



## Arizona Department of Education

The Audit Unit

1535W. Jefferson St., Bin 19

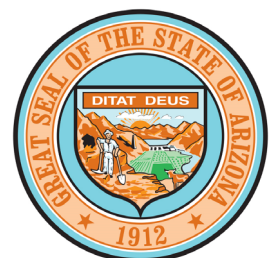
Phoenix, Arizona 85007

602-364-4036

# Average Daily Membership Audit Report Mobile Elementary School District Fiscal Years 2017, 2018 and 2019

Report Number—20-35

April 24, 2020



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## Arizona Department of Education

### Audit Unit

April 24, 2020

Teri Dominguez, Superintendent  
Mobile Elementary School District  
42798 S. 99<sup>th</sup> Ave  
Maricopa, AZ 85139

Dear Superintendent Dominguez:

The Arizona Department of Education Audit Unit has conducted an audit of the Mobile Elementary School District (District) Average Daily Membership (ADM) for Fiscal Years 2017, 2018 and 2019. The purpose of the audit was to address whether the District properly reported student enrollment, and to determine if it received the correct amount of Basic State Aid.

Auditors determined that the District incorrectly reported the enrollment data of one student in FY2017, which resulted in its ADM being overstated by 0.23. The District must adjust their budget capacity as a result of the ADM adjustment. Additionally, auditors determined that the District failed to properly maintain some required documentation in student cumulative files.

We appreciate the cooperation and assistance provided by the District's administration during the course of the audit.

Sincerely,

A handwritten signature in blue ink, appearing to read "Melissa Moreno".

Melissa Moreno,  
Chief Auditor

**Kathy Hoffman, 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 Mobile Elementary School District (District) pursuant to Arizona Revised Statutes (A.R.S.) § 15-239. This audit focused on whether the District properly reported enrollment data to ADE and received the correct amount of Basic State Aid for Fiscal Years (FY) 2017 through 2019.

***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 District’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 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 FY2013 and continuing in subsequent years, corrections for audit findings to both budget capacity and state aid (when applicable) will be made.*

**District information**—The District, located in Maricopa, Arizona, offered instruction in grades Kindergarten through 8 during the fiscal years audited. The District operated one elementary school. Table 1 presents the District’s unaudited student, staffing and financial information for FY2017, FY2018 and FY2019.

**Table 1**

**Mobile Elementary School District  
Total students, revenues and expenditures  
Fiscal years 2017, 2018 and 2019  
(Unaudited)**

	<b>2017</b>	<b>2018</b>	<b>2019</b>
<b>Students Enrolled</b>	<b>28</b>	<b>19</b>	<b>16</b>
<b>Number of Teachers</b>	<b>3</b>	<b>3</b>	<b>3</b>
<b>Revenue</b>			
Local	\$ 704,064	\$ 755,579	\$ 747,836
Intermediate	\$ 252	\$ 0	\$ 1,529
State	\$ 50,328	\$ 23,828	\$ 155,820
Federal	\$ 65,721	\$ 79,030	\$ 69,394
<b>Total Revenues</b>	<b><u>\$ 820,365</u></b>	<b><u>\$ 858,437</u></b>	<b><u>\$ 974,580</u></b>
<b>Total Expenditures</b>	<b><u>\$ 753,053</u></b>	<b><u>\$ 743,308</u></b>	<b><u>\$ 908,670</u></b>

Source: Annual Report of the Arizona Superintendent of Public Instruction for fiscal years 2017, 2018 and 2019.

## SCOPE AND METHODOLOGY

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The audit focused on whether the District 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 School Districts (USFR) and its own policies and procedures for FY2017, FY2018 and FY2019.

To conduct this audit, auditors used a variety of methods, including examining District and ADE records 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 District policies and procedures, and interviewed District management and staff. Specifically:

- **Enrollment data** – Auditors reviewed student 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.
- **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 District for FY2017, FY2018 and FY2019. The total instructional hours offered for each grade met the minimum required by statute for each of the three fiscal years audited.
- **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 District’s administration and staff members for their cooperation and assistance during the course of the audit.



