



## Arizona Department of Education

The Audit Unit

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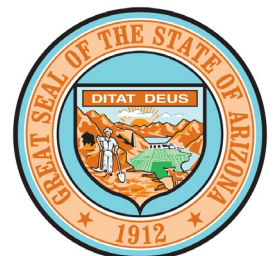
Phoenix, Arizona 85007

602-364-4036

# Average Daily Membership Audit Report Intelli-School, Inc. Fiscal Years 2019, 2020 and 2021

Report Number—22-38

April 29, 2022



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## Arizona Department of Education

### Audit Unit

April 29, 2022

Mick McElhinney, Superintendent  
Intelli-School, Inc.  
2222 W. Northern Ave.  
Suite A110  
Phoenix, AZ 85021

Superintendent McElhinney:

The Arizona Department of Education Audit Unit has conducted an audit of the Intelli-School, 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 58 students, which resulted in its ADM being overstated by 24.12. As a result, the School was overfunded by \$200,522.92 which the School must repay to ADE. Additionally, auditors determined that the School failed to properly maintain some required documentation in student cumulative files.

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 Intelli-School, 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 Phoenix, 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 FY2019, FY2020 and FY2021.

**Table 1**

**Intelli-School, Inc.  
Total students, revenues and expenditures  
Fiscal years 2019, 2020 and 2021  
(Unaudited)**

	2019	2020	2021
<b>Students enrolled</b>	<b>80</b>	<b>103</b>	<b>99</b>
<b>Number of teachers</b>	<b>4</b>	<b>4</b>	<b>4</b>
<b>Revenue</b>			
Local	\$7,746	\$7,178	\$424
Intermediate	\$ -	\$ -	\$ -
State	\$794,989	\$1,049,849	\$980,929
Federal	\$60,850	\$112,306	\$149,797
<b>Total revenues</b>	<b><u>\$863,585</u></b>	<b><u>\$1,169,333</u></b>	<b><u>\$1,131,150</u></b>
<b>Total expenditures</b>	<b><u>\$808,059</u></b>	<b><u>\$942,126</u></b>	<b><u>\$920,095</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 159 of 406 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. No Findings were identified for this area
- **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 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 \$200,522.92**

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Auditors determined that the School inaccurately reported the student data for 58 students for FY2019, FY2020 and FY2021. Specifically, auditors found that 55 students were reported with 10 or more unexcused absences and should have been withdrawn and three students generated non-fundable intervals due to excessive absences. In addition, 12 of these 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 24.12. As a result, the School was overfunded by \$200,522.92 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 58 student's enrollment data to ADE, which resulted in the School's ADM being overstated by 24.12.

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

- 55 students had 10 consecutive unexcused absences and should have been withdrawn. As a result, the ADM for the School was overreported by 22.79.
- 3 students had excessive absences which resulted in a non-fundable period. As a result, the ADM for the School was overreported by 0.65.
- 12 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 0.68.

As shown in Table 2 (page 6), data reporting errors resulted in an ADM overstatement of 24.12 for the three fiscal years audited.

**Table 2**

**Intelli-School, 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>
10-day absences	1.99	2.67	18.13	22.79
Excessive absences	0.65	-	-	0.65
SPED	-	-	0.68	0.68
<b>Total</b>	<b><u>2.64</u></b>	<b><u>2.67</u></b>	<b><u>18.81</u></b>	<b><u>24.12</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 enrollment data.

According to ARS § 15-901 (A)(2), students absent for ten consecutive school days, except for excused absences, shall be withdrawn from the school. In addition, School Finance Manual (G) students who have reached the 10% threshold for cumulative absences (excused and 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, the School incorrectly reported the data for 55 students with 10 consecutive unexcused absences and three students with excessive absences.

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

**The School was overfunded by \$200,522.92**

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 24.12. As a result, the School was overfunded by \$200,522.92 in Basic State Aid, which ADE must recoup from the School. Table 3 (page 7) shows the ADM and funding adjustments required for the School for FY2019, FY2020 and FY2021.

