 2014-15	
	#	%	#	%	#	%
Grade K	2	0%	2	0%	4	0%
Grade 1	25	1%	19	0%	24	1%
Grade 2	80	2%	73	2%	64	2%
Grade 3	52	2%	100	3%	96	3%
Grade 4	103	3%	79	2%	130	4%
Grade 5	137	4%	101	3%	115	4%
Grade 6	117	4%	147	5%	138	4%
Grade 7	204	7%	154	5%	157	5%
Grade 8	231	8%	203	7%	183	6%
Grade 9	653	18%	655	18%	705	19%
Grade 10	351	15%	341	14%	359	15%
Grade 11	133	8%	132	8%	88	5%
Grade 12	156	8%	111	6%	135	7%
Total	2,244	6%	2,117	5%	2,198	5%

Table 2 presents a general profile of the demographics of overage students. Overage students are disproportionately black, male, economically disadvantaged, and/or diagnosed with a disability. In SY 2014-15, 79.9% of overage students were economically disadvantaged, 64.3% were male, and 75.4% of overage students were black. In the same school year, 16% of all students with disabilities were overage. There is no way to ascertain if overage students with disabilities were retained before or

[2] To retrieve data on overage students, Data and Accountability selected students who were considered two or more years behind peer group, based on their age by September 1st of the year for which data was retrieved.

after the identification of the disability. However, students with disabilities are retained at higher rates than students without disabilities (Table 3). This table excludes students who take the Georgia Alternative Assessment. SCCPSS data is reflective of the literature, which shows the highest retention rates are among poor and minority children, with males twice as likely to be retained as females (Blazer, 2008).

Table 2. SCCPSS Demographics of overage students, SY 2012-15

	Demographics of overage students					
	SY 2012-13		SY 2013-14		SY 2014-15	
	#	%	#	%	#	%
Asian	23	3%	30	3%	20	2%
Black	1,711	7%	1,552	7%	1,658	7%
Hispanic	47	3%	74	3%	103	4%
Am. Indian	2	2%	3	3%	4	4%
White	377	3%	380	3%	332	3%
Multiracial	84	4%	78	4%	81	4%
Female	809	4%	771	4%	784	4%
Male	1,435	7%	1,346	7%	1,414	7%
Economically Disadvantaged	1,763	7%	1,675	6%	1,754	7%
English Language Learners	39	5%	52	6%	52	5%
Students with Disabilities	731	17%	691	15%	757	16%
Total	2,244	6%	2,117	5%	2,198	5%

Table 3. Comparison of Retention Rates for Students without Disabilities (Non-SWD) and Students with Disabilities (SWD), SY 2015-16

Grade	SY 2015-16	
	Non-SWD	SWD
Grade K	5%	14%
Grade 1	5%	6%
Grade 2	5%	8%
Grade 3	4%	6%
Grade 4	3%	7%
Grade 5	2%	5%
Grade 6	3%	3%
Grade 7	4%	8%
Grade 8	1%	2%
Grade 9	24%	42%
Grade 10	18%	32%
Grade 11	15%	22%
Grade 12	3%	17%

Table 4 indicates the probability of students in our District becoming overage. A minority, economically disadvantaged male student has an 8.6% chance of becoming overage in his school career. This same group of students has a 22% probability of being overage in high school, nearly double that of the general student population (11.6%). We must underscore that overage students should not be treated like a homogenous population, and their needs cannot be addressed with a one-size-fits-all solution. There may be commonalities for students who become overage, but each student's circumstances that led to multiple grade retentions are unique.

Table 4. Probability of SCCPSS student becoming overage

	Probability of OverAge 2 or More Years			
	All Grade Levels	Grades K-5	Grades 6 - 8	Grades 9 - 12
All Students	4.9%	2.1%	5.0%	11.6%
Minority	6.2%	2.3%	6.1%	15.0%
Male	6.6%	2.5%	6.7%	16.7%
ED	6.4%	2.4%	6.6%	16.6%
Minority + ED	6.8%	2.6%	6.9%	17.2%
Minority + Male	7.8%	3.0%	7.9%	19.3%
Male + ED	8.1%	3.1%	8.5%	21.1%
Minority + Male + ED	8.6%	3.3%	9.0%	22.0%

We also reviewed the number of overage students per school during SY 2012-13 through 2014-15. The schools were divided by type (elementary, K-8, middle, and high schools). The schools in this section were selected based on their occurrence in upper quartile per school type for highest percentage of overage students in at least two of the three school years between 2012-13 and 2014-15 (Tables 5-8). These tables demonstrate how the number of overage students increases as students progress through their school careers. For example, while no elementary school has an average higher than 5% overage students for the past three school years, at the middle school level this average increases to 15%, and is highest at the high school level at 22%. At the three District high schools with the highest percentage of overage students, one in five students is overage. Although not included in the tables, it should be noted that as of the most recent enrollment at the end of SY 2015-16, the alternative educational centers, Building Bridges Academy High School, Building Bridges Academy Middle School , and Fresh Start Program had 24%, 42% and 28% overage students, respectively.

Table 5. Overage students, per grade, per school (elementary), SY 2012-15

School	Year	Overage Students in Grade K		Overage Students in Grade 1		Overage Students in Grade 2		Overage Students in Grade 3		Overage Students in Grade 4		Overage Students in Grade 5		Total Overage Students	
		#	%	#	%	#	%	#	%	#	%	#	%	#	%
Gadsden	2012-13	0	0%	2	1%	6	5%	2	2%	13	10%	6	6%	29	4%
	2013-14	0	0%	1	1%	5	4%	6	5%	4	4%	11	10%	27	3%
	2014-15	0	0%	3	2%	3	2%	6	5%	4	4%	7	7%	23	3%
Garden City	2012-13	0	0%	3	2%	1	1%	2	2%	6	5%	8	8%	20	2%
	2013-14	0	0%	3	2%	10	7%	6	4%	4	4%	7	7%	30	4%
	2014-15	0	0%	0	0%	5	3%	7	6%	8	7%	6	6%	26	3%
Haven	2012-13	1	1%	0	0%	3	4%	3	4%	6	7%	6	8%	19	4%
	2013-14	0	0%	0	0%	4	5%	9	12%	5	7%	5	9%	23	5%
	2014-15	0	0%	1	1%	6	6%	6	9%	12	14%	11	15%	36	7%
Hodge	2012-13	0	0%	3	3%	12	12%	5	6%	7	10%	12	16%	39	7%
	2013-14	0	0%	0	0%	2	2%	11	14%	3	4%	6	8%	22	4%
	2014-15	0	0%	1	1%	1	1%	4	4%	8	11%	6	7%	20	4%
Low	2012-13	0	0%	1	1%	4	4%	2	3%	7	7%	4	5%	18	4%
	2013-14	2	2%	3	3%	3	3%	7	8%	8	9%	4	4%	27	5%
	2014-15	0	0%	3	3%	6	6%	6	6%	8	9%	9	12%	32	6%
Pt. Wentworth	2012-13	0	0%	5	5%	6	6%	1	1%	5	6%	6	8%	23	4%
	2013-14	0	0%	1	1%	6	6%	7	7%	3	4%	6	7%	23	4%
	2014-15	0	0%	3	2%	5	4%	8	7%	8	7%	6	6%	30	4%

Schools selected based on their occurrence in upper quartile per school type for highest percentage of overage students in at least two of the three school years between 2012-13 and 2014-15

Table 6. Overage students, per grade, per school (K-8), SY 2012-15

School	Year	Overage Students in Grade K		Overage Students in Grade 1		Overage Students in Grade 2		Overage Students in Grade 3		Overage Students in Grade 4		Overage Students in Grade 5		Overage Students in Grade 6		Overage Students in Grade 7		Overage Students in Grade 8		Total Overage Students	
		#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
East Broad	2012-13	0	0%	0	0%	3	3%	3	4%	6	7%	11	15%	4	7%	7	11%	1	2%	35	5%
	2013-14	0	0%	3	3%	2	2%	3	4%	5	6%	3	4%	6	9%	5	8%	4	7%	31	4%
	2014-15	0	0%	0	0%	7	7%	5	6%	8	10%	7	10%	9	12%	4	8%	6	11%	46	6%
Isle of Hope	2012-13	0	0%	1	1%	3	4%	1	1%	2	2%	5	7%	1	2%	2	3%	3	4%	18	2%
	2013-14	0	0%	0	0%	1	1%	2	3%	0	0%	3	3%	5	7%	4	6%	5	6%	20	3%
	2014-15	0	0%	0	0%	0	0%	2	3%	2	2%	4	4%	4	4%	5	8%	5	8%	22	3%

Schools selected based on their occurrence in upper quartile per school type for highest percentage of overage students in at least two of the three school years between 2012-13 and 2014-15

Table 7. Overage students, per grade, per school (middle), SY 2012-15

School	Year	Overage Students in Grade 6		Overage Students in Grade 7		Overage Students in Grade 8		Total Overage Students	
		#	%	#	%	#	%	#	%
DeRenne	2012-13	20	7%	26	9%	33	11%	79	9%
	2013-14	27	11%	25	10%	33	11%	85	11%
	2014-15	18	6%	20	8%	38	14%	76	9%
Hubert	2012-13	17	9%	26	11%	41	18%	84	13%
	2013-14	16	8%	21	11%	19	9%	56	9%
	2014-15	14	7%	19	9%	18	9%	51	8%
Mercer	2012-13	17	8%	30	13%	49	20%	96	14%
	2013-14	20	11%	22	12%	39	20%	81	14%
	2014-15	21	11%	26	15%	30	15%	77	14%
Myers	2012-13	15	7%	23	11%	16	7%	54	9%
	2013-14	15	6%	18	6%	32	10%	65	8%
	2014-15	27	10%	27	11%	28	10%	82	10%

Schools selected based on their occurrence in upper quartile per school type for highest percentage of overage students in at least two of the three school years between 2012-13 and 2014-15

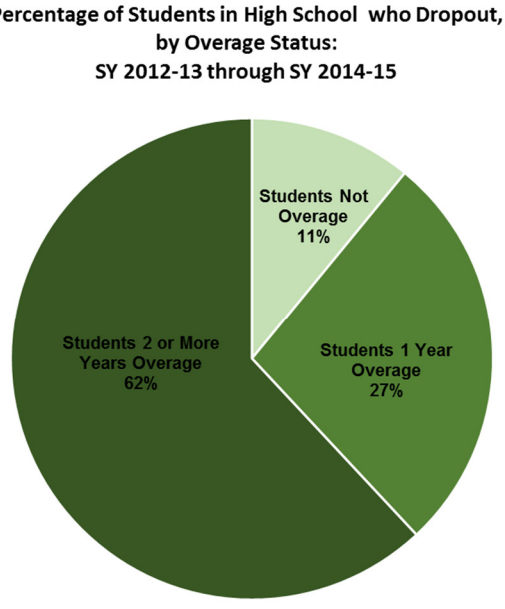
Table 8. Overage students, per grade, per school (high), SY 2012-15

School	Year	Overage Students in Grade 9		Overage Students in Grade 10		Overage Students in Grade 11		Overage Students in Grade 12		Total Overage Students	
		#	%	#	%	#	%	#	%	#	%
Beach	2012-13	104	25%	47	21%	20	11%	38	17%	209	20%
	2013-14	93	23%	50	18%	19	12%	20	10%	182	18%
	2014-15	116	23%	42	18%	4	3%	23	12%	185	17%
Groves	2012-13	109	30%	44	19%	20	12%	34	13%	207	20%
	2013-14	97	32%	41	22%	23	14%	18	12%	179	22%
	2014-15	100	26%	47	27%	14	12%	17	10%	178	21%
School of Liberal Studies at Savannah High	2012-13	76	26%	60	28%	16	12%	23	10%	175	20%
	2013-14	95	31%	49	24%	18	14%	13	9%	175	22%
	2014-15	98	28%	60	34%	16	14%	16	11%	190	24%

Schools selected based on their occurrence in upper quartile per school type for highest percentage of overage students in at least two of the three school years between 2012-13 and 2014-15

A profile of overage students would be incomplete without highlighting the relationship between overage students and the high school dropout rate (Graph 1). While the SCCPSS dropout rate has declined over the past three years and is lower than both the national and state rates,[3] the number of SCCPSS students dropping out are disproportionately overage. In SY 2012-13 through SY 2014-15, an average of 311 students dropped out of high school. Of those, 62% of them were overage two or more years. When the definition of overage is expanded to include any student at least one year behind, this population accounts for 89% of all high school dropouts. Theoretically, if the number of overage students is reduced, the number of students dropping out of high school would also decrease.

