

## 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.

<b>AUN:</b>	108118503	<b>School:</b>	Westmont Hilltop School District	<b>CAN:</b>	116196
<b>Audit Period:</b>	July 1, 2014 to June 30, 2018	<b>Findings:</b>	Four	<b>Recommendations:</b>	Fourteen

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

Finding #1: The district failed to retain required documentation to support \$1.6 million received for transportation reimbursements.

1. School district policy 800 (Records Management) was updated on September 19, 2019. All pertinent staff will be trained on the procedures according to the policy.
2. The school district administration has implemented new record retention practices, including monthly meetings, designed to ensure all documentation supporting transportation data reported to the PDE is retained in accordance with the PSC's record retention requirements.
3. The school district administration has a secure file storage location that will be used to store all source documents and calculations supporting the transportation data submitted to the PDE.

4. The school district has identified business manager and executive assistant to the superintendent to collect, organize, and retain all transportation documentation. The superintendent will assist with the process.
5. The school district will implement a transportation software for the 2020-21 school year to assist with routing and reporting.

Finding #2: The district and its school board failed to comply with provisions of the public school code and associated regulations by not maintaining records and provided insufficient monitoring procedures for its contracted bus drivers.

1. School district policy 818 (Contracted Services Personnel) was updated on September 19, 2019. All pertinent staff will be trained on the procedures according to the policy.
2. The school district administration has implemented new record retention practices, including monthly meetings, designed to ensure all documentation supporting transportation data reported to the PDE is retained in accordance with the PSC's record retention requirements.
3. The School District will conduct on-going monitor of bus driver credentials. The bus contractor will continue to provide the necessary driver credentials. The District will continue to review and maintain these records. As an additional check, the administration will conduct on-site review of the bus driver records periodically to ensure all files are up to date and on file.
4. The school district has identified the executive assistant to the superintendent to collect, organize, and retain all transportation documentation, bus driver records.
5. The school district will implement a transportation software for the 2020-21 school year to assist with routing and reporting.

Finding #3: The district failed to conduct all required monthly fire drills in accordance with the public school code and to maintain adequate fire and security drill documentation.

1. School district policy 805 (Emergency Preparedness and Response) was updated on December 3, 2019. All pertinent staff will be trained on the procedures according to the policy and associated administrative regulations.
2. The school district administration has implemented new record retention practices designed to ensure all documentation supporting fire and safety drill reported to the PDE is retained in accordance with the PSC's record retention requirements.
3. The district administration has implemented new review practices designed to ensure all documentation supporting security and fire drill data reported to the PDE is verified and accurate
4. The school district has identified the executive assistant to the superintendent to collect, organize, and retain all fire and safety documentation.

Finding #4: The district failed to accurately report nonresident student data to the Pennsylvania Department of Education Resulting in an underpayment of \$38,367.

1. The current administration will implement procedures to ensure staff responsible for the categorizing and reporting of student residency are trained on how to categorize foster students in PowerSchool as well as how to maintain proper documentation to support the categorization of the foster students

2. The current administration will implement internal control procedures to ensure that student data reported to the state is reviewed for accuracy prior to being submitted
3. The District will ensure that all staff with responsibilities for generating reports from PowerSchool are trained and can produce reports that accurately reflect the student information that is required to be reported to the state
4. The District will promptly review membership reports submitted to PDE for the 2018-2019 school year and, if errors are found, submit revised reports to PDE
5. The school district has identified the enrollment secretary to collect, organize, and retain all non-resident enrollment documentation

**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.

Department of the Auditor General  
Bureau of School Audits

**Management Reply**

LEA: Westmont Hilltop School District

Date: March 25, 2020

Audit Period: July 1, 2014 through June 30, 2018

Date Due: \_\_\_\_\_

Title: The District Failed to Retain Required Documentation to Support \$1.6 Million Received for Transportation Reimbursements

- X   Management agrees with the Finding
- Management disagrees with the Finding
- Management waives the opportunity to reply at this time

**MANAGEMENT COMMENTS:** (Please explain the cause of the problem and note what corrective action is planned. Please ensure that you respond to each recommendation point included in the draft comment. If necessary, attach additional paper.)

As noted in the finding, a prior District administrator that was employed by the District during the audit period and was responsible for reporting the required information to the State and retaining the supporting documentation, no longer works for the District and was not present during the audit fieldwork. During the time period of the audit the District's administrative office moved several times to different locations because of on-going construction projects. The prior administrator whose responsibility it was to retain the documentation was among the employees who had to relocate several times. There was no central storage location available to the administration during these relocations. Some supporting documentation was found during the audit fieldwork, but not all supporting documentation requested by the auditors for the audit period was able to be located by the current administration.

