

PERFORMANCE AUDIT

Elizabeth Forward School District Allegheny County, Pennsylvania

July 2020



Commonwealth of Pennsylvania
Department of the Auditor General

Eugene A. DePasquale • Auditor General



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EUGENE A. DePASQUALE
AUDITOR GENERAL

Dr. Todd E. Keruskin, Superintendent
Elizabeth Forward School District
401 Rock Run Road
Elizabeth, Pennsylvania 15037

Mr. Thomas Sharkey, Jr., Board President
Elizabeth Forward School District
401 Rock Run Road
Elizabeth, Pennsylvania 15037

Dear Dr. Keruskin and Mr. Sharkey:

Our performance audit of the Elizabeth Forward School District (District) evaluated the application of best practices in the area of financial stability. In addition, this audit determined the District's compliance with certain relevant state laws, regulations, contracts, and administrative procedures (relevant requirements). This audit covered the period July 1, 2014 through June 30, 2018, except as otherwise indicated in the audit scope, objective, and methodology section of the report. The audit was conducted pursuant to Sections 402 and 403 of The Fiscal Code (72 P.S. §§ 402 and 403), and in accordance with the Government Auditing Standards issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

During our audit, we found significant instances of noncompliance with the Public School Code and its associated regulations as detailed in our four findings noted in this audit report. A summary of the results is presented in the Executive Summary section of the audit report. These findings include recommendations for the District.

We also evaluated the application of best practices in the area of school safety. Due to the sensitive nature of this issue and the need for the full results of this review to be confidential, we did not include the full results in this report. However, we communicated the full results of our review of school safety to District officials, the Pennsylvania Department of Education, and other appropriate officials as deemed necessary.

Our audit findings and recommendations have been discussed with the District's management, and their responses are included in the audit report. We believe the implementation of our recommendations will improve the District's operations and facilitate compliance with legal and relevant requirements. We appreciate the District's cooperation during the course of the audit.

Sincerely,

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

Eugene A. DePasquale
Auditor General

July 24, 2020

cc: **ELIZABETH FORWARD 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 Elizabeth Forward School District (District). Our audit sought to answer certain questions regarding the District's application of best practices and compliance with certain relevant state laws, regulations, contracts, and administrative procedures.

Our audit scope covered the period July 1, 2014 through June 30, 2018, except as otherwise indicated in the audit scope, objectives, and methodology section of the report (see Appendix A). Compliance specific to state subsidies and reimbursements was determined for the 2014-15 through 2017-18 school years.

Audit Conclusion and Results

During our audit, we found significant noncompliance with relevant requirements, as detailed in our four findings.

Finding No. 1: The District Failed in Its Legal Duty to Ensure Its Contracted Bus Drivers Were Qualified and Cleared to Transport Students, Putting Them At Risk of Harm.

The District failed to meet its statutory obligations related to the employment of individuals having direct contact with students for the 2019-20 school year. Specifically, we found that the District did not ensure that all bus drivers had the required qualifications and criminal history clearances *before* they transported students at the beginning of the school year. The District's Board of School Directors did not approve any bus drivers utilized to transport District students by its primary contractor and its five supplemental contractors prior to the start of the school year. The District's failure to provide legally-mandated oversight of transportation services resulted in the District

placing its students at potential risk of harm by not ensuring that contracted bus drivers were properly qualified and cleared to transport students. (See page 8).

Finding No. 2: The District Failed to Retain Required Documentation to Support \$4.6 Million Received for Transportation Reimbursements.

The District did not comply with the record retention provisions of the Public School Code when it failed to retain adequate source documentation to verify the accuracy of \$4,674,612 it received in regular transportation reimbursements from the Pennsylvania Department of Education (PDE) for the 2014-15 through 2017-18 school years. (See page 17).

Finding No. 3: The District Failed to Obtain Required Documentation to Support the \$186,689 Received in Commonwealth Paid Tuition for Educating Nonresident Students.

The District reported a total of 21 students to PDE for reimbursements as nonresident foster students during the 2014-15 through 2017-18 school years. The District was reimbursed \$186,689 based on the reported information. All 21 of the students reported to PDE lacked the required documentation for us to conclude on the accuracy of the reported residency status, and we could not confirm the accuracy of the reimbursements received. (See page 22).

Finding No. 4: The District Failed to Update Its Safety Plan, Memorandum of Understanding, and Bullying Prevention Policy as Required By Law.

Our review found that the District failed to adequately maintain its safety plan as required by the state Emergency Management Services Code (EMS Code) and its associated regulations. The District did not provide sufficient and ongoing

planning for disaster response and emergency preparedness pursuant to the EMS Code. We further found that the District failed to update its Memorandum of Understanding with local police departments and review its bullying prevention policy within the required timeframes. (See page 26).

Status of Prior Audit Findings and Observations.

There were no findings or observations in our prior audit report.

Background Information

School Characteristics 2018-19 School Year ^A	
County	Allegheny
Total Square Miles	42
Number of School Buildings	6
Total Teachers	173
Total Full or Part-Time Support Staff	123
Total Administrators	13
Total Enrollment for Most Recent School Year	2,288
Intermediate Unit Number	3
District Career and Technical School	Steel Center for Career and Technical Education

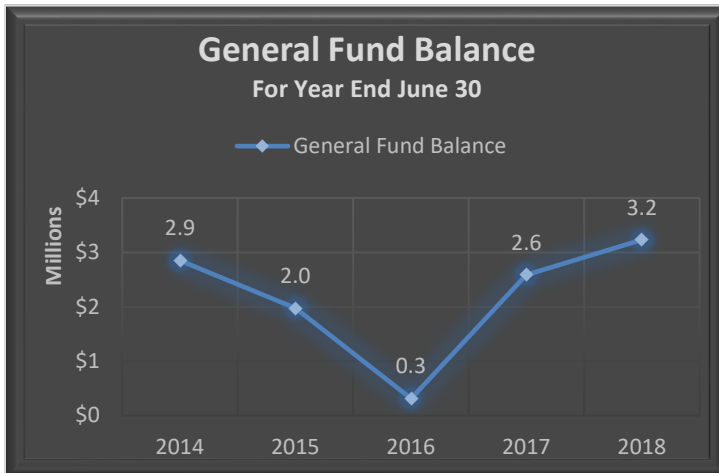
A - Source: Information provided by the District administration and is unaudited.

Mission Statement^A

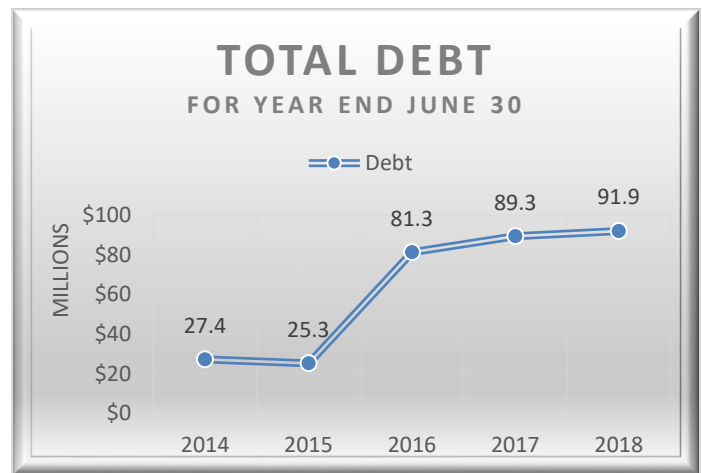
To establish a collaborative working relationship with families and communities to create learning environments for all students that nurture the academic, social and emotional skills of each student through high expectations of excellence that produce lifelong learners, world ready leaders and citizens who are prepared to meet the ever-changing challenges of a global society.

Financial Information

The following pages contain financial information about the Elizabeth Forward School District (District) obtained from annual financial data reported to the Pennsylvania Department of Education (PDE) and available on PDE's public website. This information was not audited and is presented for **informational purposes only**.

