

**What is the Grosse Pointe Public School System's position on student enrollment eligibility, verification, and concerns about students illegally attending our schools?**

Answer: The Board of Education has established policy and the administration has developed supporting guidelines that specify which students are legally eligible to attend our schools and procedures for those students to enroll. As in all cases, the policy complies with the state law of Michigan. This document will address these issues and common questions. The Board of Education, in conjunction with the administration, is committed to enforcing state law and local policy while also respecting the rights of individual citizens.

**Does the district have a policy relating to enrollment eligibility and verification?**

Answer: Yes. Policy 5111 entitled "Eligibility of Resident/Nonresident Students," and the accompanying regulations, cover these issues specifically and can be accessed by clicking on this hyperlink. Students must live within the district boundaries, or otherwise be entitled to attend our schools based on other eligibility criteria or other defined exceptions. Policy 5111 and the accompanying regulations detail all of these rules, processes, and exceptions.

**What students are eligible to enroll in Grosse Pointe Public schools?**

Answer: The following categories of students may legally attend our schools under state or federal law.

1. A student who lives with one or both parents or legal guardians in a home they own or rent in the district. In this scenario, the residence must be the parent/guardian's primary legal domicile and they must actually live in the home. Merely owning or renting a home in the district, but not living in it, is not sufficient to establish residency.
2. A student who does not live in the district, but whose parent or full legal guardian lives within the district (even if the student does not live with that parent or guardian).
3. A student who lives with a parent or full legal guardian who lives with another person in the district. In other words, the parent or legal guardian does not own or rent his or her residence, but lives with another, and the student lives with them.
4. A student whose parent or legal guardian, residing outside the district, is unable to provide a home for the student and who places the student in the home of a relative of the student within the district for the purposes of securing a suitable home for the child and not for an educational purpose.
5. A student who is placed in a licensed foster home within the district boundaries.
6. A student who is homeless. (See JBC-R for more details on what constitutes homelessness.)
7. A non-resident student attending special education programs hosted by GPPSS under Public Act 18.

**Some of these exceptions appear quite lenient. Why would the district adopt such standards for enrollment eligibility?**

Answer: All these categories are rooted in either state or federal law. As a public school system we are obligated to comply.

**Are there any other exceptions provided for in policy?**

Answer: Yes. The Board of Education has provided the following four exceptions that allow non-residents, under these very specific scenarios, to attend Grosse Pointe Schools:

1. If a family of a legally entitled student as a junior in high school moves out of the district, the student is offered the opportunity to complete his or her senior year in high school on a tuition basis.
2. If a student's family has purchased a home in the district but has not yet relocated at the start of a semester, the student will be permitted to attend school upon payment of tuition.

3. If the family of a student has moved out of the district within 30 days of the end of a marking period or semester, the student will be permitted to complete the respective semester or marking period upon payment of tuition.
4. Foreign exchange students are permitted when living with a host family in the district.

**What is the GPPSS enrollment process?**

Answer: No student is permitted to attend classes without first establishing enrollment eligibility in person at the administrative offices at 389 St. Clair. All required forms are posted on the Grosse Pointe Public School's website under "Enrollment," as are samples of the proofs of residency required. Ample documentation is required, including driver's licenses, utility bills, property tax bills, leases, and landlord affidavits among them.

**How were these policies and guidelines developed?**

Answer: The Board has received significant feedback from the community on this issue and that input has been incorporated into policy and guidelines. Substantial legal fees have been expended as the impact of state and federal law on local enrollment eligibility policy is generally what makes the issue more complex on the whole and on a case by case basis. Also, the experience accumulated by the district over the years has helped refine the process to try to make it more directed and effective on the most problematic issues.

**Are families ever required to re-register students after initially establishing enrollment eligibility?**

Answer: At this point no. Preceding the 2005-6 school year, the district mandated that all families re-register all students. This proved to be a logistically challenging process costing over \$80,000. The activity's impact in terms of identifying or dissuading ineligible students was also inconclusive. Other re-registration options are under consideration, such as requiring re-registration upon entry into middle school from elementary school and into high school from middle school.

**How does the district enforce its enrollment eligibility policy if not through re-registration?**

Answer: Part of the nature of enrollment eligibility verification is the fluid status of families' and students' residency and family situations, particularly in light of the provisions provided for in state law. Divorce, separation, custody battles and now more recently, home foreclosures contribute greatly to the evolving nature of many individual cases. As a result, we need to rely on other more directed and effective processes. Among those used by district administration are investigations based on returned mail (sent by the district) or investigations triggered by recommendations by staff or other concerned citizens.

**Who performs these investigations?**

Answer: The Board of Education has funded part time, contracted private investigators at the cost of approximately \$8,000 per year. Central office staff employees are also typically involved in these cases. Home visits are the most common practice for verifying enrollment eligibility.

**What triggers an investigation?**

Answer: The district will investigate credible information indicating that a student is not a resident or is not otherwise eligible to attend school in the district. "Credible" is an admittedly subjective term, but anonymous and unsubstantiated reports will not themselves be sufficient to trigger an investigation. Knowledge and understanding of the regulations and exceptions reviewed here is advisable prior to instigation of an investigation.