Graph 1.



[3] In 2015, the dropout rate for SCCPSS was 2.9% while the state average rate was 3.5% and the national 14 year average (2000-2014) was 6.6%. In 2016, SCCPSS rate was 2.6%. The state rate is not currently available.

Brief Description of Past Overage Programs

Through our interviews, we learned about various past overage programs that have been implemented in the District. For example, one year Beach High School (Beach) partnered with DeRenne Middle School (DeRenne) and identified retained 8th grade students. The schools initiated this arrangement. Students remained on DeRenne's rolls, but took classes at Beach for a nine week period. If students demonstrated academic and behavioral success, they were then transferred to Beach officially. If not, students returned to the DeRenne campus to finish out the year. SOAR was another overage program, housed at Hubert Middle School, but overage students from all over the District could participate. Middle school teachers with high school certification taught classes so that overage students could earn high school credit while still in middle school. The previous overage program mentioned most frequently, both in our interviews and our surveys, was Corporate Academy. According to an interview with the Executive Director of Communities in Schools (CIS), a local businessman started the program in the 1990s and eventually partnered with CIS. However, Corporate Academy dissolved several years ago, due to differences between the Academy's founder and CIS.

Costs of Overage Students

The costs related specifically to students who are overage are difficult to ascertain as there is no one budget line item that considers overage students or programs separately. Additionally, we cannot readily quantify the additional yearly costs of an overage student as compared to a non-overage student since there is no easily determinable way to track individual overage students for budgetary purposes. For example, the Twilight program ($216,000 in FY 2016), which aids overage students in credit recovery, also serves students taking courses for credit acceleration. The Gateway to Success program for overage fifth grade students falls under the Fresh Start Program. Gateway costs in its pilot year were approximately $67,730, with $45,000 towards a teacher position,[4] $10,730 towards summer school, and $12,000 towards Saturday School. The transition classroom at Port Wentworth Elementary, aimed at preventing struggling first grade students from being retained, was coded as an Early Intervention Program (EIP) classroom. Utilizing an EIP teacher for a self-contained EIP class earns the District more full-time equivalent (FTE) segments from the State than other EIP service models (augmented and pull out) because of how FTE segments are earned. An EIP student in a self-contained class earns six FTE segments, versus only one FTE segment for an EIP student receiving services through the augmented or pull-out model. This means that an EIP class of 14 students earns 84

[4] A Fresh Start teacher position was reassigned to the Gateway program for a total of two Gateway teachers. This cost is not considered here as it was already budgeted for Fresh Start.

FTE segments versus only 14 for the other two models. Adding transition classrooms coded as EIP classes would not only improve services to the students in the classes, but it would also bring more FTE segments to the District.

All of the schools with the highest population of overage students receive Title I funding. Schools qualify for Title I funds based on the number of their students who qualify for free or reduced lunch. According to the Senior Director of Compensatory Programs, overage students can be considered a subgroup for Title I purposes. Thus, schools with large overage populations could consider how to use Title I supplemental resources to specifically benefit this group of students. We are unaware of any Title I school currently using funds to target overage students, though these students already participate in Title I funded interventions for students who are working below grade level. Additionally, the District may be eligible to apply to the state for Title I Part D funds to support overage students. Part D funds are available to prevent at-risk youth from dropping out of school. Notably, if overage students attend an alternative program, such as Gateway to Success, Title I dollars do not follow the student to the alternative site.

We also considered the additional cost of overage students from another perspective, the cost of an additional year of schooling per student. The primary cause of students becoming overage is being retained two or more times. We calculated the cost using similar reasoning common in retention literature (Xia & Glennie, 2005; Balfanz, 2013; Yonke, 2012). Retention is expensive for school districts and taxpayers. Theoretically, students who are retained will consume an extra year of education because they will complete a grade twice. The District FY16 net current expenditure[5] per student is $10,620, with 54.2% ($5,756) from Local funds, 35.5% ($3,770) from State revenue, and 10.3% ($1,094) from Federal funds. For every year a student is retained, the cost of educating the student to that grade's standards has doubled. (If a student fails fourth grade, the cost to educate that student to fourth grade standards is now $21,240.) The additional cost per student who is behind his/her cohort at least two years (the definition of overage) is approximately $21,240 for the two additional years of instruction. The District averaged 2,186 overage students per year between SY 2012-15. Thus, the potential current additional cost for overage students is $4.63 million dollars, more than $2.5 million of which would be from local revenue. This cost is a broad approximation, as it does not consider the time students may make up through course/grade recovery or the structure of secondary courses which do not require grade level retention for course failure. This estimate also does not consider the monetary savings for the years overage students do not complete because they drop out of school. It would be contradictory to consider a savings when the result of such indicates an enormous societal cost since dropouts are more likely to experience unemployment, incarceration,

[5] Per the FY 2016 Adopted Budget, current expenditures used include the General Fund, Special Revenue Funds, and Debt Service Fund. Excluded are the Capital Projects Fund, Internal Service Funds, and Agency Funds.

and dependency on social services (Bowman, 2005 cited in Hammer, 2010). Dropping out is also contrary to the District's fundamental purpose to educate students. A more cost-effective approach may be to focus resources on the prevention of grade retention, which will be discussed later in this report.

The reason the cost of retention for overage students is not immediately apparent is due to how the District, like most other school districts, receives funding based on the number of students enrolled, and not on student grade progression. As a result, regardless if a student is promoted or retained, the District receives the same funding (Balfanz, 2013). This also means that there are not suddenly available resources to redirect to alternative programs or approaches to decrease retention. However, the total dollars needed to educate an overage student to a given outcome (graduation) must be considered, especially given the dearth of evidence that retention is an effective intervention for struggling students (see Condition A). It is likely more cost effective to increase funding for educational resources that will help remediate and support students than it is to provide them with an extra year in school. Finally, it is important to acknowledge that for schools to implement practice-validated interventions and alternatives to retention (see Condition A for descriptions of select interventions), adequate resources must be provided (Nagaoka & Roderick, 2004).

State and District Guidance for Overage Students

We could not find any Federal laws, Georgia Board of Education rules or District policies, regulations or guidelines that pertain to overage students specifically. However, there are certain District policies, regulations, and guidelines that affect overage students, particularly those related to promotion and retention.

Board Policy IHE, Promotion and Retention, states:

> The decision regarding the promotion, retention and placement of each student is made on the basis of academic achievement in relation to the mental ability and overall physical and emotional well being of the student. The decision to retain a student is made in order to provide additional and/or different academic instruction that will help the student be successful.
>
> Placement of each student is made on the basis of academic achievement with established criteria for each grade level and/or documented academic achievement specified in Individual Education Plans (IEPs). Social promotion is prohibited.

Board regulation IHE-R further defines promotion and retention, including who is responsible for promotion and retention decisions, parent notification of potential failure, and requirements by grade level that students must meet in order to be promoted. For

example, below are the factors considered in determining the promotion or retention of students in Grades 1-5:

1. Have a final grade of 70 or higher in oral/written language, reading, mathematics, social studies, and science.
2. Meet the requirements of the system's attendance policy. (Policy JBA)
3. Student readiness based on Georgia Milestones End of Grade testing for grades 3 and 5 (effective SY 2015-2016).
4. Meet the Lexile and RIT Gateway Requirements for grades 2 - 5 (see Exhibit IHE-E (3)).
5. Special provisions can be made for students who are English Learners (ELs) and students with identified disabilities.

Per IHE-R, parents/guardians are supposed to be notified if students are in danger of failing or being retained. The regulation states:

> If a child is experiencing academic difficulties or is subject to being retained in the current grade (K-12), the teacher must meet with the parent or guardian to discuss their child's academic standing prior to issuing the report card. This conference shall be documented using the Critical Decision Form for each subject in question. The principal must ensure that the teacher notifies the parent or guardian as early in the school year/semester as possible. Teachers are also expected to utilize the District's parent portal as a means of keeping parents informed of student progress. Students who are not successfully passing a course at the mid-term may be referred to RtI/SST.

The Critical Decision Form, obtained through ACORN, provides sections to document which subjects a student may be retained for and possible reasons why. There are sections for the teacher to write comments, to document conference notes, and for the parent to sign. The form also requires the principal's signature. Of the teachers surveyed, 87% percent agree or strongly agree that "parents/guardians are given enough notice during the school year if their student is at risk of retention."

IEH-R also states that the principal of a school is responsible for the promotion, retention, and/or placement of all students, with input from Student Support Teams. For students who do not meet promotion criteria (grades 1-8), a request for an appeal is the responsibility of the parent.

Exhibit IHE-E (3), Promotion Guidelines for SY 2015-16 provides the requirements for promotion for students Kindergarten through 8th grade. Promotion requirements for high school are based on credits completed and are outlined in policy IHF. Exhibit IHE-E (3) states that assessments (SRI and MAP) are not to be used as the sole criteria in determining promotion/retention. We reviewed how many students with passing score course grades but underperforming SRI and/or MAP scores are retained per grade level

(grades 2-8). The low number of students who fall into this category (an average of 4.51% in SY 2015-16 and 4.75% in SY 2014-15) seems to demonstrate that this practice is largely being followed.

The District provides promotion rubrics for elementary, K-8, and middle schools to use to determine if students meet requirements for promotion. If students do not meet promotion criteria, some of them are eligible for summer school. There is a summer school rubric available for participating students. During our interviews with principals there was a consensus that the District provides adequate guidance on retention, including providing these rubrics.

The Board regulation for summer school (IDCA-R) only discusses summer school requirements for middle and high school students.

As will be evident through our conditions, these policies and regulations are not always followed in relation to overage students.

