

# *State Requirements that Impact Student Enrollment & Withdrawal*

August 2024 Update

## **Background**

Common practice in Washington state has been to involuntarily withdraw students without confirmation that students are enrolled in an approved educational program. This is a gap in our social safety net for students. This guidance provides information and tools for districts to maintain student enrollment to reengage students in their education. This is a summary of statutory requirements, administrative rule and guidance. For more comprehensive guidance, see our list of [Resources](#).

This guidance provides summaries of the three primary areas of state regulations that impact school district withdrawal and enrollment practices:

1. [Compulsory Attendance](#)
2. [Apportionment](#)
3. [Comprehensive Education Data and Research System \(CEDARS\)](#)

## **Key highlights**

- The Office of Superintendent of Public Instruction (OSPI) does not require districts to withdraw students for either apportionment purposes or CEDARS reporting.
- Districts must follow the required steps in the truancy intervention process even if a student is withdrawn from enrollment.
- Districts must also have a process for outreach and reengagement for students who have been withdrawn due to nonattendance and there is no evidence that the student is enrolled elsewhere.
- OSPI strongly encourages districts to follow the steps in the truancy intervention process before withdrawing a student from enrollment.

For more comprehensive guidance, see our list of [Resources](#).



# Compulsory Attendance: Required Steps when Students are Absent

## Truancy

If a student accumulates unexcused absences, the school and district must follow the required steps outlined in the Compulsory Attendance law ([RCW 28A.225](#)) even when a student is withdrawn from enrollment due to district policy.

OSPI strongly encourages school districts to follow the steps in the truancy intervention process **before** withdrawing a student from enrollment.

These steps include, but are not limited to:

- Inform parent(s) of each unexcused absence
- Schedule a parent conference to understand the underlying barriers to attendance
  - Administer the Washington Assessment for Risks and Needs of Students (WARNS) or other assessment
- Provide data-based interventions
  - Refer the student to a Community Engagement Board
- File a truancy petition with the local juvenile court between the student's 7<sup>th</sup> unexcused absences in a month or 15<sup>th</sup> unexcused absence in a year

For a detailed summary, see OSPI's Attendance & Truancy Legally Required Steps for [Elementary](#) and [Secondary](#) as well as [Chapter 28A.225 RCW](#). The list above is not intended to provide complete guidance on these required steps.

## Absence Rules

The OSPI absence rules define an absence and the reasons a student's absence must be [excused](#). In addition, [WAC 392-401-045](#) requires districts to conduct outreach and attempt to reengage students even if they have been withdrawn, in addition to the steps required in the truancy process.

## Students that Do not Attend at the Beginning of the Year

A school district maintains the responsibility to conduct outreach ([WAC 392-401-045](#)) and intervene ([RCW 28A.225.020](#) & [RCW 28A.225.030](#)) when a student does not attend school in the

first several days of the school year. Furthermore, neither apportionment rules nor CEDARS guidance require that students are withdrawn from enrollment after the first few days of school if they are absent. See detailed [CEDARS guidance](#) on this [topic below](#).

## Students with Excused Absences

OSPI strongly recommends that districts keep students enrolled when there is communication between the school and the parent, or the student is absent for known reasons. If the student is experiencing chronic absenteeism, OSPI recommends that the school conduct a conference with the family to determine an action plan to support the student to attend more. Note: This conference is **required** for students with 5 or more excused absences from elementary school.

OSPI also strongly recommends that districts take preventative and early intervention measures to support students with excused absences, like nudge letters and parent conferences. See [OSPI's Attendance webpage](#) for more resources.

## Students that Live in the District Boundary

OSPI strongly recommends that districts keep students enrolled that reside within the district's boundary until the school has attempted the required steps above when students are absent. This applies to students known to be living within the school district boundaries or those without evidence of enrolling in another district or approved educational program.

## Apportionment: Claiming Students for Basic Education Funding

Apportionment rules **do not require or direct** school districts to withdraw students from enrollment. Apportionment guidelines only address which students can be claimed for state funding. See the [OSPI Enrollment Reporting webpage](#) for more details.

## Which students cannot be claimed for state funding?

Students who have not attended school for the new school year by the fourth school day of September or within twenty consecutive school days prior to the other monthly count days during the school year cannot be claimed on Form P-223 for state basic education funding ([WAC 392-121-108\(1\)](#)). This includes both excused and unexcused absences.

## Exception to the funding rule

There is one exception to this funding rule, as outlined in [WAC 392-121-108\(1\)\(a\)](#). If there is an agreement in place between the district and the student's parents that the student will continue their educational progress while temporarily absent from school, the student can be counted for two months. However, the student must return to school by the end of the school year. This exception does not apply to ALE enrollment and for students who have not attended a new school year.

