



## Arizona Department of Education

The Audit Unit

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Phoenix, Arizona 85007

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# Average Daily Membership Audit Report Valley of the Sun Waldorf Education Association dba Desert Marigold School Fiscal Years 2020, 2021 and 2022

Report Number—24-11

October 12, 2023



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## Arizona Department of Education Audit Unit

October 12, 2023

Mr. Frank Mirizio, Executive Director  
Valley of the Sun Waldorf Education Association, dba Desert Marigold School  
6210 S. 28<sup>th</sup> St.  
Phoenix, AZ 85042

Executive Director Mirizio:

The Arizona Department of Education Audit Unit has conducted an audit of the Valley of The Sun Waldorf Education Association dba Desert Marigold 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 eight students, which resulted in its ADM being overstated by 13.77. As a result, the School was overfunded by \$66,781.02 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,

Ross Begnoche,  
Chief Financial Officer

**Tom Horne, 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 Valley of The Sun Waldorf Education Association dba Desert Marigold 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 Phoenix, Arizona, offered instruction in grades Kindergarten through 12 during the fiscal years audited. The School operated one school in the fiscal years audited. Table 1 presents the School’s unaudited student, staffing and financial information for FY2020, FY2021 and FY2022.

**Table 1**

**Valley of The Sun Waldorf Education Association  
dba Desert Marigold School  
Total students, revenues and expenditures  
Fiscal years 2020, 2021 and 2022  
(Unaudited)**

	<b>2020</b>	<b>2021</b>	<b>2022</b>
<b>Students enrolled</b>	<b>310</b>	<b>273</b>	<b>300</b>
<b>Number of teachers</b>	<b>30</b>	<b>28</b>	<b>24</b>
<b>Revenue</b>			
Local	\$ 237,906	\$ 143,771	\$ 244,470
Intermediate	\$ 0	\$ 0	\$ 0
State	\$ 2,841,342	\$ 2,484,944	\$ 2,949,965
Federal	\$ 507,407	\$ 297,169	\$ 243,015
<b>Total revenues</b>	<b><u>\$ 3,586,655</u></b>	<b><u>\$ 2,925,884</u></b>	<b><u>\$ 3,437,450</u></b>
<b>Total expenditures</b>	<b><u>\$ 2,615,916</u></b>	<b><u>\$ 2,743,468</u></b>	<b><u>\$ 2,850,011</u></b>

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

## 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 FY2020, FY2021 and FY2022.

To conduct this audit, auditors used a variety of methods, including examining School and ADE records to review 150 of 973 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. 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 \$66,781.02**

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Auditors determined that the School inaccurately reported the student data for eight students for FY2020, FY2021 and FY2022. Specifically, auditors found that five students had an incorrectly reported FTE and three students had incorrect enrollment dates reported. As a result of these errors, the School's ADM was overreported by 13.77 and the School was overfunded by \$66,781.02 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 eight student's enrollment data to ADE, which resulted in the School's ADM being overstated by 13.77.

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 subjects enrolled.<sup>1</sup> Furthermore, A.R.S. § 15-901.07 states that a student who is enrolled in concurrent coursework must also attend at least one course offered at the school district or charter school per semester, among other requirements.<sup>2</sup>

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<sup>1</sup> 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.

<sup>2</sup> A school district or a charter school may include students enrolled in concurrent coursework for the purposes of calculating average daily membership if the school district has received approval from the state board of education or the charter school has received approval from its sponsor to offer concurrent coursework and all of the following apply:

1. A student earns at least three semester hours of credit per semester in the community college or university course.
2. A student is awarded academic credit by the school district or charter school for the concurrent coursework pursuant to section 15-701.01.
3. The concurrent coursework is at a higher level than the course taught at the school district or charter school in grades nine through twelve.
4. A student who is enrolled in concurrent coursework also attends at least one course offered at the school district or charter school per semester.
5. The concurrent coursework is applicable to an established community college academic degree or certificate program that is transferable to a university under the jurisdiction of the Arizona board of regents. Concurrent coursework that is applicable to a community college occupational degree or certificate program may be transferable to a university under the jurisdiction of the Arizona board of regents.
6. The school district or charter school pays the community college or university for the tuition cost of the concurrent coursework or reimburses the student for the tuition cost of the concurrent coursework.

