



Arizona Department of Education

The Audit Unit

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Average Daily Membership Audit Report Pinnacle Education-Kino, Inc. Fiscal Years 2016, 2017 and 2018

Report Number—20-12
October 25, 2019



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Arizona Department of Education

Audit Unit

October 25, 2019

Muhammad Padela, Vice President
Pinnacle Education-Kino, Inc.
2224 W Southern Ave Ste 1
Tempe, AZ 85282

Dear Vice President Padela:

The Arizona Department of Education Audit Unit has conducted an audit of the Pinnacle Education-Kino, Inc. (School) Average Daily Membership (ADM) for fiscal years 2016, 2017 and 2018. The purpose of the audit was to address whether the School properly reported student enrollment, and to determine if it received the correct amount of Basic State Aid.

Auditors determined that the School incorrectly reported the enrollment data of 12 students, which resulted in its ADM being overstated by 0.56. Additionally, auditors determined that the School did not maintain documentation to prove Arizona residency for two students, which resulted in its ADM being overstated 0.98. As a result, the School was overfunded by \$12,275.57 due to a net overstatement of 1.54 ADM, which the School must repay to ADE.

We appreciate the cooperation and assistance provided by the School's administration during the course of the audit.

Sincerely,

A handwritten signature in blue ink, appearing to read "Melissa Moreno".

Melissa Moreno,
Chief Auditor

Kathy Hoffman, Superintendent of Public Instruction

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INTRODUCTION AND BACKGROUND

The Arizona Department of Education (ADE) Audit Unit has conducted an Average Daily Membership (ADM) audit of the Pinnacle Education-Kino, Inc. (School) pursuant to Arizona Revised Statutes (A.R.S.) § 15-239. This audit focused on whether the School properly reported enrollment data to ADE and received the correct amount of Basic State Aid for Fiscal Years (FY) 2016 through 2018.

Average Daily Membership audits of district and charter holder funding—Pursuant to A.R.S. § 15-239, ADE may conduct ADM audits, which help ensure the appropriate distribution of Basic State Aid provided annually to school districts and charter schools. School districts and charter schools receive Basic State Aid based on several factors related to student enrollment and attendance. To receive funding, school districts and charter schools report enrollment and attendance data to ADE. ADE processes that data, determines payment amounts according to the relevant statutory funding formulas and distributes payments to schools up to twelve times each year.

The ADM audit process determines whether payments were correct or if an adjustment is needed. The audit process compares the school district's or charter school's information reported to ADE's student data system to information found on the original records kept at the school. If auditors find that the school district's or charter school's reported information does not match the original documentation, the audit will calculate and report the funding adjustment needed to the school district's or charter school's Basic State Aid. These funding adjustments can be positive or negative, depending upon the audit findings. The audit findings are written and compiled into a report that is then issued to the audited entity.

Superintendent's legal notice links the audit and appeals processes—In addition to the report, the audited entity receives The Notice of Audit Findings and Required Reimbursement (Notice) that details the audit findings and determination of the Superintendent of Public Instruction (Superintendent) regarding adjustments to be made to the school district or charter school pursuant to A.R.S. § 15-915. The audited entity may appeal the Superintendent's decision in the Notice.

Opportunity to appeal the audit—A.R.S. § 41-1092.03 provides the audited school district or charter school that disagrees with the Superintendent's decision in the Notice with the opportunity to file a formal appeal within thirty (30) days after the report was issued. If an appeal is filed, the school district or charter school and ADE may reach agreement in an informal settlement conference. If an agreement is not reached at the informal settlement conference, the appeal will be adjudicated by the Office of Administrative Hearings.

Funding adjustment process and timeframes—When the Notice is finally settled or adjudicated, if ADE has determined that a school district or charter school received an incorrect amount of Basic State Aid, A.R.S. § 15-915 directs that corrections to schools' funding be made

in the current budget year. In case of hardship, schools may request that the Superintendent allow a correction to be made partly in the current budget year and partly in the following budget year.

School information—The School, located in Nogales, Arizona, offered instruction in grades 9 through 12 during the fiscal years audited. They operated one high school. Table 1 presents the School’s unaudited student, staffing and financial information for fiscal years 2016, 2017 and 2018.