## Apportionment & Enrollment for Students with Disabilities

The OSPI absence rules and the steps required in the truancy process described above also apply to students with disabilities.

A school district is not automatically relieved of its special education and Section 504 obligations if a student is not claimed for funding. School districts maintain an obligation to offer a Free Appropriate Public Education (FAPE) for eligible students that live in the district.

It is particularly important to maintain student enrollment for students with an Individualized Education Program (IEP) because the family and IEP team should be working on identifying reasons behind any prolonged absences or school refusal. Unenrolling a student can breed conflict and potentially calls the district's FAPE obligation into question. As previously stated, OSPI strongly recommends that districts keep students enrolled when there is communication between the school and the parent, or the student is absent for known reasons.

Please note, however, that a student who is eligible for special education services but has not received special education services in the month prior to the count day, cannot be claimed on Form P-223H for special education funding.

## CEDARS: Reporting Enrollment to CEDARS

OSPI CEDARS Guidance does not require districts to withdraw students from enrollment after a certain threshold of absences. The guidance below is reflected in the July update of the [2024-25 CEDARS Reporting Guidance](#).

### Guidance for Exiting Students Who are Absent or Whose Status is Unknown

Districts have the authority to establish enrollment policies including how student enrollment is maintained and tracked in their student information systems (SIS). The guidance below articulates the CEDARS data reporting recommendations. These are not requirements unless otherwise stated.

#### Students with Excused Absences

Students who are absent from school for known reasons (e.g. excused absences), should **not** be reported to CEDARS as withdrawn.

#### Enrolled Students with Extended Consecutive Unexcused Absences

School districts have the flexibility to define minimum enrollment thresholds for their students (e.g. when to withdraw students) in their school board policy. For the purpose of CEDARS reporting, a threshold of 20 consecutive full days of unexcused absences is recommended as the

minimum amount of time to keep a student enrolled prior to withdrawing the student for non-attendance.

If a district withdraws a student for non-attendance, they should report the student to CEDARS as follows:

- Date Exited from District (Element B15) and Date Student Exited from School (Element C08) on or after the date of the last recorded unexcused absence Report all full-day unexcused absences that lead up to the student being withdrawn for non-attendance
- School Withdrawal Code (Element C09) is U4 – Involuntarily withdrawn due to non-attendance

During this timeframe the district must follow the truancy requirements (see Legally Required Steps [Elementary](#) and [Secondary](#)). See also Chapter 28A.225 RCW. Students must be included in CEDARS submissions for the remainder of the reporting school year.

## Changes Between School Years

### Students who exit between school years as a confirmed or an unconfirmed transfer

- Confirmed Transfer
  - District receives a records request for a student between school years. Student would be submitted as withdrawn with a school withdrawal code of T0, T2 or T3, dependent upon type of transfer confirmation received.
- Unconfirmed Transfer
  - District receives notice from parent/guardian that their student is moving and will not be enrolled in the new school year. Student would be submitted as withdrawn with a school withdrawal code of U3.

OSPI's recommendation is to submit the exit/withdrawal information for confirmed and unconfirmed transfers that take place between school years in the prior school year.

Reporting the student as exited in the prior school year ensures the student is not included in any program or other reporting in the new school year, e.g., Title I, Gifted, LAP, LEP/Bilingual, etc.

The decision on how/when to report students who exit from a district between school years is a district decision. OSPI recommends that districts be consistent with how they report these students and apply the same business rules to all students.

When a student is withdrawn and submitted to CEDARS as an unconfirmed transfer, OSPI recommends that districts continue outreach to determine if the student/family is still living in the district. If so, efforts should be made to reengage the student.

## **New and expected continuing students who do not attend at the beginning of the year and no communication is received from the student or parent/guardian**

This group of students includes:

- Students enrolled through the end of the prior school year who are expected to attend the following year and,
- Students who are new to the district who pre-enroll prior to the start of the new school year

## **Students who were previously enrolled and expected to return in the new school year and do not attend at the beginning of the year**

OSPI's recommendation is that the district maintains and submits the student's enrollment to CEDARS in the school they are registered to attend through September 30, while attempting to connect with the family to determine if they still reside in the district. If it is determined the family is in residence in the district, but there has been no communication with the student's parent/guardian, then the district must submit full day unexcused absences for each day the student is enrolled and not in attendance. During this timeframe the district must follow the truancy requirements outlined in [Chapter 28A.225.RCW](#) (see Legally Required Steps [Elementary](#) and [Secondary](#)).

