



Arizona Department of Education

The Audit Unit

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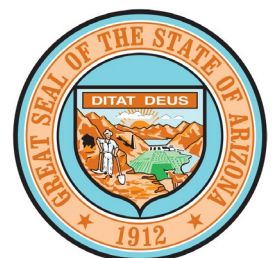
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Average Daily Membership Audit Report Paragon Management, Inc. Fiscal Years 2020, 2021 and 2022

Report Number—23-39

May 12, 2023



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Arizona Department of Education

Audit Unit

May 12, 2023

Mr. Darcy Weisner, Executive Director
Paragon Management, Inc.
12775 N 175th Ave
Surprise, AZ 85388

Dear Executive Director Weisner:

The Arizona Department of Education Audit Unit has conducted an audit of the Paragon Management, Inc. (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 30 students, which resulted in its ADM being overstated by 3.88. As a result, the School was overfunded by \$29,825.98 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

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 Paragon Management, 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) 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 Surprise, Arizona, offered instruction in grades K through 12 during the fiscal years audited. They had one high school and one elementary school. Table 1 presents the School’s unaudited student, staffing and financial information for FY2020, FY2021 and FY2022.

Table 1

**Paragon Management, Inc.
Total students, revenues and expenditures
Fiscal years 2020, 2021 and 2022
(Unaudited)**

	2020	2021	2022
Students enrolled	2,714	2,685	2,818
Number of teachers	140	166	166
Revenue			
Local	\$1,786,251	\$638,811	\$1,444,725
Intermediate	\$0	\$0	\$0
State	\$21,314,098	\$21,866,205	\$24,234,798
Federal	\$768,989	\$3,797,161	\$2,949,436
Total revenues	<u>\$23,869,338</u>	<u>\$26,302,177</u>	<u>\$28,628,959</u>
Total expenditures	<u>\$21,171,261</u>	<u>\$23,567,454</u>	<u>\$26,373,212</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 867 of 8,657 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. 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 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 material 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 OVERPAYMENT OF \$29,825.98

Auditors determined that the School inaccurately reported the student data for 30 students for FY2020, FY2021 and FY2022. Specifically, auditors found that 12 students had an incorrect entry or exit date reported, 10 students were reported and funded but did not attend the School, and eight students had an incorrectly reported FTE. As a result of these errors, the School's ADM was overreported by 3.88. As a result, the School was overfunded by \$29,825.98 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 30 student's enrollment data to ADE, which resulted in the School's ADM being overstated by 3.88.

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

- 12 students were reported with an incorrect entry or exit date. As a result, the ADM for the School was overreported by 1.19.
- 10 students were reported as attended but did not actually attend the School. As a result, the ADM for the School was overreported by 0.70.

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.

- 8 students had an incorrect FTE reported. As a result, the ADM for the School was overreported by 1.99.

As shown in Table 2, data reporting errors resulted in an ADM overstatement of 3.88 for the three fiscal years audited.

Table 2

**Paragon Management, Inc
ADM adjustments due to enrollment data errors
Fiscal years 2020, 2021 and 2022**

	2020	2021	2022	Total
Incorrect Entry/Exit Date	0.01	0.11	1.07	1.19
Did not attend	0.67	0.03	-	0.70
Incorrect FTE	-	-	1.99	1.99
Total	<u>0.68</u>	<u>0.14</u>	<u>3.06</u>	<u>3.88</u>

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

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.

The School misreported the enrollment data of 22 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. The School incorrectly reported the entry/exit dates of 12 students and 10 students were reported to ADE that did not attend.

Auditors determined that eight of the School's students did not meet the statutory and ADE guideline requirements for full time enrollment (FTE). According to analysis of the School's bell schedule and calendar for the School's high school, auditors determined that as long as a student was enrolled in four courses for FY2020 and four courses with lunch for FY2021 and FY2022, they would receive enough hours and courses to be considered full time. However, the FTE that was reported for eight students was not correct based on the number of courses the students were enrolled in. As a result, the School overreported the FTE for eight students.

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 \$29,825.98

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 overstated by 3.88. As a result, the School was overfunded by \$29,825.98 in Basic State Aid, which ADE must recoup from the School. Table 3 shows the ADM and funding adjustments required for the School for FY2020, FY2021 and FY2022.

Table 3

**Paragon Management, Inc
ADM and funding adjustments
Fiscal years 2020, 2021 and 2022**

	ADM Adjustment	Total
2020	0.68	\$5,036.48
2021	0.14	\$1,020.08
2022	3.06	\$23,769.42
Total	3.88	\$29,825.98

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

Recommendations:

1. The School must repay to ADE \$29,825.98 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 School must reconcile to ensure that enrollment dates are reported accurately pursuant to A.R.S. § 15-901.

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

Auditors determined that the School failed to properly maintain residency 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.

The School did not maintain the proper documentation required by statute and ADE’s residency guideline. Of the 150 students sampled, nine of the student files did not have the proper residency documentation, 37 of the student files did not have the residency reaffirmed annually. Table 4 lists the student file documentation maintained by the School for FY2020, FY2021 and FY2022.

Table 4

**Paragon Management, Inc
Student cumulative file documentation
Fiscal years 2020, 2021 and 2022**

	Total Sampled	Missing Residency Documentation	Residency not Reaffirmed
2020	50	4	15
2021	50	1	11
2022	50	4	11
Total	<u>150</u>	<u>9</u>	<u>37</u>

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

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 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 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.

Basic State Aid adjustment of \$29,825.98 required to be paid to ADE—Auditors identified an overall funding adjustment of \$29,825.98 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 FY2020, FY2021 and FY2022.

Table 5

**Paragon Management, Inc
ADM and funding adjustments
Fiscal years 2020, 2021 and 2022**

	2020	2021	2022	Total
ADM adjustment	0.68	0.14	3.06	3.88
Funding adjustment	\$5,036.48	\$1,020.08	\$23,769.42	\$29,825.98

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