Table 1

**Pinnacle Education-Kino, Inc.
Total students, revenues and expenditures
Fiscal years 2016, 2017 and 2018
(Unaudited)**

	2016	2017	2018
Students enrolled	105	114	144
Number of teachers	2	4	5
Revenue			
Local	\$ 70	\$ 207	\$ 191
Intermediate	\$ 0	\$ 0	\$ 0
State	\$ 737,963	\$ 717,452	\$ 674,746
Federal	\$ 0	\$ 0	\$ 0
Total revenues	<u>\$ 738,033</u>	<u>\$ 717,659</u>	<u>\$ 674,937</u>
Total expenditures	<u>\$ 447,729</u>	<u>\$ 451,348</u>	<u>\$ 434,334</u>

Source: Annual Report of the Arizona Superintendent of Public Instruction for fiscal years 2016, 2017 and 2018.

SCOPE AND METHODOLOGY

The audit focused on whether the School accurately reported its data to ADE and received the correct amount of Basic State Aid in accordance with statutes, the Uniform System of Financial Records for Arizona Charter Schools (USFRCS) and its own policies and procedures for fiscal years 2016, 2017 and 2018.

To conduct this audit, auditors used a variety of methods, including examining School and ADE records to review 150 of 508 students over the three fiscal years audited. Adjustments to ADM are based solely on those identified students that the auditors evaluated further and are not extrapolated to create findings for the entire student population. Auditors also reviewed state statutes and School policies and procedures and interviewed School management and staff. Specifically:

- **Enrollment data** – Auditors reviewed student schedules, enrollment histories and attendance data to determine if the enrollment data reported to ADE was correct. Auditors compared the entry and exit dates to determine if an adjustment was necessary. Auditors also reviewed absences to ensure that they were reported correctly and made adjustments if they were needed.
- **Student Files** – Auditors reviewed student files to ensure that they maintained required documentation such as birth certificates, immunization records, and supporting residency documentation. Auditors identified files that did not contain all the documentation that was required to be kept in them by statute and ADE guidelines.
- **FTE calculations** – Auditors reviewed the bell schedules and student schedules to determine whether the School reported the correct full-time enrollment (FTE) data to ADE. Auditors calculated the FTE based on the classes and time a student was enrolled in the School and compared the FTE to what was reported to ADE. When the FTE was incorrect, auditors made an adjustment.
- **Instructional hours** – Auditors reviewed the bell schedules and calendars for the School for fiscal years 2016, 2017 and 2018. The total instructional hours offered for each grade met the minimum required by statute for each of the three fiscal years audited.
- **SPED Data** – Auditors determined whether an adjusted student had also been funded for a special education (SPED) category. No material findings were identified for this area.

The Audit Unit expresses its appreciation to the School's administration and staff members for their cooperation and assistance during the audit.

FINDING 1: THE SCHOOL DID NOT ACCURATELY REPORT SOME STUDENT DATA, RESULTING IN AN OVERPAYMENT OF \$4,424.24

Auditors determined that the School inaccurately reported the student data for 12 students for fiscal years 2016, 2017 and 2018. Specifically, auditors found that nine students had an incorrectly reported FTE, one student had incorrect enrollment dates, one student had not attended the School, and one student should have been dropped for 10-Day unexcused absence. Due to these errors, the School's ADM was overreported by 0.56. As a result, the School was overfunded by \$4,424.24 in Basic State Aid. According to A.R.S. § 15-915, ADE needs to recover these monies from the School.

The School inaccurately reported some student data

The School inaccurately reported 12 student's enrollment data to ADE, which resulted in the School's ADM being overstated by 0.56.

According to A.R.S. § 15-901, for a high school student to be reported as a 1.0 FTE, the student must be enrolled in at least four subjects which meet at least 123 hours annually each and total at least 720 instructional hours for the year. A student who does not meet these requirements is considered a part-time student and their FTE status must be reduced based on the number of actual instructional hours provided and courses enrolled. In addition, according to ADE External Guideline and Procedures GE-17 and A.R.S. § 15-901, with the exception of pre-enrolled students, the enrollment dates for a student are the first day of actual attendance and the last day of actual attendance or excused absence. However, the School did not always adhere to these requirements. Specifically, for the students that were sampled:

- 9 students had an incorrect FTE reported. As a result, the ADM for the School was overreported by 0.43.
- 1 student was reported with incorrect enrollment dates. As a result, the ADM for the School was overreported by 0.02.
- 1 student was reported as attended but did not actually attend the School. As a result, the ADM for the School was overreported by 0.01.
- 1 student attended the School but had a period of 10 consecutive unexcused absences and should have been withdrawn for this period of time. As a result, the ADM for the School was overreported by 0.10.