**Isn't it true that since the district received funds on a per pupil basis, and given the financial stress on public schools in Michigan, that the district would choose to "look the other way" on students not legally entitled to attend Grosse Pointe schools?**

Answer: Over the years some have charged that there would be a willful ignorance of enrollment eligibility or violations for reasons of financial gain. This has been and continues to be a false accusation. Doing so would be illegal and unethical. The Board of Education trustees pledge to uphold the public trust, which supersedes any financial gain, which would be of marginal impact. Administrators who would need to be complicit in such a scheme would risk their employment to execute such a conspiracy while also standing to realize no personal gain from the illegal practice. Finally, we annually spend tens of thousands of dollars to address this issue, either through private investigators, legal fees, and other costly human resources to execute our enrollment eligibility verification process. In short, it is a baseless and preposterous charge.

**I have heard the district is looser on this policy for certain student-athletes so they can field more competitive teams. Is this true?**

Answer: The answer here is similar to the above, but the ramifications are even more significant for athletic teams. If a student-athlete were found to be illegally participating on a team, that team could face forfeiture of all of its games, meets or other contests. In fact, the athletic coaches are as diligent as any party involved to work cooperatively with the administration and investigators to ensure their entire team does not face these harsh consequences as a result of an illegally participating student-athlete.

**How can residents or district employees let the district know about someone they suspect is a non-resident who is attending our schools?**

Answer: If, after reviewing these policies and exceptions, you suspect a student is not a legally entitled to attend our schools, please provide a report, including the basis for your concern, by calling 313/432-3074.

**What happens if a student is found to not be a resident?**

Answer: If a student is found to not be a resident, the student is removed from the school district promptly (typically within a week).

**Have the investigations proved to be effective?**

Answer: Yes. This method of addressing the enrollment eligibility concerns are more directed with definable results. In the 2006/07 school year, the district investigated 182 students (2% of our total enrollment). Of those, 84 were confirmed to be enrollment eligible, 49 were removed, and 49 were placed under continuing investigation. For the 2007/08 school year, 131 investigations took place. 37 were confirmed to be enrollment eligible, 62 students were removed, and 32 remain under active investigation.

**I have reported a student to be investigated, but I never received an update on the result. Why is there no feedback when I report a student?**

Answer: Federal law, the Family Educational Rights and Privacy Act (FERPA), protects all students' privacy. The district cannot and will not provide specific feedback on any student residency cases.

**What about kids who take a SMART bus to or from school?**

Answer: While we enjoy being a district of neighborhood schools, the fact that some students rely on public transportation does not mean they are not enrollment eligible. For example, a student who has a parent who resides within the district is entitled by law to attend school in the district, even if the student does not live with that parent. In other cases, some students have after-school arrangements outside the district such as childcare or work that takes them outside the district.

**What are other districts doing to address this problem?**

Answer: Enrollment eligibility concerns are not unique to our district. As with many other common interests, we freely share and request information with other districts. Following the re-registration and revision of our

enrollment eligibility guidelines in 2005-6, GPPSS was contacted by many other districts who adopted some of our practices into their own. We remain in dialog with other districts, always willing to adopt best practices that align with our philosophies and legal obligations.

**What can the school district do when residents appear to be in violation of local occupancy laws which may enable illegitimate residency status?**

Answer: The enforcement of zoning ordinances for single or multi family dwellings is exclusively a municipal responsibility and concerns should be reported to the appropriate municipal legal authorities. The school system has no legal authority to enforce these rules. If a family lives in the district, even if it is doing so in violation of a municipal ordinance, the district has an obligation to enroll that student unless and until the student ceases to reside in the district.

**Does the district cooperate with municipalities for information related to these concerns?**

Answer: Some, but not all, of the local municipalities provide the district with information concerning evictions or homes that appear to be vacant. When this information is provided, each address can be investigated and verified. The municipalities are not obligated to cooperate with us on this basis, but such cooperation is appreciated. Some of the district municipalities have enacted stricter rental regulations within their communities and, by enforcing those regulations, may generate additional information to which we will seek access. The district is exploring ways to cooperate with local municipalities in sharing databases and other means to further enforce the enrollment eligibility policy.

**Why is changing your address with the residency office important?**

Answer: Having the most up-to-date information is critical to our schools being able to offer the best customer service. While especially important should an emergency contact be necessary, the district also uses this information for mailing regular school business notices. Please help us be responsive to your family's needs by notifying us when there is a change.

**Why, after all that has been done, are there still students in the district who are not legally enrollment eligible?**

Answer: It is simply the nature of the problem that we can never presume that we have absolute compliance. The fluid nature of residency, family situations, and enrollment eligibility requirements will likely mean verification will always be required. With strict enrollment prerequisites and substantial individual investigations, the district has acknowledged and is dealing with the challenge. We also feel we are apportioning sufficient resources to manage what we must accept as an ongoing effort. Our efforts must be persistent and aggressive, but also fair, effective and respectful. Knowing and understanding the policies and laws is critical. State and federal laws introduce non-traditional means for students to become enrollment eligible. In many cases, residents are not familiar with these legal provisions and may presume the district is not enforcing its policy. The district, however, has demonstrated commitment to upholding the policy and our legal obligations and this will continue to be the case

**Is the district open to receiving suggestions on ways that this policy and practice could be improved?**

Answer: By all means, yes. Please feel free to make constructive suggestions to the central office administration or to the Board of Education.