V. AUDIT CONDITIONS

Condition A. The District does not sufficiently prioritize preventing retention and supporting alternatives to retention in order to reduce the number of overage students. *(DAS-REMI Goal I)*

Details of Condition A

There are two guiding notions for this Audit, prevention of retention to decrease the number of overage students and recovery of grades/credits for students who are overage. This section focuses on the former.

The ultimate cause of students becoming overage is grade retention and course failure. According to the National Association of School Psychologists (2003), retained students are more likely to have at least one of the following characteristics: young or immature for their grade, show attention or behavioral problems, are not proficient in English, have reading problems, change schools often, are from low-income families, or live with adults who are uninvolved in their education (cited in Yonke, 2012). The theoretical rational for grade retention is that additional time learning in the retention year will help students meet grade level standards before moving on to the next grade. However, multiple studies (cited in Hammer, 2010) have demonstrated that retention does not result in “long-term improvements in academic achievement, social functioning, and/or emotional functioning.” One reason grade retention is ineffective for most students may be because retention is often used as an academic intervention on its own, which does not provide a mechanism to address a student’s academic struggles beyond more “seat time” during the retained year. One study (Peterson and Hughes, 2011) showed that

students who were retained received fewer services during their retention year than similarly low achieving students who were promoted to the next grade. Other studies echoed the same results; often low-achieving students who are promoted generally do as well or better academically and have fewer socio-emotional and behavior-related problems than those who are retained (many studies cited in Xia & Glennie, 2005). Survey results of teachers at the SCCPSS schools listed in Tables 4-7 reflect that retention is often treated as an intervention. Sixty-eight percent of teachers either agreed or strongly agreed that "retained students usually just repeat the grade they failed, without much change to instruction."

There is general consensus in relevant academic research that retention is not only ineffective in helping struggling students master grade level content, but is actually harmful for students. Grade retention can increase the risk of dropping out by 20% to 50% (Xia & Gennie, 2005). A longitudinal study of students retained early in their school careers revealed that by 11th grade, retained students:

> had lower levels of academic adjustment, were more likely to drop out of high school by age 19, were less likely to be enrolled in a post-secondary education program, received lower education/employment status ratings, were paid less per hour, and received poorer employment competence ratings at age 20 in comparison to a similar group of low-achieving, promoted students. (Jimerson, 1999, p. 328)

One analysis found that grade retention had a consistently negative impact on student motivation, engagement, and academic performance (Martin, 2009 cited in Balfanz, 2013). Meta-analyses on retention research showed that retained students had lower academic achievement, poorer personal adjustment, lower self-concept, and held school in less favor than promoted students (Ferguson, Jimerson & Dalton, 2001).

> Students who have been held back are much more likely to drop out before completing high school. The effect often occurs many years after a student is held back in grade and thus is invisible—without careful longitudinal study—to those who make the retention decision. The teachers and administrators who make decisions to hold children back to do not have to live with the longer-term consequences of their decisions. (Hauser, 1999, p. 498)

This research on retention, along with its high dollar price tag, makes one question its continued widespread use in school districts across the country. Indeed, one researcher claimed twenty years ago that "of all the major issues in education, grade retention represents one of the clearest examples of non-communication between research and practice" (Sakowicz, 1996 cited in Blazer, 2008). This may happen because:

> even when research findings have been effectively and clearly communicated to teachers, they often are not offered other alternatives for intervention or remediation. Educators may lack the time, resources, programmatic tools, and administrative support to identify and implement other effective intervention strategies. In contrast, retention is relatively easy to implement, provides what looks like immediate gains, and does not require the creation and funding of new programs and services. (Xia & Gennie, 2005, p. 4)

Our own District data reflects this practice; according to our survey, 63% of teachers believe that "retention puts a student at more risk for eventually dropping out of high school." However, with 23% of students being retained at least one year during the past three years, retention is not an uncommon or infrequent practice in SCCPSS.

None of this is to suggest an endorsement of social promotion, the practice of promoting students regardless if they meet grade level requirements. The dichotomous choice between retention and social promotion is avoidable if there is a focus on "early identification of academic difficulties that ensure individualized, evidence-based remediation plans with frequent progress monitoring for students who fall below grade level expectations" (NASP, 2011, p. 1). We believe there should be a District-driven shift in focus to preventing retention by using a variety of research-based practices, selected based on the needs of students and schools. Table 9 below (compiled Blazer, 2008, p.4-11) identifies a selection of research-based strategies that could reduce grade retention. How some of these practices are implemented in the District will be discussed throughout the report.

Table 9. Research-based alternatives to grade retention

Strategy/Practice	Description
Early Identification of Learning Problems	Identifying student learning problems as early as possible and intervening immediately to provide students extra help
Individualized Support Services	Addressing students' academic and social needs on a one-on-one basis. Examples: Intervention teams can meet with students to set learning goals and then monitor student progress; assigning students at risk of failure to counselors who are then responsible for their total education experience
Positive School Culture	Positive school culture includes: explicit standards set at each grade level, a culture of high expectations for all students, additional academic support available to all students in a variety of ways, sufficient resources available to provide extra academic support, positive teacher-student relationships, a principal leading and maintaining a caring school environment
Extended Learning Time	Carefully structured additional learning time, targeted to students' individual needs
After-School Programs	These include after-school and Saturday programs. They should be a supplement to, not a repeat of, regular classroom instruction. They require time for collaboration between school-day and after-school/Saturday teachers
Tutoring	One-on-one tutoring with teachers, peers, or older students. Tutoring can be individualized to address students' specific academic needs and learning styles

Double-Dosing	Extra time in a subject, usually accomplished through block scheduling
Looping	Teachers and their students staying together for two or more grade levels
Multi-Age Classrooms	Grouping of students of different ages together (usually in the early elementary grades)
Smaller Class Size	For smaller class sizes to have an impact on student performance, class sizes should be less than 20 students. This may have the greatest impact on early elementary grade levels and on economically disadvantaged and minority students
Credit Recovery Programs	These programs allow students to earn credit for previously failed courses
Freshmen Academies	For students who are identified as likely to struggle in high schools, they are placed in classes with fewer students and are assigned an academic advisor who monitors their performance
Professional Development for Teachers	Professional development that focuses on teaching teachers how to accurately diagnose students' learning difficulties. Also giving teachers time to study and plan together, observe other teachers, and give and receive coaching
Alternative Schools and Programs	For students who are not successful in the traditional school environment. Some features include additional time to meet grade level standards, lower teacher/student ratios, family involvement, and counseling services
Combine School-Based and Work Based Learning	Combining school and work-based learning increases students' awareness of their opportunities beyond school. Work based learning can increase students' investment in their education.
Parent and Community Involvement	Increased parent involvement is associated with higher levels of student achievement.

District administration mentioned other alternatives to preventing retention, including a zeroes aren't permitted[6] practice, single-gendered classrooms, and competency-based education.[7] It should also be noted that teacher quality, one of the strongest drivers of student learning and achievement (Goldhaber, 2016), plays a crucial role in reducing retention rates. Some of the recommendations in the report address issues related to improving teacher quality.

Status of Select District Strategies to Reduce Retention

The majority of the principals we interviewed, along with Central Office administration, believe that there needs to be more early age/early grade intervention with students struggling academically. All middle and high school principals we interviewed discussed the challenge of students beginning their schools already overage. Four of the five elementary school principals indicated that some students start elementary school

[6] Zeroes aren't permitted requires students who do not complete an assignment on time to complete it for a grade.

[7] In competency-based education, students advance when they demonstrate mastery of academic content, regardless of "seat time" in a class.

unprepared. Many of the professionals we surveyed also agreed more needs to be done, especially in the earlier elementary grades, to intervene with struggling students.

> Teacher Respondent #95: “I think ensuring that our K-2 programs are strong with solid instructional practices. I think we should ensure all students are reading before leaving kindergarten and if not, we should intervene at that point. We would have better success retaining a student in kindergarten or 1st grade instead of waiting until third or fourth because the learning gap would be much smaller. There needs to be more observation of teaching and learning than is currently happening in our schools. Feedback needs to be given to teachers weekly. Data needs to be used more to adjust instruction in the classroom. For the current overage students, I think the overage program would work to decrease their learning gap. There should be two teachers in the classroom where one can teach standards at their instructional level while the other may introduce current grade level standards. They would need extending time for the core subjects as well as some blended learning. They would need to track their learning and progress in a data notebook to take ownership.”

> Teacher Respondent #134: “I think that there needs to be more emphasis on learning (and parent involvement) in kindergarten and first grade. These are the grades where the building blocks of reading are developed. Students MUST know how to read if they are to be promoted to second grade. If students leave first grade without the ability to read, they will continue to perform poorly in later grades, snowballing into more mental, emotional, and behavioral challenges. This pattern further results in over-aged students because they are under-prepared for the grade they have been "promoted" to when they are not ready, and are retained in higher grades. The district can support teachers by creating positions in every school that are strictly for servicing RTI and retained students, especially in kindergarten, first, and even second grades. Targeting true learning in the younger grades, rather than backtracking while students are older, will promote stronger readers and overall students in the future.”

> Social Worker Respondent #4: Identify students earlier. Pre-K-2nd grade should be used to identify students at risk of falling behind. Use reading, math and psychological evaluations to make realistic decisions about student's educational outcomes. Reduce class size for students who have been retained and work more to engage the parent.

Schools are supposed to use Response to Intervention (RtI) as a mechanism to identify and remediate students. The primary purpose of RtI is to support students in being academically and behaviorally successful. If well implemented, RtI can prevent retention. Through RtI, students who are struggling academically are identified, and the

cause of problems is analyzed, in order to select the most appropriate and effective intervention(s) for the student. However, there are many concerns related to how RtI is implemented in the District (see Condition B for more details).

Schools should have a block of time called intervention, instructional focus, or flex time where students are supposed to receive remediation or enrichment based on their needs. Ideally, students would be divided based on data and groups would be fluid. Theoretically, students from different classes would be sent to one teacher during this block of time to work on skills they need support with. Currently, SCCPSS schools have significant discretion on how their instructional focus time is structured, including how much time in the day to commit to it, how many days per week to do it, how and if students are divided, how often student data is reviewed, etc. We learned through our interviews the time spent in this block ranged from twenty minutes to an hour per session. Several interviewees expressed concern with how high schools utilize instructional focus/flex time. One person commented that teachers have often not utilized this time for its intended purpose of enrichment and remediation. However, this person felt that one reason for this may be because these teachers have not been given sufficient guidance on how to use the time to remediate and/or build skills. When schools schedule instructional focus blocks to take place for all grades at the same time, the impact of resource teachers (EIP/REP teachers, academic coaches, gifted teachers, etc.) is more limited, since they cannot be deployed to work with one grade at a time. One District administrator commented that based on her observations, instructional focus blocks at some schools are not being done with implementation fidelity and/or are not using research-based interventions.

The Early Intervention and Remedial Education Programs (EIP and REP) are state-funded programs that provide additional teachers “to serve students who are at risk of not reaching or maintaining academic grade level.” Overage students and those at risk of becoming overage are some of the populations these programs target. The District does not currently fund the number of EIP/REP FTE segments it is eligible for. The District still has not reached the number of EIP/REP teachers it had prior to the recent recession. Some of those we interviewed expressed concern with how EIP/REP teachers are selected. Since these teachers do not have their own classes assigned to them, we were told that principals sometimes select teachers for these positions who have weaker classroom management skills and are not necessarily the instructionally strongest teachers.

