



**MISSISSIPPI OFFICE OF THE STATE AUDITOR**  
**STACEY E. PICKERING, AUDITOR**

PERFORMANCE AUDIT DIVISION  
DISTRICT EXIT CONFERENCE

*April 11, 2013*

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**Ocean Springs School District**

Beginning on Monday, April 8, 2013, the Office of the State Auditor's Performance Audit Division (PAD) performed a limited review of the accuracy and reliability of student and personnel data transmitted to the Mississippi Department of Education for the purpose of determining funding for local school districts. OSA reviewed the following:

**Student Enrollment**

1. I determined whether there is a written policy on enrollment requirements and procedures at each school. As a result, I found the following:

Pecan Park Elementary, Ocean Springs Middle, and Ocean Springs High Schools do have a written policy on enrollment requirements and procedures.

2. I determined whether the number of students enrolled in school is being accurately reported. As a result, I found the following:

Pecan Park Elementary and Ocean Springs High Schools are reporting the number of students enrolled accurately.

Ocean Springs Middle School is not reporting the number of students enrolled accurately. The enrollment report ran on April 10, 2013 shows 908 children enrolled, and the head count performed on April 10, 2013 shows 912 enrolled.

3. I determined whether the school is following policy regarding student enrollment records. As a result, I found the following:

Pecan Park Elementary School is not following policy regarding student enrollment. Of the records reviewed, 22 out of 30 had missing, incomplete, or invalid proof of residency.

Ocean Springs Middle School is not following policy regarding student enrollment. Of the records reviewed, 13 out of 27 had missing, incomplete, or invalid proof of residency.

Ocean Springs High School is not following policy regarding student enrollment. Of the records reviewed, 33 out of 49 had missing, incomplete, or invalid proof of residency.



4. I determined whether the selected student's information is in the student package and is the same as the information kept in the student's record. As a result, I found the following:

At Pecan Park Elementary School, the selected student's information in the student package **is not the same** as the information kept in the student's record. Of the records reviewed, 8 out of 30 student's information **did not match** information in the student package.

At Ocean Springs Middle School, the selected student's information in the student package **is not the same** as the information kept in the student's record. Of the records reviewed, 1 out of 27 student's information **did not match** information in the student package.

At Ocean Springs High School, the selected student's information in the student package **is not the same** as the information kept in the student's record. Of the records reviewed, 1 out of 49 student's information **did not match** information in the student package.

#### **Student Attendance/Absenteeism**

1. I determined whether there is a written policy on monitoring and reporting student absences. As a result, I found the following:

Pecan Park Elementary, Ocean Springs Middle, and Ocean Springs High Schools do have a written policy on monitoring and reporting student absences.

2. I determined whether the school is following policy regarding attendance and absenteeism. As a result, I found the following:

Ocean Springs Middle and Ocean Springs High Schools are following policy regarding attendance and absenteeism.

Pecan Park Elementary School is not following policy regarding attendance and absenteeism. Of the excuses reviewed, 1 out of 26 did not contain enough information to actually validate the excused absence.

#### **Graduation – THIS IS ONLY PERFORMED AT SCHOOLS WITH A 12<sup>TH</sup> GRADE**

1. I determined whether graduation requirements are being met. As a result, I found the following:

All students selected at Ocean Springs High School met graduation requirements.

2. I determine whether all graduation records were complete. As a result, I found the following:

At Ocean Springs High School, all graduation records were not complete. Of the records reviewed, 19 out of 26 of student's records reviewed did not have completed Summary of High School Units.



**School Attendance Reporting**

1. I determined whether the school is following policy regarding the reporting of unexcused absences. As a result, I found the following:

Pecan Park Elementary School is not following policy regarding the reporting of unexcused absences. Of the records reviewed, 8 out of 10 students reviewed were not reported in a timely manner as specified by law after accumulating five (5) or more unexcused absences.

Ocean Springs Middle School is not following policy regarding the reporting of unexcused absences. Of the records reviewed, 8 out of 12 students reviewed were not reported in a timely manner as specified by law after accumulating five (5) or more unexcused absences.

Ocean Springs High School is not following policy regarding the reporting of unexcused absences. Of the records reviewed, 4 out of 10 students reviewed were not reported in a timely manner as specified by law after accumulating five (5) or more unexcused absences.

