



## Arizona Department of Education

The Audit Unit

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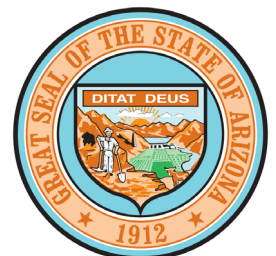
Phoenix, Arizona 85007

602-364-4036

# Average Daily Membership Audit Report Gila Bend Unified School District Fiscal Years 2017, 2018 and 2019

Report Number—21-01

July 21, 2020



**CONTACTING  
THE AUDIT UNIT**

Melissa Muñoz, Audit Manager

Phone: (602) 542-8932

Email: [Melissa.Munoz@azed.gov](mailto:Melissa.Munoz@azed.gov)

Fax: (602) 364-3264

Mail: 1535 W. Jefferson St., Bin 19  
Phoenix, AZ 85007-3209

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## Arizona Department of Education

Audit Unit

July 21, 2020

Dr. Anthony J. Perkins, Superintendent  
Gila Bend Unified School District  
PO Box V  
Gila Bend, AZ 85337

Dear Dr. Perkins:

The Arizona Department of Education Audit Unit has conducted an audit of the Gila Bend Unified School District (District) Average Daily Membership (ADM) for Fiscal Years 2017, 2018 and 2019. The purpose of the audit was to address whether the District properly reported student enrollment, and to determine if it received the correct amount of Basic State Aid.

Auditors determined that the District incorrectly reported the enrollment data of 11 students, which resulted in its ADM being overstated by 2.95. The District must adjust their budget capacity as a result of the ADM adjustment. Additionally, auditors determined that the District failed to properly maintain some required documentation in student cumulative files.

We appreciate the cooperation and assistance provided by the District'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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# TABLE OF CONTENTS

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	<u>Page</u>
<b>Introduction and background .....</b>	<b>1</b>
<b>Scope and methodology.....</b>	<b>3</b>
<b>Finding 1: The District did not accurately report some student data, resulting in an overstatement of 2.95 ADM .....</b>	<b>5</b>
The District inaccurately reported some student data.....	5
The District failed to comply with statute and ADE guidelines .....	6
The District was overstated by 2.95 ADM .....	7
Recommendations .....	7
<b>Finding 2: The District did not properly maintain some student records as required by statute and guideline.....</b>	<b>8</b>
The District did not properly maintain student file documentation .....	8
Recommendation .....	9
<b>ADM adjustments .....</b>	<b>10</b>

# TABLE OF CONTENTS (CONT'D)

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	<u>Page</u>
<b>Tables:</b>	
1 Gila Bend Unified School District Total students, revenues and expenditures Fiscal years 2017, 2018 and 2019 (Unaudited) .....	2
2 Gila Bend Unified School District ADM adjustments due to enrollment data errors Fiscal years 2017, 2018 and 2019.....	6
3 Gila Bend Unified School District Student cumulative file documentation Fiscal years 2017, 2018 and 2019.....	9
4 Gila Bend Unified School District ADM adjustments Fiscal years 2017, 2018 and 2019.....	10

# INTRODUCTION AND BACKGROUND

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The Arizona Department of Education (ADE) Audit Unit has conducted an Average Daily Membership (ADM) audit of the Gila Bend Unified School District (District) pursuant to Arizona Revised Statutes (A.R.S.) § 15-239. This audit focused on whether the District properly reported enrollment data to ADE and received the correct amount of Basic State Aid for Fiscal Years (FY) 2017 through 2019.

***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.

In addition, ADE will adjust the District’s budget capacity if required. ADE School Finance Memorandum 13-011 summarizes the budget capacity adjustment authorized by statute:

*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 FY2013 and continuing in subsequent years, corrections for audit findings to both budget capacity and state aid (when applicable) will be made.*

**District information**—The District, located in Gila Bend, Arizona, offered instruction in grades K through 12 during the fiscal years audited. They operated 1 high school, and 1 elementary school. Table 1 presents the District’s unaudited student, staffing and financial information for FY 2017, FY 2018 and FY 2019.