Nearly every principal we spoke to believe that smaller class sizes would benefit both struggling and overage students. Many of the teachers we surveyed also agreed.

> Respondent #51: “These students need more individualized instruction and pull-out services. In addition, more teachers need to be hired to service these students, which results in class size reduction.”
>
> Respondent #86: “Class size is a major factor in the success/failure of students, especially the overage students. The teacher-student ratio, doesn't always lend room for an effective instruction system to take place. These students are already behind, and sometimes unmotivated. Being in large classroom settings isn't fair to the teacher or the students. Either the class sizes are smaller, or two teachers are placed in the larger classroom populations.”
>
> Respondent #67: “I think if we had smaller class sizes throughout grade levels, we would not have as many retentions, therefore there would not be as many overage students. It is difficult to give these at risk students the attention they need when there are 23 other students in the class, most of them also being at risk...”

The majority of the secondary school principals we interviewed believe there need to be more career paths available at more schools. Many of the people we interviewed believed that Career, Technical, and Agricultural Education (CTAE) could be used to reengage overage students, especially when the career tracks are reflective of students’ interests and needs of the community. They expressed concern that career and technical opportunities seem to be accessible only to certain students. Several mentioned that the GPA requirement for Woodville Tompkins High creates a barrier for many students to attend that career-focused school.

Several principals independently mentioned the concept of transition or multi-grade classrooms as a way to prevent retention. One counselor in our survey responded, “Students who do not master enough material to be promoted should be in a "step up" program with remediation in addition to the next level curriculum. Classes should be small (12) with maximum resources available to those students. The BEST TEACHERS should be teaching those classes.”

In SY 2015-16, Port Wentworth Elementary implemented the District’s only transition classroom, which was coded as an EIP class. The class had a teacher with eight years of experience as well as full-time paraprofessional. All the students in the 1st grade class had struggled academically; some had previously failed or were eligible for retention. The teacher taught 1st grade standards, but also incorporated kindergarten standards for remediation. The teacher put a strong emphasis on phonics instruction, often completing two 30 to 40 minutes phonics lessons per day. Most the students in the class experienced large growth in math and reading, although they were not necessarily on grade level by the end of the school year. For example, according to the mClass

math scores, nine of 13 students scored at the benchmark level. At the beginning of the year, only two students scored at benchmark. In reading, seven students scored at benchmark on DIBELS at the end of the year. Many of the students in the class were transient; there were only six students who started the school year in the class that remained by the end.

During our interview, the teacher who taught this class believed the most important aspects of the transition class were the low student numbers, having a full-time paraprofessional for support, and having flexibility in how she structured/scheduled each day for her class. She stressed the importance of having a very instructionally strong teacher for transition classes. She believes the transition model is effective in preventing retention. She thinks that it is crucial for students to enter 3rd grade on grade level. If they are not, it is very difficult to catch them up, and each year the gap gets larger. She sees the early grades (K-2) as essential in closing the gap, including using the transition classroom K/1 and 1/2 as an intervention.

The District has now expanded transition classrooms to other schools. In SY 2016-17, there are four transition classrooms, two at Low Elementary (2nd/3rd grade and 4th/5th and two at Port Wentworth Elementary (K/1st and 1st/2nd).

Early Warning System

An essential factor in preventing grade failure is early identification of at-risk students and getting them the help and support they need before they fall behind (Franklin, 2003). One tool that may help reduce retention is a computer-based system that identifies students at risk of failing and/or graduating on time. An Early Warning Indicator and Intervention System (EWS) is a way to utilize data to keep students on the pathway to graduation:

> The most effective EWS are characterized by a combination of features that enable rapid identification of students who are in trouble; rapid interventions that are targeted to students' immediate and longer-term need for support, redirection and greater success; the frequent monitoring of the success of interventions; a rapid modification of interventions that are not working; and shared learning from outcomes. (Bruce et al., 2011, p. 2)

According to research conducted by the Consortium on Chicago Schools, the Center for Social Organization of Schools at Johns Hopkins University, and the Philadelphia Education Fund, the most highly predictive and high yield factors of dropping out, more predictive than test scores or demographics, are attendance, behavior, and course passing/performance. In a study of students determining the presence of any of these factors in sixth grade students in a high poverty-urban school district, 60% of the students who would not graduate within one year of expected graduation could be

identified (Balfanz et al., 2007). These indicators have been validated by studies in other districts and states. The student performance indicators are the "ABCs," data that is already collected by the District:

- **A**ttendance: Missing 20 days or being absent 10 percent of school days
- **B**ehavior: Two or more mild or more serious behavior infractions
- **C**ourse performance: An inability to read at grade level by the end of third grade; failure in English or math in sixth through ninth grade; a GPA of less than 2.0; two or more failures in ninth grade courses; and failure to earn on-time promotion to tenth grade(Bruce et al., 2011, p. 3)

It should be noted that interventions should be implemented with students before threshold points are reached. Additionally, early warning systems do not improve outcomes unless they prompt schools to take meaningful action to help students who are struggling (Brown, 2016). Although not listed as a primary predictor, a key take away for an early warning system is that overage students are more likely to exhibit at least one of the warning flags for dropping out of school. In one study being overage for sixth grade appeared to be highly predictive that these students would not graduate within one year of their expected graduation date. However, when examined closely, a high percentage of these students failed math, failed English, attended school less than 80% of the time, or had unsatisfactory behavior (Balfanz et al, 2007). In a study conducted in Baltimore City Schools to determine whether there were high yield indicators present starting in 6th grade that predicted eventual dropout, being overage by even only one year was the single strongest predictor of non-graduation. Of those that were overage by two or more years, only 8.4% graduated (Baltimore Education Research Consortium, 2011).

Gwinnett County Public School System (GCPSS) has developed their own EWS for students at risk of not graduating. Teachers in grades 3 through 12 receive a weekly alert with individual students' risk levels, which can also pinpoint what is putting the student at risk: absences, course grades, or behavior. We spoke with the Director of Research and Evaluation and the Coordinator of Research and Evaluation at GCPSS about their early warning identification system, how it was created, how it was implemented and how GCPSS uses it. When building the system, they viewed how/when students get off track in school through the lens of student engagement. They included the variables that were most predictive in endangering a student of not graduating on time. They wanted the system to be dynamic and have positive predictive value (be as accurate as possible in its identification of students at risk). For example, for attendance risk, for students that miss more than 10% of school, there is an 80% chance that he/she will not graduate on time. They recognize that predictive powers are

not as high for students in the younger grades. Prediction is based on a student's likelihood to graduate on time.

The team that created the system was interdisciplinary, and also included consultants from IBM. The system was piloted in 2012, and implemented across the District the following school year. The system is one of the most popular tools and is generally well received by the employees that use it (teachers, administrators, counselors, psychologists, etc.). Every week, teachers get an email (with embedded links) that identifies students at risk. Teachers can also apply filters to their students to get different lists (identify all students with attendance risk, identify all ESOL students at risk, etc.) Teachers have access to all the students' school/class information, beyond the subject they teach.

One important point the GCPSS employees made is that identifying the students is not beneficial unless a school uses the system to "team around" students at risk. The intent is that schools will set up teams of people to reduce the risk, interventions will be put in place based on the risk, progress will be monitored, and changes will be made based on the results. They thought it would be speculating too much to state whether the system has helped to prevent retentions, but they believe the potential for that is there. GCPSS provided many resources on their early warning system, which can be shared upon request.

The District does not currently have a strategic early warning system. Neither PowerSchool nor Tienet, the student information systems that District currently uses, could be solely utilized as an early warning system. Information would have to come from both programs, and neither can contain all the data usually incorporated into an early warning system (attendance, behavior, and course failure). Within the past five years, the District developed a limited Rapid Response System to give principals a way to monitor teacher attendance and student attendance and discipline. The data connections points between the systems used for the program were problematic and prone to "breaking." The reporting features were not as user-friendly as desired. Thus, this initiative was ended. As part of the FY 2017 Budget, the District plans to purchase a software product that can provide real-time information and data analyses in an easy to understand format to school leaders and District administration, but the process for purchasing has not yet started.

Recommendations for Condition A

Internal Audit recommends to Academic Affairs:

1. Perform a District-wide study to determine the most frequent causes of retention and implement best practices to reduce those causes.

2. Develop and lead an initiative to increase identification of learning problems in early grades (K-3), as well as increase the use of interventions and strategies for addressing them.
3. Improve guidance and monitoring of intervention/instructional focus blocks.
4. Increase the number of EIP/REP teachers allocated directly to the schools.
5. Increase the number of transition classrooms. The District could determine criteria for which a school should implement transition classrooms by grade level. (Example: If the number of students eligible for retention in one grade reaches a certain threshold, the school would be required to implement a transition classroom the following year.) The District should keep the teacher/student ratio in these classes low, as well as monitor the effectiveness of these classes in preventing retention. Additionally, the District should consider categorizing these classes as EIP self-contained classes where applicable and appropriate in order to maximize resources from the state.

Internal Audit recommends to Data & Accountability and Academic Affairs:

6. Purchase and implement an early warning system to identify students who are struggling. The District should develop protocols and guidelines for how schools utilize this information to support students and reduce risk.

Condition B. RtI is underutilized in supporting students who are struggling academically. *(DAS-REMI Goal I)*

Details of Condition B

Though not the focus of the Audit, the effectiveness of RtI is relevant for overage students since the purpose of RtI "is to provide an appropriate level of evidence-based instruction based on [students'] needs…and involves frequent assessment of students' progress, data-based decision making, and placement of students within a range of instructional supports" (Barnes & Harlacher, 2008, cited in Mayfield, 2012). RtI should help reduce grade retention since struggling students should be identified before they fall behind and offered varying levels of additional academic support through a tiered system. Tier II of RtI is for students who are not making adequate progress on grade level standards and Tier III is for students who receive individualized, intensive intervention to remediate students' skill deficits.

The majority of the principals we spoke with believe that overage students should be in RtI Tier II or III. Most of the principals we interviewed believe that a student should not be retained without evidence of RtI. Fifty-nine percent of teachers surveyed agree or strongly agree that the majority of students who have failed are in Tier II or Tier III of the RtI process. However, the data does not reflect these beliefs. Of the students recognized as overage at the end of SY 2015-16, only 10.6% of them were identified as

in RtI Tier II or Tier III. When overage high school students are removed from consideration, since their RtI activities are not currently reported in Tienet, the District's education case management system, the percent of overage elementary, K-8 and middle school students who were in RtI at the end of last school year is only 23.3%. These percentages do not capture the intensity or frequency of the interventions.

