

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF THE AUDITOR GENERAL

SUMMARY REPORT:

**THE ALBERT GALLATIN AREA SCHOOL DISTRICT
HOMEBOUND INSTRUCTION PROGRAM**

February 2003

INTRODUCTION AND BACKGROUND

The Department of the Auditor General (the Department) conducts regular audits of school districts pursuant to its authority and responsibility under the Fiscal Code.¹ In October 2001, the Office of Special Investigations (OSI) received a request to assist the Department's Bureau of School Audits in a review of the Homebound Instruction Program (HIP) at the Albert Gallatin Area School District (AGASD) as part of a regular audit of the school district. The inquiry included interviews of AGASD employees and homebound instructors and a review of the school district's records for the 1999-2000 and 2000-2001 school years.

The findings, conclusions and recommendations of the investigation were sent to AGASD officials on December 4, 2002. The school district submitted responses on January 2 and February 4, 2003. The responses have been included as part of the final report.

SUMMARY OF FINDINGS

AGASD failed to manage the HIP properly. There were four specific areas of deficiencies: 1) absence of detailed policy, procedures and guidelines; 2) incomplete application forms; 3) lack of a tracking system and (4) timesheet discrepancies. There also appear to have been instances when false and misleading information was submitted on school district timesheet information forms.

FINDINGS

Students temporarily excused and provided with homebound instruction in accordance with requirements of the Pennsylvania Department of Education (PDE) are counted, for attendance purposes, as if they were in school. Pursuant to the Public School Code, school districts receive reimbursement from the Commonwealth for homebound instruction.² A PDE regulation³ states that:

- School districts shall adopt rules and procedures governing temporary excuses granted to students by teachers and principals.
- Students may be excused "upon receipt of satisfactory evidence of mental, physical or other urgent reasons" during a temporary period.
- The term "urgent reasons" is strictly construed and does not permit irregular attendance.

¹ 72 P.S. § 403.

² 24 P.S. § 25-2510.1.

³ 22 Pa. Code § 11.25.

- School districts are required to (a) adopt policies that describe services available to students excused under the regulation and (b) define responsibilities of the school district and the pupils regarding the instructional services.

In the school years under review, homebound instruction in AGASD included approximately 105 students and at least four instructors. The program was managed by a homebound instruction supervisor from 1995 until the individual's retirement in December 2001.

1. Absence of policies, procedures and guidelines

Information pertaining to homebound instruction is found in the School District's Policy and Procedures Manual which, in Section 4510, states that "The Superintendent is authorized to arrange for homebound instruction for children confined at home for various reasons which might qualify them for such instruction under the State Code." There are no other written guidelines or policies.

The former HIP supervisor confirmed that the school district lacked a detailed policy which contained descriptions of the responsibilities of students and instructors. According to the former supervisor, there were many problems that he could not address while he held the position due to time constraints and other duties/responsibilities.

AGASD students received homebound instruction for both medical and non-medical reasons. However, according to information provided by AGASD, the school district did not request state reimbursement for non-medical HIP students. Most of the non-medical assignments are for students who are waiting for "alternative education placement" and those who exhibit serious disciplinary problems. The practice of placing students in the HIP for non-medical reasons appears to have resulted in an unusually large number of students being in the program.

2. Incomplete application forms

AGASD utilizes an application form for students who have temporary medical conditions. The parents fill out the application and then take it to a doctor who certifies the student is unable to attend school. The school district relies upon the doctor to establish how long the student receives homebound instruction. However, many of AGASD's forms do not have "ending" dates. Ending dates on most forms reviewed as part of the investigation were labeled "to be determined." The former HIP supervisor told OSI that he used that term because he often didn't know how long the homebound instruction should last. Instructors interviewed by OSI said that they did not know the ending period for most students and continued to teach until the parents or someone at the school notified them to stop.

A review of the HIP application forms also noted other deficiencies: There were no parent signatures, home addresses or telephone numbers for students, and no specific descriptions of the medical reason for the student to be placed in the homebound instruction program. There are also no applications in the records of those students who were placed in HIP for disciplinary reasons.

3. Lack of a tracking system

There is no tracking system for the HIP. Thus, there is no way to determine how many students are in the program at any particular time without reviewing all of the application files and contacting each of the individual schools in the school district. There is no centralized tracking or recording of a student's progress, grades, dates of return to regular classes, special concerns, or contacts with the guidance office.

