



## Arizona Department of Education

The Audit Unit

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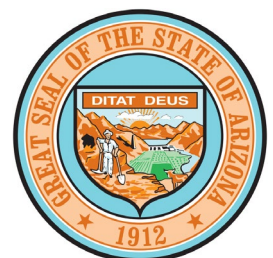
Phoenix, Arizona 85007

602-364-4036

# Average Daily Membership Audit Report Institute for Transformative Education, Inc. Fiscal Years 2019, 2020 and 2021

Report Number—22-19

December 14, 2021



**CONTACTING  
THE AUDIT UNIT**

Angel Santiago, Audit Supervisor

Phone: 602-364-4061

Email: [Angel.santiago@azed.gov](mailto:Angel.santiago@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

December 14, 2021

Luis Perales, Chief Executive Officer  
Institute for Transformative Education, Inc.  
1300 S Belvedere Ave  
Tucson, AZ, 85711

Dear Chief Executive Officer Perales:

The Arizona Department of Education Audit Unit has conducted an audit of the Institute for Transformative Education, Inc. (School) Average Daily Membership (ADM) for Fiscal Years 2019, 2020 and 2021. 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 four students, which resulted in its ADM being overstated by 0.5162. As a result, the School was overfunded by \$4,383.70 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

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The Arizona Department of Education (ADE) Audit Unit has conducted an Average Daily Membership (ADM) audit of the Institute for Transformative Education 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) 2019 through 2021.

***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 Tucson, Arizona, offered instruction in grades 9 through 12 during the fiscal years audited. They had one high school. Table 1 presents the School’s unaudited student, staffing and financial information for FY2019, FY2020 and FY2021.

**Table 1**

**Institute for Transformative Education Inc.  
Total students, revenues and expenditures  
Fiscal years 2019, 2020 and 2021  
(Unaudited)**

	<b>2019</b>	<b>2020</b>	<b>2021</b>
<b>Students enrolled</b>	<b>103</b>	<b>80</b>	<b>70</b>
<b>Number of teachers</b>	<b>5</b>	<b>3</b>	<b>3</b>
<b>Revenue</b>			
Local	\$ 89,952	\$128,256	\$135,853
Intermediate	\$0	\$0	\$0
State	\$1,001,288	\$824,925	\$619,825
Federal	\$221,191	\$478,678	\$164,758
<b>Total revenues</b>	<b><u>\$1,312,431</u></b>	<b><u>\$1,431,859</u></b>	<b><u>\$920,436</u></b>
<b>Total expenditures</b>	<b><u>\$1,288,923</u></b>	<b><u>\$1,273,394</u></b>	<b><u>\$962,304</u></b>

Source: Annual Report of the Arizona Superintendent of Public Instruction for FY2019, FY2020 and FY2021.

## SCOPE AND METHODOLOGY

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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 FY2019, FY2020 and FY2021.

To conduct this audit, auditors used a variety of methods, including examining School and ADE records to review 150 of 302 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.
- **Student Files** – Auditors reviewed student files to ensure that they maintained required documentation such as birth certificates, immunization records, and supporting residency documentation. No material findings were identified for this area.
- **Instructional hours** – Auditors reviewed the bell schedules and calendars for the School for FY2019, FY2020 and FY2021. The total instructional hours offered for each grade met the minimum required by statute for each of the three fiscal years audited.
- **Distance Learning Plans** – Auditors reviewed the Distance Learning Plans (DLP) for FY2021 that were used to provide education to students. In addition, auditors reviewed the percentage of learning that was distance learning or in person to determine if this was reported correctly. No findings were identified for this area.



- ***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 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 \$4,383.70**

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Auditors determined that the School inaccurately reported the student data for four students for FY2019, FY2020 and FY2021. Specifically, auditors found that three students had an incorrectly reported FTE, one student had over 10 consecutive absences beyond the ten percent threshold. Three of the students that had data reported incorrectly were also funded with a SPED category. As a result of these errors, the School's ADM was overreported by 0.5162. As a result, the School was overfunded by \$4,383.70 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 4 student's enrollment data to ADE, which resulted in the School's ADM being overstated by 0.5162.