2. I determined whether the school attendance officer is following policy regarding reporting of unexcused absences. As a result, I found the following:

Pecan Park Elementary, Ocean Springs Middle, and Ocean Springs High Schools' attendance officer is following policy regarding the reporting of unexcused absences.

**Reporting of Suspensions**

1. I determined whether the school is following policy regarding the reporting of suspensions. As a result, I found the following:

Pecan Park Elementary, Ocean Springs Middle, and Ocean Springs High Schools are following policy regarding the reporting of suspensions.

**Posting of Historical Documents**

1. I determined whether the school is posting the required historical documents. As a result, I found the following:

Pecan Park Elementary, Ocean Springs Middle, and Ocean Springs High Schools are posting the required historical documents.

**Teacher Endorsements**

1. I determined whether teachers in the school have proper endorsements for the subjects they teach. As a result, I found the following:

At Pecan Park Elementary, Ocean Springs Middle, and Ocean Springs High Schools, all the teachers reviewed have proper endorsements for the subjects they teach.

**Note: OSA is aware that Process Standard 8.1 allows no more than 5% of FTE units, not including academic core subjects, to work outside of the area or areas of endorsement.**



**Textbooks**

1. I determined whether each child in the school is assigned a textbook in each applicable class. As a result, I found the following:

Of the classes reviewed at Pecan Park Elementary School, 2 out of 20 classes did not assign textbooks to all students enrolled.

Of the classes reviewed at Ocean Springs Middle School, 14 out of 20 classes did not issue textbooks to all students enrolled.

Of the classes reviewed at Ocean Springs High School, 13 out of 20 classes did not assign textbooks to all students enrolled in each class.

**Safety**

1. I determined whether the district/schools are in compliance with all required safety laws and policies. As a result, I found the following:

District

Ocean Springs School District is not in compliance with all required safety laws and policies.

Schools

Pecan Park Elementary, Ocean Springs Middle, and Ocean Springs High Schools are not in compliance with all required safety laws and policies.

**Property Internal Controls**

1. I determined whether the district has internal controls related to property and whether the district is adhering to those controls. As a result, I found the following:

Ocean Springs School District has internal controls related to property and is adhering to those controls.

**Vehicles**

1. I determined whether the district is following policy regarding the marking of district vehicles. As a result, I found the following:

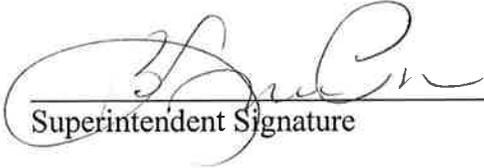
Ocean Springs School District is following policy regarding the marking of district vehicles.

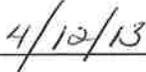
**NOTE: Please be advised, a copy of this report is made available to the Mississippi State Board of Education and the Commission on School Accreditation as an element of review for administering the State performance-based accreditation system for public schools. As a result, any adverse findings in this report may affect your accreditation status. In addition, if you have any vehicles that were not properly marked, you have five days to correct this. If the correction is not made, vehicles will be impounded by the State Auditor's Office and the Tax Commission will be notified to withhold any sales and excise tax due.**



I would like to thank you for taking time out of your busy schedule to discuss the results of the review in your district. Copies of all audit exceptions are available upon your request. Please submit formal comments regarding the audit to me, at P.O. Box 956, Jackson, MS 39205, **within one week from today**. If you have questions or comments, please feel free to contact me, Keyla Bradford, Project Manager, at 601-576-2800.

**By signing below you agree that you have received a copy of this report and a brief explanation of the exceptions.**

  
\_\_\_\_\_  
Superintendent Signature

  
\_\_\_\_\_  
Date

# Ocean Springs School District

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Superintendent

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MEMO

To: Keyla Bradford, State Auditor  
From: Bonita Coleman Potter PhD, Superintendent  
Date: April 18, 2013  
Re: Response to Audit Findings

**Please find the responses to the following audit findings in our state audit conducted during the week of April 8 – 12, 2013.**

