



Arizona Department of Education

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Average Daily Membership Audit Report Flagstaff Arts and Leadership Academy Fiscal Years 2015, 2016 and 2017

Report Number—19-07
August 23, 2018



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State of Arizona
Department of Education



August 23, 2018

Deidre Crawley, Dean of Academy
Flagstaff Arts and Leadership Academy
3401 N. Fort Valley Rd.
Flagstaff, AZ 86001

Dear Dean Crawley,

The Arizona Department of Education Audit Unit has conducted an audit of the Flagstaff Arts and Leadership Academy (School) Average Daily Membership (ADM) for Fiscal Years 2015, 2016 and 2017. 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 16 students, which resulted in its ADM being overstated by 4.00. As a result, the School was overfunded by \$27,670.29 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

Diane M. Douglas, 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 Flagstaff Arts and Leadership Academy (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) 2015 through 2017.

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 School'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 2014, 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 FY2015 and continuing in subsequent years, corrections for audit findings to both budget capacity and state aid (when applicable) will be made.

School information—The School, located in Flagstaff, Arizona, offered instruction in grades 7 through 12 during the fiscal years audited. Table 1 presents the School’s unaudited student, staffing and financial information for FY2015, FY2016 and FY2017.

Table 1

**Flagstaff Arts and Leadership Academy
Total Students, Revenues and Expenditures
FY2015, FY2016 and FY2017
(Unaudited)**

	FY2015	FY2016	FY2017
Students Enrolled	326	323	311
Number of Teachers	21	21	21
Revenue			
Local	\$ 393,535	\$ 256,795	\$ 206,939
Intermediate	\$ 0	\$ 0	\$ 0
State	\$ 2,533,944	\$ 2,613,639	\$ 2,617,914
Federal	\$ 44,270	\$ 43,519	\$ 44,489
Total Revenues	<u>\$ 2,971,749</u>	<u>\$ 2,913,953</u>	<u>\$ 2,869,342</u>
Total Expenditures	<u>\$ 2,556,854</u>	<u>\$ 2,554,605</u>	<u>\$ 2,790,008</u>

Source: Annual Report of the Arizona Superintendent of Public Instruction for FY2015, FY2016 and FY2017.

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 (USFR) and its own policies and procedures for FY2015, FY2016 and FY2017.

To conduct this audit, auditors used a variety of methods, including examining School and ADE records over the three fiscal years audited. Auditors also reviewed state statutes and School policies and procedures, and interviewed School management and staff. Specifically:

- **Enrollment data** – Auditors reviewed student schedules, enrollment dates, 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.
- **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.
- **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.
- **Instructional hours** – Auditors reviewed the bell schedules and calendars for the School for FY2015, FY2016 and FY2017. The total instructional hours offered for each grade met the minimum required by statute for each of the three fiscal years audited. 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 OVERPAYMENT OF \$27,670.29

Auditors determined that the School inaccurately reported the student data for 16 students for FY2015, FY2016 and FY2017. Specifically, auditors found that 15 students had an incorrectly reported FTE, resulting in the ADM being overreported by 3.27. Auditors also found that one student had not attended the School, resulting in the ADM being overreported by 0.73. In total, the School's ADM was over reported by 4.00. As a result, the School was overfunded by \$27,670.29 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 16 student's enrollment data to ADE, which resulted in the School's ADM being overstated by 4.00.

According to A.R.S. § 15-901 and ADE Guidelines and Procedures EX-18, for a high school student to be reported as a 1.0 FTE, the student must be enrolled in at least four courses 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 EX-1, 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:

- 15 students had an incorrect FTE reported. As a result, the ADM for the School was overreported by 3.27.
- 1 student was reported as attended but did not actually attend the School. As a result, the ADM for the School was overreported by 0.73.

As shown in Table 2, data reporting errors resulted in an ADM overstatement of 4.00 for the three fiscal years audited.

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 courses 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 courses 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 courses 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 course which meets for at least 123 hours annually.

