

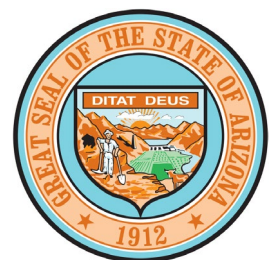


Arizona Department of Education

The Audit Unit
1535 W. Jefferson St., Bin 19
Phoenix, Arizona 85007
602-364-4036

Average Daily Membership Audit Report Higley Unified School District Fiscal Years 2019, 2020 and 2021

Report Number—23-08
September 14, 2022



**CONTACTING
THE AUDIT UNIT**

Melissa U. Muñoz, Audit Manager

Phone: 602-542-8932

Email: 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

September 14, 2022

Dr. Dawn Foley, Superintendent
Higley Unified School District
2935 S. Recker Road
Gilbert, AZ 85295

Dear Superintendent Foley:

The Arizona Department of Education Audit Unit has conducted an audit of the Higley Unified School District (District) Average Daily Membership (ADM) for Fiscal Years 2019, 2020 and 2021. 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 144 students, which resulted in its ADM being overstated by 38.71. As a result, the District was overfunded by \$199,420.48 which the District must repay to ADE. 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

	<u>Page</u>
Introduction and background	1
Scope and methodology.....	3
Finding 1: The District did not accurately report some student data, resulting in an overpayment of \$199,420.48.....	5
The District inaccurately reported some student data.....	5
The District failed to comply with statute and ADE guidelines	7
The District was overfunded by \$199,420.48.....	8
Recommendations	8
Finding 2: The District did not properly maintain some student records as required by statute and guideline.....	10
The District did not properly maintain student file documentation	10
Recommendation	11
ADM and funding adjustments	12

TABLE OF CONTENTS (CONT'D)

		<u>Page</u>
Tables:		
1	Higley Unified School District Total students, revenues and expenditures Fiscal years 2019, 2020 and 2021 (Unaudited)	2
2	Higley Unified School District ADM adjustments due to enrollment data errors Fiscal years 2019, 2020 and 2021	7
3	Higley Unified School District ADM and funding adjustments Fiscal years 2019, 2020 and 2021	8
4	Higley Unified School District Student cumulative file documentation Fiscal years 2019, 2020 and 2021	11
5	Higley Unified School District ADM and funding adjustments Fiscal years 2019, 2020 and 2021	12

INTRODUCTION AND BACKGROUND

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

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 Gilbert, Arizona, offered instruction in grades Kindergarten through 12 during the fiscal years audited. They operated two high schools, two middle schools, and nine elementary schools. Table 1 presents the District’s unaudited student, staffing and financial information for FY2019, FY2020 and FY2021.

Table 1

Higley Unified School District
Total students, revenues and expenditures
Fiscal years 2019, 2020 and 2021
(Unaudited)

	2019	2020	2021
Students Enrolled	12,465	12,985	12,664
Number of Teachers	717	730	763
Revenue			
Local	\$ 50,603,513	\$ 51,171,160	\$ 51,320,028
Intermediate	\$ -	\$ 4,786,078	\$ 5,474,795
State	\$ 63,728,645	\$ 70,314,428	\$ 68,803,950
Federal	\$ 5,669,000	\$ 5,806,658	\$ 10,885,822
Total Revenues	\$ 120,001,158	\$ 132,078,324	\$ 136,484,595
Total Expenditures	\$ 113,290,852	\$ 123,920,341	\$ 126,230,607

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

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 FY2019, FY2020 and FY2021.

To conduct this audit, auditors used a variety of methods, including examining District and ADE records to review 3,000 of 40,993 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
- **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.
- **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 District 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 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 OVERPAYMENT OF \$199,420.48

Auditors determined that the District inaccurately reported the student data for 144 students for FY2019, FY2020 and FY2021. Specifically, auditors found that 59 students had an incorrectly reported FTE, 25 students were reported with incorrect enrollment dates, 23 preschool students were not eligible for funding, nine students had insufficient homebound instruction or did not have homebound medical documentation, four students had a non-fundable interval due to excessive absences, four students incurred 10 consecutive unexcused absences and should have been withdrawn, four students had not attended the District and sixteen preschool students were reported with an incorrect calendar. In addition, 28 of these student 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 38.71. As a result, the District was overfunded by \$199,420.48 in Basic State Aid. According to A.R.S. § 15-915, ADE needs to recover these monies from the District.

The District inaccurately reported some student data

The District inaccurately reported 144 students' enrollment data to ADE, which resulted in the District's ADM being overstated by 38.71.

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. A.R.S. § 15- 901 states that for preschool a student must receive at least three hundred sixty minutes of instruction per week. Also, A.R.S. § 15-901 also states homebound students must have medical certification and must receive at least 4 hours of instruction per week to be considered full-time. Additionally, A.R.S. § 15-901

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.

requires that ADM be calculated on the first 100 days of the school year, which must be reported accurately to ensure proper funding. Further, 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. Finally, A.R.S. § 15- 901 requires that ADM be calculated on the first 100 days of the school year, which must be reported accurately to ensure proper funding. However, the District did not always adhere to these requirements. Specifically, for the students that were sampled:

- 59 students had an incorrect FTE reported. As a result, the ADM for the District was overreported by 4.51.
- 25 students were reported with incorrect enrollment dates. As a result, the ADM for the District was overreported by 0.61.
- 23 preschool students were reported; however, they were not eligible for funding. As a result, the ADM for the District was overreported by 9.53.
- 9 students did not receive sufficient homebound instruction or did not have medical certification. As a result, the ADM for the District was overreported by 6.30.
- 4 students had excessive absences which resulted in a non-fundable period. As a result, the ADM for the District was overreported by 0.59.
- 4 students had 10 consecutive unexcused absences and should have been withdrawn. As a result, the ADM for the District was overreported by 0.34.
- 4 students were reported as attended but did not actually attend the District. As a result, the ADM for the District was overreported by 0.32.
- 16 students were reported with an incorrect calendar, resulting in funding being based on the incorrect first 100 days of the school year. As a result, the ADM for the District was underreported by 0.57.
- 28 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 17.09.