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, A.R.S. § 15-901 states that a student with 10 consecutive unexcused absences must be withdrawn and beginning in FY2019, School Finance Manual (G) states that students who have reached the 10% threshold for cumulative absences (excused or unexcused) based on the number of instructional calendar days at their school and incur 10 or more consecutive absences will generate non-fundable ADM intervals. However, the School did not always adhere to these requirements. Specifically, for the students that were sampled:

- 3 students had an incorrect FTE reported. As a result, the ADM for the School was overreported by 0.4150.
- 1 student had over 10 consecutive absences beyond the ten percent threshold, which generated a non-fundable ADM interval. As a result, the ADM for the School was overreported by 0.1000.
- 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 School was overreported by 0.0012.

As shown in Table 2, data reporting errors resulted in an ADM overstatement of 0.5162 for the three fiscal years audited.

**Table 2**

**Institute for Transformative Education Inc.  
ADM adjustments due to enrollment data errors  
Fiscal years 2019, 2020 and 2021**

	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>Total</b>
FTE	0.1325	0.2825	-	0.4150
Excessive Absence	0.1000	-	-	0.1000
SPED	0.0004	0.0008	-	0.0012
<b>Total</b>	<b><u>0.2329</u></b>	<b><u>0.2833</u></b>	<b><u>=</u></b>	<b><u>0.5162</u></b>

Source: Auditor analysis of School records, ADE data for FY2019, FY2020 and FY2021.

**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 three 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 subjects the students were enrolled in. As a result, the School overreported the FTE for three students.

Additionally, the School misreported the enrollment data of one student. According to A.R.S. § 15- 901 states that a student with 10 consecutive unexcused absences must be withdrawn and beginning in FY2019, School Finance Manual (G) states that students who have reached the 10% threshold for cumulative absences (excused or unexcused) based on the number of instructional calendar days at their school and incur 10 or more consecutive absences will generate non-fundable ADM intervals. As a result, one student had over 10 consecutive absences beyond the ten percent threshold, which generated a non-fundable ADM interval.

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

## The School was overfunded by \$4,383.70

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 FY2019, FY2020 and FY2021. The student data incorrectly reported by the School resulted in its ADM being overstated by 0.5162. As a result, the School was overfunded by \$4,383.70 in Basic State Aid, which ADE must recoup from the School. Table 3 shows the ADM and funding adjustments required for the School for FY2019, FY2020 and FY2021.

**Table 3**

**Institute for Transformative Education Inc.  
ADM and funding adjustments  
Fiscal years 2019, 2020 and 2021**

	<b>ADM Adjustment</b>	<b>Total</b>
2019	0.2329	\$1,941.54
2020	0.2833	\$2,442.16
2021	-	-
<b>Total</b>	0.5162	\$4,383.70

Source: Auditor analysis of School and ADE records for FY2019, FY2020 and FY2021.

### **Recommendations:**

1. The School must repay to ADE \$4,383.70 in Basic State Aid due to incorrectly reported student data.
2. The School needs to ensure that it properly reports students' FTE pursuant to statute and ADE guidelines.
3. The District should ensure that students with excessive absences be properly withdrawn and that excused and unexcused absences be reported correctly.

# ADM AND FUNDING 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.*

**Basic State Aid adjustment of \$4,383.70 required to be paid to ADE**—Auditors identified an overall funding adjustment of \$4,383.70 for the three fiscal years audited due to inaccurate student enrollment.

Table 4 lists the ADM adjustments and the associated Basic State Aid adjustments for the School for fiscal years 2019, 2020 and 2021.

**Table 4**

**Institute for Transformative Education Inc.  
ADM and funding adjustments  
Fiscal years 2019, 2020 and 2021**

	2019	2020	2021	Total
ADM adjustment	0.2329	0.2833	-	0.5162
<b>Funding adjustment</b>	<b>\$1,941.54</b>	<b>\$2,442.16</b>	-	<b>\$4,383.70</b>

Source: Auditor analysis of ADE and School student and financial data for FY2019, FY2020 and FY2021.