

PERFORMANCE AUDIT

Towanda Area School District Bradford County, Pennsylvania

April 2015



Commonwealth of Pennsylvania
Department of the Auditor General

Eugene A. DePasquale • Auditor General



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EUGENE A. DePASQUALE
AUDITOR GENERAL

The Honorable Tom W. Wolf
Governor
Commonwealth of Pennsylvania
Harrisburg, Pennsylvania 17120

Mr. Robert Fetterman, Board President
Towanda Area School District
410 State Street
Towanda, Pennsylvania 18848

Dear Governor Wolf and Mr. Fetterman:

We conducted a performance audit of the Towanda Area School District (District) to determine its compliance with certain relevant state laws, regulations, contracts, grant requirements, and administrative procedures (relevant requirements). Our audit covered the period January 25, 2013 through October 8, 2014, except as otherwise stated in the report. Additionally, compliance specific to state subsidies and reimbursements was determined for the school years ended June 30, 2011 and June 30, 2012. Our audit was conducted pursuant to Section 403 of The Fiscal Code, 72 P.S. § 403, and in accordance with *Government Auditing Standards* issued by the Comptroller General of the United States.

Our audit found that the District complied, in all significant respects, with relevant requirements.

We appreciate the District's cooperation during the conduct of the audit.

Sincerely,

A handwritten signature in black ink, appearing to read "Eugene A. DePasquale".

Eugene A. DePasquale
Auditor General

April 1, 2015

cc: **TOWANDA AREA SCHOOL DISTRICT** Board of School Directors

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Executive Summary

Audit Work

The Pennsylvania Department of the Auditor General conducted a performance audit of the Towanda Area School District (District) in Bradford County. Our audit sought to answer certain questions regarding the District's compliance with certain relevant state laws, regulations, contracts, grant requirements, and administrative procedures and to determine the status of corrective action taken by the District in response to our prior audit recommendations.

Our audit scope covered the period January 25, 2013 through October 8, 2014, except as otherwise stated in the audit scope, objectives, and methodology section of the report. Compliance specific to state subsidies and reimbursements was determined for the 2010-11 and 2011-12 school years.

District Background

The District encompasses approximately 163 square miles. According to 2010 federal census data, it serves a resident population of 8,662. According to District officials, the District provided basic educational services to 1,645 pupils through the employment of 116 teachers, 75 full-time and part-time support personnel, and 11 administrators during the 2011-12 school year. The District received \$10.7 million in state funding in the 2011-12 school year.

Audit Conclusion and Results

Our audit found that the District complied, in all significant respects, with certain relevant state laws, regulations, contracts, grant requirements, and administrative procedures. Our audit resulted in no findings or observations.

Status of Prior Audit Findings and

Observations. With regard to the status of our prior audit recommendations to the Towanda Area School District (District) from an audit released on June 20, 2013, we found that the District had taken appropriate corrective action in implementing our recommendations pertaining to membership reporting errors (see page 7). The District also implemented our recommendations pertaining to the District financing some of its debt with Interest-Rate Management ("SWAP") Agreements (see page 8).

Audit Scope, Objectives, and Methodology

Scope

What is a school performance audit?

School performance audits allow the Pennsylvania Department of the Auditor General to determine whether state funds, including school subsidies, are being used according to the purposes and guidelines that govern the use of those funds. Additionally, our audits examine the appropriateness of certain administrative and operational practices at each local education agency (LEA). The results of these audits are shared with LEA management, the Governor, the Pennsylvania Department of Education, and other concerned entities.

Our audit, conducted under authority of Section 403 of The Fiscal Code, 72 P.S. § 403, is not a substitute for the local annual audit required by the Public School Code of 1949, as amended. We conducted our audit in accordance with *Government Auditing Standards* issued by the Comptroller General of the United States.

Our audit covered the period January 25, 2013 through October 8, 2014, except for the verification of professional employee certification which was performed for the period July 1, 2013 through September 29, 2014.

Regarding state subsidies and reimbursements, our audit covered the 2010-11 and 2011-12 school years.

