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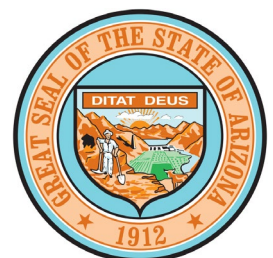
Phoenix, Arizona 85007

602-364-4036

Average Daily Membership Audit Report Student Choice High School Fiscal Years 2018, 2019 and 2020

Report Number—21-30

February 25, 2021



**CONTACTING
THE AUDIT UNIT**

Taylor MacNamara, Audit Manager

Phone: 602-364-4063

Email: Taylor.MacNamara@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

February 25, 2021

Patrick Meehan, Charter Representative
GAR, LLC dba Student Choice High School
8253 W. Thunderbird Rd., Suite 105
Peoria, AZ 85381

Dear Charter Representative Meehan:

The Arizona Department of Education Audit Unit has conducted an audit of the GAR, LLC dba Student Choice High School (School) Average Daily Membership (ADM) for Fiscal Years 2018, 2019 and 2020. 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 had incorrectly reported the enrollment data and FTE status of 65 students. Auditors also determined that the School had misreported or received incorrect funding for DRP enrollments for 49 students. As a result, the School was overfunded by \$26,848.41 which the School must repay to ADE. Additionally, auditors determined that the School failed to properly maintain some required documentation in student cumulative files and student written learning plans.

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 Student Choice High School (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) 2018 through 2020.

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 Phoenix, Arizona, offered instruction in grades 9 through 12 during the fiscal years audited. The School operated one high school. Table 1 presents the School’s unaudited student, staffing and financial information for FY2018, FY2019 and FY2020.

Table 1
Student Choice High School
Total students, revenues and expenditures
Fiscal years 2018, 2019 and 2020
(Unaudited)

	2018	2019	2020
Students enrolled	1,054	1,372	1,689
Number of teachers	24	26	35
Revenue			
Local	\$ 5,070	\$ 2,106	\$ 400
Intermediate	\$ 0	\$ 0	\$ 0
State	\$ 7,571,437	\$ 10,785,143	\$ 12,052,923
Federal	\$ 0	\$ 0	\$ 0
Total revenues	<u>\$ 7,576,507</u>	<u>\$ 10,787,249</u>	<u>\$ 12,053,323</u>
Total expenditures	<u>\$ 6,325,771</u>	<u>\$ 8,654,101</u>	<u>\$ 11,013,464</u>

Source: Annual Report of the Arizona Superintendent of Public Instruction for fiscal years 2018, 2019 and 2020.

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 FY2018, FY2019 and FY2020.

To conduct this audit, auditors used a variety of methods, including examining School and ADE records to review 704 of 6,941 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.
- **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.
- **Dropout Recovery Program (DRP)** – Auditors reviewed written learning plans, monthly progress indicators, and enrollment histories to determine if DRP enrollment data reported to ADE was correct. When DRP enrollment was incorrect, auditors made an adjustment. In addition, auditors identified elements required in the written learning plans that were not documented.
- **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.
- **Instructional hours** – Auditors reviewed the bell schedules and calendars for the School for FY2018, FY2019 and FY2020. 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 findings were identified for this area.

- **Limiting** – Auditors reviewed the total ADM for each enrolled student to ensure that they were appropriately limited by ADE’s system. If a student was not limited appropriately, and adjustment was determined.

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

FINDING 1: THE SCHOOL DID NOT ACCURATELY REPORT SOME STUDENT DATA, RESULTING IN AN OVERPAYMENT OF \$110,304.73

Auditors determined that the School inaccurately reported the student data for 65 students for FY2018, FY2019 and FY2020. Specifically, auditors found that 58 students had an incorrectly reported FTE, five students had incorrect enrollment dates, one student attended but was not funded and one student was not correctly limited. As a result of these errors, the School's ADM was overreported by 15.64. As a result, the School was overfunded by \$110,304.73 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 65 student's enrollment data to ADE, which resulted in the School's ADM being overstated by 15.64.

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.¹ 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:

- 58 students had an incorrect FTE reported. As a result, the ADM for the School was overreported by 16.13.
- 5 students were reported with incorrect enrollment dates. As a result, the ADM for the School was overreported by 0.24.

¹ 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 attended the School but was not reported and funded as being enrolled in the School. As a result, the ADM for the School was underreported by 0.77.
- 1 student was not limited to 1.0 ADM for their enrollment. As a result, the ADM for the School was overreported by 0.04.

As shown in Table 2, data reporting errors resulted in an ADM overstatement of 15.64 for the three fiscal years audited.