**Recommendations and responses:**

**The Westmont Hilltop School District should:**

1. Immediately take the appropriate administrative measures to ensure that it retains all documentation supporting the transportation data reported to PDE, including student bus rosters, mileage average calculations, and nonpublic school student requests for transportation in accordance with PSC's record retention requirements.
  - a. In response, the District administration has implemented new record retention practices designed to ensure all documentation supporting transportation data reported to the PDE is retained in accordance with the PSC's record retention requirements.
2. Establish a safe and adequate location to store all source documents and calculations supporting the transportation data submitted to the PDE.
  - a. In response, the District administration has a secure file storage location in the District administrative office that will be used to store all source documents and calculations supporting the transportation data submitted to the PDE.

3. Ensure that record retention procedures are documented and staff are trained on the procedures.

a. Board Policy 800 addresses record retention. All pertinent staff will trained on the procedures according to the policy.

Additional pages attached: Yes \_\_\_\_\_ No \_\_\_\_\_

Signatures and Date:

 4/2/20  
Superintendent, Ex. Director, Director

 4/2/2020  
Business Manager

Department of the Auditor General  
Bureau of School Audits

**Management Reply**

**LEA:** Westmont Hilltop School District

**Date:** 3/25/20

**Audit Period:** July 1, 2014 through June 30, 2018

**Date Due:** \_\_\_\_\_

**Title:** The District Failed to Accurately Report Nonresident Student Data to the Pennsylvania Department of Education in an Underpayment of \$38,367

- X   Management agrees with the Finding
- Management disagrees with the Finding
- Management waives the opportunity to reply at this time

**MANAGEMENT COMMENTS:** (Please explain the cause of the problem and note what corrective action is planned. Please ensure that you respond to each recommendation point included in the draft comment. If necessary, attach additional paper.)

As noted in the finding, a prior District administrator that was employed by the District during the audit period and was responsible for reporting the required Foster Student information to the State, no longer works for the District and was not present during the audit fieldwork. During the time period of the audit the prior administrator took on multiple roles within the District Administrative office from Superintendent to Assistant Superintendent to Business Manager. In those roles, the employee was responsible for the reporting of child accounting to the state. Proper internal controls were not in place to ensure the reporting to the state was correct during the time period under audit. The employee left employment of the district prior to the audit fieldwork.

**Recommendations and responses:**

**The Westmont Hilltop School District should:**

1. Ensure that District officials responsible for categorizing and reporting foster students are properly trained on the types of nonresident students and the supporting documentation necessary to support the classification reported to PDE.
  - a. In response, the current administration will implement procedures to ensure staff responsible for the categorizing and reporting of student residency are trained on how to categorize foster students in PowerSchool as well as how to maintain proper documentation to support the categorization of the foster students.
2. Implement controls that would ensure that District personnel other than the employee who categorized foster student data reviews this data prior to reporting.
  - a. In response, the current administration will implement internal control procedures to ensure that student data reported to the state is reviewed for accuracy prior to being submitted.
3. Ensure that District personnel are trained on District SIS reports and are able to generate reports that identify residency status of students.

a. In response, the District will ensure that all staff with responsibilities for generating reports from PowerSchool are trained and can produce reports that accurately reflect the student information that is required to be reported to the state.

4. Review membership reports submitted to PDE for the 2018-2019 school year and, if errors are found, submit revised reports to PDE.

a. In response, the District will promptly review membership reports submitted to PDE for the 2018-2019 school year and, if errors are found, submit revised reports to PDE.

Additional pages attached: Yes \_\_\_\_\_ No \_\_\_\_\_

Signatures and Date:

 4/2/20  
Superintendent, Ex. Director, Director

 4/2/2020  
Business Manager

Department of the Auditor General  
Bureau of School Audits

**Management Reply**

**LEA:** Westmont Hilltop School District

**Date:** 3/25/20

**Audit Period:** July 1, 2014 through June 30, 2018

**Date Due:** \_\_\_\_\_

**Title:** The District Failed to Conduct all Required Monthly Fire Drills in Accordance with the Public School Code and to Maintain Adequate Fire and Security Drill Documentation

- ☒ **Management agrees with the Finding**
- ☐ **Management disagrees with the Finding**
- ☐ **Management waives the opportunity to reply at this time**

**MANAGEMENT COMMENTS:** (Please explain the cause of the problem and note what corrective action is planned. Please ensure that you respond to each recommendation point included in the draft comment. If necessary, attach additional paper.)

