

APPENDIX A: FULL FINDINGS AND RECOMMENDATIONS

FINDINGS

As a result of its performance review of the 2016–17 CPS elementary Options for Knowledge admissions process, the OIG has issued the following findings:

1. Audited schools with at least one improper admission were the rule, not the exception.

Of the 421 schools audited for elementary admissions that went through, or should have gone through, OAE’s Options for Knowledge admissions process in SY 2016–17, 93 percent contained at least one admissions audit failure. Almost two-thirds had at least 10 audit failures. Nearly half had at least 15 failures. This constitutes a pervasive problem.

2. Admissions audit failures occurred in almost every kind of CPS elementary school imaginable.

Audit failures occurred in 355 of 359 neighborhood elementary schools (with 6,169 total admissions audit failures); at 27 of 38 magnet schools (326 audit failures) and at 10 citywide non-magnet schools (374 audit failures). They occurred in schools with high SQRP ratings (127 Level 1+ schools had 1,769 audit failures) as well as poor ratings (two Level 3 schools had 48 audit failures); 17 overcrowded¹ schools (282 audit failures) as well as 212 underutilized schools (4,219 audit failures). Even 32 of the 38 elementary schools headed by prized Independent School Principals had audit failures (434). At 8 of the 10 most competitive neighborhood schools for open-enrollment kindergarten seats, almost 70 kindergarteners were admitted improperly while more than 1,700 others who applied through OAE were left in the lurch. The 27 schools with selective-enrollment elementary school seats had only one 2016–17 SEES admissions audit failure, perhaps because such seats were among the most closely monitored in the past several years.

3. Nearly two of every five admissions failed the audit.

Among more than 18,200 elementary-grade admissions audited, nearly 6,900 reflected improper admissions. Thus, 38 percent failed the audit, or nearly two of every five admissions. To spot-check these numbers, the OIG interviewed the principals of 30 audited schools about their more than 500 combined audit failures. This sample represented seven percent of both all schools audited and all audit failures. From this process the OIG estimated that 18 percent of audit failures in sampled schools may have been appropriate admissions that were documented improperly — often due to clerical failures to update

¹ “Overcrowded” refers to schools with fall 2015 adjusted utilization rates, including leased and modular classrooms, of more than 120%, which was the metric at the time of these admissions. “Underutilized” schools used less than 80% of their space. Under the utilization metric in effect at the time, only 4% of elementary schools audited were overcrowded; 53% were underutilized and 42% were efficient.

addresses. However, other evidence indicated OAE also may have missed some improper admissions. Therefore, the OIG is using the OAE's audit numbers but cautions that they should be considered estimates. In addition, even if the overall audit failure rate were adjusted downward by 18 percent to reflect the results of the sample group, 31 percent of all admissions would have failed the audit instead of the 38 percent unadjusted rate. Even the lower adjusted rate constitutes a pervasive problem.

4. The neighborhood phenomenon.

The largest number of audit failures by category — 6,169 — involved students who rejected their own neighborhood schools only to be improperly slipped into other neighborhood schools. This reflects the fact that neighborhood schools by far housed the largest number of admissions audited — close to 12,000. In addition, 99 percent of all neighborhood schools audited had at least one audit failure. Neighborhood school admissions had the highest audit failure rate, at 52 percent, among four OIG-created school categories. If all schools audited had properly enrolled their non-neighborhood students in SY 2016–17, admissions to neighborhood schools would have represented almost two-thirds of all Options admissions.

5. Pre-K students, children of CPS employees got improper preference.

One prevalent pattern involved more than 980 children who attended schools other than their neighborhood ones for pre-K and then were promoted to kindergarten in those schools without going through OAE, as required. This practice occurred at almost two-thirds of audited schools. Another pattern was the improper admissions of the children of CPS employees. The admissions of 221 children of CPS employees to 144 elementary schools failed the audit.

6. Improper admissions occurred after schools were dropped from the Options for Knowledge Guide.

According to OAE, 70 audited schools voluntarily opted out of the 2016–17 Options Guide, making them ineligible for out-of-boundary admissions. Yet these schools then turned around and bypassed OAE to improperly admit more than 1,030 kids using apparent side-door processes. Another six schools were removed from the Guide by CPS due to projected overcrowding, yet they improperly admitted a total 68 non-neighborhood students who did not go through OAE.