## Student Enrollment

- Ocean Springs Middle School is not reporting the number of students enrolled accurately. The enrollment report ran on April 10, 2013 shows 908 students enrolled, and the head count performed on April 10, 2013 shows 912 enrolled.**  
As a result of this slight discrepancy at Ocean Springs Middle School, internal audits using the headcount procedure will be conducted at least twice annually as an extra assurance that all school sites are accurately reporting enrollment.
- Pecan Park Elementary, Ocean Springs Middle School and Ocean Springs High School is not following policy regarding student enrollment because of missing, incomplete or invalid proof of residency. (PP-22/20, OSMS 13/27, OSHS 33/49)**  
OSSD follows the procedures as outlined on the attached documents issued from State Department. The district's procedure for verifying residence is in compliance with the guidelines that were set forth by the attached guidance.
- At Pecan Park Elementary, Ocean Springs Middle School and Ocean Springs High School selected student's information is not the same as the information kept in the student's record. (PP-8/30, OSMS 1/27, OSHS 1/49)**  
As a result of these findings, the district will include the collection of this information with the revamped yearly registration process and will limit the number of staff that can make changes to demographic information and streamline the procedure of making such changes.

## Student Attendance/Absenteeism

- Pecan Park Elementary is not following policy regarding attendance and absenteeism. Of the excuses reviewed, 1 out of 26 did not contain enough information to validate the excused absence.**  
As a result of this finding, all attendance clerks will use a date stamp when excuses are received.



## Graduation

2. **At Ocean Springs High School, all graduation records were not complete. 19 out of 26 student records reviewed did not have a completed Summary of High School Units.**

As a result of this finding, the high school counselors will follow a more structured procedure to include an indication of the different types of units completed by the student rather than just a tally of the units completed.

## School Attendance Reporting

1. **Pecan Park Elementary, Ocean Springs Middle School and Ocean Springs High School are not following policy regarding the reporting of unexcused absences in a timely manner as specified by law after accumulating five or more unexcused absences. (PP-8/10, OSMS-8/12, OSHS-4/10).**

As a result of this finding, our technology department will work with Pearson PowerSchool state reporting group to develop a less cumbersome report that enables the attendance clerks to more easily identify students with excessive absences.

## Textbooks

1. **Pecan Park Elementary, Ocean Springs Middle School and Ocean Springs High School did not assign textbooks to all students enrolled in each applicable class. (PP-2/20, OSMS- 14/20, OSHS- 13/20)**

Because many of the classes in Ocean Springs School District use electronic media rather than print media, some teachers have elected to have class sets of textbooks rather than assigning them to students individually. At present Ocean Springs School District does not have a procedure in place to document that all students have access to these resources at home. A procedure will be developed and documentation will be provided to assure that all students have access to these resources when off campus.

## Safety

1. **Ocean Springs School District and the schools audited are not in compliance with all required safety laws and policies.**

At present the policy is being revised and will be brought to the school board for approval when revisions are completed. School leaders were under the assumption that 8 drills were required each school year but were not aware that they had to be conducted each month. The Operations Director will work with all principals and directors to assure that the required drills are conducted at each school site on a monthly basis.



DESCRIPTOR TERM: Residency Verification  
CODE: 6600  
ADOPTION DATE: April 20, 1990  
REVISION: July 17, 1992

Attorney

The requirements relative to school district verification of student residency are as outlined below. The attached form is suggested as a way to collect the required information.

## I. POLICY

Definition of residence for school attendance purposes:

The student physically resides full time, weekdays/nights and weekends, at a place of abode located within the limits of the school district.

1. Effective for the 1990-91 school year, all school districts will require students who are seeking to enroll or continue to enroll in a school district to register at the school they are assigned to attend. The school district shall verify the residence of each student.

2. **IN SUCCEEDING YEARS** any new student enrolling or entering a school district or any continuing students whose residence has changed will be required to verify his or her residence address as herein provided as a part of the registration process.

## II. PROCEDURE

1. Each student identified in paragraphs 1 and 2 above must establish his or her residency in the following manner:

### a. STUDENTS LIVING WITH PARENTS OR GUARDIAN

The parent or legal guardian of a student seeking to enroll must provide the school district with at least two of the items numbered (1) through (9) below as verification of their address, except that any document with a post office box as an address will not be accepted.