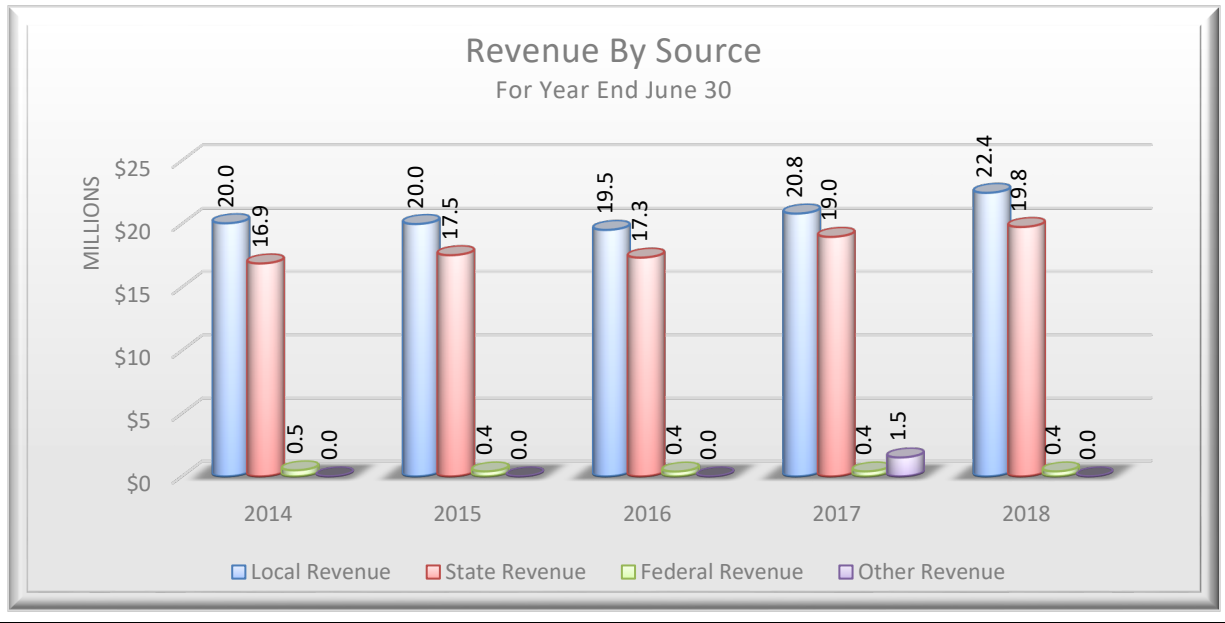
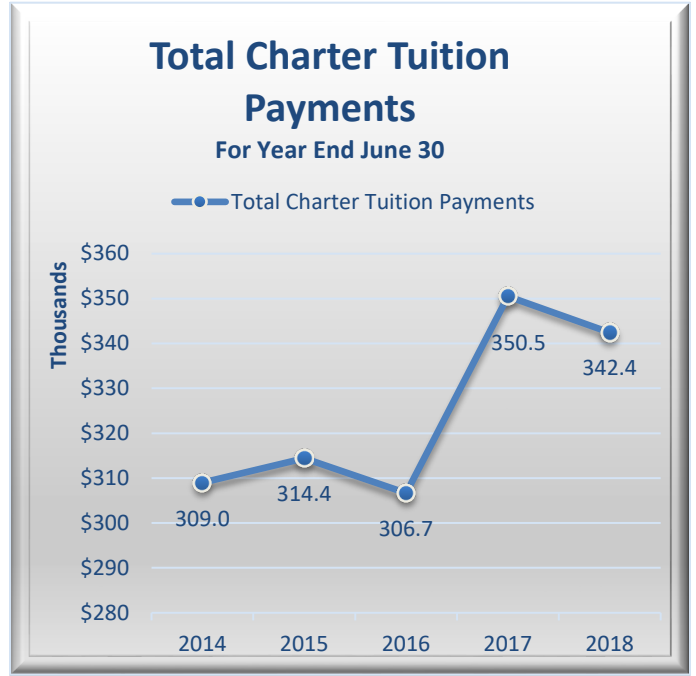
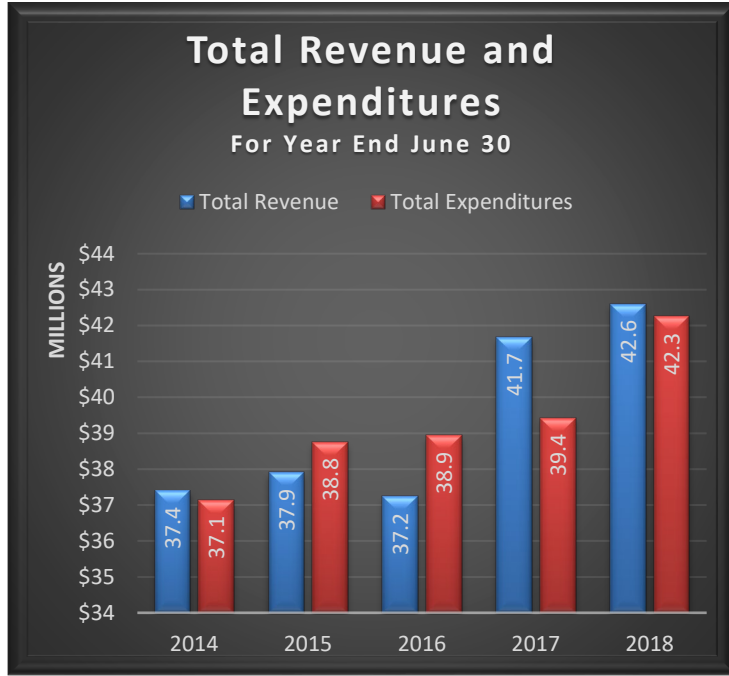


Note: General Fund Balance is comprised of the District's Committed, Assigned and Unassigned Fund Balances.



Note: Total Debt is comprised of Short-Term Borrowing, General Obligation Bonds, Authority Building Obligations, Other Long-Term Debt, Other Post-Employment Benefits, Compensated Absences and Net Pension Liability.

Financial Information Continued

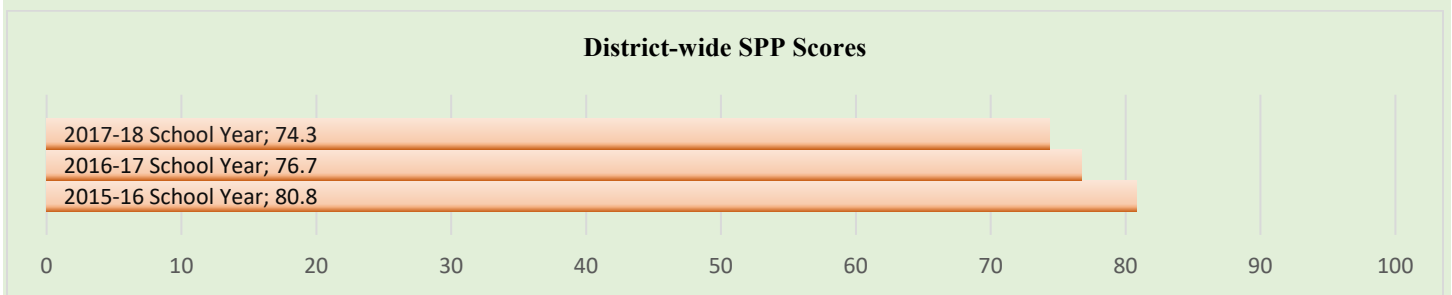


Academic Information

The graphs on the following pages present the District-wide School Performance Profile (SPP) scores, Pennsylvania System of School Assessment (PSSA) scores, Keystone Exam results, and 4-Year Cohort Graduation Rates for the District obtained from PDE's data files for the 2015-16, 2016-17, and 2017-18 school years.¹ The District's individual school building scores are presented in Appendix B. These scores are provided in this audit report for **informational purposes only**, and they were not audited by our Department.