7. Some schools in Options Guide refused OAE waitlist kids yet accepted others.

Another 47 schools — all with boundaries — stayed in the 2016–17 Options Guide but told OAE they had no seats for outsiders. Then they bypassed OAE to improperly admit 653 students from outside their boundaries.

8. Many principals don't know Options admissions rules.

Many principals interviewed by the OIG did not know all the admissions rules. Others knew the rules, but broke them anyway. Nearly half (14 of 30) functioned as if they had principal discretion, something barred on the elementary level in 2010. Many said they never received training on the rules; others were taught the wrong rules by their predecessors. Many told the OIG that to this day they are lobbied by parents to admit students. This lobbying makes it critically important that principals understand Options admissions rules so they know if a parent is asking them to do something inappropriate.

9. Some principals are improperly screening prospective students.

More than half of the principals interviewed (16 of 30) had their own system for admitting non-neighborhood kids. In several cases these systems included improperly vetting students by checking their report cards for grades and attendance or contacting their previous schools even though the Options Guide bars the use of "academic criteria, interviewing or screening of any kind" during the magnet and open-enrollment admissions process.

10. Schools are ignoring OAE recommendations on how to contact waitlist applicants.

OAE asks schools to "work" their waitlists in IMPACT (the CPS records system that includes admissions) but many schools were not updating their IMPACT waitlists or inserting IMPACT notes on when and how waitlist parents were contacted. This made it difficult to detect queue-jumping. In the future, the GoCPS system is expected to contact online applicants in waitlist order with offers, which should reduce queue-jumping. However, schools will still need to contact the small number of parents who submit paper applications.

11. Three loopholes identified.

The OIG detected at least three loopholes in current admissions policies: 1) Non-magnet elementary schools with citywide boundaries (11 total) are not covered in the two most relevant policies: on CPS enrollments ([17-0426-P01](#)) and on Options admissions ([17-0426-P02](#)). Such schools also are not specifically addressed in the 2016–17 Options Guide; 2) little explicit policy detail is offered on how schools should proceed after OAE-issued waitlists are exhausted; 3) no clear policy language specifically covers admissions rules for the scores of schools that opted out of the 2016–17 Options Guide. These loopholes leave CPS vulnerable to misconduct and undue influence or, at a minimum, to the existence of a jumble of inconsistent practices across the system.

12. One loophole addressed during course of OIG review.

Amid OIG questions about some of the more than 1,030 improper admissions in the 70 audited schools that OAE said had opted out of the 2016–17 Options Guide, one OAE official

acknowledged that OAE should have monitored such schools more closely. As a result, under GoCPS, almost all non-charter CPS elementary schools that were omitted from the old Options Guide now are participating in GoCPS for 2018–19 admissions and thus should be subject to OAE rules. This is a step forward, although it does not address issues at the 322 other schools with audit failures.

13. Scattered rules.

There's no easy way for principals to access all the rules they need to know to properly admit elementary students. Instead, such guidance is scattered across two Board policies; the Options for Knowledge Guide (since replaced by the GoCPS Elementary and High School Guide for 2018–19); the Principal's Handbook and OAE emails. A PowerPoint from a clerk training session contains the most detail, but few principals take this training. Several principals were not sure where to find the rules. As a result, many principals call a colleague, their network chiefs or OAE, resulting in what can be incorrect information, depending on the source. Plus, it is inefficient for OAE to spend time answering questions that could be answered by a clear, concise document consolidating admissions rules.

14. Inconsistent language.

Two key Board policies covering CPS enrollments and Options admissions are filled with constant references to schools needing to follow procedures outlined in the Options for Knowledge Guide. But as of this writing, the term "Options for Knowledge" has been stripped from the title and most of the text of the new GoCPS Elementary and High School Guide for 2018–19. That's because the Options application process is being rebranded as GoCPS. To ease enforcement, admissions rule language should be consistent across the new Guide, existing policies and GoCPS.

RECOMMENDATIONS

As a result of its performance review, the OIG has issued the following recommendations:

1. A thorough training program on elementary Options admissions rules is warranted, particularly among neighborhood school staff.

Many principals conceded they didn't know the rules but seemed eager to learn them. Several recommended that they be trained at their annual Law Conference. Principals, assistant principals and enrollment clerks should undergo mandatory training, minimally, at the beginning of each employee's tenure in a school building. Network chiefs also could use training, as principals described situations in which their network chiefs gave them incorrect advice. One OAE official supported the idea of providing admissions training during principal Law Conferences and suspected that most audit failures were due to the "many misconceptions over the years" held by employees who do not know the rules.

