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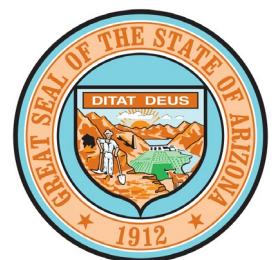
Phoenix, Arizona 85007

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Average Daily Membership Audit Report Cottonwood-Oak Creek School District Fiscal Years 2018, 2019 and 2020

Report Number—21-46

June 29, 2021



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Arizona Department of Education

Audit Unit

June 29, 2021

Steven King, Superintendent
Cottonwood-Oak Creek School District
1 N. Willard St.
Cottonwood, AZ 86326

Dear Superintendent King:

The Arizona Department of Education Audit Unit has conducted an audit of the Cottonwood-Oak Creek School District (District) Average Daily Membership (ADM) for Fiscal Years 2018, 2019 and 2020. 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 10 students, which resulted in its ADM being understated by 7.02. As a result, the District was underfunded by \$32,913.00 which ADE must repay to the District. 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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INTRODUCTION AND BACKGROUND

The Arizona Department of Education (ADE) Audit Unit has conducted an Average Daily Membership (ADM) audit of the Cottonwood-Oak Creek 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) 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.

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 Cottonwood, Arizona, offered instruction in grades PSD through 12 during the fiscal years audited. The District operated six elementary schools and an AOI program. Table 1 presents the District’s unaudited student, staffing and financial information for FY 2018, FY 2019 and FY 2020.

Table 1

**Cottonwood-Oak Creek School District
Total students, revenues and expenditures
Fiscal years 2018, 2019 and 2020
(Unaudited)**

	2018	2019	2020
Students enrolled	2,022	2,102	2,049
Number of teachers	130	114	118
Revenue			
Local	\$ 6,465,473	\$ 6,842,246	\$ 6,668,897
Intermediate	\$ 1,608,422	\$ 1,580,824	\$ 1,618,978
State	\$ 6,587,224	\$ 7,430,228	\$ 8,419,892
Federal	\$ 2,671,446	\$ 2,614,349	\$ 3,129,761
Total revenues	\$ 17,332,566	\$ 18,467,647	\$ 19,837,528
Total expenditures	\$ 19,018,717	\$ 18,260,645	\$ 19,218,935

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 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 2018, FY 2019 and FY 2020.

To conduct this audit, auditors used a variety of methods, including examining District and ADE records to review 306 of 3,042 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.
- **AOI data** – Auditors compared 100% of the Arizona Online Instruction data that was reported to ADE to the AOI data from the District. Auditors reviewed instructional time reported as well as the full or part time status that was reported for each student. When the data reported to ADE was incorrect, an adjustment was determined.
- **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 2018, FY 2019 and FY 2020. 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.

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 UNDERPAYMENT OF \$32,913.00

Auditors determined that the District inaccurately reported the student data for 10 students for FY 2018, FY 2019 and FY 2020. Specifically, auditors found that seven students attended the District but were not reported and funded as being enrolled in the District, two students were misreported for AOI and one student had an incorrectly reported FTE. As a result of these errors, the District's ADM was underreported by 7.02. As a result, the District was underfunded by \$32,913.00 in Basic State Aid. According to A.R.S. § 15-915, ADE needs to repay these monies to the District.

The District inaccurately reported some student data

The District inaccurately reported 10 students' enrollment data to ADE, which resulted in the District's ADM being understated by 7.02.

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 District did not always adhere to these requirements. Specifically, for the students that were sampled:

- 7 students attended the District but were not reported and funded as being enrolled in the District. As a result, the ADM for the District was underreported by 4.22.
- 1 student in the AOI program had minutes of attendance incorrectly reported. As a result, the ADM for the District was underreported by 0.1.
- 1 student in the AOI program was incorrectly submitted as full time when the student should have been reported as part time. As a result, the ADM for the District was underreported by 0.01.
- 1 student had an incorrect FTE reported. As a result, the ADM for the District was underreported by 0.50.
- 3 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 underreported by 2.28.

As shown in Table 2, data reporting errors resulted in an ADM understatement of 7.02 for the three fiscal years audited.

Table 2
Cottonwood-Oak Creek School District
ADM adjustments due to enrollment data errors
Fiscal years 2018, 2019 and 2020

	Attended	Incorrect FTE	AOI	SPED	Total
2018	(3.42)	-	(0.01)	(2.28)	(5.71)
2019	(0.80)	-	-	-	(0.80)
2020	-	(0.50)	(0.01)	-	(0.51)
Total	(4.22)	(0.50)	(0.02)	(2.28)	(7.02)

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

The District must properly reconcile its enrollment data with ADE

The District can likely avoid errors in the future by ensuring it regularly and correctly reconciles its data to the data contained in ADE's system. Additionally, the District 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 District should review its reconciliation practices to ensure that its staff properly review the reports produced by ADE and reconcile them to the District's SMS data to identify any discrepancies and correct any errors identified.

The District was underfunded by \$32,913.00

Auditors determined that the District did not receive the correct amount of Basic State Aid due to the inaccurate student data reported to ADE for FY 2018, FY 2019 and FY 2020. The student data incorrectly reported by the District resulted in its ADM being understated by 7.02. As shown in Table 3 (see page 7), the District was underfunded by \$32,913.00 in Basic State Aid for the three fiscal years audited which ADE must repay to the District pursuant to A.R.S. § 15-915.

Table 3
Cottonwood-Oak Creek School District
ADM and funding adjustments
Fiscal years 2018, 2019 and 2020

	ADM adjustment	Total
2018	(5.71)	\$ (25,749.06)
2019	(0.80)	\$ (4,267.66)
2020	(0.51)	\$ (2,896.28)
Total	(7.02)	\$ (32,913.00)

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

Recommendations:

1. ADE must pay to the District \$32,913.00 in Basic State Aid due to incorrectly reported student data.
2. The District must reconcile to ensure that enrollment dates are reported accurately pursuant to A.R.S. § 15-901.
3. The District must ensure that it properly calculates and reports students' FTE pursuant to statute and ADE guidelines.

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

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. § 15-823 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 a student 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 90 students sampled, 20 of the student files did not have the proper residency documentation, 11 of the student files did not have the residency reaffirmed annually, five did not have a birth certificate in their file and one student did not have immunization record documentation in their file. Table 4 (see page 9) lists the student file documentation maintained by the District for FY 2018, FY 2019 and FY 2020.

Table 4

**Cottonwood-Oak Creek School District
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	6	4	2	-
2019	30	9	2	2	1
2020	30	5	5	1	-
Total	90	20	11	5	1

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

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 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.

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.

Basic State Aid adjustment of \$32,913.00 required to be paid to the District—Auditors identified an overall funding adjustment of \$32,913.00 for the three fiscal years audited due to inaccurate student enrollment.

Table 5 lists the ADM adjustments and the associated Basic State Aid adjustments for the District for fiscal years 2018, 2019 and 2020.

Table 5

**Cottonwood-Oak Creek School District
ADM and funding adjustments
Fiscal years 2018, 2019 and 2020**

	2018	2019	2020	Total
ADM adjustment	(5.71)	(0.80)	(0.51)	(7.02)
Funding adjustment	\$ (25,749.06)	\$ (4,267.66)	\$ (2,896.28)	\$ (32,913.00)

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