Several people we interviewed do not believe that RtI is being implemented with fidelity. One District administrator thinks that some student retention is due to lack of appropriate and sufficient RtI interventions. Many people we spoke to believe that the successful implementation of RtI depends on a principal's commitment to it, which varies from school to school. All principals we talked to think improvements to RtI are necessary. Many people we interviewed think that strategic, definitive RtI guidance should come from the District level, including District-selected interventions and progress monitoring tools. This would help the academic specialists, who support schools in RtI implementation, because they would not have to spend so much time figuring out the various different systems schools select. It would also make fidelity checks more useful if schools were required to utilize the same programs. District-wide monitoring tools and interventions offer consistency, which is especially important for highly transient students. One elementary school principal said that there are too many interpretations of how the RtI process works. Several people we talked to said that standardized interventions are largely absent in middle and high schools. As of SY 2015-16, high schools were not given a model for RtI. Several interviewees commented that high school teachers had not yet been trained to use Tienet. Many principals believed for RtI to be improved, there needs to be a position at the school level whose primary function is RtI implementation. A District-wide RtI manual was supposed to be completed by SY 2015-16, but it was never released. Schools decide which, if any, progress monitoring tool to buy, instead of it being a District-level decision. A District progress monitoring tool for grades K-8 was part of the proposed budget for SY 2016-17, but was eliminated.

Several people we interviewed, including academic specialists, District administration, and principals, believe there is not enough examination, at a classroom or a school level, of whether or not Tier I instruction (general classroom instruction) is effective. Additionally, there seems to be a misunderstanding among some teachers that academic interventions can only take place if a student is in Tier II or Tier III. Also, there is confusion among some teachers who think that the progress monitoring tool is the academic intervention itself. Another related concern is that some teachers may have students complete the progress monitoring, but are not necessarily providing the interventions.

Several people we talked to believed that housing RtI in Specialized Instruction (SPICE) instead of school governance sent a message that the primary purpose of RtI was the

determination of eligibility for special education, not remediation and prevention of retention. However, as of SY 2016-17, SPICE is now working collaboratively with school governance to manage RtI.

Recommendations for Condition B

Internal Audit recommends to Academic Affairs:

1. Develop a plan to increase the number of overage students receiving RtI interventions. As a condition of retention, the District should consider requiring evidence of RtI for students who have previously been retained.

Condition C: The number and type of opportunities for grade/credit recovery for overage students vary by grade level and school site, which means access is limited for some overage students. Additionally, recovery opportunities are not well publicized to eligible students. *(DAS-REMI Goal I)*

Details of Condition C

This section of the report focuses on the recovery of grades/credits for students who are overage. As stated previously, the primary reason students become overage is because they are retained at least two times. In our survey, we asked teachers, social workers, and counselors to rank the reasons they believe contribute most to students being retained. Below are the results for each group (Table 10).

Table 10. Beliefs on what causes grade retention

	Teachers n=212	Social Workers n=15	Counselors n=42
1	Behavior	Literacy Problems	Lack of student motivation
2	Literacy Problems	Failing math and/or reading courses	Behavior
3	Failing math and/or reading courses	Lack of parental involvement	Literacy Problems
4	Lack of student motivation	Absenteeism	Failing math and/or reading courses
5	Lack of parental involvement	Hardship at home	Lack of parental involvement
6	Absenteeism	Behavior	Absenteeism
7	Inability to pass state tests	Lack of student motivation	Inability to pass state tests
8	Hardship at home	Inability to pass state tests	Hardship at home
9	Ineffective instruction	Ineffective instruction	Ineffective instruction
10	Health problems	Health problems	Health problems

It is interesting to note that teachers found behavior to be the most significant variable that contributes to retention. Literacy problems were the only factor that ranked in the

top three for all three groups. All three groups of professionals found ineffective instruction and health problems to be the least significant factors.

We reviewed the 2015-16 School Accountability Plans for the 16 schools included in our Audit. Only one school mentioned the number of retained students; no school plan addressed overage students.

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Secondary School Credit/Grade Recovery Opportunities

The District has many opportunities for credit and grade recovery that are offered at the majority of middle and high schools selected for our Audit, including:

- Online credit recovery through A+ Learning, including Twilight
- Before and after school tutorial
- Saturday school
- Grade contracts (if students earn between 60-69% at the end of a nine week period, they are offered a two week window to improve their grade)
- Afterschool direct instruction credit recovery
- Midyear promotion for qualifying students
- Ability to make up/redo work
- Flexible scheduling (with permission from the principal)
- Block scheduling
- Summer school

While this list is expansive, not all opportunities are available at all sites. This means that access to credit recovery opportunities varies for overage students by school site, which may limit access for some. For example, only one principal mentioned grade contracts and only one principal mentioned offering direct instruction for credit recovery. Some schools have clear tutorial schedules, requiring certain subjects to be offered during certain days of the week, while other schools make teacher-provided tutorials voluntary. Based on our interviews with principals, midyear promotion is not used frequently. Some principals do not think the District provides enough guidance on how students qualify for midyear promotion. Mid-year promotion is not an option for those in 5th or 8th grade, as that would require a move to another school. One principal mentioned the lack of District guidance on how high schools should address students who are not making progress towards graduation. This principal discussed how these under-credited students are not being served well in the traditional high school model.

A+ Learning is available to all middle and high schools, but some schools do not use it. Twilight is only available to high school students. Some schools have online credit recovery during the school day while others do not offer it until after school. Most credit

recovery opportunities are optional and available after school, which requires students to have transportation, as well as the desire to attend extended learning day. Because they are part of elementary school governance, K-8 schools do not have the same credit recovery opportunities as middle schools. According to one District administrator, the schools do not advertise these opportunities to students and their families as widely and as frequently as they should.

A+ Learning/Virtual Course Recovery

Our District follows the trend of other districts across the country to use technology as a means for credit recovery. The District currently uses A+ Learning as its platform to provide online instruction. In SY 2014-15, 238 overage students took classes through A+. In SY 2015-16, this number increased to 266 overage students. This represent a small number of the students engaging in A+ courses (21.6% of A+ users in SY 2014-15 and 19% the next year).

The quality of efficacy of these programs must be monitored:

> Online credit recovery programs are designed to be helpful and offer additional pathways for student success but if they are not of high quality, if the courses are low-rigor or if they do not meet the actual academic needs of students, these programs could be providing a lesser quality of education. It's a gray area—when designed well, credit recovery is an alternative pathway to graduation, when designed poorly, it becomes a problem of unequal education. (Powell et al., 2008, p. 14)

According to a District administrator, every year teachers with proven performance in both traditional and classes review A+ high school courses for alignment with the Georgia Standards of Excellence. Curriculum adjustments are also made during the school year as needed. Below (Table 11) is a comparison of course pass rates and course grade averages for A+ and traditional classes, both for overage students and non-overage students. Generally, course pass rates and course grades are higher in A+ courses for overage students than in more traditional classes.

Table 11. Course pass rate/grade averages for A+ courses, compared to non A+ courses

	A PLUS COURSES				COMPARABLE NON A PLUS COURSES			
	Over-Age Students		Not Over-Age Students		Over-Age Students		Not Over-Age Students	
	SY 2014-15	SY2015-16	SY 2014-15	SY2015-16	SY 2014-15	SY2015-16	SY 2014-15	SY2015-16
Course Pass Rate	74%	71%	91%	87%	64%	63%	90%	90%
ELA	71%	60%	94%	85%	67%	65%	92%	91%
Math	64%	61%	86%	84%	52%	56%	83%	84%
Science	74%	78%	90%	87%	66%	64%	91%	91%
Social Studies	93%	74%	93%	89%	68%	65%	91%	91%
Course Grade Average	71.6	69.2	79.3	77.9	67.1	67.6	79.7	79.4
ELA	74	60.5	79.2	75.8	68.2	67.9	81.6	80.2
Math	64.9	62.3	74.9	71.4	63.5	66.5	75.1	75.4
Science	71.8	74.9	79.2	79.7	67.6	67.7	80.3	80.4
Social Studies	82.1	72.6	81.6	80.3	68.3	68.2	80.6	80.2

Some people we spoke with think that the blended learning model is not being implemented fully in the District, with little teacher instruction and interaction. Based on our interviews, one reason for this may be that teachers do not receive adequate training on how to implement appropriately. As part of our survey, teachers ranked online courses last as an effective intervention for overage students.

Elementary School Credit/Grade Recovery Opportunities

Except for Gateway to Success, elementary schools lack opportunities for students to get back on track academically if they are retained. This means that if a student is retained in elementary school, there is no structured mechanism that allows him/her to catch up with their cohort until middle school. The District may be missing an important window for remediation and recovery, especially when the research suggests earlier interventions are more effective.

Because of how most elementary classrooms are structured, students may have to repeat an entire grade due to low achievement in one subject, despite if they demonstrate proficiency in all the other subjects. Thus, if a student scores a failing grade in reading in 2nd grade, but passes all other subjects, he/she may still have to repeat all of 2nd grade. Unlike middle and high school students, elementary school students cannot attend summer school to try to raise a failing course grade. Elementary school students (grades 2-5) are only eligible for summer school if they underperform on SRI or MAP testing. To our knowledge, midyear promotion is not currently practiced in any of the elementary schools we reviewed. One elementary school principal cautioned that if midyear promotion opportunities were available in elementary school, there would need to be dual grade classrooms, lower teacher/student ratios, and strict guidelines of who could qualify to participate and what is required to be promoted outside of the normal schedule.

Gateway to Success

Gateway to Success (Gateway) started as a pilot program in October of SY 2015-16. The class was held at the Fresh Start Program on Port Wentworth Elementary School's campus. The purpose of the program was to provide an accelerated academic recovery program for students who were at least two grades behind their peers. The class was comprised of 30 overage 5th graders, split into two classes, with a goal to be promoted to the 7th grade in SY 2016-17. The demand for the program was high; according to the Center Leader for Fresh Start and Gateway, for every one student admitted, at least two additional students were eligible. The median age of these students at the beginning of SY 2015-16 was 12 years old (most students begin 5th grade at 10 years old). Most of the students had a history of a high level of transience, some switching schools multiple times during one school year. Only nine students (30%) had RtI plans upon entry to Gateway. Of the 30 originally admitted into the program, 23 finished it; the other seven went back to their home school before the end of the year. Of the program completers, ten were promoted to the 7th grade and 13 to the 6th grade for SY 2016-17.

The instruction level of the students was far below 5th grade upon entry into Gateway. Such low starting scores indicate that these students were not provided sufficient interventions before entering the program. The average fall SRI score (reading benchmark) for Gateway completers was 532 Lexile points. This score roughly equates with a 3rd grade reading level. The average SRI score (reviewing highest score achieved at any point during the year) at the end of the program was 720 Lexile points, which is approximately at 5th grade reading level. The average fall MAP score (math benchmark) for Gateway completers was 193, which is around the equivalent of a beginning of the year 3rd grade on-level score. The average MAP score at the end of the program was 205 points, which represents a middle of 4th grade on-level score. Thus, though their growth should be commended, students remain very below grade level as they enter 6th and 7th grade.