2. CPS needs to make elementary Options admissions rules clear, consistent and accessible.

The rules currently are disorganized, scattered across several locations and pitted with loopholes. Imprecise rules are difficult to enforce and create openings for misconduct. Contributing to this imprecision is the fact that the Options and GoCPS Guides are written as informational tools for parents, yet the two relevant CPS policies refer to the Guides as if they were detailed procedural manuals for school staff, which they are not. The OIG urges CPS to carefully examine its admissions policies, guides and training documents for clarity, conciseness and consistency.

Another way to more swiftly address many issues raised in this report would be to craft a concise summary of key Options/GoCPS admissions rules, preferably in a one-page document, and require that relevant parties sign an attestation in the document affirming that they have read the rules and acknowledging that breaking them could subject them and/or their school to penalties including: termination, as currently reflected in the “enforcement” section of the Options admissions policy (See [17-0426-PO2](#)), the lowering of a school’s SQRP Data Quality Index score, and possibly the loss of an ISP status. All principals, assistant principals and enrollment clerks could be required to sign this document at the beginning of their tenures in their school buildings and to keep a copy for reference. This way, CPS employees could not say they didn’t know the rules or where to find them — two statements the OIG heard frequently. The OIG also would recommend posting this summary online in a location easily accessible to principals and enrollment staff.

This summary of key admissions rules should make clear, at a minimum, that: a) only selective-enrollment high school principals have principal discretion; b) all non-selective students seeking admission to non-zoned schools must apply through OAE and be selected according to the order listed in OAE lotteries. Once OAE waitlists are exhausted, applicants to any remaining seats should fill out “post-application process forms,” which schools must accept on a “first-come, first-served basis” and send to OAE for approval prior to enrollment; c) no vetting or screening of students or families is allowed at any time prior to enrollment and d) in all but elementary schools with magnet pre-Ks, out-of-boundary pre-K students must re-apply through OAE to a school’s kindergarten program. An Oct. 5, 2016 email from Enrollment and Access Executive Director Tony Howard would be a good starting point for this document. Note that Howard’s email was issued after the admissions year covered in the OAE audit but before the OIG talked to principals who displayed lack of knowledge of the rules.

3. Schools that have exhausted their OAE-issued waitlists should be given clear guidance on how to admit additional students.

After waitlists are exhausted, schools are supposed to fill openings by asking parents of potential students to fill out post-application process forms on a first-come, first-served

basis, according to the OAE's clerk training PowerPoint (note that this instruction is missing from the 2016–17 Options Guide, its 2018–19 GoCPS version and two relevant Board policies). Some principals admit vetting students once their waitlists are exhausted. This is against the rules, officials say, but post-waitlist vetting is not covered in the two relevant board policies and it is only mentioned once in the Options Guide and GoCPS Guide. In fact, some might argue that the two Guides only prohibit the vetting of students who are on OAE waitlists; no mention is made in the Guides' section on "screening" of the possibility that a school could exhaust its OAE waitlist or take students outside a waitlist. Even under GoCPS, this time period will probably be especially vulnerable to misconduct and side-door admissions — a vulnerability that is exacerbated by the planned continued use of inefficient paper post-lottery forms. Thorough training of principals and enrollment staff on post-waitlist admissions rules and increased penalties for violators could reduce the current level of infractions during this time period. However, unless the rules for this window of time are clear, they cannot be uniformly applied and enforced.

4. Citywide non-magnet schools should be specifically covered in current admissions policies.

The definition of "open-enrollment" schools in CPS policies should include citywide non-magnet schools. Citywide non-magnets currently are not covered in the Board's enrollment or Options for Knowledge admissions policies. Both policies and Guides define "open-enrollment" schools as "neighborhood" schools with available seats. Such a definition excludes citywide schools. This category of schools had the second-worst failure rate, of 48 percent, so it needs to be covered in admissions policies.

5. CPS should revisit the boundaries, admissions practices and online profiles of its 11 citywide non-magnet elementary schools.

At least four citywide non-magnets were created without attendance boundaries to relieve overcrowding at one or more nearby schools. Some citywide non-magnets were in the 2016–17 Options for Knowledge Guide; some were not — including three underutilized schools. At least three citywide non-magnets were admitting all students according to their own rules, totally outside of and unknown to OAE.