There are no lists of current or potentially available instructors or the number of students assigned to any particular instructor. Neither the current nor former homebound instruction supervisor knew whether a student's participation in the HIP was maintained as part of the student's permanent record at the school district.

4. Timesheet discrepancies

HIP instructors use a form entitled "Time Sheets" to record their work as instructors for payment purposes. The form contains the instructor's name and mailing address, the name of the student, dates when homebound instruction was given, hours worked each day and the total hours. A separate timesheet form is submitted for each student for each two-week period of homebound instruction. Instructors were previously paid \$11.00 per hour; in March 2001, the hourly rate was increased to \$15.00.

Department auditors analyzed timesheet forms submitted by four instructors for the 1999-2000 and 2000-2001 school years. One of the instructors was a full-time teacher at AGASD; the others were substitute teachers. The auditors' analysis showed the total instructional hours reported by each homebound instructor. The following discrepancies were noted:

- Numerous forms did not have a parent's signature. The forms contain the initials "DV" on the line for the parent's signature. These are the initials of the former HIP supervisor.⁴
- On several forms, it appeared that the signature of the parent was photocopied.
- According to some forms, homebound instruction took place on Saturdays, Sundays and holidays, as well as weekdays.
- There were occasions when forms were submitted listing more than 24 hours of homebound instruction on a given day. In one instance, for one day, an instructor claimed that he instructed 16 students for a total of 51 hours. There were numerous instances of instructors claiming 18 to 20 hours of homebound instruction for a given day.

⁴ According to the AGASD payroll clerk, the HIP supervisor's initials are used to indicate to the payroll clerk that the HIP supervisor has seen the timesheet and authorized making payment to the instructor.

- There is no set time for submission of timesheet forms by the homebound instructors. In many cases, timesheets were not submitted until months after the period during which the services were performed.

OSI interviewed four instructors who submitted the forms found to contain the above discrepancies.⁵ They made the following comments related to problems and discrepancies in the HIP:

Instructor No. 1

- Instructors are assigned students ranging from first graders through high school seniors with a wide range of academic ability.
- The former HIP supervisor told the instructor to include preparation time in the total hours listed on the form. According to the instructor, there are usually two hours of preparation time for every three hours of instruction.
- While the usual practice is to have the parent sign the form after the instruction is provided, the instructor photocopied some parents' signatures and showed the form to the parent for approval. The instructor said that, in those cases, the parents' approval could be verified.
- Most of weekend and holiday hours shown on the forms were used for preparation of lessons; some instruction was also provided on weekends and holidays and, on many days, homebound instruction was provided all day and until 9:00 p.m.
- The instructor did not have regular meetings with the HIP supervisor.

Instructor No. 2

- Instructor times shown on the forms reflect an average of 2.5 hours per student per day, not the actual time the instructor spent at the student's home.
- The time on the forms is "instructional" and "non-instructional"; the latter refers to travel, preparation, grading and other time spent "for the student," when the instructor was not actually at the student's home.

Instructor No. 3

- Most of the instructor's homebound students had been expelled from regular classes or were placed in the program for disciplinary reasons. Very few were placed in the HIP for medical reasons.

⁵ There are other instructors in the HIP program. However, these four instructors provided most of the services.

- Students range from first grade to senior high school. At the same time, there is very little program structure and a lack of guidelines for the instructor.
- The length of time a student remained in the HIP was determined by the HIP supervisor.
- The program appeared to have expanded and “ballooned” out of control. By the end of the school year, there are so many students in the HIP that it is impossible to provide the right amount of instruction.
- The former HIP supervisor told the instructor to try to see students as much as possible, but to put down five hours of instruction on the forms. According to the instructor, the former HIP supervisor had to be aware that the forms were not accurate.
- The instructor tried to see each student twice a week, but the actual time is not the amount shown on the forms. Due to the number of students assigned to the instructor near the end of the school year, it is virtually impossible to see students for the amount of time shown on the forms, particularly because of the distances to be traveled.
- Travel time, preparation and instruction planning time are taken into consideration for each student. Instruction is given on Saturdays. On Sundays, the instructor corrects papers and reads materials assigned to the students.
- The instructor has never signed a parent’s signature on a form; he had parents sign a blank form and the instructor filled in the numbers later.

