Attendance & Truancy: Questions & Answers for School Districts

ABOUT THIS Q&A
This guidance is supplemental to existing OSPI information regarding attendance. The most up-to-date agency information and guidance pertaining to reopening schools is located on OSPI's COVID-19 Guidance & Resources webpage.

GUIDING PRINCIPLES
- The purpose of taking daily attendance is to provide educators with meaningful data that signals when a student is missing instructional time.
- Absences should not be used in a punitive manner; they give us an opportunity to respond proactively to support students to re-engage.

QUESTIONS & ANSWERS
1. Are districts required to record daily attendance?
Yes, school districts are required to take daily attendance for each student enrolled on any day when there is planned instructional activities. This includes days with in-person, remote, or hybrid instruction. Marking a student absent is not intended to be punitive and should not be used as such.

2. When should a student be marked absent from remote learning?
An absence from remote learning is when a student is not participating in planned instructional activities on a scheduled remote learning day. Student presence or participation may be asynchronous or synchronous.

For the purposes of taking daily attendance, examples of what student participation could look like include, but are not limited to:

- Daily logins to learning management systems;
- Daily interactions with educators to acknowledge attendance (including messages, emails, phone calls or video chats); or
- Evidence of participation in a task or assignment.

Districts will need to adopt consistent practices for determining when students are recorded as attending during a scheduled day. Districts have broad authority to allow for the unique circumstances that their students, and the adults supporting them, face due to COVID-19.

When developing their local definition of absence, districts should take into consideration that the intent of marking a student absent is to measure when a student is missing instructional time.
3. Do districts need to determine if a student’s absence is a full day absence?
Yes. Districts continue to be required under RCW 28A.225.020 to determine when a student misses a majority of their school day. This requirement in statute provides parameters around what counts as an unexcused absence for truancy purposes.

4. How many times per day should districts take attendance for elementary grades?
Districts have flexibility to determine how frequently they will track daily attendance or participation in elementary grades. This frequency should be based on their instructional plan and the requirement to determine if the student misses the majority of their school day. At a minimum, attendance must be determined once a day.

5. In secondary grades, if a student has multiple classes on a given day, does attendance need to be recorded for each class?
Yes. Attendance should be taken for each scheduled day and for each class that has planned instructional activities. Planned instructional activities can be synchronous or asynchronous, including participation in a task or assignment.

6. Can a student demonstrate attendance before or after regularly scheduled school hours?
Yes. A student participating in planned asynchronous learning before or after regularly scheduled school hours can be considered present and not absent. Daily planned instruction may be synchronous or asynchronous.

Districts should develop a plan where teachers can retroactively determine if students participated in asynchronous activities. OSPI supports this flexibility.

7. Can a district count a student as present for a class if they are unable to attend a live scheduled session?
Yes, districts can count a student present if they engage in asynchronous activities, in place of a live scheduled session. Districts are encouraged to provide this flexibility but are not required to provide this alternative.

8. Does a student have to attend a certain portion of a synchronous class or complete a whole assignment in order to be considered present?
No. Districts should adopt policies and practices which allow students to be marked present when a student attempts an assignment, logs on for a part of the class, or asynchronously demonstrates participation. Attendance should not be tied to completion.

District monitoring of student engagement and mastery is outside the scope of the purpose of taking attendance.
9. Do districts need to adopt identical procedures on taking daily attendance for remote, in-person, and hybrid instructional modalities?
No. Districts have the flexibility to align attendance taking procedures with different instructional modalities while operating within the daily attendance taking requirement and the definitions of absence for in-person and remote learning. As the school year progresses with a goal of providing in-person instruction using the school reopening decision tree, this flexibility will be important. Districts will need to ensure attendance procedures can adapt throughout the planned and scheduled calendar.

10. What are the new reasons that a student can be considered excused?
The emergency rule specifies these new reasons that a students’ absence may be excused.

- Absences related to the student’s illness, health condition, or medical appointments due to COVID-19;
- Absences related to caring for a family member who has an illness, health condition, or medical appointment due to COVID-19;
- Absences related to the student’s employment or other family obligations during regularly scheduled school hours that are temporarily necessary due to COVID-19 until other arrangements can be made, including placement in a more flexible education program;
- Absences due to the student’s parent or guardian’s work schedule or other obligations during regularly scheduled school hours, until other arrangements can be made;
- Absences due to the student’s lack of necessary instructional tools, including internet broadband access or connectivity;
- Other COVID-19 related circumstances as determined between school and parent/guardian or emancipated youth.

See the emergency rule Chapter 392-401A WAC for the complete list of excused reasons.

11. How will the emergency rule impact apportionment?
Apportionment is based on enrollment on a monthly count day. Enrolled students are those who are enrolled and whose attendance record shows they have attended at least once in the prior 20 school days before the count day. Enrollment for apportionment reporting and daily attendance are two different measures.

To claim a student for state funding for September, a student must have participated on or before the September count day, which is the fourth school day of September. For October through June, the count day is the first school day of the month. To claim a student for these months, enrolled students must have attended at some point within 20 consecutive school days prior to the count day.
12. Do districts have to withdraw or unenroll students based on lack of attendance or participation by the first count day in September or after 20 days?

Districts are **not** required to withdraw students from enrollment if they do not attend prior to the first count day in September or if they have 20 consecutive days of absences on or before the count day in later months. Districts are encouraged to maintain students in their local system even if they cannot claim the student for state funding. This enables districts to communicate with families, attempt to secure the student’s reengagement, and reduces the barrier of re-enrolling when the student does start attending again.