# FINDING 1: THE DISTRICT DID NOT ACCURATELY REPORT SOME STUDENT DATA, RESULTING IN AN OVERSTATEMENT OF 0.23 ADM

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Auditors determined that the District inaccurately reported the student data for one student in FY2017. Specifically, auditors found that one student had an incorrectly reported exit date. As a result of this error, the District’s ADM was overreported by 0.23.

## The District inaccurately reported some student data

The District inaccurately reported the exit date of one student to ADE, which resulted in the District’s ADM being overstated by 0.23.

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. However, the District did not always adhere to this requirement. Specifically, for the students that were sampled:

- 1 student was reported with an incorrect exit date. As a result, the ADM for the District was overreported by 0.23.

As shown in Table 2, a student data reporting error resulted in an ADM overstatement of 0.23 for the three fiscal years audited.

**Table 2**

**Mobile Elementary School District  
ADM adjustments  
Fiscal years 2017, 2018 and 2019**

	<b>Incorrect Exit Date</b>	<b>Total</b>
2017	0.23	0.23
2018	-	-
2019	-	-
<b>Total</b>	<b>0.23</b>	<b>0.23</b>

Source: Auditor analysis of District records, ADE data for fiscal years 2017, 2018 and 2019.

## **The District failed to comply with statute and ADE guidelines**

The District did not follow statute and ADE guidelines when calculating student enrollment data.

The District misreported the enrollment data of 1 student. 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. The District incorrectly reported the exit dates of one student.

In the future, the District must ensure it complies with statute and ADE guidelines to properly report student enrollments.

## **The District was overstated by 0.23 ADM**

Auditors determined that the District did not report the correct ADM due to inaccurate enrollment data reported to ADE for FY2017. The student data incorrectly reported by the District resulted in its ADM being overstated by 0.23. Because the District did not receive any basic state aid for FY2017, there is no financial adjustment necessary. However, 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 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.*

## **Recommendations:**

1. The District must reconcile to ensure that enrollment dates are reported accurately pursuant to A.R.S. § 15-901.
2. The District must adjust its budget capacity for the three fiscal years audited. Budget capacity adjustment calculations for the District will be made by ADE once the audit is finalized.

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

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Auditors determined that the District failed to properly maintain residency, birth certificate and immunization documentation for some students as required by statute and ADE guidelines. The District did not properly maintain required documentation in some of its student cumulative files. In the future, the District should properly maintain these documents to ensure compliance with statute and ADE guidelines.

### **The District did not properly maintain student file documentation**

Auditors determined that the District 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 District 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 District 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 District did not maintain the proper documentation required by statute and ADE's residency guideline. Of the 80 students sampled, 29 of the student files did not have the proper residency documentation, 6 did not have a birth certificate in their file and 4 students did not have immunization record documentation in their file. Table 3 (page 7) lists the student file documentation maintained by the District for FY2017, FY2018 and FY2019.

**Table 3**

**Mobile Elementary School District  
Student cumulative file documentation  
Fiscal years 2017, 2018 and 2019**

	<b>Total Sampled</b>	<b>Missing Residency Documentation</b>	<b>Missing Birth Certificate</b>	<b>Missing Immunization</b>
2017	29	12	3	2
2018	22	10	1	0
2019	29	7	2	2
<b>Total</b>	<b><u>80</u></b>	<b><u>29</u></b>	<b><u>6</u></b>	<b><u>4</u></b>

Source: Auditor analysis of District records for fiscal years 2017, 2018 and 2019.

In the future, the District 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.

**Recommendation:**

1. The District 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.

# 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.*

**Budget capacity adjustment required**—The District must adjust its budget capacity for the three fiscal years audited. Budget capacity adjustment calculations for the District will be made by ADE once the audit is finalized.

**No Basic State Aid adjustment required**— Auditors identified an overall ADM overstatement of 0.23 for the three fiscal years audited due to improperly reported enrollment data. However, since the District did not receive any basic state aid for FY2017, no financial adjustment is required.

Table 4 lists the ADM adjustments and the associated Basic State Aid adjustments for the District for fiscal years 2017, 2018 and 2019.

**Table 4**

**Mobile Elementary School District  
ADM adjustments  
Fiscal years 2017, 2018 and 2019**

	2017	2018	2019	Total
ADM adjustment	0.23	-	-	0.23

Source: Auditor analysis of ADE and District student and financial data for fiscal years 2017, 2018 and 2019.