**Table 1**

**Gila Bend Unified School District  
Total students, revenues and expenditures  
Fiscal years 2017, 2018 and 2019  
(Unaudited)**

	<b>2017</b>	<b>2018</b>	<b>2019</b>
<b>Students Enrolled</b>	<b>427</b>	<b>433</b>	<b>455</b>
<b>Number of Teachers</b>	<b>22</b>	<b>25</b>	<b>26</b>
<b>Revenue</b>			
Local	\$ 2,472,195	\$ 4,805,371	\$ 4,869,708
Intermediate	\$ 0	\$ 0	\$ 558
State	\$ 438,770	\$ 496,094	\$ 449,110
Federal	\$ 965,918	\$ 811,713	\$ 951,160
<b>Total Revenues</b>	<b><u>\$ 3,876,883</u></b>	<b><u>\$ 6,113,178</u></b>	<b><u>\$ 6,270,536</u></b>
<b>Total Expenditures</b>	<b><u>\$ 5,164,975</u></b>	<b><u>\$ 5,705,239</u></b>	<b><u>\$ 5,669,518</u></b>

Source: Annual Report of the Arizona Superintendent of Public Instruction for fiscal years 2017, 2018 and 2019.

## SCOPE AND METHODOLOGY

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The audit focused on whether the District 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 School Districts (USFR) and its own policies and procedures for FY 2017, FY 2018 and FY 2019.

To conduct this audit, auditors used a variety of methods, including examining District and ADE records to review 150 of 1,353 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 District policies and procedures, and interviewed District 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 District 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 District 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 District for FY 2017, FY 2018 and FY 2019. 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. When students with a special education category also had an adjustment, auditors made an adjustment to the special education weight as well.



- **Limiting**—Auditors reviewed the total ADM for each enrolled student to ensure that they were appropriately limited by ADE’s system. No findings were identified for this area.

The Audit Unit expresses its appreciation to the District’s administration and staff members for their cooperation and assistance during the course of the audit.

# **FINDING 1: THE DISTRICT DID NOT ACCURATELY REPORT SOME STUDENT DATA, RESULTING IN AN OVERSTATEMENT OF 2.95 ADM**

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Auditors determined that the District inaccurately reported the student data for 11 students for FY 2017, FY 2018 and FY 2019. Specifically, auditors found that 5 students had an incorrectly reported FTE, 1 student had not attended the District, 1 student had an incorrect entry date and 4 students had an enrollment period with 10 unexcused absences. In addition, 9 of these students that had data reported incorrectly were also funded with a SPED category. As a result of these errors, the District's ADM was overreported by 2.95.

## **The District inaccurately reported some student data**

The District inaccurately reported 11 students' enrollment data to ADE, which resulted in the District's ADM being overstated by 2.95.

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.<sup>1</sup> 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. Pursuant to A.R.S. §15-901 (A)(2), students absent for ten (10) consecutive school days, except for excused absences, shall be withdrawn from the school. However, the District did not always adhere to these requirements. Specifically, for the students that were sampled:

- 5 students had an incorrect FTE reported. As a result, the ADM for the District was overreported by 0.35.
- 1 student was reported as attended but did not actually attend the District. As a result, the ADM for the District was overreported by 1.00.

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<sup>1</sup> Pursuant to A.R.S. § 15-901, a full time student (1.0 FTE) in grades 9 through 12 must be scheduled for and attending at least 720 hours of instruction and at least four subjects each of which meets for at least 123 hours annually; a 0.75 FTE student must be scheduled for at least 540 hours of instruction and at least three subjects each of which meets for at least 123 hours annually, a 0.50 FTE student must be scheduled for at least 360 hours of instruction and at least two subjects each of which meets for at least 123 hours annually and a 0.25 FTE student must be scheduled for at least 180 hours of instruction and at least one subject which meets for at least 123 hours annually.

- 1 student was reported with incorrect enrollment dates. As a result, the ADM for the District was overreported by 0.12.
- 4 students incurred 10 consecutive unexcused absences and should have been withdrawn for 10 consecutive unexcused absences. As a result, the ADM for the District was overreported by 0.52.
- 9 of the students that had data reported incorrectly were also funded with a SPED category. As a result, the weighted SPED ADM for the District was overreported by 0.96.

As shown in Table 2, data reporting errors resulted in an ADM overstatement of 2.95 for the three fiscal years audited.

**Table 2**

**Gila Bend Unified School District  
ADM adjustments due to enrollment data errors  
Fiscal years 2017, 2018 and 2019**

	<b>FTE</b>	<b>Incorrect Enrollment</b>	<b>10 unexcused absences</b>	<b>Did not attend</b>	<b>SPED</b>	<b>Total</b>
2017	0.19	-	0.23	-	-	0.42
2018	0.16	-	-	1.00	-	1.16
2019	-	0.12	0.29	-	0.96	1.37
<b>Total</b>	<b>0.35</b>	<b>0.12</b>	<b>0.52</b>	<b>1.00</b>	<b>0.96</b>	<b>2.95</b>

Source: Auditor analysis of District records, ADE data for fiscal years 2017, 2018 and 2019.

