



Arizona Department of Education

The Audit Unit

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Average Daily Membership Audit Report Tucson Preparatory School Fiscal Years 2020, 2021 and 2022

Report Number—23-32

April 7, 2023



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Arizona Department of Education

Audit Unit

April 7, 2023

Jody Sullivan, Executive Director
Tucson Preparatory School
104 E Prince Rd
Tucson, AZ 85705

Dear Executive Director Sullivan:

The Arizona Department of Education Audit Unit has conducted an audit of the Tucson Preparatory School (School) Average Daily Membership (ADM) for Fiscal Years 2020, 2021 and 2022. 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 understated by 1.23. As a result, the School was underfunded by \$10,544.44 which the School must recoup from 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

Tom Horne, 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 Tucson Preparatory 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) 2020 through 2022.

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 FY2020, FY2021 and FY2022.

Table 1
Tucson Preparatory School
Total students, revenues, and expenditures
Fiscal years 2020, 2021 and 2022
(Unaudited)

	2020	2021	2022
Students enrolled	117	140	114
Number of teachers	7	7	7
Revenue			
Local	\$48,911	\$8,070	\$1,039
Intermediate	\$140,064	\$0	\$0
State	\$1,195,099	\$1,308,063	\$1,175,224
Federal	\$127,651	\$292,776	\$415,515
Total revenues	<u>\$1,511,725</u>	<u>\$1,608,909</u>	<u>\$1,591,778</u>
Total expenditures	<u>\$1,433,283</u>	<u>\$1,482,660</u>	<u>\$1,465,231</u>

Source: Annual Report of the Arizona Superintendent of Public Instruction for FY2020, FY2021 and FY2022.

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 FY2020, FY2021 and FY2022.

To conduct this audit, auditors used a variety of methods, including examining School and ADE records to review 150 of 531 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. No material findings were identified for this area.
- **Instructional hours** – Auditors reviewed the bell schedules and calendars for the School for FY2020, FY2021 and FY2022. 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. 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. 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 UNDERPAYMENT OF \$10,544.44

Auditors determined that the School inaccurately reported the student data for four students for FY2020, FY2021 and FY2022. Specifically, auditors found that two students that attended were not reported and funded, one student did not attend, and one student had 10 consecutive unexcused absences and should have been withdrawn. As a result of these errors, the School's ADM was underreported by 1.23. As a result, the School was underfunded by \$10,544.44 in Basic State Aid. According to A.R.S. § 15-915, ADE needs to repay these monies to the School.

The School inaccurately reported some student data

The School inaccurately reported four student's enrollment data to ADE, which resulted in the School's ADM being understated by 1.23.

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. In addition, A.R.S. § 15-901 states that a student with 10 consecutive unexcused absences must be withdrawn. However, the School did not always adhere to these requirements. Specifically, for the students that were sampled:

- Two students attended the School but were not reported and funded as being enrolled in the School. As a result, the ADM for the School was underreported by 1.34.
- One student was reported as attended but did not actually attend the School. As a result, the ADM for the School was overreported by 0.01.
- One student had 10 consecutive unexcused absences and should have been withdrawn. As a result, the ADM for the School was overreported by 0.10.

As shown in Table 2 (page 6), data reporting errors resulted in an ADM understatement of 1.23 for the three fiscal years audited.

Table 2

**Tucson Preparatory School
ADM adjustments due to enrollment data errors
Fiscal years 2020, 2021 and 2022**

	2020	2021	2022	Total
Attended	(1.34)	-	-	(1.34)
Did not Attend	0.01	-	-	0.01
10-day absence	-	-	0.10	0.10
Total	(1.33)	-	0.10	(1.23)

Source: Auditor analysis of School records, ADE data for FY2020, FY2021 and FY2022.

The School must properly reconcile its enrollment data with ADE

The School 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 School 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 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 was underfunded by \$10,544.44.

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 FY2020, FY2021 and FY2022. The student data incorrectly reported by the School resulted in its ADM being understated by 1.23. As a result, the School was underfunded by \$10,544.44 in Basic State Aid, which ADE must repay to the School. Table 3 (page 7) shows the ADM and funding adjustments required for the School for FY2020, FY2021 and FY2022.

Table 3

**Tucson Preparatory School
ADM and funding adjustments
Fiscal years 2020, 2021 and 2022**

	ADM Adjustment	Total
2020	(1.33)	\$(11,447.18)
2021	0.00	\$0.00
2022	0.10	\$902.74
Total	(1.23)	\$(10,544.44)

Source: Auditor analysis of School and ADE records for FY2020, FY2021 and FY2022.

Recommendations:

1. The School must recoup from ADE \$10,544.44 in Basic State Aid due to incorrectly reported student data.
2. The School must reconcile to ensure that all students are reported accurately pursuant to A.R.S. § 15-901.
3. The School must withdraw students that have 10 or more consecutive unexcused absences pursuant to A.R.S. § 15-901.

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 \$10,544.44 required to be paid to the School—Auditors identified an overall funding adjustment of \$10,544.44 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 FY2020, FY2021 and FY2022.

Table 4

**Tucson Preparatory School
ADM and funding adjustments
Fiscal years 2020, 2021 and 2022**

	2020	2021	2022	Total
ADM adjustment	(1.33)	0.00	0.10	(1.23)
Funding adjustment	\$(11,477.18)	\$0.00	\$902.74	\$(10,544.44)

Source: Auditor analysis of ADE and School student and financial data for FY2020, FY2021 and FY2022.