What is a SPP score?

A SPP score serves as a benchmark for schools to reflect on successes, achievements, and yearly growth. PDE issues a SPP score annually using a 0-100 scale for all school buildings in the Commonwealth, which is calculated based on standardized testing (i.e., PSSA and Keystone exam scores), student improvement, advance course offerings, and attendance and graduation rates. Generally speaking, a SPP score of 70 or above is considered to be a passing rate.²



¹ PDE is the sole source of academic data presented in this report. All academic data was obtained from PDE's publicly available website.

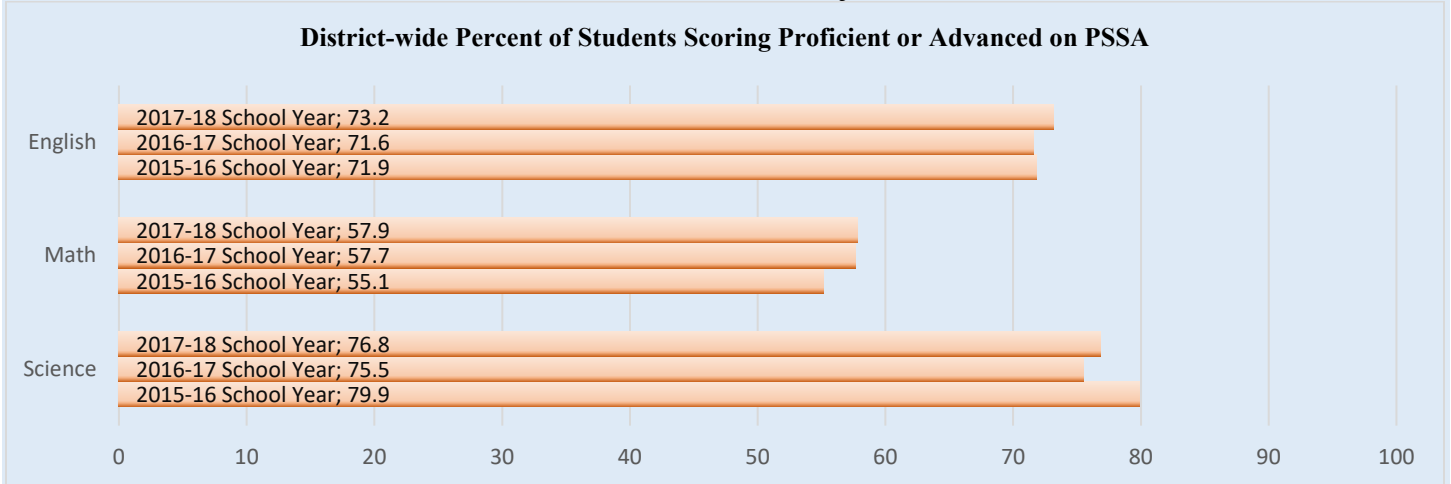
² PDE started issuing a SPP score for all public school buildings beginning with the 2012-13 school year. For the 2014-15 school year, PDE only issued SPP scores for high schools taking the Keystone Exams as scores for elementary and middle scores were put on hold due to changes with PSSA testing. PDE resumed issuing a SPP score for all schools for the 2015-16 school year.

Academic Information Continued

What is the PSSA?

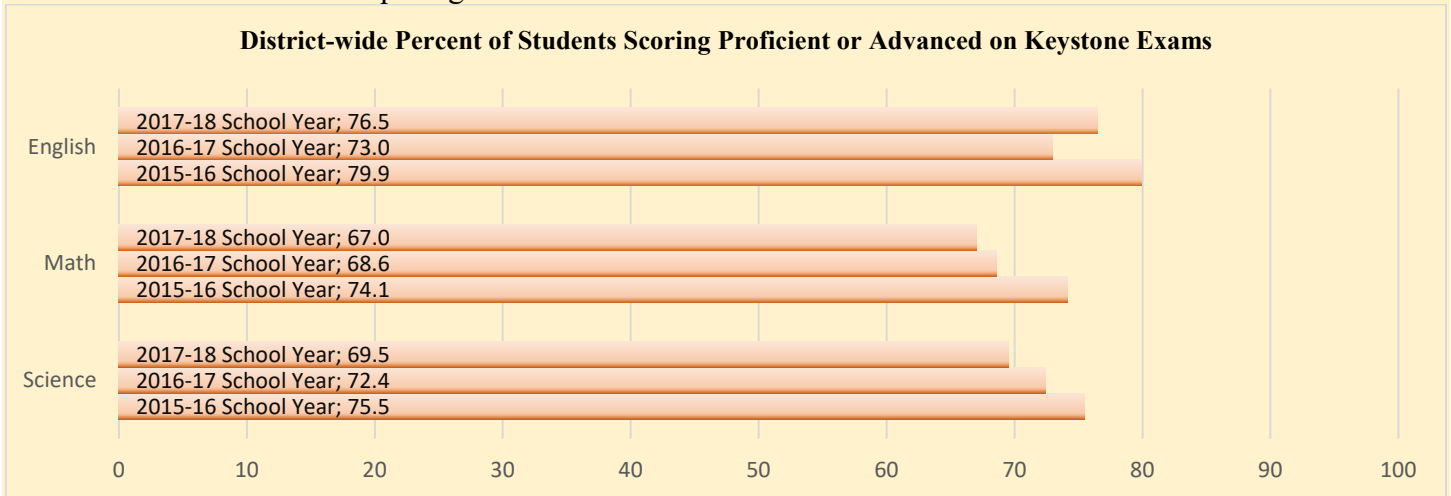
The PSSA is an annual, standardized test given across the Commonwealth to students in grades 3 through 8 in core subject areas, including English, Math and Science. The PSSAs help Pennsylvania meet federal and state requirements and inform instructional practices, as well as provide educators, stakeholders, and policymakers with important information about the state's students and schools.

The 2014-15 school year marked the first year that PSSA testing was aligned to the more rigorous PA Core Standards. The state uses a grading system with scoring ranges that place an individual student's performance into one of four performance levels: Below Basic, Basic, Proficient, and Advanced. The state's goal is for students to score Proficient or Advanced on the exam in each subject area.



What is the Keystone Exam?

The Keystone Exam measures student proficiency at the end of specific courses, such as Algebra I, Literature, and Biology. The Keystone Exam was intended to be a graduation requirement starting with the class of 2017, but that requirement has been put on hold until the 2020-21 school year.³ In the meantime, the exam is still given as a standardized assessment and results are included in the calculation of SPP scores. The Keystone Exam is scored using the same four performance levels as the PSSAs, and the goal is to score Proficient or Advanced for each course requiring the test.

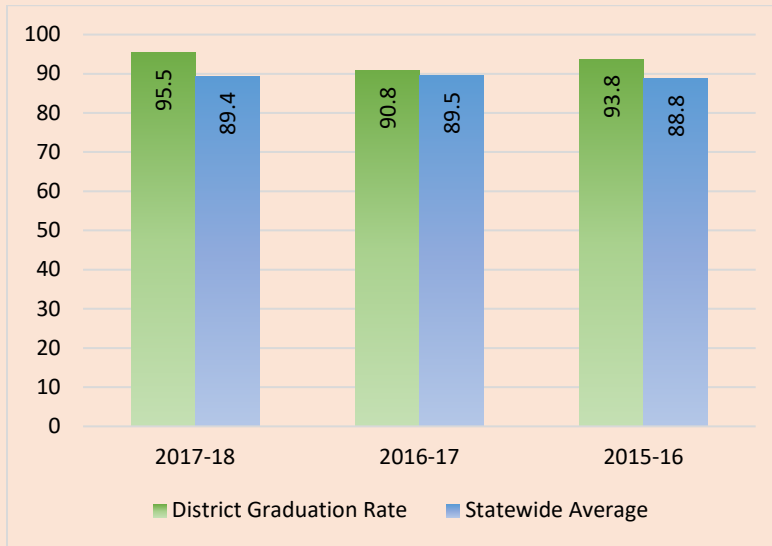


³ Act 158 of 2018, effective October 24, 2018, amended the Public School Code to further delay the use of Keystone Exams as a graduation requirement until the 2021-22 school year. See 24 P.S. § 1-121(b)(1).