As shown in Table 2 (see page 7), data reporting errors resulted in an ADM overstatement of 38.71 for the three fiscal years audited.

Table 2

**Higley Unified School District
ADM adjustments due to enrollment data errors
Fiscal years 2019, 2020 and 2021**

	2019	2020	2021	Total
Incorrect FTE	3.43	0.31	0.77	4.51
Incorrect enrollment	0.21	0.21	0.18	0.60
Preschool eligibility	3.47	5.70	0.36	9.53
Homebound	4.01	2.29	-	6.30
Excessive absence	0.20	0.39	-	0.59
10 day absence	0.08	0.16	0.10	0.34
Did not attend	-	0.08	0.24	0.32
Preschool calendar	(0.55)	(0.08)	0.06	(0.57)
SPED	6.85	10.12	0.12	17.09
Total	<u>17.70</u>	<u>19.18</u>	<u>1.83</u>	<u>38.71</u>

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

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 59 of the District'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 total hours or number of courses the students were enrolled in. As a result, the District overreported the FTE for 59 students.

Additionally, the District misreported the enrollment data of 53 students. According to ARS § 15-901 and ADE guidelines, ADM is based on the first 100 days of the school year, using the enrollment date and the withdrawal date of the student. Further, 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 and incur 10 or more consecutive absences will generate non-fundable ADM intervals. The District incorrectly reported the entry/exit dates of 25 students, the calendar for 16 students, generated a non-fundable interval for four students, did not withdraw four students with 10 or more absences and four students were reported to ADE that did not attend.

The District also misreported nine students as being homebound. According to ARS § 15-901, a homebound student must be certified by a medical doctor as being unable to attend regular classes for a period of not less than three school months during a school year. A homebound student can be counted as in attendance for each day in a week where at least four hours of

instruction were provided. However, the District incorrectly reported the nine students as being homebound without the proper certification and did not provide at least four hours of instruction.

Furthermore, the District incorrectly claimed the enrollment of 23 preschool students. According to A.R.S. § 15- 901, preschool student must receive at least three hundred sixty minutes of instruction per week. However, 23 preschool students only received IEP services, and were not enrolled in a preschool program. Therefore, they did not qualify for funding.

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

The District was overfunded by \$199,420.48

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 FY2019, FY2020 and FY2021. The student data incorrectly reported by the District resulted in its ADM being overstated by 38.71. As a result, the District was overfunded by \$199,420.48 in Basic State Aid for the three fiscal years audited which ADE must recoup from the District pursuant to A.R.S. § 15-915.

Table 3

**Higley Unified School District
ADM and funding adjustments
Fiscal years 2019, 2020 and 2021**

	ADM Adjustment	Total
2019	17.70	\$83,411.09
2020	19.18	\$100,216.74
2021	1.83	\$15,792.65
Total	38.71	\$199,420.48

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

Recommendations:

1. The District must repay to ADE \$199,420.48 in Basic State Aid due to incorrectly reported student data.
2. The District needs to ensure that it properly reports students' FTE pursuant to statute and ADE guidelines.
3. The District must reconcile to ensure that enrollment dates are reported accurately pursuant to A.R.S. § 15-901.

4. The District must collect required medical certification documentation and provide education services to homebound student for a minimum of four hours per week for students certified as Homebound pursuant to A.R.S. § 15-901.
5. The District needs to ensure that it provides Preschool students with at least three hundred sixty minutes of instruction per week pursuant to A.R.S. § 15- 901 and only reports students that are enrolled in a Preschool program.

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 and birth certificate 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, the student file must contain a photocopy of the student's birth certificate, other reliable proof of the student's identity and age and an affidavit explaining the inability to provide a birth certificate, or a letter from an authorized agency with custody of the student.

The District did not maintain the proper documentation required by statute and ADE's residency guideline. Of the 150 students sampled, two of the student files did not have the proper residency documentation, 25 of the student files did not have the residency reaffirmed annually and one did not have a birth certificate in their file. Table 4 (see page 11) lists the student file documentation maintained by the District for FY2019, FY2020 and FY2021.

Table 4

**Higley Unified School District
Student cumulative file documentation
Fiscal years 2019, 2020 and 2021**

	Total Sampled	Missing Residency Documentation	Residency not Reaffirmed	Missing Birth Certificate
2019	50	1	8	1
2020	50	0	7	-
2021	50	1	10	-
Total	<u>150</u>	<u>2</u>	<u>25</u>	<u>1</u>

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

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 and birth certificate 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 and birth certificate 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 \$199,420.48 required to be paid to ADE—Auditors identified an overall funding adjustment of \$199,420.48 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 FY2019, FY2020 and FY2021.

Table 5

**Higley Unified School District
ADM and funding adjustments
Fiscal years 2019, 2020 and 2021**

	2019	2020	2021	Total
ADM adjustment	17.70	19.18	1.83	38.71
Funding adjustment	\$83,411.09	\$100,216.74	\$15,792.65	\$199,420.48

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