While all districts have the same school years, some have different fiscal years. Therefore, for the purposes of our audit work and to be consistent with Pennsylvania Department of Education (PDE) reporting guidelines, we use the term *school year* rather than fiscal year throughout this report. A school year covers the period July 1 to June 30.

Objectives

What is the difference between a finding and an observation?

Our performance audits may contain findings and/or observations related to our audit objectives. Findings describe noncompliance with a statute, regulation, policy, contract, grant requirement, or administrative procedure. Observations are reported when we believe corrective action should be taken to remedy a potential problem not rising to the level of noncompliance with specific criteria.

Performance audits draw conclusions based on an evaluation of sufficient, appropriate evidence. Evidence is measured against criteria, such as laws and defined business practices. Our audit focused on assessing the District's compliance with certain relevant state laws, regulations, contracts, grant requirements, and administrative procedures. However, as we conducted our audit procedures, we sought to determine answers to the following questions, which serve as our audit objectives:

- ✓ Were professional employees certified for the positions they held?
 - To address this objective, auditors reviewed and evaluated certification documentation for all 115 teachers and administrators that were hired during the 2013-14 and 2014-15 school years.

- ✓ In areas where the District received state subsidies and reimbursements based on non-resident pupil membership, did it follow applicable laws [24 P.S. § 13-1301, 13-1302, 13-1305, and 13-1306] and procedures [22 PA Code Chapter 11]?
 - To address this objective, auditors reviewed placement information on all eight (8) and four (4) non-resident foster students who were educated by the District for the 2010-11 and 2011-12 school years, respectively.

- ✓ Did the District ensure that bus drivers transporting District children at the time of the audit have the necessary license, physicals, training, background checks, and clearances as outlined in 24 P.S. § 1-111, 24 P.S. § 2070, 67 P.S. § 71.1, 22 PA Code Chapter 8, and 23 PA C.S. § 58-6354, and did they have written policies and procedures governing the hiring of new bus drivers?

To address this objective:

- The auditors initially selected 5 of the 62 drivers who transported students according to the Board of School Directors approved bus driver list as of September 9, 2014. Auditors ensured that all of the drivers included on the approved list included both district-employed and contractor-employed drivers, as appropriate.

- The auditors also requested copies of the written policies and procedures governing the hiring of bus drivers to determine that these processes included requesting background checks and clearances.

✓ Did the District take appropriate steps to ensure school safety?

- To address this objective, auditors reviewed a variety of documentation including safety plans, training schedules, anti-bullying policies, and after action reports to assess whether the District followed best practices in school safety and 24 P.S. Sect. 13-1302, 1302.1A, 13-1303.1, and 13-1303 A. Generally, the auditors evaluate the age of the plan, whether it is being practiced through training and whether the school has an after action process for trying to improve on the results of its training exercises.

✓ Did the District take appropriate corrective action to address recommendations made in our prior audit?

To address this objective:

- The auditors interviewed District administrators to determine whether they had taken corrective action.
- The auditors then reviewed documentation to verify that the administration had implemented the prior audit report's recommendations and/or observed these changes in person.

Methodology

What are internal controls?

Internal controls are processes designed by management to provide reasonable assurance of achieving objectives in areas such as:

- Effectiveness and efficiency of operations.
- Relevance and reliability of operational and financial information.
- Compliance with certain relevant state laws, regulations, contracts, grant requirements, and administrative procedures.

Government Auditing Standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our results and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our results and conclusions based on our audit objectives.

The District's management is responsible for establishing and maintaining effective internal controls to provide reasonable assurance that the District is in compliance with certain relevant state laws, regulations, contracts, grant requirements, and administrative procedures (relevant requirements). In conducting our audit, we obtained an understanding of the District's internal controls, including any information technology controls, as they relate to the

District's compliance with relevant requirements that we consider to be significant within the context of our audit objectives. We assessed whether those controls were properly designed and implemented. Any deficiencies in internal controls that were identified during the conduct of our audit and determined to be significant within the context of our audit objectives are included in this report.