**The District failed to comply with statute and ADE guidelines**

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

Auditors determined that 5 of the District’s students did not meet the statutory and ADE guideline requirements for full time enrollment (FTE). Auditors analyzed the District’s bell schedule and calendar for the District’s high schools to determine how many classes or other periods in the day would be required to meet the minimum requirements for full time, or for part time FTE. However, the FTE that was reported for 5 students was not correct based on the number of courses the students were enrolled in. As a result, the District overreported the FTE for 5 students.

Additionally, the District misreported the enrollment data of 6 students. According to ARS § 15-901 (A)(2), 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 District incorrectly reported the entry dates of 1 student and 1 student was reported to ADE that did not attend. In addition, the District failed to properly withdraw students with unexcused absences. According to A.R.S. §15-901 (A)(2), students absent for ten (10) consecutive school days, except for excused absences, shall be withdrawn from the school. The District failed to withdraw 4 students with 10 unexcused absences in a row.

In the future, the District must ensure it complies with statute and ADE guidelines to properly calculate and report FTE and report student enrollments.

### **The District was overstated by 2.95 ADM**

Auditors determined that the District did not report the correct ADM due to inaccurate enrollment data reported to ADE for FY 2017, FY 2018 and FY 2019. The student data incorrectly reported by the District resulted in its ADM being overstated by 2.95. Because the District did not receive any basic state aid, there is no financial adjustment necessary. However, 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 2014, 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.*

### **Recommendations:**

1. The District needs to ensure that it properly calculates and reports students' FTE pursuant to statute and ADE guidelines.
2. The District must reconcile to ensure that enrollment dates are reported accurately pursuant to A.R.S. § 15-901.
3. The District must adjust its budget capacity for the three fiscal years audited. Budget capacity adjustment calculations for the District will be made by ADE once the audit is finalized.

## **FINDING 2: THE DISTRICT DID NOT PROPERLY MAINTAIN SOME STUDENT RECORDS AS REQUIRED BY STATUTE AND GUIDELINE**

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Auditors determined that the District failed to properly maintain residency, birth certificate and immunization documentation for some students as required by statute and ADE guidelines. The District did not properly maintain required documentation in some of its student cumulative files. In the future, the District should properly maintain these documents to ensure compliance with statute and ADE guidelines.

### **The District did not properly maintain student file documentation**

Auditors determined that the District failed to maintain residency documentation for some 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 District failed to maintain birth certificate documentation for some students 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.

In addition, auditors determined that the District failed to maintain immunization documentation for some students as required by statute. According to A.R.S. § 15-872, "A pupil shall not be allowed to attend school without submitting documentary proof to the school administrator unless the pupil is exempted from immunization pursuant to section 15-873."

The District did not maintain the proper documentation required by statute and ADE's residency guideline. Of the 75 students sampled, 45 of the student files did not have the proper residency documentation, 32 did not have a birth certificate in their file and 1 student did not have immunization record documentation in their file. Table 3 (page 10) lists the student file documentation maintained by the District for FY 2017, FY 2018 and FY 2019.

**Table 3**

**Gila Bend Unified School District  
Student cumulative file documentation  
Fiscal years 2017, 2018 and 2019**

	<b>Total Sampled</b>	<b>Missing Residency Documentation</b>	<b>Missing Birth Certificate</b>	<b>Missing Immunization</b>
2017	25	11	7	-
2018	25	17	13	1
2019	25	17	12	-
<b>Total</b>	<b><u>75</u></b>	<b><u>45</u></b>	<b><u>32</u></b>	<b><u>1</u></b>

Source: Auditor analysis of District records for fiscal years 2017, 2018 and 2019.

In the future, the District 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 immunization documentation as required by law.

**Recommendation:**

1. The District must comply with statute and collect and maintain in each student's cumulative file copies of verifiable residency, birth certificate and immunization documentation as required by law.

# ADM ADJUSTMENTS

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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.*

**Budget capacity adjustment required**—The District must adjust its budget capacity for the three fiscal years audited. Budget capacity adjustment calculations for the District will be made by ADE once the audit is finalized.

**No Basic State Aid adjustment required**— Auditors identified an overall ADM overstatement of 2.95 for the three fiscal years audited due to improperly reported enrollment data. However, since the District did not receive any basic state aid, no financial adjustment is required.

Table 4 lists the ADM adjustments and the associated Basic State Aid adjustments for the District for fiscal years 2017, 2018 and 2019.

**Table 4**

**Gila Bend Unified School District  
ADM adjustments  
Fiscal years 2017, 2018 and 2019**

	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>Total</b>
ADM adjustment	0.42	1.16	1.37	2.95

Source: Auditor analysis of ADE and District student and financial data for fiscal years 2017, 2018 and 2019.