As shown in Table 2, data reporting errors resulted in an ADM overstatement of 0.56 for the three fiscal years audited.

Table 2

**Pinnacle Education-Kino, Inc.
ADM adjustments due to enrollment data errors
Fiscal years 2016, 2017 and 2018**

	Incorrect FTE	Incorrect enrollment dates	Did not attend	10 Day Absence	Total
2016	0.25	0.02	0.01	-	0.28
2017	0.07	-	-	0.10	0.17
2018	0.11	-	-	-	0.11
Total	0.43	0.02	0.01	0.10	0.56

Source: Auditor analysis of School records, ADE data for fiscal years 2016, 2017 and 2018.

The School failed to comply with statute and ADE guidelines

The School did not follow statute and ADE guidelines when calculating and reporting student FTE or student enrollment data.

Auditors determined that nine of the School's students did not meet the statutory and ADE guideline requirements for full time enrollment (FTE). The FTE that was reported for nine students was not correct based on the number of courses the students were enrolled in. As a result, the School overreported the FTE for nine students.

Additionally, the School misreported the enrollment data for three students. According to ARS § 15-901, the first day of membership for continuing or pre-enrolled students, shall be defined as either the first day a student physically attends school or the first day that classroom instruction is offered, provided that such students physically attend school within the first ten school days. For all other students, the first day of membership shall be defined as the first day a student physically attends school. The School incorrectly reported the enrollment dates of one student, one student was reported to ADE that did not attend, and one student had 10 or more consecutive unexcused absences and should have been withdrawn. As a result, the School overreported enrollment data for three students.

In the future, the School must ensure it complies with statute and ADE guidelines to properly calculate and report FTE and student enrollments. The School must ensure that a process is in place that captures the proper entry and exit dates of students to ensure proper funding and reporting of data. The School should review its reconciliation practices to ensure that its staff properly review the reports produced by ADE and reconcile them to the School's SMS data to identify any discrepancies and correct any errors identified.

The School was overfunded by \$4,424.24

Auditors determined that the School did not receive the correct amount of Basic State Aid due to the inaccurate student data reported to ADE for fiscal years 2016, 2017 and 2018. The student data incorrectly reported by the School resulted in its ADM being overstated by 0.56. As a result, the School was overfunded by \$4,424.24 in Basic State Aid, which ADE must recoup from the School. Table 3 shows the ADM and funding adjustments required for the School for fiscal years 2016, 2017 and 2018.

Table 3

**Pinnacle Education-Kino, Inc.
ADM and funding adjustments
Fiscal years 2016, 2017 and 2018**

	ADM adjustment	Total
2016	0.28	\$2,160.77
2017	0.17	\$1,303.15
2018	0.11	\$960.32
Total	0.56	\$4,424.24

Source: Auditor analysis of School and ADE records for fiscal years 2016, 2017 and 2018.

Recommendations:

1. The School must repay to ADE \$4,424.24 in Basic State Aid due to incorrectly reported student data.
2. The School needs to ensure that it properly calculates and reports students' FTE pursuant to statute and ADE guidelines.
3. The School must reconcile to ensure that enrollment dates are reported accurately pursuant to A.R.S. § 15-901.

FINDING 2: THE SCHOOL DID NOT PROPERLY MAINTAIN SOME STUDENT RECORDS AS REQUIRED BY STATUTE AND GUIDELINE, RESULTING IN AN OVERPAYMENT OF \$7,851.33

Auditors determined that the School failed to properly maintain residency and birth certificate documentation for some students as required by statute and ADE guidelines. The School did not properly maintain required documentation in some of its student cumulative files and two students were funded without the proper residency documentation showing that these students were Arizona residents. In the future, the School should properly maintain these documents to ensure compliance with statute and ADE guidelines.