Academic Information Continued

What is a 4-Year Cohort Graduation Rate?

PDE collects enrollment and graduate data for all Pennsylvania public schools, which is used to calculate graduation rates. Cohort graduation rates are a calculation of the percentage of students who have graduated with a regular high school diploma within a designated number of years since the student first entered high school. The rate is determined for a cohort of students who have all entered high school for the first time during the same school year. Data specific to the 4-year cohort graduation rate is presented in the graph below.⁴



⁴ PDE also calculates 5-year and 6-year cohort graduation rates. Please visit PDE's website for additional information:
<http://www.education.pa.gov/Data-and-Statistics/Pages/Cohort-Graduation-Rate.aspx>.

Findings

Finding No. 1

The District Failed in Its Legal Duty to Ensure Its Contracted Bus Drivers Were Qualified and Cleared to Transport Students, Putting Them At Risk of Harm

Criteria relevant to the finding:

Chapter 23 (relating to Pupil Transportation) of the State Board of Education regulations, among other provisions, provides that the board of directors of a school district is responsible for the selection and approval of eligible operators who qualify under the law and regulations. *See*, in particular, 22 Pa. Code § 23.4(2).

Section 111 of the Public School Code (PSC) requires state and federal criminal background checks and Section 6344(a.1)(1) of the Child Protective Services Law (CPSL) requires a child abuse clearance. *See* 24 P.S. § 1-111 and 23 Pa.C.S. § 6344(a.1)(1), as amended.

With regard to criminal background checks, Sections 111(b) and (c.1) of the PSC require prospective school employees who have direct contact with children, including independent contractors and their employees, to submit a report of criminal history record information obtained from the Pennsylvania State Police, as well as a report of Federal criminal history record information obtained from the Federal Bureau of Investigation. *See* 24 P.S. § 1-111(b) and (c.1).

Section 6344(b)(3) of the CPSL requires, in part, that, “The applicant shall submit a full set of fingerprints to the Pennsylvania State Police for the purpose of a record check...” *See* 23 Pa.C.S. § 6344(b)(3) (Act 153 of 2014).

The Elizabeth Forward School District (District) failed to meet its statutory obligations related to the employment of individuals having direct contact with students for the 2019-20 school year. Specifically, we found that the District did not ensure that all bus drivers had the required qualifications and criminal history clearances *before* they transported students at the beginning of the school year. The District’s Board of School Directors (Board) did not approve any bus drivers utilized to transport District students by its primary contractor and its five supplemental contractors prior to the start of the school year. By not ensuring that contracted bus drivers were properly qualified and cleared to transport students, The District’s failure to provide legally-mandated oversight of transportation services resulted in the District placing its students at potential risk of harm by not ensuring that contracted bus drivers were properly qualified and cleared to transport students.

Background – Conflict with Primary Contractor

Prior to the start of the 2019-20 school year, the District learned that its primary contractor did not intend to provide transportation services for the current school year. Even though the District approved an extension of the contract with that vendor through the 2022-23 school year at the October 17, 2018 public board meeting, the contractor never signed the transportation contract and ultimately refused to transport students at the beginning of the 2019-20 school year. This unexpected dilemma resulted in a delayed start of the 2019-20 school year while the District sought legal mitigation to resolve the contractual complications and hire additional contractors to provide transportation in the meantime.

Despite a court order directing the primary contractor to transport District students, the primary contractor claimed to be unable to provide service on all of the District’s routes due to a driver shortage. This forced the District to find additional contractors to ensure that enough buses were available to transport all students.

Employment Requirements

Several state statutes and regulations, including the Public School Code (PSC) and its associated regulations, establish the minimum required qualifications for school bus drivers. The ultimate purpose of these requirements is to ensure the protection, safety, and welfare of the students

*Criteria relevant to the finding
(continued):*

Further, both the PSC and the CPSL now require **recertification** of the required state and federal background checks and the child abuse clearance **every 60 months** (or every five years). See 24 P.S. § 1-111(c.4), 23 Pa.C.S. § 6344.4.

Section 111(e) of the PSC lists convictions for certain criminal offenses that require an absolute ban on employment. Further, Section 111(f.1) of the PSC requires that a ten, five, or three year *look-back period* for certain convictions be met before an individual is eligible for employment. See 24 P.S. § 1-111(e) and (f.1).

Section 111(a.1)(1) specifies that bus drivers employed by a school entity through an independent contractor who have direct contact with children must also comply with Section 111 of the PSC. See 24 P.S. § 1-111(a.1)(1).

Section 111(c.4) further requires administrators to review the criminal background and child abuse reports and determine if the reports disclose information that may require further action. See 24 P.S. § 1-111(c.4).

Administrators are also required to review the required documentation according to Section 111(g)(1) of the PSC. This section provides that an administrator or other person responsible for employment decisions in a school or institution under this section who willfully fails to comply with the provisions of this section commits a violation of this act, subject to a hearing conducted by the Pennsylvania Department of Education (PDE), and shall be subject to a civil penalty up to \$2,500. See 24 P.S. § 1-111(g)(1).

transported on school buses.

Regardless of whether they hire their own drivers or use a contractor's drivers, school districts are required to verify and have on file a copy of the following documents for each employed or contracted driver *before* he or she is authorized to transport students with Board approval:

1. Driver qualification credentials,⁵ including:
 - a. Valid driver's license (Commercial driver's license if operating a school bus).
 - b. Valid school bus endorsement card, commonly referred to as an "S" card, indicating completion of skills and safety training (if operating a school bus).
 - c. Annual physical examination (if operating a school bus).
2. Criminal history reports/clearances:
 - a. State Criminal History Clearance (PSP clearance).⁶
 - b. Federal Criminal History Clearance, based on a full set of fingerprints (FBI clearance).
 - c. PA Child Abuse History Clearance.

Expired Driver Qualification Documents and Missing or Incomplete Background Clearances

The District contracts for its transportation services, and the contractor provides copies of employment documentation to the District for its contracted bus drivers. As such, District officials maintained files for the bus drivers approved by the Board. However, based on our review of the District's documentation contained in these files, we determined that the District did not have complete records. We also noted that the District did not have adequate controls and monitoring procedures to be able to determine whether drivers had the proper qualifications and background clearances prior to these drivers being assigned by the contractor to transport District students.

Primary Contractor

Our review of the original contract with the primary contractor revealed that the contractor was obligated to provide the District with a roster designating which of its drivers would be assigned to transport District students by August 15th of the current school year. We also reviewed the proposed contract extension noting that it now included a clause stating: "Contractor agrees that every school bus driver shall have all required background clearances, including but not limited to, requirements under the School Code 24 P.S. § 1-111, the Child Protective Services Act [i.e.,

⁵ Pennsylvania's Vehicle Code, 75 Pa.C.S. §§ 1508.1 (relating to Physical examinations) and 1509 (relating to Qualifications for school bus driver endorsement).

⁶ PSP refers to the Pennsylvania State Police.

*Criteria relevant to the finding
(continued):*

Section 8.2 of Title 22, Chapter 8 (relating to Criminal Background Checks) of the State Board of Education regulations requires, in part, “(a) School entities shall require a criminal history background check **prior to hiring an applicant or accepting the services of a contractor**, if the applicant, contractor or contractor’s employees would have direct contact with children.” [Emphasis added]. See 22 Pa. Code § 8.2(a).

Section 23.4 of Title 22, Chapter 23 (relating to Pupil Transportation) of the State Board of Education regulations provide that the board of directors of a school district is responsible for the selection and approval of eligible operators who qualify under the law and regulations. See 22 Pa. Code § 23.4(2).