The District maintains that all security and fire drills were completed for the time period reviewed; however, the documentation was insufficient. During the 2019-20 school year, the school district has updated district policy and instituted administrative regulation to ensure accurate documentation of completed security and fire drills. Also, the District administration has implemented new record retention practices designed to ensure all documentation supporting security and fire drill data reported to the PDE is reported accurately.

**Recommendations and responses:**

**The Westmont Hilltop School District should:**

1. **Conduct security and fire drills in full compliance with the PSC for all future years**
  - a. In response, the District will continue to comply with the requirements of the PSC.
2. **Create and retain individual school building security and fire drill logs noting relevant information like the date, type, and results of the drill performed, as support for the data that is reported to PDE**
  - a. In response, the District administration has implemented new record retention practices designed to ensure all documentation supporting security and fire drill data reported to the PDE is retained in accordance with the PSC's record retention requirements.
3. **Require building principals and other senior administrative personnel to verify drill data before submitting the district-wide ACS reports to PDE.**
  - a. In response, the District administration has implemented new review practices designed to ensure all documentation supporting security and fire drill data reported to the PDE is verified and accurate.




4. Ensure personnel responsible for completing and submitting ACS reports are trained with regard to PDE's reporting requirements and that the chief school administrator is aware of his fire and security drill obligations and certification requirements.

a. In response, the District administration will provide on-going training in regard to providing accurate data to PDE.

Additional pages attached: Yes \_\_\_\_\_ No \_\_\_\_\_

Signatures and Date:

 4/2/20  
\_\_\_\_\_  
Superintendent, Ex. Director, Director

 4/2/2020  
\_\_\_\_\_  
Business Manager

Department of the Auditor General  
Bureau of School Audits

**Management Reply**

**LEA:** Westmont Hilltop School District

**Date:** 3/25/20

**Audit Period:** July 1, 2014 through June 30, 2018

**Date Due:** \_\_\_\_\_

**Title:** The District and Its School Board Failed to Comply with Provisions of the Public School Code and Associated Regulations by Not Maintaining Records and Provided Insufficient Monitoring Procedures for Its Contracted Bus Drivers

- ☒ **Management agrees with the Finding**
- ☐ **Management disagrees with the Finding**
- ☐ **Management waives the opportunity to reply at this time**

**MANAGEMENT COMMENTS:** (Please explain the cause of the problem and note what corrective action is planned. Please ensure that you respond to each recommendation point included in the draft comment. If necessary, attach additional paper.)

The District agrees with the finding that not all bus driver records were maintained at the district office. A prior District administrator that was employed by the District during the audit period and was responsible for reviewing the required information and retaining the supporting documentation, no longer works for the District and was not present during the audit fieldwork. During the time period of the audit the District's administrative office moved several times to different locations because of on-going construction projects. The prior administrator whose responsibility it was to retain the documentation was among the employees who had to relocate several times. There was no central storage location available to the administration during these relocations. Some supporting documentation was found during the audit fieldwork, but not all supporting documentation requested by the auditors for the audit period was able to be located by the current administration.

However, the District disputes the implication that the student's safety was at risk during this time period. All bus driver qualifications were obtained and reviewed to ensure that credentials and clearances were satisfied during the audit period. The records were not maintained appropriately as described in the first paragraph, but the obligation to ensure that bus drivers were qualified and eligible to transport students was met by both the administration and the Board of Directors.

**Recommendations and responses:**

**The Westmont Hilltop School District should:**

1. Obtain, review, and maintain all contracted driver credentials and clearances.
  - a. In response, the District administration has implemented an on-going monitoring process and has also implemented proper record retention procedures for all bus driver records. The bus driver records will be sent to the District from the bus contractor as in the past. Periodic checks of the records at the contractor location will also be implemented to ensure all recent records are on file.

2. Continue to implement it's new tracking and monitoring procedures on an on-going basis and evaluate the effectiveness of these procedures by verifying all bus driver credentials remain complete and current throughout the school year.

a. In response, the District will conduct on-going monitor of bus driver credentials. The bus contractor will continue to provide the necessary driver credentials. The District will continue to review and maintain these records. As an additional check, the administration will conduct on-site review of the bus driver records periodically to ensure all files are up to date.

3. Follow the District's own *Contracted Personnel* Policy No. 818 establishing the District's duties related to the maintenance, review, and monitoring of contractors and contracted employees.

a. The current administration has implemented procedures to ensure that the Board Policy 818 is followed and adhered to.

Additional pages attached: Yes \_\_\_\_\_ No \_\_\_\_\_

Signatures and Date:

 4/2/20  
\_\_\_\_\_  
Superintendent, Ex. Director, Director

 4/2/2020  
\_\_\_\_\_  
Business Manager