The School did not properly maintain student file documentation

The School did not maintain the proper documentation required by statute and ADE's residency guideline. Of the 75 students sampled, four of the student files did not have the proper residency documentation as the ADE Arizona Residency Guideline requires. Two student files contained evidence of the minor students Arizona residency, and two student files did not have evidence of Arizona residency. In addition, one student did not have a birth certificate in their file.

Auditors determined that the School failed to maintain residency documentation for four students as required by statute and ADE guidelines. According to A.R.S. § 15-802 and the ADE Arizona Residency Guideline, school districts and charter schools are required to maintain verifiable documentation of Arizona residency in the student's cumulative file. This documentation must be provided each time a student enrolls in a school district or charter school and reaffirmed during the annual registration process. The ADE Arizona Residency Guideline identifies an approved list of options a parent or legal guardian may provide to the school district or charter school to meet these requirements.

Auditors also determined that the School failed to maintain birth certificate documentation for one student as required by statute. According to A.R.S. § 15-828, a photocopy of the student's birth certificate or other reliable proof of the student's identity and age must be placed in the student's file.

Table 4 lists the student file documentation maintained by the School for fiscal years 2016, 2017 and 2018.

Table 4

**Pinnacle Education-Kino, Inc.
Student cumulative file documentation
Fiscal years 2016, 2017 and 2018**

	Total sampled	Missing residency documentation	Missing birth certificate
2016	25	-	-
2017	25	-	1
2018	25	4	-
Total	75	4	1

Source: Auditor analysis of School records for fiscal years 2016, 2017 and 2018.

The School was overfunded by \$7,851.33

Auditors determined that the School did not receive the correct amount of Basic State Aid due to failing to maintain residency documentation to prove Arizona residency for students in fiscal year 2018. The School's failure to collect proper residency documentation for four students, two of which resulted in the School's ADM being overstated by 0.98. As a result, the School was overfunded by \$7,851.33.

Table 5 shows the ADM adjustment due to improper residency documentation for fiscal years 2016, 2017 and 2018.

Table 5

**Pinnacle Education-Kino, Inc.
Student Residency Documentation ADM Funding Adjustment
Fiscal years 2016, 2017 and 2018**

	Students	ADM	Funding
2016	-	-	-
2017	-	-	-
2018	2	0.98	\$7,851.33
Total	2	0.98	\$7,851.33

Source: Auditor analysis of School records for fiscal years 2016, 2017 and 2018.

In the future, the School must ensure that it complies with statute by collecting and maintaining in each student's cumulative file copies of verifiable residency, birth certificate documentation and as required by law.

Recommendation:

1. The School must comply with statute by collecting and maintaining in each student's cumulative file copies of verifiable residency and birth certificate documentation as required by law.

ADM AND FUNDING ADJUSTMENTS

A.R.S. § 15-915 requires that ADE makes corrections for audit findings to both budget capacity and state aid. ADE's School Finance Unit's Memo 13-011 informs LEAs of these statutory requirements:

A.R.S. §15-915, as amended by Laws 2012, Chapter 357, Section 3, requires the superintendent of public instruction, when it is determined that state aid or budget limits have been calculated in error, within the prior 3 years, to make corrections to budget limits and state aid in the current year. (Hardship application may be approved by the superintendent). Effective for audits initiated during 2013 and continuing in subsequent years, corrections for audit findings to both budget capacity and state aid (when applicable) will be made.

Basic State Aid adjustment of \$12,275.57 required to be paid to ADE—Auditors identified an overall funding adjustment of \$12,275.57 for the three fiscal years audited due to inaccurate student enrollment and residency documentation.

Table 6 lists the ADM adjustments and the associated Basic State Aid adjustments for the School for fiscal years 2016, 2017 and 2018.

Table 6

**Pinnacle Education-Kino, Inc.
ADM and funding adjustments
Fiscal years 2016, 2017 and 2018**

	2016		2017		2018		Total
	ADM	Funding	ADM	Funding	ADM	Funding	
Inaccurate enrollment data	0.28	\$2,160.77	0.17	\$1,303.15	0.11	\$960.32	\$4,424.24
Residency	-	-	-	-	0.98	\$7,851.33	\$7,851.33
Total funding adjustment	0.28	\$2,160.77	0.17	\$1,303.15	1.09	\$8,811.65	\$12,275.57

Source: Auditor analysis of ADE and School student and financial data for fiscal years 2016, 2017 and 2018.