Instructor No. 4

- The former HIP supervisor told the instructor that up to two hours of preparation time could be taken for each student.
- The instructor believes that he is permitted to record one to 1.5 hours of instruction time if the student is not available.
- The instructor often works five to six nights per week until 2:00 to 3:00 a.m. on matters related to instruction, such as homework. The instructor adds that time to the time spent with the student each day. Thus, according to the instructor, the amount of time on the timesheets reflects actual HIP hours, but not necessarily on the days indicated. This was the instructor’s explanation for time periods on forms that added up to more than 24 hours for a given day.
- The instructor rarely has a parent present when instruction is being given and has never bothered to obtain the signature of a parent. He said that he asked the former

HIP supervisor if a parent's signature was needed and was informed by him that it was not necessary. The instructor said that he used the line on the form intended for the parent's signature as a means to record cancellations.

- The instructor said that there were no HIP guidelines for either the instructor or the student. He gave one example of a student who was rarely available for home instruction.⁶

OSI interviewed the parent of a student who was in the school district's HIP for most of the 2000-2001 school years. According to the parent, the homebound instructor visited the student about four times per month, was rarely present with the student for more than 15 to 20 minutes, mostly discussed personal matters not related to the lessons, and told the parent that her son was smart and could do the work on his own. The parent stated that she contacted the former HIP supervisor numerous times to complain. He told her that he and the superintendent were going to meet with the instructor, that the instructor had been reprimanded and, later, that the instructor was going to be fired.

According to the parent, her signature was forged on timesheet forms submitted by the instructor. The parent provided OSI with copies of six forms for different periods during the 2000-2001 school year. Each had signatures of her or the student. According to her, she and her son never signed them. The forms were for instruction in December 2000, January, February and March 2001. According to the analysis of school district HIP records by Department auditors, the instructor reported providing 17 hours, 13 hours, 20 hours and 21 hours of instruction to that student during those months (a total of 71 hours of instruction). For the entire school year, the instructor reported 134 hours of homebound instruction for the student. Only 20 hours of that total were shown on the form submitted by the school district to PDE for reimbursement.

OSI found no evidence of disciplinary action taken by the school district against the instructor. According to the superintendent, she first received the parent's complaint in July 2001; the former HIP supervisor later told her that the parent contacted him in May 2001 and that, as a result, the instructor received a pay cut during that month. OSI found no record of a cut in the instructor's pay. According to the available records, the instructor submitted no timesheets for any period after May 18, 2001, and did not appear to have received any pay for work after that date.

⁶ In addition to this instructor's information concerning an individual student, another instructor and a school district employee informed OSI of incidents involving students in the HIP that appear to warrant further investigation by the school district and/or law enforcement agencies.

CONCLUSIONS AND RECOMMENDATIONS

AGASD failed to conduct the HIP in accordance with the PDE regulations, failed to manage the HIP properly and made questionable use of the HIP to deal with disciplinary problems. The investigation did not determine whether the deficiencies had an effect on the amount of HIP reimbursement the school district is entitled to receive from PDE for the school years included in the review.

It is recommended that AGASD:

1. Establish written guidelines and procedures for homebound instruction with eligibility requirements, start and end dates, minimum and maximum hours of instruction, appropriate and reasonable allowances for travel and preparation time, maximum numbers of students per instructor and specified responsibilities for students, parents and instructors. The school district should also ensure that all parties included in the program are aware of the procedures. The criteria for program eligibility should also be submitted to PDE to obtain confirmation that they are in accordance with the Public School Code and PDE requirements.
2. Ensure that HIP application forms are properly and fully completed.
3. Adopt an HIP tracking system to record student progress, especially dates of return to regular classes and the receipt and results of inquiries and complaints from parents, students and instructors.
4. Conduct regular audits of HIP timesheets submitted by instructors and promptly correct all discrepancies. The audit process should include a system for checking with parents and instructors to verify times, hours, student progress and subjects taken.
5. Ensure that instructors are qualified to teach subjects included in HIP as well as being qualified to provide appropriate instruction to each student assigned to them.
6. Take appropriate disciplinary action against any instructor who submitted false and misleading information in connection with the HIP.
7. Determine whether the school district is entitled to repayment from HIP instructors for hours of instruction that were paid for but not provided during the 1999-2000 and 2000-2001 school years.
8. Review instances in which students did not receive homebound instruction after being assigned to the program for possible discrepancies in school records and truancy issues.