One, the Chicago Academy, was created by the Academy for Urban School Leadership using a non-OAE admissions system that selected students in order of their distance from the school, with the closest students picked first. As of this writing, OAE officials planned to fold the Chicago Academy into the GoCPS lottery admissions system and drop its distance-based tradition. However, this distance-based system or a proximity lottery may be worth exploring as a method for selecting students in at least those citywide non-magnet schools where such admission methods could more closely mirror such schools' founding purposes.

The Board reports establishing these schools should be revisited to determine if listed preferences still need to be followed (See [17-0426-PO1 I.A.2.b](#)) or if Board reports should

be updated. In addition, as of this writing, the “admissions” sections of the online school profiles of these 11 schools need to be clarified. Ten of them state that “Students who live within the school’s attendance boundary can be enrolled automatically and do not have to apply” but also that “Students who live outside the school’s attendance boundary must submit a Standard Elementary School application.” This is confusing. The 11th school’s admissions section says only “no program application requirements available.”

6. Admissions data in GoCPS and in the upcoming Aspen SIS should be easily auditable by not only OAE but also the OIG and the CPS Audit Department.

Auditable information should include when offers were made and accepted, when waitlists were exhausted, and when post-lottery applications were submitted to and approved by OAE. The OIG and CPS Audit Department should be able to access this information easily systemwide, not just on a school-by-school basis, to relieve OAE of the responsibility of doing large-scale audits that include neighborhood schools with non-zoned seats. In addition, OAE should create an auditable way for schools to collect the responses of those few parents who apply to GoCPS on paper, rather than online. Finally, the OIG and others should be able to easily analyze systemwide post-lottery application forms, which often were missing from OAE records, triggering many audit failures. These forms currently exist only on paper — something one OAE official expected to continue under GoCPS.

7. Audits of non-neighborhood K–8 admissions should be performed regularly and new penalties for violators should be considered.

Except for the most recent OAE audit done at the OIG’s request, the biggest Options rule breakers — neighborhood schools with non-neighborhood admissions — probably have never been audited en masse for Options compliance. Regular audits of neighborhood schools’ non-zoned students are warranted, perhaps as often as annually, considering the large number of suchS applicants that went, or should have gone, through the Options process. CPS should consider reducing a school’s Data Quality Index score if an audit or some other form of investigation finds that a school has improperly skirted OAE or not properly updated student addresses during enrollments. Note that currently, 5 percent of an elementary school’s SQRP rating (and 6.25 percent of a high school’s rating) is based on its Data Quality Index score — 40 percent of which is tied to “registration and enrollment.” In addition, if Independent School Principals repeatedly violate admissions rules, CPS should consider dropping their ISP status or overseeing their enrollments more closely.

8. CPS should consider creative ways of expanding sibling preferences.

One of the most-cited reasons for violating existing rules was that principals wanted to “keep families together” and therefore they enrolled siblings outside the required OAE process. One parent told the OIG that she moved her family out of Chicago because her neighborhood school was too dangerous and she was unable to enroll all three of her children at two Options schools near each other. The OIG would urge CPS to explore new

policies or procedures that could help keep families together without overcrowding schools, so CPS does not lose students to the suburbs.

9. CPS needs to use consistent language in Board policies and GoCPS materials.

CPS is in the process of rebranding its Options for Knowledge application process as GoCPS. Current CPS admissions and enrollment policies frequently refer to procedures outlined in the “Options for Knowledge” Guide. However, as of this writing, the phrase “Options for Knowledge” has largely been stripped out of the GoCPS website as well as the GoCPS Elementary and High School Guide for SY 2018–19. CPS needs to make the language across policies, guides, rules and GoCPS consistent so policies can be enforced and employees can be held accountable.

10. Parents need more transparency about application rules and options.

The Options Guide does not explain that a parent is entitled to fill out a post-application process form if an Options school has an opening and its waitlist has been exhausted. Admissions guides and websites intended for parents should be streamlined and clarified and should feature a description of all Options admissions rules, including post-application process form procedures and where parents can complain (including to the OIG) if they detect violations of any admissions rules. OAE may want to consider only allowing schools to use post-application process forms if they publicly list on the school’s or CPS’s website that the school is accepting such applications. Otherwise, schools can choose to tell some parents but not others about this option. Year-round public online posting — via a school or the GoCPS website — of open school seats, and in what grades, also would be helpful.