Table 2

**Student Choice High School
ADM adjustments due to enrollment data errors
Fiscal years 2018, 2019 and 2020**

	FTE	Enrollment dates	Attended	Limiting	Total
2018	6.39	-	-	-	6.39
2019	9.61	(0.02)	-	0.04	9.63
2020	0.13	0.26	(0.77)	-	(0.38)
Total	16.13	0.24	(0.77)	0.04	15.64

Source: Auditor analysis of School records, ADE data for fiscal years 2018, 2019 and 2020.

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 58 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 the students was not correct based on the annual instructional hours or the number of courses the students were enrolled in. As a result, the School overreported the FTE for 58 students.

Additionally, the School misreported the enrollment data of six 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 School incorrectly reported the entry/exit dates of five students and one student attended the School but was not reported and funded as being enrolled.

Finally, one student was not limited to 100 membership days, or 1.0 ADM, by ADE’s system. As a result, the ADM for the student was overreported.

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 was overfunded by \$110,304.73

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 FY2018, FY2019 and FY2020. The student data incorrectly reported by the School resulted in its ADM being overstated by 15.64. As a result, the School was overfunded by \$110,304.73 in Basic State Aid, which ADE must recoup from the School. Table 3 shows the ADM and funding adjustments required for the School for FY2018, FY2019 and FY2020.

Table 3

**Student Choice High School
ADM and funding adjustments
Fiscal years 2018, 2019 and 2020**

	ADM adjustment	Total
2018	6.39	\$ 43,749.98
2019	9.63	\$ 69,366.53
2020	(0.38)	\$ (2,811.78)
Total	15.64	\$ 110,304.73

Source: Auditor analysis of School and ADE records for fiscal years 2018, 2019 and 2020.

Recommendations:

1. The School must pay to ADE \$110,304.73 in Basic State Aid due to incorrectly reported student data.
2. The School must 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 HAD INACCURATE DRP REPORTING AND FUNDING, RESULTING IN AN UNDERPAYMENT OF \$83,456.32

Auditors determined that the School's ADM funding and reporting was inaccurate for 49 DRP students for FY2018, FY2019 and FY2020. Specifically, auditors found that 37 students did not receive correct DRP funding, seven students were missing a written learning plan and five students had incorrect monthly progress indicators. As a result of these errors, the School's ADM was underreported by 11.35 and the School was underfunded by \$83,456.32 in Basic State Aid. According to A.R.S. § 15-915, ADE must pay these monies to the School.

The School inaccurately reported some student data

The School was not appropriately funded for 37 student's enrollment data and the School inaccurately reported 12 student's enrollment data to ADE which resulted in the School's ADM being understated by 11.35.

According to A.R.S. § 15-901.06, each eligible pupil who is enrolled in a dropout recovery program shall have a written learning plan developed by the pupil's assigned mentor. In addition, funding is determined based on the participation of the students and their satisfactory or unsatisfactory monthly progress indicators as defined in A.R.S. § 15-901.06. However, the School did not always adhere to these requirements. Specifically, for the students that were sampled:

- 37 students were not appropriately funded by ADE for their DRP enrollment. As a result, the ADM for the School was underreported by 14.68.
- 7 students were reported but did not have a written learning plan for part of their DRP enrollment. As a result, the ADM for the School was overreported by 3.33.
- 5 students were reported with one or more incorrect monthly progress indicators. However, due to positive and negative adjustments, the net adjustment to ADM as a result was 0.00.

As shown in Table 4 (see page 9), data errors resulted in an ADM understatement of 11.35 for the three fiscal years audited.

Table 4

**Student Choice High School
ADM adjustments due to DRP data errors
Fiscal years 2018, 2019 and 2020**

	Incorrect funding	Missing written learning plan	Incorrect monthly indicator	Total
2018	(3.43)	3.08	(0.08)	(0.43)
2019	(3.50)	0.25	-	(3.25)
2020	(7.75)	-	0.08	(7.67)
Total	(14.68)	3.33	-	(11.35)

Source: Auditor analysis of School records, ADE data for fiscal years 2018, 2019 and 2020.

The School must properly reconcile its enrollment data with ADE

The School can identify errors in the future by ensuring it regularly and correctly reconciles its data to the data contained in ADE's system. Additionally, the School must ensure that a process is in place that captures the proper entry and exit dates and monthly progress indicators of DRP 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 did not properly maintain written learning plan documentation

The School did not maintain the proper DRP written learning plan documentation required by statute. According to A.R.S. § 15-901.06, the written learning plan shall include the following elements: the start date and anticipated end date of the plan, courses to be completed by the pupil during the academic year, whether courses will be taken sequentially or concurrently, state competency exams to be taken, as necessary, expectations for satisfactory monthly progress and expectations for contact with the pupil's assigned mentor. However, of the 371 written learning plans reviewed:

- 18 written learning plans did not include the anticipated end date.
- 89 written learning plans did not include course to be completed in the academic year.
- 8 written learning plans did not include whether courses were concurrent or sequential.
- 194 written learning plans did not include state competency exams to be taken.