13. What is “non-truancy remote learning absence” and why did OSPI develop this new category?

The emergency rule creates the new category of absence “non-truancy remote learning absence” which shall be used to identify any absence from remote learning through October 4.

This new category of absence is neither excused nor unexcused. Beginning October 5, districts will begin differentiating between excused and unexcused for absences on remote learning days. Districts should review their methods of communicating with families about attendance (e.g. letters, robocalls, family and student portals) to ensure that the “non-truancy remote learning absence” is not communicated as excused or unexcused.

The purpose of this new category is to create flexibility at the beginning of the school year as students, families, and schools adjust to remote learning settings. Districts are still required to develop a tiered response system for all absences, including “non-truancy remote learning” absences.

14. How does the non-truancy remote learning absence affect the “20-day drop” rule or requirements for claiming students for state funding?

The non-truancy absence remote learning absence category is still an absence. In order to claim a student for state funding, they still need to have attended at least once prior to the September count day. However, as stated above, districts are not required to withdraw the student, but can keep them enrolled while ensuring they are not claimed for state funding.

15. What parts of the compulsory attendance laws (or Becca Bill requirements) are still required this fall?

Districts are still required to comply with **Chapter 28A.225 RCW**. For schools that are fully remote or where remote learning days are planned as part of a hybrid model, absences from remote learning will be considered non-truancy remote learning absences through October 4, 2020. This mean absences from remote learning, until October 4, are neither excused nor unexcused and therefore do not contribute to the accumulation of unexcused absences which require action under **RCW 28A.225.020** or **28A.225.030**.
Districts are still required by Chapter 28A.225 RCW to do the following:

- Provide information about attendance to parents including district policies, supports and resources, and expectations of students. (RCW 28A.225.005)
- Convene team for youth in foster care or dependent pursuant to chapter 13.34 to review excessive or unexpected absences to determine causes of absences and support youth’s school work (RCW 28A.225.023)
- Daily notification of all absences

For students currently on a petition, districts should continue to partner with their local juvenile courts and follow expectations accordingly.

16. What is required as part of a tiered response system?
School districts must develop a tiered response system for all absences (WAC 392-401A-045), regardless of their type (excused, unexcused, or non-truancy remote). The tiered system is intended to address barriers to student participation and engagement in learning during the COVID epidemic.

Tiered response systems must include:

- Monitoring daily attendance data for all absences
- A process to contact families and verify current contact information
- Daily notification of absences to parents;
- A process for outreach to determine student needs
- Differentiated supports that address the barriers to attendance and participation that includes universal supports for all students and tiered interventions for students at-risk of and experiencing chronic absence; and

See the emergency rule Chapter 392-401A WAC for complete details.

17. What strategies and resources does OSPI recommend for developing a tiered response system for all absences?
School districts should consider reviewing their existing strategies implemented under the compulsory attendance laws (Chapter 28A.225 RCW), which include:

- Hold parent conferences
- Administer an assessment to identify barriers to attendance
- Provide best practice interventions
- Refer the student to a community truancy board
- File a truancy petition
- Convene the IEP or 504 team
In addition, districts can access the following resources:

- **Attendance Playbook: Smart Solutions for Reducing Chronic Absenteeism in the COVID Era** (FutureEd)
- **Guide to Using the Attendance Playbook: Smart Strategies for Reducing Chronic Absenteeism in the COVID Era** (Attendance Works)
- **Improving Attendance in a Remote Learning Environment** (Center on PBIS)
- **Multi-Tiered System for Attendance Resources** (Attendance Works)
- **Remote Learning Tiered Engagement Tool – Sample** (High Desert ESD, Oregon)
- **Family Connections Tool** (High Desert, ESD)

Please visit the [OSPI Attendance Webpage](https://www.ospi.wa.us) for additional resources on effective strategies to increase student attendance and participation.

18. **If a student is absent because they need an accommodation due to a disability (IEP or 504), can that absence be excused?**

Yes. Students with a 504 plan or IEP can be marked as an excused absence in accordance with the rules. If, however, a student with a 504 plan or IEP is in contact with their teacher or other district official regarding their potential need for an accommodation, they may not need to be given an excused absence. Educators should be willing to engage with families and the members of the student’s IEP and/or 504 teams to discuss how the student has a need for an accommodation that is not yet met. Districts may need to develop a plan where teachers can retroactively determine if students participated in asynchronous activities with accommodations. OSPI supports this flexibility and value for equitable access to learning.

19. **How will this emergency rule impact absence data reporting to CEDARS?**

School districts will continue to report all absences to CEDARS, including the temporary “non-truancy remote” absence. When reporting this temporary absence in CEDARS, districts will report it as “excused.” In their local student information systems, districts are encouraged to create a separate category to capture the “non-truancy remote learning” absence to ensure that these absences are not communicated as excused or unexcused to parents and students.

Districts continue to be required under [RCW 28A.225.020](https://apps.leg.wa.gov/statutes/cw/28A/225/020) to determine when a student misses a majority of their school day.

The CEDARS manual and reporting guidance will be updated as soon as possible and will be available on OSPI’s CEDARS webpage.

20. **How long will the emergency rule be in effect?**

The emergency rule will be in place temporarily for four months. OSPI intends to engage in rulemaking to make the rule permanent for the remainder of the school year.
21. What is chronic absence?
Chronic absence is when a student misses 10% or more of their school days, for any reason, whether the absence is excused, unexcused or non-truancy remote learning. This amounts to two days a month. Washington measures student’s regular attendance as an element of the accountability system, the Washington School Improvement Framework, in alignment with the definition of chronic absence.