**Table 3**

**Intelli-School, Inc.  
ADM and funding adjustments  
Fiscal years 2019, 2020 and 2021**

	<b>ADM Adjustment</b>	<b>Total</b>
2019	2.64	\$21,661.47
2020	2.67	\$22,073.78
2021	18.81	\$156,787.67
<b>Total</b>	24.12	\$200,522.92

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

**The School failed to properly report student attendance**

Auditors found that the School failed to maintain sufficient attendance documentation to support the data submitted to ADE for funding purposes as required by both statute and ADE guidance. According to ADE School Finance Manual, section G-2, “The school will document the date, reason, and person reporting the absence. The documented record shall be maintained for not less than four years after the fiscal year it was created or received.” However, the School was inconsistent with documenting the reasons or who reported the absences at the time they were created or received. Some dates with student absences there would be no notes, or vague information was documented.

In addition, the School failed to properly report excused or unexcused absences. According to ARS § 15-901 (A)(1), ADE defines an excused absence as an absence due to illness, doctor appointment, bereavement, family emergencies, out-of-school suspensions, religious purposes and School approved family vacations. If an absence occurs relating to any other term or condition, the absence shall be counted as unexcused. However, there were absences that were marked as unexcused that should have been excused based on the reason reported, and there were absences marked as excused that should have been unexcused. In the future, the School should properly report accurate student attendance.

Further, the School failed to properly calculate and report partial day absences. According to ARS § 15-901, “the attendance of a pupil shall not be counted as a full day unless the pupil is actually and physically in attendance and enrolled in and carrying four subjects” In addition, it states that “For high schools, the attendance of a pupil may be counted as one-fourth of a day’s attendance for each sixty minutes of instructional time in a subject that counts toward graduation” However, the School was not calculating and reporting partial day absences correctly. The School would allow students to make up time on other days to offset partial absences to report the student as in attendance for the full day. In addition, if a student was in attendance for less than four hours, the School would report the student as absent for the full day even though they were only partially absent. In the future, the School should properly calculate and report partial day absences on the day which they occur.

In the future, the School should maintain sufficient attendance documentation, accurately report excused or unexcused absences and properly calculate and report partial day absences.

**Recommendations:**

1. The School must repay to ADE \$200,522.92 in Basic State Aid due to incorrectly reported student data.
2. The School must ensure that a student with 10 consecutive unexcused absences must be withdrawn retroactive to the last day of attendance or excused absence.
3. The School must ensure compliance with records retention schedules required by statute and ADE guideline when documenting and maintaining student attendance.
4. The School must properly calculate and report partial day absences on the day which they occur.

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

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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. § 15-823 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 School failed to maintain birth certificate documentation for some students as required by statute. According to A.R.S. § 15-828, the student file must contain a photocopy of the student's birth certificate, other reliable proof of the student's identity and age and affidavit explaining the inability to provide a birth certificate, or a letter from an authorized agency with custody of the student.

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 75 students sampled, six of the student files did not have the proper residency documentation, 16 of the student files did not have the residency reaffirmed annually, three did not have a birth certificate in their file and two students did not have immunization record documentation in their file. Table 4 lists the student file documentation maintained by the School for FY2019, FY2020 and FY2021.

**Table 4**

**Intelli-School, Inc.  
Student cumulative file documentation  
Fiscal years 2019, 2020 and 2021**

	<b>Total Sampled</b>	<b>Missing Residency Documentation</b>	<b>Residency not Reaffirmed</b>	<b>Missing Birth Certificate</b>	<b>Missing Immunization</b>
2019	25	3	7	-	-
2020	25	1	6	-	-
2021	25	2	3	3	2
<b>Total</b>	<b><u>75</u></b>	<b><u>6</u></b>	<b><u>16</u></b>	<b><u>3</u></b>	<b><u>2</u></b>

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

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

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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 \$200,522.92 required to be paid to ADE**—Auditors identified an overall funding adjustment of \$200,522.92 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 School for fiscal years 2019, 2020 and 2021.

**Table 5**

**Intelli-School, Inc.  
ADM and funding adjustments  
Fiscal years 2019, 2020 and 2021**

	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>Total</b>
ADM adjustment	2.64	2.67	18.81	24.12
<b>Funding adjustment</b>	\$21,661.47	\$22,073.78	\$156,787.67	\$200,522.92

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