(1) Filed Homestead Exemption Application form;

1. Mortgage Documents or property deed;
2. Apartment or home lease;
3. Utility bills;
4. Driver's license
5. Voter precinct identification;
6. Automobile registration;
7. Affidavit and/or personal visit by a designated school district official;
8. Any other documentation that will objectively and unequivocally establish that the parent or guardian resides within the school district; and, in the case of a student living with a legal guardian who is a bona fide resident of the school district;
9. Certified copy of filed petition for guardianship if pending and final decree when granted.

### b. HOMELESS CHILDREN

When a child is determined to be homeless as defined by the Stewart B. McKinney Act 42 USC Section 11431(1), 11432 (e)(4) and 11302(a), the school district shall consider and take enrollment action that is in the best interest of the child pursuant to 40 USC 11432(e)(3).

### c. STUDENTS LIVING WITH ADULTS OTHER THAN PARENTS OR LEGAL GUARDIANS:

(1) The non-parent claiming district residency must meet the criteria of subparagraph (a)(1) through (9) above, required of a parent or legal guardian.

(2) The district resident must provide the school with an affidavit stating his or her relationship to the student, and that the student will be living at his/her abode full time, and provide documentation fully explaining the reason(s) (other than school attendance zone or district preference) for this arrangement. The local school board or its designee will make the necessary factual determinations under subsection II.1(c)(2). Examples of situations where "in loco parentis" authority of an adult should be recognized to establish residency of the minor include but are not limited to the following:

- (a) Death or serious illness of the child's parent(s) or guardian(s);
- (b) Abandonment of the child;
- (c) Child abuse or neglect;
- (d) Unstable family relationships or undesirable conditions in the home of the child's parents or guardians having a detrimental effect on the child;
- (e) Students enrolled in recognized exchange programs residing with host families. (3) Whenever appropriate the person who has assumed responsibility for the care and custody of the child shall be encouraged to obtain legal guardianship of the child.
- (d) The requirements of Section II.1(a) and (c) above are minimum requirements and the school district may require additional documentation and verification at any time.
- (e) At a minimum, the district shall maintain in a file a written instrument identifying the types of documents used to verify each student's residency and copies of any relevant guardianship petition or decree.
- (f) The provisions of this policy do not apply to students who reside outside the school district, but who have legally transferred into the school district.2. In the event that a local school district has a similar procedure which requires documentation of residence and is approved by the State Board of Education, such procedure may be substituted for the procedure outlined in Section II.



# MISSISSIPPI

## STATE DEPARTMENT OF EDUCATION

TOM BURNHAM, Ed.D.  
State Superintendent of Education

Judy Rhodes, Associate State Superintendent, Administration and Finance

Bureau of School Support, Smith Sparks, Director

Division of Textbooks • Bob Tom Johnson, Ed.D., Director

Suite 1604 Sillers Office Building • P. O. Box 771 • Jackson, MS 39205-0771 • (601) 359-2791 • FAX (601) 359-2326

July 23, 1992

TO: School District Superintendents

FROM: Judy Rhodes 

SUBJECT: Amendment of the Residency Verification Process

The Mississippi State Board of Education, in its meeting on July 17, 1992, gave final approval to changes in the procedures to be followed in documenting the residency of students.

Basically, the revised policy removes the requirement that a parent, guardian or other adult must continue to provide an annual statement that the previously documented residence has not changed. A new suggested form has been created which combines the two forms used in the past in the documentation process. As you will note on the enclosed copy of the new form, the parent, guardian or other adult signs a statement to the fact that notice will be given to the district if the residence should change. In summary, the "Residency Registration and Documentation Checklist" would be completed upon a student's initial enrollment in the district. No further documentation or paper work would be required unless the residence should change.

Please be reminded that Section 37-15-29 of the Mississippi Code mandates that no minor child may attend any school except in the district of his residence unless a lawful transfer is in effect. A district may continue to require annual verification. I suggest and encourage you to use the residency verification approach you feel will best satisfy the intent of this law. Certainly, if you have already completed the documentation process under the former system for the 1992-93 school year, no further action would be required.

The question has been posed relative to the action to be followed in making the transition to the new position. It is our opinion that if you have the initial documentation form and you have secured the annual statement of continued residency for the past year, where applicable, there would be no need to secure further documentation unless the residence of the student should change. The new policy would be phased in as new students enroll in your schools.

Should you have questions regarding this change, please feel free to call Bob Tom Johnson at 359-2791.

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