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

- 5 students had an incorrect FTE reported. As a result, the ADM for the School was overreported by 1.63.
- 3 students were reported with incorrect enrollment dates. As a result, the ADM for the School was overreported by 0.10.
- 2 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 12.04.

As shown in Table 2, data reporting errors resulted in an ADM overstatement of 13.77 for the three fiscal years audited.

**Table 2**

**Valley of The Sun Waldorf Education Association  
dba Desert Marigold School  
ADM adjustments due to enrollment data errors  
Fiscal years 2020, 2021 and 2022**

	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>Total</b>
Incorrect FTE	1.00	1.63	(1.00)	1.63
Incorrect enrollment dates	-	0.01	0.09	0.10
SPED	6.02	6.02	-	12.04
<b>Total</b>	<b>7.02</b>	<b>7.66</b>	<b>(0.91)</b>	<b>13.77</b>

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.

Auditors determined that five of the School’s students did not meet the statutory and ADE guideline requirements for full time enrollment (FTE). 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. Furthermore, A.R.S. § 15-901.07 states that a student who is enrolled in concurrent coursework must also attend at least one course offered at the school district or charter school per semester. However, the FTE that was reported for five students was not correct based on

the number of courses and/or annual instructional hours the students were enrolled in. As a result, the School overreported the FTE for these students.

Additionally, the School misreported the enrollment data of three 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. However, the School incorrectly reported the entry/exit dates of three 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 \$66,781.02**

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 13.77. As a result, the School was overfunded by \$66,781.02 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**

**Valley of The Sun Waldorf Education Association  
dba Desert Marigold School  
ADM and funding adjustments  
Fiscal years 2020, 2021 and 2022**

	<b>ADM adjustment</b>	<b>Total</b>
2020	7.02	\$33,584.36
2021	7.66	\$40,441.99
2022	(0.91)	\$(7,245.33)
<b>Total</b>	<b>13.77</b>	<b>\$66,781.02</b>

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

### **Recommendations:**

1. The School must repay to ADE \$66,781.02 in Basic State Aid due to incorrectly reported student data.
2. The School must 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**

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Auditors determined that the School failed to properly maintain residency and birth certificate 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 an affidavit explaining the inability to provide a birth certificate, or a letter from an authorized agency with custody of the student.

The School did not maintain the proper documentation required by statute and ADE's residency guideline. Of the 75 students sampled, 24 of the student files did not have the proper residency documentation, two did not have the residency reaffirmed annually, and three did not have a birth certificate. Table 4 (see page 9) lists the student file documentation maintained by the School for FY2020, FY2021 and FY2022.

**Table 4**

**Valley of The Sun Waldorf Education Association  
dba Desert Marigold School  
Student cumulative file documentation  
Fiscal years 2020, 2021 and 2022**

	<b>Total sampled</b>	<b>Missing residency documentation</b>	<b>Residency not reaffirmed</b>	<b>Missing birth certificate</b>
2020	25	7	1	2
2021	25	9	1	-
2022	25	8	-	1
<b>Total</b>	<b>75</b>	<b>24</b>	<b>2</b>	<b>3</b>

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 and birth certificate 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 and birth certificate 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 \$66,781.02 required to be paid to ADE**—Auditors identified an overall funding adjustment of \$66,781.02 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**

**Valley of The Sun Waldorf Education Association  
dba Desert Marigold School  
ADM and funding adjustments  
Fiscal years 2020, 2021 and 2022**

	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>Total</b>
ADM adjustment	7.02	7.66	(0.91)	<b>13.77</b>
<b>Funding adjustment</b>	<b>\$33,584.36</b>	<b>\$40,441.99</b>	<b>\$(7,245.33)</b>	<b>\$66,781.02</b>

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