See also PDE’s “Clearances/Background Check” web site for current school and contractor guidance (<https://www.education.pa.gov/Educators/Clearances/Pages/default.aspx>).

Law], and federal law.” While we note that these contractual obligations were not met due to ongoing litigation and the resulting delay in the start of the school year, we also noted that no such roster of drivers, nor required clearances were provided to the District for review. Through a court ruling, issued in January 2020, the primary contractor was compelled to provide the District with a current list of all bus drivers, along with their qualifications and clearances, who were assigned routes in the District.

In February 2020, we obtained and reviewed the District’s driver records for its primary contractor and found that **the records provided were incomplete for all 25 of the primary contractor’s drivers**. Some driver files were missing more than one required document, despite the court order to provide complete driver records. Specifically, we found the following issues:

- 2 bus drivers had driver’s licenses with an expired “S” endorsement
- 25 drivers were missing the Federal Criminal History Record

As stated above, the District did not maintain complete records for the drivers employed by the primary contractor for the 2019-20 school year due to the contractor’s refusal to provide the requested information.

Supplemental Contractors

Due to ongoing litigation with its primary contractor and the need for the District to utilize supplemental contractors in order to provide transportation services for all students, we also reviewed the District’s driver records for these additional drivers added during the 2019-20 school year.

Specifically, in January 2020, we obtained and reviewed the District’s records for the 34 drivers employed by the five additional contractors and found that those **records were incomplete for 21 of 34 drivers, or 61 percent of all drivers**. Some driver files were missing more than one required document. Collectively, we found the following items missing from the District’s records:

- 11 bus drivers had expired/missing driver’s licenses with the required “S” endorsement
- 13 drivers did not have a current driver’s license
- 7 bus drivers did not have current physicals
- 16 drivers were missing the Federal Criminal History Record
- 13 drivers were missing the State Criminal History Record
- 14 drivers were missing Child Abuse Clearances

As of March 6, 2020, the primary contractor and the five supplemental contractors had not provided the required documentation noted above to the District, including missing federal and state criminal history records

and Pennsylvania Child Abuse clearances. These problems occurred because the District failed to review the completeness of the drivers' qualifications prior to drivers being assigned to transport District students. These failures put students at a potential risk of harm.

Lack of Ongoing Monitoring Procedures

Ultimately, the District—not the contractor—is responsible for determining both pre-employment and post-employment (i.e., after being hired) driver fitness. As such, ongoing monitoring is crucial to a District ensuring that its contracted drivers meet all employment requirements. This responsibility has been heightened by recent amendments to the PSC and the Child Protective Services Law (CPSL) requiring that all clearances be renewed every five years. Our review of monitoring procedures revealed that while the District maintained a spreadsheet of driver qualifications, there was no evidence of ongoing monitoring taking place nor established procedures for follow up action.

The District's lack of monitoring of ongoing bus driver qualifications and clearances due to reliance on the contractors caused the District to have incomplete files, which resulted in the District not complying with the PSC, the CPSL, the State Vehicle Code, the State Board of Education regulations, and Pennsylvania Department of Education (PDE) guidance.

Untimely Board Approval

The District's Board approved a list of the 34 bus drivers for its five supplemental contractors during its February 19, 2020 board meeting despite not all required qualifications being on file. The primary contractor's drivers were never board-approved because the primary contractor has yet to provide the District with the FBI clearances for its 25 drivers. Since the District's school operations started on August 26, 2019, the drivers for the supplemental contractors were board-approved well *after* they had direct contact with children, and the drivers with the primary contractor were never approved. Further, board approval after the fact is essentially meaningless, particularly since drivers were approved without having all of the necessary documentation and the administration ensuring that all drivers were qualified and appropriately cleared *before* transporting District students.

Weak Contracted Services Personnel Policy

All of the District's bus drivers are contracted employees. District Policy No. 818, *Contracted Services Personnel*, was adopted in February 2011 and contains the requirements for contracted bus drivers. As per the policy, the District relies on the contractors to inform it when drivers have been charged or convicted of a crime. However, driver eligibility is ultimately the responsibility of the District and not the contractor.

It is critical for the District to immediately update its policy to reflect the current laws and regulations. Since Policy No. 818 was first adopted in 2011, there have been significant changes to laws and regulations related to background clearances. As stated above, both the PSC and the CPSL were amended to require that all three background clearances be obtained every five years. By not addressing these legislative changes in the District's policy and the resulting need for ongoing monitoring, there is a risk that these requirements may be overlooked and/or that the District could be unaware of when drivers with expired credentials and/or clearances are transporting students.

Conclusion

The District and its Board did not meet their statutory obligation to ensure that bus drivers are qualified and eligible to transport students. Specifically, the District failed to comply with laws, regulations, and PDE guidance documents by failing to obtain, review, and maintain all required bus driver qualifications and clearances and to have the Board approve all drivers prior to transporting students. Additionally, the District failed to have a clear board policy regarding contracted driver requirements and it lacked review and monitoring procedures to ensure employment eligibility and continual oversight of the bus contractors and their drivers.

Furthermore, the Board's approval of the original list of bus drivers after the start of the school year was essentially meaningless because the administration could not and did not review drivers' qualifications and clearances prior to the transportation of students. As a result, drivers were permitted to transport students without the District ensuring they were qualified and cleared in accordance with state and federal laws, including the PSC, the CPSL, and the Pennsylvania Vehicle Code.

Recommendations

The *Elizabeth Forward School District* should:

1. Immediately obtain and review any missing driver credentials and clearances from its contractors and verify driver eligibility.
2. Comply with the PSC's requirements to obtain, review, and maintain required credentials and background clearances for all contracted employees. This includes reviewing all background clearance documents for current and prospective bus drivers and documenting continued employment eligibility on a case-by-case basis with student safety serving as the utmost consideration.
3. Ensure that the Board approves the vetted list of drivers *before* the start of the school year.

4. Develop and implement formal written procedures with clear and concise provisions requiring the District to determine driver eligibility prior to employment and to conduct routine and ongoing monitoring of driver records. These procedures should ensure that all required credentials and clearances are obtained, reviewed, and on file at the District prior to individuals transporting students, and that all required documentation continues to be updated and complete. The procedures should also require the administration to attest in an open and public meeting before the Board that the list of drivers provided for approval contains only drivers for whom the District has obtained all of the required records.
5. Revise its outdated *Contracted Services Personnel* Policy 818 to reflect current background clearance requirements for all contracted employees having direct contact with students, including bus drivers. The policy should *clearly* address and outline the responsibilities of the District and the Board to ensure that drivers are qualified with the proper credentials and have obtained all clearances *before* the District authorizes them to transport District students. Additionally, this policy should detail ongoing monitoring procedures to be performed by the District to ensure the completeness of driver records and upcoming expiration dates to ensure timely renewal of driver qualification documents, such as licenses, physical exams, and background clearances, which are now required to be renewed every five years.

Management Response

District management provided the following response:

“During the 2019-2020 school year, Elizabeth Forward School District was in litigation with Pennsylvania Coach Lines, its primary transportation provider since 2004. Specifically, PA Coach refused to bus school district students. This forced the School District to utilize several additional transportation companies to transport students. All transportation companies identified their drivers and the Elizabeth Forward School Board approved all of the drivers in March, 2020. The transportation companies on occasion used additional substitute bus drivers. When the district was notified about these substitute drivers; all clearances and documentation were obtained by the school district. Throughout the entire school year, all bus drivers had the appropriate clearances and documentation and no students were harmed.

“Elizabeth Forward School District terminated Pennsylvania Coach Lines as its primary transportation provider and has now contracted with Student Transportation of America (STA) for the next five (5) years. There are monthly meetings scheduled with STA and Elizabeth Forward's Business Department to review any new drivers and substitute drivers. Any new bus drivers will be approved throughout the school year, with all bus drivers being approved at the August board meeting before each new school year.