In order to properly plan our audit and to guide us in possible audit areas, we performed analytical procedures in the areas of state subsidies and reimbursements, pupil transportation, and comparative financial information.

Our audit examined the following:

- Records pertaining to pupil membership, bus driver qualifications, professional employee certification, and financial stability.
- Items such as board meeting minutes and policies and procedures.

Additionally, we interviewed select administrators and support personnel associated with the District's operations.

To determine the status of our audit recommendations made in a prior audit report released on June 20, 2013, we reviewed the District's response to PDE dated November 13, 2013. We then performed additional audit procedures targeting the previously reported matters.

Findings and Observations

For the audited period, our audit of the Towanda Area School District resulted in no findings or observations.

Status of Prior Audit Findings and Observations

Our prior audit of the Towanda Area School District (District) released on June 20, 2013, resulted in one (1) finding and one (1) observation. The finding pertained to membership reporting errors and a lack of internal controls. The observation pertained to the District financing some of its debt with Interest-Rate Management (“SWAP”) Agreements. As part of our current audit, we determined the status of corrective action taken by the District to implement our prior audit recommendations. We analyzed the District’s written response provided to the Pennsylvania Department of Education (PDE), performed audit procedures, and interviewed District personnel regarding the prior finding and observation. We found that the District did implement our recommendations related to the membership reporting errors and a lack of internal controls, as well as the District financing some of its debt with Interest-Rate Management “SWAP” Agreements.

Auditor General Performance Audit Report Released on June 20, 2013

Finding: **Membership Reporting Errors and a Lack of Internal Controls Resulted in a Total Reimbursement Underpayment of \$36,368**

Finding Summary: Our prior audit of the District found reporting errors, as well as a lack of internal controls. District personnel inaccurately reported the membership for children placed in private homes (foster children). The lack of internal controls resulted in the District failing to reconcile preliminary data reports from PDE, which resulted in incorrect data being reported on the Final Summary of Child Accounting.

Recommendations: Our audit finding recommended that the District should:

1. Establish internal controls that include reconciliations of the data that is uploaded into the Pennsylvania Information Management System.
2. Implement controls to verify actual membership days to computer generated reports.
3. Perform an internal review of membership reports and summaries prior to submission of final reports to PDE.
4. Review subsequent year reports and, if errors are found, submit revised reports to PDE.

We also recommended that PDE should:

5. Revise all reports that have been incorrectly completed and adjust the District's reimbursements affected by the error.

Current Status: During our current audit, we found that the District did implement our prior recommendations. PDE has not adjusted the District's allocations to resolve the \$36,368 underpayment. Therefore, we again recommend PDE resolve the \$36,368.

Observation: The District Financed Some of Its Debt with Interest-Rate Management ("SWAP") Agreements

Observation Summary: On June 3, 2005, the District entered into an Interest-Rate Management "SWAP" Agreement in connection with its \$9,995,000 Series of 2004 general obligation bonds.

The District terminated its Interest-Rate Management "SWAP" Agreement effective February 27, 2012, and paid \$133,000 in termination fees for the 2004 "SWAP". Whenever the District terminates a "SWAP", it should weigh the cost of these fees against the potential long-term risk of maintaining the investment.

Recommendations: Our audit observation recommended that the District should:

Consider all the risks, including potential termination fees when entering into any Interest-Rate Management "SWAP" Agreements.

Current Status: During our current audit, we found that the District did implement our prior recommendations. The Interest-Rate Management "SWAP" Agreement has been terminated for a payment of \$133,000 to the counterparty. The net effect of the termination resulted in investment income of \$72,693.

Distribution List

This report was initially distributed to the Superintendent of the District, the Board of School Directors, and the following stakeholders:

The Honorable Tom W. Wolf
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Harrisburg, PA 17120

The Honorable Pedro A. Rivera
Acting Secretary of Education
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This report is a matter of public record and is available online at www.PaAuditor.gov. Media questions about the report can be directed to the Pennsylvania Department of the Auditor General, Office of Communications, 231 Finance Building, Harrisburg, PA 17120; via email to: news@auditorgen.state.pa.us.