



## Arizona Department of Education

The Audit Unit

1535 W. Jefferson St., Bin 19

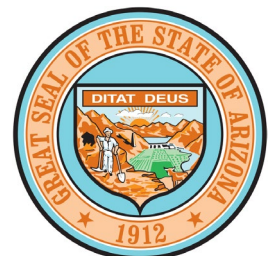
Phoenix, Arizona 85007

602-364-4036

# Average Daily Membership Audit Report Portable Practical Educational Preparation, Inc. Fiscal Years 2021, 2022 and 2023

Report Number—24-19

December 29, 2023



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## Arizona Department of Education Audit Unit

December 29, 2023

Charles Woods, Charter Representative  
Portable Practical Educational Preparation, Inc.  
99 E. Virginia St., STE 200  
Phoenix, AZ 85004

Dear Mr. Woods:

The Arizona Department of Education Audit Unit has conducted an audit of the Portable Practical Educational Preparation, Inc. (School) Average Daily Membership (ADM) for Fiscal Years 2021, 2022 and 2023. The purpose of the audit was to address whether the School properly reported AOI student enrollment, and to determine if it received the correct amount of Basic State Aid.

Auditors determined that the School incorrectly reported the AOI data of 251 students, which resulted in its ADM being understated by 18.50. Additionally, auditors determined that the School did not maintain proof of residency for four students, which resulted in its ADM being overstated by 5.71. As a result, the School was underfunded by \$126,193.94 which the School must recoup from 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,

*Angel Santiago*

Angel Santiago,  
Chief Auditor

**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 Portable Practical Educational Preparation, 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) 2021 through 2023.

***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 those 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. They had two Arizona online schools. Table 1 presents the School’s unaudited student, staffing and financial information for FY2021, FY2022 and FY2023.

**Table 1**

**Portable Practical Education Preparation, Inc.  
Total students, revenues and expenditures  
Fiscal years 2021, 2022 and 2023  
(Unaudited)**

	<b>2021</b>	<b>2022</b>	<b>2023</b>
<b>Students enrolled</b>	<b>8,955</b>	<b>7,004</b>	<b>6,019</b>
<b>Number of teachers</b>	<b>266</b>	<b>287</b>	<b>179</b>
<b>Revenue</b>			
Local	\$0	\$0	\$0
Intermediate	\$0	\$0	\$0
State	\$69,885,929	\$61,471,127	\$61,291,186
Federal	\$2,652,667	\$7,841,895	\$7,671,996
<b>Total revenues</b>	<b><u>\$72,538,596</u></b>	<b><u>\$69,312,647</u></b>	<b><u>\$ 68,963,182</u></b>
<b>Total expenditures</b>	<b><u>\$71,852,124</u></b>	<b><u>\$67,686,630</u></b>	<b><u>\$ 121,598,591</u></b>

Source: Annual Report of the Arizona Superintendent of Public Instruction for FY2021, FY2022 and Annual Financial Report for FY2023.

## 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 FY2021, FY2022 and FY2023.

To conduct this audit, auditors used a variety of methods, including examining School and ADE records to review all 29,178 AOI 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:

- **AOI data** – Auditors compared 100% of the Arizona Online Instruction data that was reported to ADE to the AOI data from the School. Auditors reviewed instructional time reported as well as the full or part time status that was reported for each student. When the data reported to ADE was incorrect, an adjustment was determined.
- **Student Files** – Auditors reviewed 150 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.
- **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 AOI DATA RESULTING IN AN UNDERPAYMENT OF \$148,534.12**

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The School did not accurately report enrollment data for 251 of its AOI students to ADE for FY2021, FY2022 and FY2023. Specifically, auditors found that 242 students were reported to ADE's data system with incorrect minutes, four students attended but were not reported, three students were not funded due to failing integrity, and two students were reported but did not attend. As a result, the School's weighted AOI ADM was understated by 18.50. This led to the School being underfunded by \$148,534.12 which ADE must pay to the School according to A.R.S. § 15-915.

## **The School inaccurately reported some AOI enrollment data**

Auditors determined that student data for 251 of its AOI students was inaccurate, which resulted in the School's weighted AOI ADM being understated by 18.50 for FY2021, FY2022 and FY2023. According to A.R.S. § 15-808, AOI ADM is based on the number of minutes a student participates in the AOI during the year. In addition, SF-0003 states that full time AOI students must enroll in and participate in four or more classes during the year. If a student is enrolled in fewer than four classes, they should be reported as part time. However, the School did not always meet these requirements as follows:

- 242 students were reported to ADE's data system with incorrect AOI minutes.
- 4 students attended the School but were not reported to ADE.
- 3 students were not funded due to failing integrity.
- 2 students were reported to ADE that did not actually attend the School.
- 44 students that were identified with an adjustment also had a SPED weight.

As shown in Table 2 AOI data reporting errors resulted in a net weighted ADM understatement of 18.50 for FY2021, FY2022 and FY2023.

**Table 2**

**Portable Practical Education Preparation, Inc.  
AOI ADM Adjustments  
Fiscal years 2021, 2022 and 2023**

<b>Adjustments</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>Total</b>
Full time	(1.06)	(2.29)	(15.15)	(18.50)
Part time	--	-	-	-
<b>Total</b>	<b>(1.06)</b>	<b>(2.29)</b>	<b>(15.15)</b>	<b>(18.50)</b>

Source: Auditor analysis of School records and ADE data for fiscal years 2021, 2022 and 2023.