“The following are the new driver requirements in the bus contract with Student Transportation of America (STA) and Elizabeth Forward School District, which was approved by the School Board on June 17, 2020:

Drivers

- a) The Contractor agrees to maintain an active roster of the necessary drivers at its cost and expense to operate each of the School District dedicated vehicles without exception. Such drivers and support persons are the employees of the Contractor and not of the School District.
- b) The Contractor agrees that each bus will be operated by a properly trained and licensed driver and that all operators shall meet all rules and regulations of the Bureau of Traffic Safety of the Pennsylvania Department of Transportation.
- c) The following forms and documents are required for all drivers without exception. These forms shall be provided to the School District prior to the start of the school year, each year of the Agreement, and prior to the assignment of any new driver: Act 34, Act 24, Act 126, Act 168, Act 114 and Act 151 forms; PDE Form 6004, Arrest/Conviction Report & Certification Form, Mandatory Training for Child Abuse Recognition & Reporting, Sexual Misconduct/Abuse Disclosure Release Form; current driver’s license photocopy; completed physical examination forms and proof of compliance with drug and alcohol screening programs. The Contractor must maintain and provide an active roster list of all active drivers to the School District on or before the 15th of each month.
- d) In addition to regular driver roster requirements described above, the Contractor agrees to provide an adequate amount of substitute drivers in order to maintain continuity on School District’s bus runs. The Contractor must maintain and provide a list of all substitute drivers to the School District on or before the 15th of each month. Only those substitute drivers with all necessary clearances, background checks and other relevant information required by School District shall be included on this monthly list.
- e) The Contractor must conduct annual physical examinations for all operators of vehicles as required by State and Federal regulations. These evaluations must be maintained on file and may be requested by the School District at any time. The School District reserves the right to request a physical examination of a vehicle operator with a physician designated by the School District.
- f) The Contractor, at his/her own expense, shall produce and distribute a comprehensive driver handbook which will include rules/regulations, training requirements, required forms, driver responsibilities, driving practices, emergency and discipline procedures, route information,

first aid information, pertinent telephone numbers, a wireless direct communication system or comparable system, operation procedures, and other significant information. A copy of the above-listed documents must be provided to the School District annually for its files. The driver handbook should be updated annually and a copy submitted to the School District prior to the start of each school year.

- g) Drivers must dress appropriately and maintain personal hygiene suitable for working around children.
- h) Drivers must wear photo identification while driving for the School District or when on School District property pursuant to their responsibilities as a driver.
- i) Drivers must conduct a pre-trip and post-trip inspection of each vehicle being utilized by the School District. The Contractor must institute a procedure to document and ensure that these inspections occur each day of operation. Failure of a driver to conduct a pre- or post-trip inspection is grounds for immediate removal of the employee for all School District transportation.
- j) The Contractor shall conduct an annual performance evaluation of every driver to include driving ability, interaction with students, communication with administration, and communication with the public. The School District may request a copy of any evaluation. In addition, inappropriate behavior by a driver must be handled through an appropriate discipline procedure that may include the issuing of verbal reprimands, written reprimands, demotion or suspension, and termination of employment. The Contractor shall timely notify the appropriate School District personnel when a driver has received a step in the discipline process.
- k) The School District reserves the right to receive a list of proposed drivers and approve such a list prior to the commencement of the school year. The School District also reserves the right to request, and the Contractor shall immediately remove any driver from the School District at any time in the School District's sole discretion. The School District or Contractor may request a joint investigation of any incidents and a discussion of possible actions. The School District's decision in this regard is final.
- l) The Contractor shall immediately comply with a request by the School District to remove any school bus driver at the School District's request.”

Auditor Conclusion

We are pleased to note that the District is addressing the need to obtain, review, and retain all driver qualification documentation as part of the

transportation contract beginning with the 2020-21 school year. We must note that at the time of our audit request to review necessary documentation, the District files were incomplete, as detailed in the finding, and remained incomplete as of our final review on March 6, 2020. We continue to stress, as noted in our finding, that the review and approval process for drivers, as well as any other contracted employees, needs to occur prior to those individuals having direct contact with District students. While it is a good start to include the requirements for bus drivers in its contract with its transportation contractor, it is imperative that the District takes a more active role in the review process and verify requirements prior to drivers interacting with students. Many issues we found during our audit can be attributed to the District's reliance on third parties when the responsibility ultimately resides with the District. We will review the District's implementation of our recommendations, as well as the effectiveness of any other corrective actions taken by the District during our next audit.

Finding No. 2

The District Failed to Retain Required Documentation to Support \$4.6 Million Received for Transportation Reimbursements

Criteria relevant to the finding:

Record Retention Requirement

Section 518 of the PSC requires that financial records of a district be retained for a period of **not less than six years**. (Emphasis added.) *See* 24 P.S. § 5-518.

Student Transportation Subsidy

The PSC provides that school districts receive a transportation subsidy for most students who are provided transportation. Section 2541 (relating to Payments on account of pupil transportation) of the PSC specifies the transportation formula and criteria. *See* 24 P.S. § 25-2541.

Total Students Transported

Section 2541(a) of the PSC states, in part: "School districts shall be paid by the commonwealth for every school year on account of pupil transportation which, and the means and contracts providing for which, have been approved by the Department of Education, in the cases hereinafter enumerated, an amount to be determined by multiplying the cost of approved reimbursable pupils transportation incurred by the district by the district's aid ratio. In determining the formula for the cost of approved reimbursable transportation, the Secretary of Education may prescribe the methods of determining approved mileages and the utilized passenger capacity of vehicles for reimbursement purposes." *See* 24 P.S. § 25-2541(a).

The District did not comply with the record retention provisions of the PSC when it failed to retain adequate source documentation to verify the accuracy of \$4,674,612 it received in regular transportation reimbursements from PDE for the 2014-15 through 2017-18 school years.

School districts receive two separate transportation reimbursement payments from PDE. The regular transportation reimbursement is broadly based on the number of students transported, the number of days each vehicle was used to transport students, and the number of miles that vehicles are in service, both with and without students. The supplemental transportation reimbursement is based on the number of charter school and nonpublic school students transported at any time during the school year. The failure to retain adequate supporting documentation precluded us from determining the accuracy of the District's regular transportation reimbursements for the 2014-15 through 2017-18 school years.

Without proper documentation, we were unable to determine the appropriateness of the more than \$4.6 million in regular transportation reimbursements received by the District. It is absolutely essential that records related to the District's transportation expenses and reimbursements be retained in accordance with the PSC's record retention provision (for a period of not less than six years) and be readily available for audit. As a state auditing agency, it is concerning to us that the District did not have the necessary and legally required documents available for audit. Periodic auditing of such documents is extremely important for District accountability and verification of accurate reporting.

It is also important to note that the PSC requires that all school districts annually file a sworn statement of student transportation data for the prior and current school year with PDE in order to be eligible for the transportation subsidies. According to a District official, the District completed this sworn statement for all four school years discussed in this finding. However, the District could only provide a copy of the signed sworn statements for the 2014-15, 2015-16, and 2017-18 school years. It is essential that the District accurately report transportation data to PDE and retain the support for this transportation data. Further, the sworn statement of student transportation data should not be filed with the state Secretary of Education unless the data has been double-checked for accuracy by personnel trained on PDE's reporting requirements. An official signing a

Criteria relevant to the finding (continued):

Sworn Statement and Annual Filing Requirement

Section 2543 of the PSC sets forth the requirement for school districts to annually file a sworn statement, in a format prescribed by the Secretary of Education, of student transportation data for the prior and current school year with PDE in order to be eligible for the transportation subsidies. See 24 P.S. § 25-2543.