- 114 written learning plans did not include expectations for satisfactory monthly progress.
- 5 written learning plans did not include expectations for mentor contact.

Table 5 lists the written learning plan documentation maintained by the School for FY2018, FY2019 and FY2020.

Table 5

**Student Choice High School
Written learning plan documentation
Fiscal years 2018, 2019 and 2020**

	2018	2019	2020	Total
Missing start date	-	-	-	-
Missing anticipated end date	17	1	-	18
Missing courses to be completed	47	42	-	89
Missing sequential or concurrent	5	3	-	8
Missing exams	107	86	1	194
Missing satisfactory monthly progress expectations	1	33	80	114
Missing mentor contact expectations	3	2	-	5

Source: Auditor analysis of School records for fiscal years 2018, 2019 and 2020.

The School must ensure that student written learning plans include all elements required by statute.

The School was underfunded by \$83,456.32

Auditors determined that the School did not receive the correct amount of Basic State Aid due to incorrect DRP funding and inaccurate DRP data reported to ADE FY2018, FY2019 and FY2020. The incorrect funding and incorrectly reported student data resulted in the School's ADM being understated by 11.35. As a result, the School was underfunded by \$83,456.32 in Basic State Aid, which ADE must pay to the School. Table 6 (see page 11) shows the ADM and funding adjustments required for the School for FY2018, FY2019 and FY2020.

Table 6

**Student Choice High School
ADM and funding adjustments
Fiscal years 2018, 2019 and 2020**

	ADM adjustment	Total
2018	(0.43)	\$ (2,943.15)
2019	(3.25)	\$ (23,413.63)
2020	(7.67)	\$ (57,099.54)
Total	(11.35)	\$ (83,456.32)

Source: Auditor analysis of School and ADE records for fiscal years 2018, 2019 and 2020.

Recommendations:

1. ADE must pay to the School \$83,456.32 in Basic State Aid due to incorrectly reported student data and incorrect DRP funding.
2. The School must ensure that it properly calculates reports students' DRP enrollments pursuant to statute and ADE guidelines.
3. The School must ensure that student written learning plans include all elements required by statute.
4. The School must reconcile to ensure that DRP enrollments are reported and funded accurately pursuant to A.R.S. § 15-901.06.

FINDING 3: THE SCHOOL DID NOT PROPERLY MAINTAIN SOME STUDENT RECORDS AS REQUIRED BY STATUTE AND GUIDELINE

Auditors determined that the School failed to properly maintain residency, birth certificate and immunization 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. 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

Auditors determined that the School 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 School 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 School 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 School did not maintain the proper documentation required by statute and ADE's residency guideline. Of the 90 student files sampled, 25 did not have the proper residency documentation, 17 did not have the residency reaffirmed annually, 3 did not have a birth certificate in their file and 2 did not have immunization record documentation in their file. Table 7 (see page 13) lists the student file documentation maintained by the School for FY2018, FY2019 and FY2020.

Table 7

**Student Choice High School
Student cumulative file documentation
Fiscal years 2018, 2019 and 2020**

	Total sampled	Missing residency documentation	Residency not reaffirmed	Missing birth certificate	Missing immunization
2018	30	9	7	-	1
2019	30	8	6	2	1
2020	30	8	4	1	-
Total	90	25	17	3	2

Source: Auditor analysis of School records for fiscal years 2018, 2019 and 2020.

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 immunization documentation 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, birth certificate and immunization 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 \$26,848.41 required to be paid to ADE—Auditors identified an overall funding adjustment of \$26,848.41 for the three fiscal years audited due to inaccurate student enrollment and DRP data.

Table 8 lists the ADM adjustments and the associated Basic State Aid adjustments for the School for fiscal years 2018, 2019 and 2020.

Table 8

**Student Choice High School
ADM and funding adjustments
Fiscal years 2018, 2019 and 2020**

	2018		2019		2020		Total
	ADM	Funding	ADM	Funding	ADM	Funding	
Inaccurate enrollment data	6.39	\$ 43,749.98	9.63	\$ 69,366.53	(0.38)	\$ (2,811.78)	\$ 110,304.73
DRP	(0.43)	\$ (2,943.15)	(3.25)	\$ (23,413.63)	(7.67)	\$ (57,099.54)	\$ (83,456.32)
Total funding adjustment	5.96	\$ 40,806.83	6.38	\$ 45,952.90	(8.05)	\$ (59,911.32)	\$ 26,848.41

Source: Auditor analysis of ADE and School student and financial data for fiscal years 2018, 2019 and 2020.