AGASD's RESPONSE



ALBERT GALLATIN AREA SCHOOL DISTRICT
2625 MORGANTOWN ROAD • UNIONTOWN, PA 15401-6703
724-564-7190 FAX 724-564-7195

January 2, 2003

Peter J. Smith, Director
Office of Special Investigations
Department of the Auditor General
Room 327, Finance Building
Harrisburg, PA 17120

RE: Albert Gallatin Area Homebound
Instruction Program

Dear Director Smith:

I have received and reviewed the draft final report of the Albert Gallatin Area School District's Homebound Instruction Program.

I also have initiated corrective action not only to meet the recommendations outlined in this draft report, but also to assure that the district's Homebound Instruction Program (HIP) is providing services in accordance with the Public School Code and PDE requirements.

Attached please find the revised Homebound Instruction Policy adopted in October 2002. Also attached are other revised forms regarding the HIP.

The policy clearly defines homebound instruction as a temporary placement. It also specifies guidelines to determine student eligibility to receive instruction. This policy limits the number of homebound students an instructor may have at one time to not more than five. It also provides for parent signatures on all time sheets including only actual time of instruction.

In July of 2001, the school board named two new administrative assistants to Central Office. The additional staff has provided for the sharing of duties and responsibilities to help eliminate administrative time constraints. A central office administrator has been designated as Homebound Instruction Supervisor.

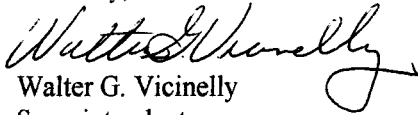
It is the HIP supervisor's responsibility to approve or disapprove homebound requests assuring that appropriate forms are completed properly. Also, this administrator is to monitor the entire process, communicating with principals, counselors, instructors,

students and parents. The HIP supervisor, along with the school counselors will jointly review the student's educational progress. The HIP supervisor will meet with each instructor to review procedures and forms prior to the beginning of instruction. Timesheets will be reviewed and approved by this supervisor.

An independent review of this report and of action already initiated will be conducted to determine if any other action may be necessary. The policy and procedure will be reviewed annually and revised as needed.

Please contact me with any questions or other recommendations at (724) 564-7190.

Sincerely,


Walter G. Vicinelly
Superintendent

WGV/db

Enclosure



ALBERT GALLATIN AREA SCHOOL DISTRICT
2625 MORGANTOWN ROAD • UNIONTOWN, PA 15401-6703

Walter G. Vicinelly, *Substitute Superintendent*
(724) 564-7190 • Fax: (724) 564-7195

February 4, 2003

Peter J. Smith, Director
Office of Special Investigations
Department of the Auditor General
Finance Building, Room 327
Harrisburg, Pennsylvania 17120

RE: Albert Gallatin Area Homebound Instruction Program

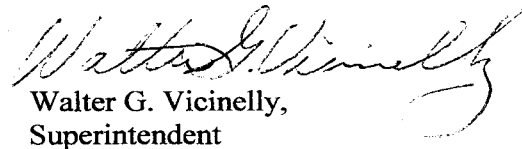
Dear Director Smith:

An independent review of the report regarding the Investigation of the Albert Gallatin Area Homebound Instruction Program will be conducted. This review will be initiated by myself and the district solicitor or his designee.

An effort will be made to determine if disciplinary action against any instructor is warranted or if school district funds may be recovered. Actions already initiated will also be reviewed and revised as warranted.

Please let me know if additional information is required at this time.

Sincerely,


Walter G. Vicinelly,
Superintendent

WV: dl

DEPARTMENT OF THE AUDITOR GENERAL'S COMMENTS

AGASD submitted its revised HIP Policy and other HIP forms as part of its response. The revised policy incorporates the report's recommendations related to policies and procedures, or their equivalent, with one exception: the policy and statements in the response do not address Recommendation No. 5 (ensuring that homebound instructors are qualified to provide appropriate instruction).

The results of the independent review to be conducted by AGASD concerning possible disciplinary action and recovery of school district funds should be reported to the Department as well as to PDE. A copy of the final report is being sent to the Fayette County District Attorney's office for review. Therefore, the results of the AGASD independent review should also be provided to that office.

REPORT DISTRIBUTION LIST

This report was initially distributed to the superintendent of the school district, the board members, and the following:

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Mr. William A. Hardenstine, Jr.
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