We spoke with eight SCCPSS employees involved in some capacity with the Gateway Program during SY 2015-16, including Gateway classroom teachers, paraprofessionals, the transition case management coordinator, and teachers involved in Gateway Saturday school and summer school. Everyone we spoke with supported the purpose of Gateway, and they all think a program to support overage students in the District is necessary. However, they all expressed concerns with the program. The following is a list of some of the issues that different people discussed:

- Unclear selection process for choosing students;
- No District-provided modified curriculum or pacing guide for the program;
- Inadequate small group instruction and/or differentiation in classrooms;

- Students with individual education programs (IEPs) not receiving the minimum service hours from the special education (SPED) teacher (10 hours per week in an alternative learning environment);
- Lack of classroom materials and resources;
- Teacher input into the program not being considered
- No dedicated counselor

We discussed these concerns with District Administration, and there is a difference of opinion regarding some of them. For example, Administration stated that the process for selecting students was clear and includes hand selection of participants based on SRI/MAP scores, principal recommendations, and a review of student behavior. District Administration also believed there were sufficient learning materials and resources, including ChromeBooks, A+ Learning, Reflex Math, Newsela, and i-Ready assessments.

Most people we spoke to at Gateway believe the class size of 15 students was a manageable size class. None of the people we talked with thought that the students felt like it was a punishment to be at Gateway.

Many of the 2015-16 Gateway guidelines outlined in a handbook that students and parents sign, were not enforced. The student program requirements state that students cannot have more than three absences. Only seven students had three or less absences. The average number of absences of the students who remained in the program was 9.74 days. Six students missed 15 days or more, with the highest number of absences at 33. Guidelines also state that students cannot have more than one disciplinary referral. Ten students exceeded more than one discipline referral. Four students had five or more referrals. Most of the people we spoke with said that behavior problems were not adequately addressed. At some point in the school year, Gateway students were no longer allowed to attend connections classes (art, music, P.E., etc.) due to behavior. Connections classes were then taught by Gateway classroom teachers. One person interviewed thought the reason the rules were not enforced was because doing so would result in the loss of the majority of students from the program. District Administration also agreed that guidelines were not always enforced because to do so does not acknowledge the challenges some Gateway students face. Gateway program requirements were not changed for SY 2016-17.

The use of the promotion rubrics and criteria used for Gateway students was not consistent across the cohort. Attending summer school was a requirement for promotion for Gateway students. Based on the rubrics used, students are supposed to score seven or higher (out of a possible 10) on both the reading and math rubrics in order to

be eligible for promotion to the next grade. The rubrics for elementary school[8] are different than the rubrics for middle school.[9] Of the 23 Gateway students, eight students were scored on both the elementary and middle school rubrics, according to student records. Based on promotion guidelines on the elementary school rubric, only one of those eight students scored a seven or above in only one subject (reading). When these same eight students were scored on the middle school promotion rubric, they all scored seven or higher on both reading and math, making them eligible for promotion. Of the remaining 15 students, four were only scored on the elementary rubric, one record was not obtained, and the other ten were only scored on the middle school rubric.

Students who completed Gateway in SY 2015-16 are now back at traditional schools for middle school. These students may participate in REP or RtI at their current schools, but are not tracked or provided more support than students who have remained on track for their school careers.

The following suggestions were made by people we interviewed on how to improve the program:

- Notifying students at the end of the school year prior to entry into Gateway;
- More accountability for students and parents if students are not adhering to program expectations;
- More instructional time devoted to remediation and foundational skills;
- More experienced teachers leading the program;
- Allowing students to attend connections;
- Extending the length of the program to allow for more instructional time, potentially including the summer before the students' Gateway year;
- Extended learning day;
- Socioemotional skill development; and
- Start the program with students in grades lower than 5th grade

District Administration felt that notifying students at the end of the school year about entry into Gateway was too early since students had not yet gone to summer school.

[8] Criteria for elementary rubrics: Compass learning pathway completion (up to 3 points); final report grade (up to 2 points); SRI score and how close to benchmark (up to 3 points); overall conduct grade for the school year (up to 1 point); attendance missing three or less days of summer school (up to ` point). Bonus points include 1 point for scoring GMAS proficient or 2 points for scoring GMAS distinguished.

[9] Criteria for middle school rubrics: Final report card grade (up to 3 points); SRI growth (up to 3 points); SRI score and how close to benchmark (up to 3 points); attendance/conduct missing less than six days OR conduct grade of S or E (up to 1 point); Bonus point for Ready Theory, Compass Learning, MobyMax, etc. (up to 1 point).

District Administration agreed with the need for more accountability, more experienced teachers, and socioemotional skill development.

It should be reiterated that Gateway was in its first year of implementation during SY 2015-16. The true effectiveness of a program cannot be fully determined based on only one year of implementation. Moreover, we acknowledge Gateway's tremendous task, to provide accelerated education to overage students to catch them up with their peer group. Some changes have been made for SY 2016-17, including changing the eligible students from overage 5th graders to overage 4th graders. The accelerated program may be more feasible since 4th and 5th grade are both elementary grades, instead of having to teach 5th and 6th grade content like the previous year. During SY 2016-17, a counselor has been assigned to Gateway and Fresh Start. This person also serves as the transition case management coordinator. Gateway also has an academic coach three days a week. Additionally, Gateway now has its own SPED teacher position, although it has not yet been filled. The program has also moved to Shuman Elementary. As Gateway is now located at a school with 21st Century, there is potential for Gateway students to attend after school programming with 21st Century.

Programs for SY 2016-17

Though beyond the scope of the audit, it is worth noting the additional programs the District has added to support overage students in SY 2016-17. The 7+ Program is a site based data monitoring process at middle schools aimed at identifying overage 7th grade students who are two or more grade levels behind. The intent is to direct these students to interventions which support grade acceleration. The Rising STARS program, modeled after the STAR Academy developed in Pickens County, South Carolina, has 33 overage 8th students. Students enrolled with Rising STARS go to school every day at a feeder high school with transportation provided. A middle school teacher is assigned to the high school to support students enrolled in the program. Participating students are able to earn at least six credits (per year) toward their high school graduation and take courses with regular high school students. Upon completing their first year with Rising STARS, these students could potentially be promoted to 10th grade.

Recommendations for Condition C

Internal Audit recommends to Academic Affairs:

1. Survey secondary school sites regarding the efficacy and availability of credit/grade recovery opportunities in order to determine what opportunities need to be expanded and/or improved. Use the results of this analysis to develop and implement enhanced credit/grade recovery opportunities.

2. Require schools that meet a certain threshold of overage students have a plan to support and remediate them, which should be part of the school accountability plan. These same schools should communicate their grade/credit recovery options to eligible students and parents throughout the course of the school year.
3. Title I schools with high populations of overage students should consider categorizing overage students as a subgroup in order to devote Title I resources and track academic progress. The District should consider applying for Title I, Part D funds to increase resources available to support overage students.
4. With input from elementary school principals, provide grade/recovery opportunities for students in elementary school, including offering summer school to elementary students who failed core courses.
5. Require students who are retained to have an individualized learning plan to be implemented and monitored during the retention year.
6. Make the following improvements to Gateway:
    a. The District should consider notifying students of their entry into Gateway earlier than is currently done so that students can start Gateway on the first day of school or as part of a Gateway summer school cohort.
    b. Adhere to program requirements outlined in the Program Guidelines or modify them.
    c. Monitor Gateway program for differentiated instruction, remediation, and services provided to students with IEPs.
    d. Criteria used for summer school promotion rubric for Gateway students should be more clearly defined.

Condition D. Transition to high school is challenging for many students. There are not enough proactive and preventative strategies to make the transition to 9th grade successful for more students. *(DAS-REMI Goal I)*

Details of Condition D

According to the Southern Regional Education Board (2002), students are three to five times more likely to fail a class in 9th grade than any other grade (cited in Corsello & Sharma, 2015). Ninth grade tends to be the largest class size at high schools across the country because of student retention rates in 9th grade (Balfanz & Stewart, 2011). Nearly one-third of the nation's recent high school drop outs were never promoted beyond ninth grade (Neild, 2009). There are developmental, academic, and structural challenges that may be more prevalent in transitioning to ninth grade than to other grades (Neild, 2009 cited in Corsello & Sharma, 2015, p.5). They include:

1. Developmental and life course changes where parental influence wanes, and children have more autonomy, reduced parental supervision and support while

peer influence increases. These can lead to increased risk taking and declining academic performance.

2. Transition to a new school that involves breaking the social bonds that students had formed with their teachers and peers from the middle grades. Students must negotiate new social relationships and adapt to the practices and routines of the new school.
3. Inadequate preparation for high school where students who struggled academically or who were inadequately challenged before high school fall even further behind. Students with poor math and reading skills are overwhelmed by academic demands of high school and get discouraged that they will ever complete it.
4. High school organization and climate in which the traditional social organization of high school encourages teachers to focus on the subject matter and not the students. Students have different teachers for each subject, and teachers have little or no opportunities to learn how students are doing in other classes.

Many of these challenges were confirmed in our interviews with SCCPSS high school principals. They all believe that the majority of failure in high school occurs in 9th grade, and that if students can be successful in 9th grade, they are much more likely to graduate from high school. Two of the three high school principals mentioned that many parents view their high school-age students as "adults" and therefore do not stay involved with their student's academic progress. One principal said the challenge for high schools is that when many students come in so far behind grade level, it is difficult to get them to graduate within four years. Two of the school principals lamented that there are no reading teachers in high school, which is problematic as many students come to high school as struggling readers. Most high school teachers are not trained to teach reading, particularly using adult literacy techniques. According to the Alliance for Excellent Education, students who enter high school with low reading abilities are twenty times more likely to drop out than their highest-achieving peers (cited in Gewertz, 2005). High school courses are content driven in order to meet graduation requirements, and thus must be delivered on grade level, not instructional level. One principal commented that the credit driven atmosphere of high school is not conducive to intense remediation, and that the District does not provide resources for it. Another principal said that high schools could not offer remedial classes during the school day because they would not be paid through FTE.

The data related to SCPSS 9th grade course failure at high schools across the District reflect high course failure rates, particularly for overage students (Table 12). The overall District course failure rate for first-time, overage 9th grade students is four times higher (40%) than that of students who are not overage (10%).

Table 12. Course failure rate for first time 9th grade students

First-Time 9th Grade	Over-Age 2 or More		Over-Age 1 Year		Not Over-Age	
	SY 14-15	SY 15-16	SY 14-15	SY 15-16	SY 14-15	SY 15-16
Core Course Failure Rate	44%	40%	27%	24%	13%	10%
Beach	57%	40%	31%	28%	22%	12%
Early College	NA	*	NA	0%	NA	2%
Groves	51%	60%	40%	42%	28%	25%
Islands	15%	31%	16%	12%	9%	5%
Jenkins	28%	38%	19%	21%	12%	13%
Johnson	63%	51%	33%	25%	25%	20%
New Hampstead	18%	39%	13%	21%	8%	7%
Savannah Arts	*	*	3%	7%	1%	1%
SLS @ Savannah High	33%	16%	30%	26%	17%	13%
Windsor Forest	24%	40%	23%	18%	11%	11%
Woodville-Tompkins	*	*	3%	15%	4%	1%
Building Bridges	NA	50%	NA	45%	NA	26%
Coastal Georgia Comprehensive Academy	*	*	*	19%	*	14%
ELL Program @ Groves	NA	0%	NA	13%	NA	0%
Early College Program (before modified into a school)	*	NA	*	NA	2%	NA
Ombudsman	75%	NA	69%	NA	56%	NA

*Not reported; less than 20 core courses

Additionally, the District's ratio of 9th graders to the prior year's 8th graders for SY 2014-15 and SY 2015-16 was compared to the ratios of a selection of comparable districts. If students were progressing through 9th grade on time, the ratios would be expected to be similar numbers. However, about 30% of students in 9th grade in SCCPSS were also in 9th grade the previous year (signifying course failure and grade retention) compared to the 10-17% of repeating 9th graders in other comparable counties[10] in the state (Table 13 below).

