

Appendix A



COMMONWEALTH OF PENNSYLVANIA PENNSYLVANIA DEPARTMENT OF THE AUDITOR GENERAL

Act 44 Auditee Reporting Form (School District Audits)

The Department of the Auditor General provides this form for every school district to report its adoption of the Department's recommendations in its most recent audit pursuant to Act 44 of 2017 amendments to The Fiscal Code regarding Auditee reporting requirements and the Department's STATEMENT OF POLICY and FORM in 4 Pa. Code Part XIV published in the Pennsylvania Bulletin on February 10, 2018.

Within **120 business days** of the publication of the audit listed below, the school district must submit a response to the Department detailing the adoption of the Department's recommendations, or the reason why recommendations have not been adopted.

AUN: School: CAN:
Audit Period: Findings: Recommendations:

District Response: (Textbox below will expand or attachments can be added as necessary)

Note: Pursuant to Section 1.5 of Act 44, if the Auditee fails to respond to the Department's recommendations within **120 business days**, the Department will notify the Governor and the Chairpersons and Minority Chairpersons of the Appropriations Committees of the Senate and the House of Representatives, which may consider an Auditee's failure to respond to the Department's audit when determining the Auditee's future appropriations.

The District Failed to Implement Sufficient Internal Controls That Led to Noncompliance

With Statutory Obligations by Not Maintaining Complete Records for and Properly

Monitoring Its Contracted Bus Drivers

While Chambersburg does have an internal process to handle verification of qualifications for all drivers, certain review processes were missed. We attribute this to staff turnover in the Transportation department and a lack of clear understanding of the complete process. Driver information was submitted for Board approval prior to the start of the 20-21 school year. Subsequently, several drivers decided not to follow through with employment or left contracted driver positions due to COVID or other reasons. Upon notification from the contractor, these drivers were removed from the transportation master list, however, were not removed from the Board approved driver list. This created a difference between the lists. We also had a Non-pub contractor who failed to report a newly appointed driver to a route; however, this driver was certified and qualified. The documents were obtained from the Non-pub contractor when it was discovered this person was driving. The contractor was reminded of the process and their responsibilities under the contractual agreement.

Action Plan:

Transportation will enhance the internal control process by implementing verifiable internal control procedures to ensure all drivers are qualified and Board Approved. The process will include:

- 1) Driver Records from the Transportation software (Bus Boss) will be reviewed verified daily by the Assistant Transportation Supervisor.
- 2) The internal checklist for driver credentials will be updated to include supervisory review by the Supervisor of Transportation.
- 3) The Assistant Supervisor of Transportation or the Supervisor of Transportation will review and confirm all documentation has been provided and complete, prior to moving any driver forward for Board approval.
- 4) All contractors will be required to complete the standardized check list prior to submitting driver documentation to the Transportation Department.
- 5) Monthly reviews of the Master Driver List to the Board approved list will be conducted by the Supervisor of Transportation and confirmed by the Director of Support Services.
- 6) A report from BussBoss will be generated daily to alert management of expired or soon to expire driver credentials and clearances. The report will be reviewed daily by the Supervisor of Transportation. All contractors will be notified via the report with a deadline to complete the required credentialing.
- 7) Contractors are required to notify the District of any driver changes; however, this has not always occurred in a timely manner. To enhance our control over contracted driver changes, all contractors will be required to attest monthly to any changes in driver status. This attestation will occur during the monthly payment voucher submission. The Supervisor of Transportation will direct the corrections to be made to the master list and board list of approved drivers. The Supervisor of Transportation will review and confirm the changes have been made.
- 8) Transportation already requires a list of drivers from each contractor and each route in our system has a driver assigned. Sub drivers are currently documented in our system

as subs and are currently not associated with any specific routes. We will develop and implement a plan to have contractors notify transportation daily with any driver changes with the driver name and route they will cover. The Supervisor of Transportation will verify that the driver is approved and on the driver list for the contractor. The documents will be maintained for audit purposes.

Chambersburg Area School District Response Continued:

1. Conduct security and fire drills in compliance with the PSC requirements for all future school years.

The Chambersburg Area School District has addressed numerous compliance issues in the area of conducting security and fire drills. Specific areas that have been addressed are:

- 1) Failure to conduct and/ or properly report fire drills.
- 2) Failure to properly conduct a security drill within the first 90 days of school.
- 3) Unintentionally inaccurate reporting of data.

Administrative/ Informational meetings have been held with administrators and every building principal to specifically address the above deficiencies that were discovered during the Auditor General's Safe Schools audit of the CASD. The CASD Director of Safety has been tasked with coordinating the response and compliance of all aspects noted in the audit. The following procedures/steps will be implemented immediately:

- 1) All drill schedules will be reported to the Director of Safety and a master drill calendar will be created for the Chambersburg Area School District. A specific mandatory monthly drill schedule was sent to every principal to follow with no exceptions moving forward (See below schedule). This schedule moving forward addresses all the required CASD drills that will meet the requirements of the PSC. A form will be sent to each principal to complete and send to the Director of Safety with all drill information listed. (See attached)
- 2) Each principal was also requested to schedule an individual meeting with the Director of Safety, if needed, to specifically cover the requirements for drills and reporting with their head teachers and secretaries. Items covered during the meeting were the current CASD Drill database, how to navigate through it, and required data entry.
- 3) The current database was developed in 2008 and the CASD is currently exploring other options to update or upgrade the database for all users to ensure reporting accuracy. We will work with Technology to identify an updated solution.
- 4) It is now mandatory that only principals or their designee (head teacher or secretary) can enter data into the database immediately following any drill conducted. Each principal was provided specific guidelines in reference to what type of information shall be entered for every drill.
- 5) Principals were also advised that there would be zero tolerance moving forward for missed mandatory drills. The principals are responsible for conducting the drills and notifying the Director of Safety should any problems arise.
- 6) A procedure will be put into place to review the drill database and scheduled drills on a biweekly basis by the Safety and Security staff.
- 7) Specific School Police Officers will be assigned to each school in order to provide information and be a direct link for any questions or concerns.
- 8) Reminders will be sent in reference to conducting drills, inaccurate entries or reporting errors.
- 9) Other specific areas that were addressed and will no longer be permitted were:
 - No drills are to be held after school hours

- Drills will still be conducted during Covid-19 times as required
- No replacing of a specific drill for another without Director of Safety approval
- Discussions are not considered drills and can't take the place of a drill
- Real life incidents (i.e.: fire at a building or gas leak) are not considered drills
- Security Drill: Mandatory that it is held within the first 90 days of school opening

| Month of | Type of Drill | | | | |
|-----------|---------------|--|----------|-----------------------|--|
| July | Fire | | | | |
| August | Fire | BUS (1 st week of school) | | | |
| September | Fire | | Intruder | | |
| October | Fire | | SIP | Reverse Evacuation | |
| November | Fire | | Weather | | |
| December | Fire | | Intruder | | |
| January | Fire | BUS | SIP | | |
| February | Fire | | Intruder | | |
| March | Fire | | Weather | Reverse Evacuation | |
| April | Fire | | Intruder | | |
| May | Fire | | SIP | | |
| June | Fire | | | | |

2. Require building principals and other senior administrative personnel to verify drill data before submitting the ACS report to PDE.

The CASD previously had multiple staff members providing information for the ACS reporting. The member who was in charge of the reporting assumed that data and drills were conducted in a timely manner and appropriately entered.

Improvement steps will to include:

- 1) The responsibility for verifying drill data will now fall under the Director of Safety. The drill and data entry will be reviewed on a biweekly basis along with the drill calendar as a "check and balance" to ensure procedures are being followed.
- 2) The CASD administration is currently looking at the implementing an attestation policy for principals to verify drills and data entry. The attestation will be another check that the

building principals are meeting the requirements. This may be conducted monthly, quarterly or annually as approved by the CASD Cabinet.

- 3) A year-end review will also be conducted to verify accuracy of drills and reporting data with each principal and the Director of Safety or their designee. This will ensure accountability and consistency in conducting drills and database entry.
- 4) The Safety and Security team members will ensure the principals, head teachers and secretaries are properly trained in the CASD reporting procedures. The below email has been sent to the principals for consistency and the Director of Safety has conducted several meetings/ question and answer sessions with those schools requesting further detail:

Also, every drill that is conducted is required to be entered into our CASD Drill Database. The information shall be entered by a principal, head teacher or secretary immediately after the drill so that it is documented. This is a Safe Schools requirement and our district has not been reporting on a regular basis. Upon entering the information into the database and for future consistency, please enter the following information into the drill database once it is conducted:

1. *Who is inputting the information?*
2. *Specify the Type of Drill (Fire, Run-Hide-Fight, Reverse Evacuation, Shelter in Place, Weather, etc.)*
3. *Explanation of the Drill (What occurred, how things went)*
4. *Who was present for the drill (i.e. Staff only, students and staff, A students, B students etc?)*
5. *Any issues noted during the drill--- if no issues, please indicate that also*

There are several areas to input information, so please make sure you select the proper place to input that particular drill:

1. *Fire*
2. *Shelter*
3. *Other (weather)*
4. *Security (Run-Hide-Fight (intruder), Reverse Evacuation, etc.)*

3. Ensure all personnel in charge of completing and submitting ACS reports are trained on PDE's reporting requirements and guidance.

The CASD Director of Safety will schedule a meeting/ training with the two team members who are in charge of gathering and inputting the information required for the ACS report. This will be done with the approval of the CASD Cabinet member, Tamera Stouffer. The Director of Safety will also reach out to the Pennsylvania Department of Education for the purpose of scheduling training specifically for PIMS-ACS reporting. A request will also be submitted to the Pennsylvania Department of Education for providing training materials and information guides for our team members, if the information is not specifically listed or available on their website.

4. Make certain that the Chief School Administrator is aware of his/her fire and security drill obligations and certification statement requirements.

A meeting will be scheduled with the CASD Superintendent, Dr. Dion Betts and Cabinet member, Tamera Stouffer to discuss all procedures for the CASD that are now in place for ACS reporting, fire and security drill obligations, and certification statement requirements. A biannual review will be conducted with both of the above administrators to verify compliance and ensure consistency for the Chambersburg Area School District. A copy of the findings, this response letter, the yearly letter to the superintendent/ school board and the yearly executive session

meeting discussing Safe Schools Requirements will be provided to the above members of the administration.