Section 2543 of the PSC, which is entitled, “Sworn statement of amount expended for reimbursable transportation; payment; withholding” of the PSC states, in part: “Annually, each school district entitled to reimbursement on account of pupil transportation shall provide in a format prescribed by the Secretary of Education, data pertaining to pupil transportation for the prior and current school year. . . . The Department of Education may, for cause specified by it, withhold such reimbursement, in any given case, permanently, or until the school district has complied **with the law or regulations** of the State Board of Education.” (Emphasis added.) Ibid.

sworn statement must be aware that by submitting the transportation data to PDE, he/she is asserting that the information is true and that they have verified evidence of accuracy.⁷

Lack of Supporting Documentation for Regular Transportation Reimbursement

The regular transportation reimbursement is based on several components that are reported by the District to PDE for use in calculating the District’s annual reimbursement amount. These components include, but are not limited to, the following:

- Total number of days each vehicle is used to transport students to and from school.
- Miles with and without students for each vehicle.
- Students assigned to each vehicle.

PDE guidelines state that districts are required to report the number of miles per day, to the nearest tenth, that each vehicle travels with and without students. If this figure changes during the year, districts are required to calculate a weighted or sample average. The District was able to provide us with the information reported to PDE. This information was generated by the District’s transportation contractor. However, the District was unable to provide us with the documents to support this reported information. Without odometer readings, student rosters, the school calendar, and transportation invoices, we were unable to determine the accuracy of the reported data to PDE and the total reimbursement received for these years. The table below shows the reimbursement received for each school year during the audit period.

Table 1

Elizabeth Forward School District Regular Transportation Reimbursements	
School Year	Regular Transportation Reimbursement
2014-15	\$1,186,735
2015-16	\$1,222,884
2016-17	\$1,219,614
2017-18	\$1,045,379
Total:	\$4,674,612

⁷ Please note that while a sworn statement is different from an affidavit, in that a sworn statement is not typically signed or certified by a notary public but are, nonetheless, taken under oath. See <https://legaldictionary.net/sworn-statement/> (accessed April 30, 2020)

*Criteria relevant to the finding
(continued):*

Elizabeth Forward School District Board Policy #810 states:

Transportation for students shall be provided in accordance with law and board policy.

Delegation of Responsibility:

The Superintendent or designee shall be responsible to maintain records and make required reports regarding school transportation.

PDE instructions for Local Education Agencies (LEA) on how to complete PDE-1049. PDE-1049 is the electronic form used by LEAs to submit transportation data annually to PDE.
<http://www.education.pa.gov/Documents/Teachers-Administrators/Pupil%20Transportation/eTran%20Application%20Instructions/PupilTransp%20Instructions%20PDE%201049.pdf>
(accessed 4/10/20)

Record the vehicle odometer readings on or about July 1 prior to the beginning of the school year and on or about July 1 at the end of the school year. The two readings should be about one year apart. After the second reading, subtract the beginning of the year odometer reading from the end of the year odometer reading to determine the annual odometer mileage.

Once during each month, from October through May, for to-and-from school transportation, measure and record:

1. The number of miles the vehicle traveled with students.
2. The number of miles the vehicle traveled without students.
3. The greatest number of students assigned to ride the vehicle at any one time during the day.

The District attributed its inability to produce source documentation to the fact that it solely relied upon the contractor to supply the data which is used by PDE to calculate the District's transportation reimbursements. The District was not in compliance with the PSC by failing to obtain and maintain this documentation. Additionally, the District was not in compliance with its own Board Policy No. 810 entitled, *Transportation*. This board policy addresses the fact that the Superintendent or designee shall be responsible for maintaining records and making required reports regarding school transportation.

Based on interviews with District personnel and our review of documentation provided by the District, we found that the District did not have written policies, procedures, or control activities in place which are suitably designed to provide reasonable assurance that the District is completely and accurately reporting transportation data elements to PDE. The District did not have employees independent of the data input process who review the data prior to submission to PDE. The individual vehicle data (mileage, pupils assigned, number of days in service) was calculated and maintained by the contractor and are not reviewed for accuracy by the District. Therefore, we found that the District did not take an active role in overseeing transportation operations and associated reporting responsibilities, but instead solely relied upon its contractor to compile and provide the data reported to PDE.

We could not determine whether the amount of regular transportation reimbursement received was appropriate for the 2014-15 through 2017-18 school years. Transportation expenses and the subsequent transportation reimbursements are significant factors that can impact the District's overall financial position. Therefore, it is in the best interest of the District to ensure that it regularly and consistently meets its fiduciary and statutory duties and complies with the PSC's record retention requirements.

Recommendations

The *Elizabeth Forward 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 student rosters 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 PDE.
3. Establish internal controls over transportation reporting. These internal controls should include the following: procedures relating to obtaining and reviewing transportation data prior to reporting to PDE. These reviews should include tracing some data elements to source

*Criteria relevant to the finding
(continued):*

At the end of the school year, calculate the average of the eight measurements for each of the three variables calculated to the nearest tenth. These averages are called sample averages.

The annual odometer mileage and the sample averages determined by the above methods should be used to complete the PDE-1049, end-of-year pupil transportation report in the eTran system.

Use of this specific form is not a PDE requirement; it has been designed and provided as a service to local education agencies that wish to use it for recording and calculating data that is reported to PDE on the PDE-1049 report in eTran. **If used, this form, along with the source documentation that supports the data, should be retained for auditor review.**

documents and calculations to provide reasonable assurance that necessary supporting documentation is available.

4. Ensure that record retention procedures are documented and staff are trained on the procedures.
5. Ensure that sworn statements are retained for audit and not signed by the Superintendent unless the transportation data is being reviewed by someone who is trained on PDE reporting requirements and that the transportation data is accurate.

Management Response

District management provided the following response:

“During the 2019-2020 school year, Elizabeth Forward School District was in litigation with Pennsylvania Coach Lines, its primary transportation provider since 2004. Specifically, PA Coach refused to bus school district students. This forced the School District to utilize several additional transportation companies to transport students.

“Elizabeth Forward School District terminated Pennsylvania Coach Lines and the district has contracted with Student Transportation of America (STA) for the next five years. There are monthly meetings scheduled with STA and Elizabeth Forward's Business Department to review all state transportation reporting.

“Elizabeth Forward School District's Director of Finance and Operations has completed the Pennsylvania Association of School Business Officials (PASBO) online transportation course. The Assistant Director of Finance and Operations will also complete the next online PASBO transportation training.

“The following section lists the new state reporting requirements in the transportation contract with Student Transportation of America (STA) and Elizabeth Forward School District, which was board approved on June 17, 2020:

2. Reporting Requirements

- a) School District Reports - The Contractor must agree to complete any and all necessary forms furnished by the School District as often as required by the School District for the proper administration of this Agreement and to provide such information to the School District as is necessary to evaluate the operation of this Agreement and the transportation system thereunder. Such information shall be provided to the School District within fifteen calendar (15) days of each request or a mutually agreed upon time period, unless otherwise provided for by this Agreement.

- b) State Reports - The Contractor agrees to provide the School District with all information essential to the completion and submission of the Pennsylvania Department of Education Transportation Reimbursement Application and any other required documents. These reports must be forwarded to the School District no later than thirty (30) days after the last regular busing day of the school year. In addition, the Contractor will keep and file with the School District any records and reports which the School District may reasonably require. These include but are not limited to:
 - i. Monthly mileage forms for each bus by bus number indicating mileage with and without students.
 - ii. Monthly student rosters for each bus.
 - iii. Odometer readings for June 30 of the current year and July 1 of the preceding year for each bus with the make of vehicle and the vehicle identification number.
- c) Other Reporting Requirements - The Contractor will assist in tracking and providing required documentation for any types of State or Federal reporting requirements, that the School District must adhere to that require some level of assistance from the Contractor.
- d) Vehicle Information - The Contractor must provide an annual report to the School District that includes: year of manufacture for every vehicle, the seating capacity, the vehicle identification number, the title number, the license plate number and all other applicable vehicle identification information.”