Table 13. Ratio of 9th graders to prior year 8th graders

	SY 2014-15	SY 2015-16
SCCPSS	1.31 to 1	1.31 to 1
Comp. Group	1.10 to 1	1.17 to 1

[10] Bibb, Clayton, Douglas, Henry, Muscogee, Richmond, and Atlanta Public Schools

"The movement from the eighth to the ninth grade is an especially difficult transition for many students, pointing to a need for key programs and instructional support at the ninth grade level" (Arlington Public Schools, 2011, p. 10). Several models have been implemented and studied in school districts across the country to reduce 9th grade retention and course failures. For example, Building Assets-Reducing Risks (BARR) (Sparks, 2016) was established in Minnesota in 1998 after a high school's 9th grade counselor realized that nearly half of the freshmen at her school were failing at least one core academic course. Incoming freshmen are grouped in cohorts of 30 to take the same core academic classes together. Students also have a 30-minute weekly lesson on social-emotional skills. Teachers meet every week for a check-in on every student in their cohort, discussing academic, social, and family needs and strengths. After the first year, course failure rate fell from 47% to 28% and has leveled off to less than 20% every year. New Hampshire's Achievement in Dropout Prevention and Excellence Program utilizes a research-based risk assessment tool to match individual students with appropriate supports, based on their risk factors, to try to ensure a better transition into high school. The risk assessment tool is completed by transition teams during students' last middle school year (Kennelly & Monrad, 2007, p. 27). Another model is Talent Development High School's Ninth-Grade Success Academy in Philadelphia (Kennelly & Monrad, 2007, p. 21), which has six main strategies for helping ninth grade students be successful:

1. A separate physical setting in which the needs of the incoming freshman class can be met in a distraction-free, concentrated way;
2. A team-teaching structure designed to divide the class into smaller, more intimate groups, identify specific students needing assistance, and provide that assistance effectively;
3. Supports and incentives for students to attend school regularly and achieve academically;
4. A curricular regimen, built upon the extended block schedule, which was designed to help students overcome skill and knowledge deficiencies;
5. The Twilight Academy, a specialized program for ninth graders who failed, or experienced difficulty, in the normal school setting; and
6. Ongoing coaching and professional development for teachers that is curriculum-specific and focuses on modeling lessons, strategies for learning, and classroom management.

One District administrator we spoke with used to lead a 9th Grade Academy in another school district. She said the most important parts of the program included the academy being physically separated from the rest of the school and having its own leader, selecting teachers who had a passion for teaching 9th graders, providing teachers training in developmental psychology to provide context for student behaviors, and

having social/emotional support for students from a guidance counselor and social worker.

According to our interviews, all three high schools reviewed as part of this Audit have instituted some form of a 9th grade academy. We also surveyed the eleven SCPSS high school principals regarding their perspectives on 9th grade academies (Table 14). Seven principals completed the survey, including five from schools in high poverty areas. Six principals (86%) responded they believe that 9th grade academies would both reduce course failures and reduce the dropout rates at their school. They were questioned on the usefulness on various features of 9th grade academies reviewed in the literature, as well as if these features were in place at their schools.

Table 14. SCCPSS high school principal perceptions on 9th grade academy features

9th Grade Academy Feature	Percent of principals who thought feature was useful or very useful	Percent of schools that have feature, according to principal
Physical separation of 9th grade students from rest of the student body	71%	14%
Dedicated 9th grade academy administrator (who reports to the principal)	71%	57%
Remedial math course	58%	57%
Remedial reading/English	58%	43%
Block scheduling	71%	86%
Double dosing (taking a subject all year, even with block scheduling)	43%	43%
Freshman seminar class (note-taking, study skills, time management, etc.)	86%	14%
Positive teacher-student relationships	100%	100%
Team based teaching	86%	14%
Common planning time for teacher teams/time for collaboration	86%	29%
System to identify students with higher risk of failing	86%	57%
Real-time review of data	86%	29%

Many of the features that high school principals feel are useful or very useful are not available in many SCCPSS high schools. For example, 86% of principals believe a freshman seminar class and team based teaching are useful, but both are only available in 14% of schools. Common planning time for teacher teams/time for collaboration and real-time review of data are present in only 29% of respondents' school though 86% of principals favor them. It is important to note that this survey does not reveal to what extent these features are in place and/or if they are offered with consistency and fidelity to all students.

Recommendations for Condition D

Internal Audit recommends to Academic Affairs:

1. Implement research-based, validated practices to reduce 9th grade retention at schools where 9th grade course failure rate reaches a certain threshold.
2. Consider developing a research-informed District model for a freshman academy. Pilot model at select high schools, monitor its implementation, and evaluate for effectiveness in reducing 9th grade retention. Ensure adequate funding is obtained prior to implementation.

Condition E: The majority of overage students face many nonacademic challenges that present barriers to learning. The District could address these challenges more effectively. *(DAS-REMI Goals I and IV)*

Details of Condition E

While overage students cannot be lumped into one homogenous group, it is true that the majority of overage students must contend with challenges beyond the classroom. Most overage students have personal, family, and social barriers that interfere with the ability to go to school and do well (Dynarkski et al., 2008). As stated earlier, nearly 80% of overage students are economically disadvantaged. One principal we met with underscored the harmful effects of poverty. He commented on how the poverty rate is higher in the neighborhoods his school serves than in metropolitan areas like Oakland, California, Washington, DC, and Harlem, New York. One person we interviewed pointed out how retention can invade a school's culture; when retention is not uncommon, some students believe it is acceptable to be retained. Another principal mentioned that we need to acknowledge and address the challenges students face as part of supporting them academically. We must acknowledge that improved instruction alone cannot eliminate or address the non-academic barriers to learning that many students face (Light et al., 2013). Educator and advocate Pedro Noguera stated in an interview, "Educational equity really is about giving students all the tools and support they need to be successful—recognizing that none of the kids are the same. Some kids have greater needs than others, and so we need to be thoughtful in the way we allocate resources and support children" (Rea, 2015, p. 20).

While continuing to provide strong academics, one way to address these non-academic barriers is for schools to offer "wraparound" services, or student and family supports integrated with and often delivered directly in schools that help address social and nonacademic barriers. The theory behind wraparound services suggests that "students whose health and wellness needs are attended to will be healthier, more focused, and better able to learn. Similarly, families engaged with schools and supportive services will

have increased capacity to support children learning and health. For schools, having additional systems for confronting social challenges that impede learning, will allow teachers and administrators to focus on instruction" (Jones, 2014, p. 2). The types of wraparound services offered, including those provided within schools and those provided through coordination with external organizations, can vary greatly, depending on the needs of the school community. Some examples of wraparound services are school based clinics, family counseling, food assistance, adult education, and parenting classes. In a report from the Southern Education Foundation (2015) of instructional and community-based strategies for strong public schools in Georgia, one example shared was the Clark County School District's commitment to utilizing schools as community hubs as part of its effort to improve student outcomes and close achievement and opportunity gaps. The District has formed multiple partnerships with local nonprofit groups to provide wrap-around services and address issues such as summer slide, food insecurity, after-school enrichment programs, and the digital divide.

Nearly everyone we interviewed in the school setting believes that wraparound services need to be available at schools, although they differed on the level of school involvement. Some think schools should only connect families with community organizations that provide nonacademic services while others thinks these services should be available at the school site.

In the survey to social workers and counselors, we asked whether or not they believed offering wraparound services in schools is a good idea. Social workers unanimously believed it is a good idea, and a great majority of counselors (79%) also agreed. As a follow up question, both groups were asked to select the three wraparound services they thought would be most beneficial. From a list of ten choices, overwhelmingly, 93% of social workers selected mental health services, followed by parenting classes (47%), and tied for third with 33% each were school-based health clinic and assistance signing up families for eligible social services. The counselors' choices mirrored the social workers with mental health services (74%), parenting classes (54%) and signing up for social services (55%).

The vast majority of all three groups we surveyed agreed or strongly agreed (64% of social workers, 77% of counselors, and 75% of teachers) that "community organizations working in the schools could play a key role in providing support to overage students." Social workers and counselors were asked to name between three and five community organizations they believe the school system should work with. Responses included thirty-nine individual organizations with the Boys and Girls Club, 100 Black Men of Savannah, Department of Children and Family Services, and Gateway Counseling being the most frequently listed groups. Respondents also answered the question more generally and instead of naming specific organizations, listed the kinds of organizations to partner with; these top categories included mentoring groups and local churches.

A local organization that could assist in connecting students and resources is Communities in Schools (CIS). According to CIS literature, their model provides site coordinators at schools to "assess student needs and provide resources to help them succeed in the classroom and in life." These CIS site coordinators "conduct needs assessments, develop student support plans, provide, broker and coordinate resources, evaluate student progress against established goals and monitors, and adjust service delivery, as needed." Their research-based strategy is to "unify the full resources of the community (civic organizations, local government, law enforcement, businesses, faith groups, and volunteers) around children, families, teachers and schools as a support system." Their model incorporates three tiers of increasing support for students, where Tier I encompasses school wide initiatives, Tier II contains targeted services and resources typically provided in a group setting to students with common needs, and Tier III focuses on individual students with multiple risk factors. CIS partners with SCCPSS, but is currently only working in one school, Haven Elementary, which is now in its third year of implementation. While results cannot be attributed solely to the presence of CIS, Haven's academic achievements are positive. For example, 78% of students in 2nd grade, 70% of students in 3rd grade, 73% of students in 4th grade, and 88% of students in 5th grade at Haven were reading on grade level by the end of SY 2015-16. A current barrier to CIS engaging with more schools is lack of funding.

Positive adult-students relationships can also be an important nonacademic support for struggling students. Many teachers wrote in our survey about the potential benefits of mentors for overage students.

> Respondent #38: "Students tend to perform up to a standard that is expected. If someone is watching and checking on their attendance, behavior, and grades then they know they are being monitored closely and that someone is looking out for and pushing them to excel."
>
> Respondent #51: "Most of our overage students are capable of passing or at the very least showing improvement. The first reason for retention is poor behavior, lack of respect for school as an institution and/or teachers, lack of a vision of their future and importance of education in having a successful future, a seemingly complacent attitude toward retention/failure. Because of this, a mentor would be extremely helpful in showing these children the value of education, helping to instill a strong work ethic and sense of empowerment in their future, establish goals, and provide a role model they can emulate…"
>
> Respondent #137: "Many students lack motivation because they do not feel that adults in their lives care about their educational success or are "on their side. Mentoring and tutoring provide students with positive adult interaction and make

them feel that they have an advocate, and at the same time provide more individualized instruction."

Some SCCPSS schools have mentoring programs, but it seems to be a piecemeal effort, largely driven by a school's specific interest.