Program data, such as special education, bilingual, Title I Part A, Learning Assistance, or other program identifiers, should not be submitted with the student in the new school year, until or if the student returns to enrollment.

For students who do not return to enrollment, OSPI recommends (although does not require) exiting the student no later than September 30th. Exiting the student ensures the students are not included in October enrollment counts or other student programs or measures. These students must be reported with a school withdrawal code of U2 – 'Enrolled in prior year, but no show this year'. The student must be included in CEDARS submissions for the remainder of reporting school year.

## **Students new to the district who enroll prior to the start of the new school year, but do not attend at the beginning of the year.**

For students who are enrolled in the district prior to the start of the new school year but do not attend at the beginning of the year, OSPI recommends that districts maintain their enrollment until confirmed to be residing in a different district or enrolled in another approved educational program, or through the last school day of September, whichever is later.

If the student is determined to be in residence in the district and is not enrolled in an approved educational program elsewhere and does not begin attending before September 30, our recommendation is to exit the student by September 30th. Doing so allows the district an opportunity to do outreach and attempt to engage the student and their parent/guardian. Full day unexcused absences must be reported for each day the student is enrolled and not in

attendance. During this timeframe the district must follow the truancy requirements outlined in [Chapter 28A.225.RCW](#) (see Legally Required Steps [Elementary](#) and [Secondary](#)).

If the student does not begin attending before September 30, OSPI recommends exiting the student by September 30th. Doing so ensures they are not included in October enrollment or any other student measures. These students would be exited with a school withdrawal code of U4 – ‘Involuntarily withdrawn due to non-attendance’. Student must be included in CEDARS submissions for the remainder of the reporting school year.

## Students Who Enroll During the School Year but Do Not Attend

For students who enroll during the school year but do not attend, OSPI recommends that districts maintain their enrollment until confirmed to be residing in a different district or enrolled in another approved educational program.

If the student is determined to be residing in the district and is not enrolled in an approved educational program elsewhere our recommendation is to maintain their enrollment through a minimum of 20 serving days. Doing so allows the district an opportunity to do outreach and attempt to engage the student and their parent/guardian. However, districts are not required to withdraw at this time; if the district chooses the student can remain enrolled longer according to the school district’s policy. Full day unexcused absences must be reported for each day the student is enrolled and not in attendance. During this timeframe the district must follow the truancy requirements (see Legally Required Steps [Elementary](#) and [Secondary](#)). See also [Chapter 28A.225.RCW](#).

If the student does not begin attending prior to the end of the 20 serving days, our recommendation is to exit the student with a school withdrawal code of U4 – ‘Involuntarily withdrawn due to non-attendance’. Students must be included in CEDARS submissions for remainder of the reporting school year.

Withdrawing a student does not relieve a district of their responsibility to attempt to locate and reengage the student. Districts must still follow the required steps in response to unexcused absences outlined in the compulsory attendance law (Chapter 28A.225 RCW).

## Reporting absences

If a district **reports the student to CEDARS as enrolled**, (not exited and no withdrawal code), the students’ absences must be submitted to OSPI.

If a district **does report a student to CEDARS as withdrawn** (exited with a withdrawal code), then the district does not submit absences as of the date of withdrawal and the district must continue to submit the students record for the remainder of the school year.

## CEDARS submissions October 15 deadline

Please note that current school year CEDARS submissions are not due until October 15. Even after October 15, districts can retroactively change or update CEDARS submissions to reflect changes in enrollment.

**This timeline provides school districts with ample time to attempt the outreach and interventions steps for students that do not attend at the beginning of the school year, before committing to reporting students as enrolled to CEDARS for October enrollment counts.**

Additionally, CEDARS reporting is **not required** to be aligned with P223 reporting dates for claiming students for apportionment. Different deadlines and reporting rules apply to these collections.

## Contact

This guidance was developed in collaboration with the following OSPI Departments:

For questions regarding Attendance, Truancy and Reengagement, please contact Krissy Johnson at [Attendance@k12.wa.us](mailto:Attendance@k12.wa.us)

For questions regarding Enrollment Reporting and Apportionment, please contact Becky McLean at [becky.mclean@k12.wa.us](mailto:becky.mclean@k12.wa.us).

For questions regarding CEDARS Reporting, please contact Lisa Ireland at [lisa.ireland@k12.wa.us](mailto:lisa.ireland@k12.wa.us). Resources

- [OSPI Withdrawing Students Webinar \(March 2023\)](#)
- [OSPI Attendance Policies, Guidance and Data Reporting resources](#) – we will publish any further guidance on this topic on this webpage.
- [OSPI Attendance webpage](#)
- [Enrollment Reporting Webpage](#)
- [CEDARS Manual and Reporting Guidance](#)