**The School must properly reconcile its enrollment data with ADE data**

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 data system. The School should review its reconciliation practices to ensure that its staff properly review the reports produced by and reconcile them to the School’s AOI SIS/SMS data to identify any discrepancies that would affect funding and correct any errors identified. The School must comply with the requirements of A.R.S. § 15-808 and SF-0003 when calculating and reporting AOI students.

**The School was underfunded by \$148,534.12**

Auditors determined that the School did not receive the correct amount of Basic State Aid due to the inaccurate AOI student data reported to ADE for FY2021, FY2022 and FY2023. The student data incorrectly reported by the School resulted in its ADM being understated by 18.50. As a result, the School was underfunded by \$148,534.12 in Basic State Aid, which ADE must repay to the School. Table 3 (page 6) shows the ADM and funding adjustments required for the School for FY2021, FY2022 and FY2023.

**Table 3**

**Portable Practical Education Preparation, Inc.  
ADM and funding adjustments  
Fiscal years 2021, 2022 and 2023**

	<b>ADM Adjustment</b>	<b>Total</b>
2021	(1.06)	\$(4,155.88)
2022	(2.29)	\$(17,068.78)
2023	(15.15)	\$(127,309.46)
<b>Total</b>	<b>(18.50)</b>	<b>\$(148,534.12)</b>

Source: Auditor analysis of School and ADE records for fiscal years 2021, 2022 and 2023.

**Recommendations:**

1. The School must recoup from ADE \$148,534.12 in Basic State Aid for the fiscal year audited for incorrect AOI enrollment data.
2. The School must comply with the requirements of A.R.S. § 15-808 and SF-0003 when calculating and reporting AOI students.

## **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 an 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 150 students sampled, 4 of the student files did not have the proper residency documentation, one of the student files did not have the residency reaffirmed annually, two did not have a birth certificate in their file and 145 student files did not have immunization record documentation in their file. Table 4 (see page 8) lists the student file documentation maintained by the School for FY2021, FY2022 and FY2023.

**Table 4**

**Portable Practical Education Preparation, Inc.  
Student cumulative file documentation  
Fiscal years 2021, 2022 and 2023**

	<b>Total Sampled</b>	<b>Missing Residency Documentation</b>	<b>Residency not Reaffirmed</b>	<b>Missing Birth Certificate</b>	<b>Missing Immunization</b>
2021	50	4	1	1	50
2022	50	-	-	-	48
2023	50	-	-	1	47
<b>Total</b>	<b><u>150</u></b>	<b><u>4</u></b>	<b><u>1</u></b>	<b><u>2</u></b>	<b><u>145</u></b>

Source: Auditor analysis of School records for FY2021, FY2022 and FY2023.

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 ADE’s Arizona Residency Guidelines and A.R.S.§ 15-808, 15-823, 15-828, and 15-172.

**The School was overfunded by \$22,340.18**

Auditors determined that the School did not receive the correct amount of Basic State Aid due to failing to maintain residency documentation to prove Arizona residency for four students. The School’s failure to collect proper residency documentation for four students, resulted in the School’s ADM being overstated by 5.71. As a result, the School was overfunded by \$22,340.18. Table 5 shows the ADM adjustment due to improper residency documentation for FY2021, FY2022 and FY2023.

**Table 5**

**Portable Practical Educational Preparation, Inc.  
Student residency ADM funding adjustment  
Fiscal years 2020, 2021 and 2022**

	<b>Students</b>	<b>ADM</b>	<b>Funding Adjustment</b>
2021	4	5.71	\$22,340.18
2022	-	-	-
2023	-	-	-
<b>Total</b>	<b><u>4</u></b>	<b><u>5.71</u></b>	<b><u>\$22,340.18</u></b>

Source: Auditor analysis of School records for FY2021, FY2022 and FY2023.

**Recommendations:**

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.
2. ADE must recoup from the School \$22,340.18 in Basic State Aid due to improperly maintained residency documentation.

# 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 \$126,193.94 required to be paid to the School**—Auditors identified an overall funding adjustment of \$126,193.94 for the three fiscal years audited due to inaccurate AOI enrollment data.

Table 6 lists the ADM adjustments and the associated Basic State Aid adjustments for the School for FY2021, FY2022 and FY2023.

**Table 6**

**Portable Practical Educational Preparation, Inc.  
ADM and funding adjustments  
Fiscal years 2021, 2022 and 2023**

	2021		2022		2023		Total	
	ADM	Funding	ADM	Funding	ADM	Funding	ADM	Funding
AOI	(1.06)	\$(4,155.88)	(2.29)	\$(17,068.78)	(15.15)	\$(127,309.46)	(18.50)	\$(148,534.12)
Residency	5.71	\$22,340.18	-	-	-	-	5.71	\$22,340.18
<b>Total funding adjustment</b>	<b>4.65</b>	<b>\$18,184.30</b>	<b>(2.29)</b>	<b>\$(17,068.78)</b>	<b>(15.15)</b>	<b>\$(127,309.46)</b>	<b>(12.79)</b>	<b>\$(126,193.94)</b>

Source: Auditor analysis of ADE and School student and financial data for FY2021, FY2022 and FY2023.