The value of personal connections and positive relationships between students and teachers cannot be underestimated as a way to engage students and support learning. Research suggests that teacher-student relationships are the primary factor in determining the degree to which students feel cared for and connected to their school community (Ellerbrock & Keifer, 2014). Some principals expressed concern with some teachers' ability to connect with overage students, particularly if students have a behavior problem. One principal said she thinks that some teachers have a mindset that some students can't perform and that interferes with their learning/success. Another principal discussed the demographic changes at her school over the past five years, but believed the professional culture of the school had not shifted, meaning many teachers have a difficult time addressing the challenges of their school's population. This principal thinks there needs to be more professional development for teachers to improve cultural competence and challenge teachers' mindsets to work with diverse students. She pointed out that professional development to develop content expertise does not matter if the classroom environment is not conducive to learning. In interviews with teachers who work effectively with students facing adversity, one reporter found a common belief amongst the teachers that these students "have strengths that can sustain them as they reach for education goals. The educators interviewed respect those strengths and help students recognize and develop them" (Miller, 2006).

Finally, helping students develop socioemotional skills is another way to provide nonacademic support. Several principals mentioned the negative external factors competing with education for a student's attention are strong. Most people we interviewed believed that overage students need additional socioemotional support. One middle school principal discussed the need for classes/lessons to learn self-esteem, coping skills, the value of education, goal setting, how to be self-motivated, the difference between school and street behavior. Most of the principals discussed the difficulty in trying to motivate overage students.

The vast majority (77%) of counselors we surveyed agreed or strongly agreed that they should "help students develop non-cognitive skills like persistence, teamwork, self-discipline, and organization." They were asked a follow up question to "explain the way you believe these non-cognitive skills can best be taught." The top answers provided were small group, classroom lessons, and individual sessions. However, it is important to note that 57% of counselors did not think they "generally have enough time during the day to counsel students who need additional academic, social, or emotional support."

When asked a similar question about counselors, 48% of teachers also did not think "guidance counselors provided sufficient support to overage students who experience behavior and/or emotional problems."

Integrating non-academic supports is by no means an easy task and requires commitment from the Board, District leadership, principals and teachers, collaboration between the District and community partners, and a large investment of resources. One study (Jones, 2014) estimated the cost per student ($1,312) to provide comprehensive wraparound services. It also should be noted that the benefit of offering these types of services would extend beyond overage students. For a case study on implementing District-wide learning supports, please see *Rebuilding for Learning: Addressing Barriers to Learning and Teaching, and Re-engaging Students* regarding the experiences of Gainesville City Schools in Georgia.

Recommendations for Condition E

Internal Audit recommends to Academic Affairs:

1. Perform a needs assessment at select schools to determine what wraparound services would be most beneficial to school community. Study the feasibility of providing these services.
2. Increase the number of professional learning opportunities for teachers on student engagement, culturally responsive teaching, and/or related topics.
3. Identify the role of counselors in supporting overage students and monitor their involvement.

Internal Audit recommends to Public Affairs and Administrative Services:

4. In conjunction with wraparound services feasibility study, create a list of all community organizations, non-profits, governmental agencies, etc. that SCCPSS currently works with, categorized by service type.

VI. BEST PRACTICES

Several best practices have been discussed throughout this report. This section will highlight best practices of alternative pathways and sites for overage students. "Alternative education programming—often featuring flexible scheduling, multiple means to earn credit, differentiated instruction, and personalized learning—offers at risk students more customized options for achieving a high school diploma" (Culbertson et al, 2014, p. 1).

The majority of the teachers we surveyed selected an alternative school for overage students as the intervention they thought would be most effective for supporting

overage students. This reflects their response to another question where 74% agreed or strongly agreed that overage students would be more academically successful in an alternative school setting. As part of the survey, teachers were asked to explain why they chose the top two interventions they believed would be most effective. Almost 40% of teachers wrote about an alternative school for overage students. Several reasons were provided, including giving students more individualized attention and support, more flexibility in scheduling, and concern that overage students are a negative influence on other students in the class.[11]

> Respondent #9: "…An alternative school for overage students allows for social interaction with students with similar ages. The stages of development are so great between 12 and 16 and I find it inappropriate for 12 year olds and 16 year olds to be in close proximity of each other."
>
> Respondent #15: "Overage students feel the need to mask their shortcomings by misbehaving. Making the issue a vicious cycle. Moreover, it affect the overall learning for all students when you have behavior problems in the classroom from students that look like grown men and women. It is cruel to make overage students stay in school with students who act and look half their age. Two years is a big difference in physical and emotional development. An alternative school would provide a safe environment for students that would curtail their discomfort and shame."
>
> Respondent #66: "An alternative school for overage students would take the stigma of being overage away - everyone there would have the same status. Tutoring would complement any other instructional vehicle used. Tutoring should be personal and focused."
>
> Respondent #109: "An alternative school for overage students would allow students to catch up in an environment that caters to their needs. Hopefully, this school could offer an accelerated program to catch up students who are more than one grade level behind in performance, especially those that are two or even three grades behind where they belong in age. Having students who are significantly older than the other students in a classroom is not developmentally appropriate- ie. a 15 year old in 5th grade. These students need to be in a setting designed for their needs and advanced ages."

There were counselors and social workers who also agreed an alternative environment may be beneficial for overage students.

[11] Spelling errors have been corrected.

> Social Worker Respondent #2: “Overage students, the students who've been retained more than once, need to have a separate program that is specifically tailored to expedite their success. The older kids I work with feel out of place when they are surrounded by students much younger than themselves. It can cause many behavior problems.”
>
> Counselor Respondent #26: “At the high school level, I believe it can be accomplished through a smaller learning environment with students taking blended online learning opportunities and courses that they have an interest (i.e. a career or technical pathway). They can also be offered the opportunity to learn work or job ready skills with a goal of being placed in a job, apprenticeship or internship.”

Many of the principals we interviewed support an alternative environment for overage students. The ones who support an alternative site for overage students do so in order for them to be in an environment with others facing similar circumstances, instead of having to “save face” amongst younger peers. Many of those principals also believed that misbehavior of overage students stemmed from them trying to deflect from their academic difficulties.

However, it must be cautioned that alternative programs cannot “be used as dumping grounds where schools can escape accountability for struggling students. Instead, alternative programs should utilize innovative education strategies to reengage students and help them get back on track” (Rath, et al., 2012, p.4). Below is a list of features of effective alternative education models (Culbertson et al, p. 4):

- Development of a comprehensive alternative pathway (not an “add on” or piecemeal approach)
- Clearly identified goals with high expectations for social, emotional, behavioral, and academic growth
- Low adult-student ratios, with significant staff autonomy
- Strong positive relationships between teachers and students
- A non-deficit philosophy (teachers adjust their instructional approaches to accommodate individuals, rather than demanding that students change to fit the approach)
- Training and support of teachers in areas such as behavior management, alternative learning styles, and communication with families
- Individualized student support with links to multiple agencies and individuals outside of the school building including students’ families

The New York City Department of Education (NYCDOE) developed an Office of Multiple Pathways to Graduate (OMPG) more than a decade ago, the mission of which is to

identify off-track students, those who have fallen behind in credits or are overage for their grade, and offer educational options that recognize their academic and non-academic needs. They offer a portfolio of recuperative options, acknowledging that off-track students are a heterogeneous group that requires different approaches to get back on track. The OMPG offers three alternative models:

- Transfer Schools: Full-time day schools for overage, under-credited students who are already off track but still young and far from graduation. They are small, personalized learning environments with an emphasis on rigorous academic standards, student-centered pedagogy, support to meet instructional and developmental goals, and a focus on connections to college. The teachers use the Framework for Effective Instruction (FEI) model, which is briefly described below. These schools graduate up to 69% of their students, those who are disengaged, overage, and under-credited, compared to an average of 19% for this population in the traditional high school.
- Young Adult Borough Centers: These centers are housed within traditional high schools and are designed to provide older students, ages 17 to 21, who have already completed four years of high school, with a way to satisfy graduation requirements. They concentrate only on the credits they need to graduate. Evening hours help students who have other responsibilities. Each site is operated through a collaborative partnership between the NYDOE and a community based organization.
- Access to GED: This program is available to students who are older with too few credits to graduate before they age out of the school system.

All three alternative models incorporate a Learning to Work initiative, which aims to keep overage, under-credited students engaged in school by developing the skills they need to complete high school, gain employment, and succeed in post-secondary education. Students have access to employability skills development workshops, subsidized internships, college and career counseling, and job placement. The program also includes attendance outreach, individual and group counseling, academic tutoring, and youth development supports (Alliance for Excellent Education, 2011; Cahill et. al, 2006; Rudenstine & Gitelman, 2008).

The OMPG also developed a professional development handbook for professional learning communities to learn about the Framework for Effective Instruction (FEI), a teaching and learning model developed to use with overage, under-credited students. It incorporates:

1. The sheltered instruction model for English Language Learners;

2. The use of seven key learning strategies for struggling readers and the development of metacognitive thinking skills;
3. The development of higher-order thinking skills in all students.

This handbook is available online and is listed in this report's bibliography (Rudenstine & Gitelman, 2008).

The Houston Independent School District in Texas (2011) uses a tiered model to support its overage middle school students in credit acceleration. The school-based tier addresses the needs of overage students at the school site. Each middle school has one to two recovery centers where they receive instruction through computer-based learning and instruction from a teacher and a tutor (blended learning model). Students receive a double dose of reading and mathematics. Students can accelerate at their own pace. This tier serves the most students (around 1,400). The next level tier is a district-based intervention, to support overage 6th and 7th grade students who were not successful through the recovery centers (around 200 students). These students attend school at one campus. They receive instruction from a teacher, including double doses of reading and math. Students are eligible for two years of instruction in one year plus a summer school component. The last tier is the high school partnership for overage 8th grade students. These students (around 200) attend school at one of ten designated high school campus, but remain middle school students for the first semester. Students receive instruction through a blended learning model and also receive a double dose of math and reading.

SCCPSS seems to be implementing alternative models similar to that of Houston's for SY 2016-17, although the District's programs involve a much smaller number of students.

Before any large scale alternative education models could be considered, the cost and potential benefits and limitations must be compared to those of offering alternative classes and/or scheduling at a students' home school. Another crucial consideration of providing overage students an alternative option to the traditional school setting is the careful selection of the teachers and staff. All principals stressed the importance of having the right teachers to teach overage classrooms, whether they be at an alternative site or at a student's home school. Some of the qualities mentioned include the ability to connect with students, patience, and very strong classroom management. One District Administrator said teachers working with overage students need to be hardworking, willing to go the extra mile, be research minded, have the ability to diagnose the root of a student's misunderstanding, be organized, and be an expert in reading instruction. Another Administrator said these teachers need to have "high expectations with compassion."

Recommendations for Best Practices

Internal Audit recommends to Academic Affairs:

1. Review successful models for educating overage students at alternative sites. If alternative sites are developed, their design and implementation must be carefully planned and monitored. Such alternative sites should not be considered punitive.
2. Develop a professional learning community for teachers who teach a large number of overage students, either in a traditional school setting or alternative setting.
3. Research recruitment and retention strategies to attract experienced, committed teachers to teach overage students.

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