Table 2

**Flagstaff Arts and Leadership Academy
ADM Adjustments
Due to Enrollment Data Errors
FY2015, FY2016 and FY2017**

	FTE	Did not Attend	Total
FY2015	1.96	-	1.96
FY2016	1.03	-	1.03
FY2017	0.29	0.73	1.02
Total	<u>3.27</u>	<u>0.73</u>	<u>4.00</u>

Source: Auditor analysis of School records, ADE data for FY2015, FY2016 and FY2017

The School must properly reconcile its enrollment data with ADE

The School did not follow statute and ADE Guidelines when calculating and reporting student FTE.

Auditors determined that 15 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 schedules and calendars for the School’s High School students, auditors determined that as long as a student was enrolled in four B day courses as well as lunch, they would receive enough hours and courses to be considered full time. The FTE for 15 students was not correct based on the number of courses and time the student was enrolled in. 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 overfunded by \$27,670.29

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 FY2015, FY2016 and FY2017. The student data incorrectly reported by the School resulted in its ADM being overstated by 4.00. As a result, the School was overfunded by \$27,670.29 in Basic State Aid, which ADE must recoup from the School. Table 3 shows the ADM and funding adjustments required for the School for FY2015, FY2016 and FY2017.

Table 3

**Flagstaff Arts and Leadership Academy
ADM and Funding Adjustments
FY2015, FY2016 and FY2017**

	FY2015	FY2016	FY2017	Total
ADM Adjustments	1.96	1.03	1.02	4.00
Funding Adjustments	\$13,128.05	\$6,842.19	\$7,700.05	\$27,670.29

Source: Auditor analysis of School and ADE records for FY2015, FY2016 and FY2017.

Recommendations:

1. ADE must recoup from the School \$27,670.29 in Basic State Aid due to incorrectly reported student data.
2. The School needs to ensure that it properly calculates and reports students' FTE and enrollments pursuant to statute and ADE guidelines.

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, 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. § 15-802 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, a photocopy of the student's birth certificate or other reliable proof of the student's identity and age must be placed in the student's file.

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 101 students sampled, 58 of the student files did not have the proper residency documentation, 3 did not have a birth certificate in their file and 1 student did not have immunization record documentation in their file. Table 4 lists the student file documentation maintained by the School for FY2015, FY2016 and FY2017.

Table 4

**Flagstaff Arts and Leadership Academy
Student Cumulative File Documentation
FY2015, FY2016 and FY2017**

	Total Sampled	Missing Residency Documentation	Missing Birth Certificate	Missing Immunization
FY2015	34	13	0	0
FY2016	34	24	0	0
FY2017	33	24	3	1
Total	<u>101</u>	<u>58</u>	<u>3</u>	<u>1</u>

Source: Auditor analysis of School records for FY2015, FY2016 and FY2017.

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 law.

Recommendations:

1. The School must comply with statute and collect and maintain in each student’s cumulative file copies of verifiable residency, birth certificate and immunization documentation as required by law.
2. The School needs to ensure it maintains all required documentation for students that attend the School.

ADM and Funding Adjustments

A.R.S. § 15-915 requires that ADE makes corrections for audit findings to 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 2014, 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 FY2015 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 \$27,670.29 required to be repaid by the School—Auditors identified an overall funding adjustment of \$27,670.29 for the three fiscal years audited due to improperly reported FTE and student data.

Table 5 lists the ADM adjustments and the associated Basic State Aid adjustments for the School for FY2015, FY2016 and FY2017.

Table 5

**Flagstaff Arts and Leadership Academy
ADM and Funding Adjustments
FY2015, FY2016 and FY2017**

	FY2015	FY2016	FY2017	Total
ADM Adjustments	1.96	1.03	1.02	4.00
Funding Adjustments	<u>\$13,128.05</u>	<u>\$6,842.19</u>	<u>\$7,700.05</u>	<u>\$27,670.29</u>

Source: Auditor analysis of ADE and School student and financial data for FY2015, FY2016 and FY2017.