Auditor Conclusion

We are pleased that the District has included contractual provisions obligating the transportation contractor to provide all necessary source documentation used for reporting transportation data to PDE. However, it will be imperative for the District to ensure that this information is obtained and reviewed prior to reporting information to PDE. Additionally, it is the responsibility of the District to retain this information for audit. We stress the importance of creating written procedures to strengthen the internal controls pertaining to obtaining, reporting, and retaining transportation data. We will assess the effectiveness of the District’s corrective actions and implementation of our recommendations during our next audit.

Finding No. 3

The District Failed to Obtain Required Documentation to Support the \$186,689 Received in Commonwealth Paid Tuition for Educating Nonresident Students

Criteria relevant to the finding:

The State Board of Education's regulations and PDE guidelines govern the classifications of nonresident children placed in private homes.

Payment of Tuition

Section 1305(a) of the PSC provides for Commonwealth payment of tuition for nonresident children placed in private homes as follows:

“When a non-resident child is placed in the home of a resident of any school district by order of court or by arrangement with an association, agency, or institution having the care of neglected and dependent children, **such resident being compensated for keeping the child**, any child of school age so placed shall be entitled to all free school privileges accorded to resident school children of the district, including the right to attend the public high school maintained in such district or in other districts in the same manner as though such child were in fact a resident school child of the district.” [Emphasis added.] See 24 P.S. § 13-1305(a).

The District reported a total of 21 students to PDE for reimbursements as nonresident foster students during the 2014-15 through 2017-18 school years. The District was reimbursed \$186,689 based on the reported information. All 21 of the students reported to PDE lacked the required documentation for us to conclude on the accuracy of the reported residency status, and we could not confirm the accuracy of the reimbursements received.

School districts are entitled to receive Commonwealth-paid tuition for educating certain nonresident students. To be eligible to receive Commonwealth-paid tuition, the student's parent/guardian must not be a resident of the educating district and the student must have been placed in a private home of a resident within the district by order of the court or by arrangement with an association, agency, or institution.⁸ Additionally, the district resident must be compensated for the care of the student.

These students are commonly referred to as “foster students” and it is the mandate of the educating District to annually obtain the required documentation to correctly categorize and accurately report the number of foster students to PDE. The District was unable to produce the required documentation to support the number of foster students reported to PDE. Without this critical documentation, we were unable to verify the accuracy of the tuition received by the District.

⁸ For example, this includes the relevant county children and youth agency.

*Criteria relevant to the finding
(continued):*

Section 2503(c) of the PSC specifies the amount of Commonwealth-paid tuition on behalf of nonresident children placed in private homes by providing, in part:

“Each school district, regardless of classification, which accepts any non-resident child in its school under the provisions of section **one thousand three hundred five . . .** shall be paid by the Commonwealth an amount equal to the tuition charge per elementary pupil or the tuition charge per high school pupil, as the case may be . . .” [Emphasis added.] See 24 P.S. § 25-2503(c).

The table below illustrates the number of foster students reported as educated by the District and the corresponding amount of Commonwealth paid tuition received by the District for these students.

Elizabeth Forward School District Nonresident Foster Student Data Reported to PDE		
School Year	Reported Number of Foster Students	Commonwealth Paid Tuition Received⁹
2014-15	2	\$ 7,756
2015-16	3	\$ 11,423
2016-17	7	\$ 68,853
2017-18	9	\$ 98,657
Totals	21	\$186,689

The District was unable to produce all required information supporting that these students were accurately reported. For example, the District reported some of these students for reimbursement without the address information for the student’s parent or guardian. Other documentation that was missing included annually updated records that would confirm if the District’s resident foster parent was being compensated for the care of the student and that each student continued to meet the requirements to be reported as a foster student.

The District personnel responsible for categorizing and reporting foster students were not adequately trained on the documentation necessary to report foster students. Documentation was not obtained and in multiple instances the District would report foster students for consecutive school years without re-determining eligibility. Prior to the 2016-17 school year, a group home opened within the District that housed foster students. This led to the District’s increase in reporting foster students to PDE for reimbursement during the 2016-17 and 2017-18 school years.

The District lacked internal controls over the categorization and reporting of foster student data. The District did not have policies and procedures to assist personnel in accurately identifying a foster student and the required documentation needed to support this categorization. Additionally, the District did not have an adequate review process when a student was enrolled as a foster student. A District employee other than the employee responsible for categorizing and enrolling nonresident foster students should have reviewed the documentation supporting this categorization prior to reporting to PDE. Finally, the District did not review its categorization of nonresident foster students when new information was obtained by the District.

⁹ Commonwealth tuition is determined by identifying if the nonresident student is an elementary or secondary school student and the District’s tuition rate for the applicable category.

Recommendations

The *Elizabeth Forward School District* should:

1. Ensure that District personnel responsible for enrolling students and making residency determinations are properly trained on the classifications of nonresident students and the required documentation needed for nonresident foster students.
2. Ensure that District personnel other than the employee categorizing foster students reviews nonresident foster student determinations for accuracy.
3. Develop policies and procedures pertaining to the accurate reporting of foster students.

Management Response

District management provided the following response:

“The Elizabeth Forward School District is in agreement with the audit finding that a total of 21 students were reported to the Pennsylvania Department of Education (PDE) for reimbursements as nonresident foster students during the 2014-15 through 2017-18 school years.

“Over the last several years, the Elizabeth Forward School District has worked to implement a Central Registration process in an effort to establish better internal controls of student registration data collections. The District has emphasized the importance of student tracking and the collection of proper documentation. The District has made many attempts to obtain required documentation as documented in the files of individual foster students submitted to the auditors. Even with the District reaching out to caseworkers, the agencies placing the foster students in homes within the District have failed to provide the District with Agency detailed documentation required by PDE.

“According to the finding, 15 students did not have an Agency Placed Letter (APL) for the year reviewed, 5 APLs did not note that the foster parent received a per diem and 1 student was not listed on the PDE 4507. The District attempted to obtain Agency Placement Letters and often times were only supplied with an official court order for placement, which we recorded to verify foster placement. As noted, the Agency Placement letters did not always note if the foster parent received a per diem and the District has documentation for those students via a separate email asking the case worker for more detailed information.

“While the District recognizes that not all of the documentation was collected for each student as stated in the audit report, the majority of information required by PDE was obtained from the Foster Agencies after

numerous attempts by the District in contacting the agencies. Many times the District was only provided with court documents and email correspondence from case workers and supervisors to verify information required by PDE including the student's biological parent's address. Agency Placement letters were not provided to the District in all cases.

“The District will continue to do its due diligence to obtain the required documentation annually to correctly categorize and accurately report the number of foster students to PDE. The District will reach out to the Agencies in an attempt to develop a better communication system and their understanding of PDE requirements of the School District.

“The District realizes its responsibility to obtain the required documentation, and it will require Agencies to provide all required documentation at the initial registration of foster students.

“The District has implemented and will continue to develop a more thorough process for the PIMS Administrator and the Student Registrar to work together in creating a procedural checklist when a foster student is enrolled or unenrolled within the District.

“The checklist will be maintained in the front of each student foster file and updated every school year. These individuals will work with the foster family and agencies to obtain all required information.

“This will include documentation from Allegheny County or any other county agency or private entity that is placing a student within the Elizabeth Forward School District EACH YEAR for any and all students, including those who are reenrolling every year.

“A Foster Manual will be created for reference purposes. This will provide new and existing employees with a guideline to follow in foster registrations, and continued enrollment of foster students from year to year.”

Auditor Conclusion

We are pleased that the District acknowledges that requirements were not obtained for the nonresident foster students reported to PDE during the audit period. It is important to note that an agency placement letter is not required for each student reported; however, the District must ensure that it has verified and retained documentation to ensure that all nonresident foster students are eligible to be reported as such. It is the District's responsibility to obtain and retain this information prior to reporting nonresident foster students to PDE for reimbursement. We are pleased to see that the District is creating and implementing a procedural checklist and foster manual for its staff. We will review the effectiveness of these corrective actions and any additional corrective actions during our next audit of the District.

Finding No. 4

The District Failed to Update Its Safety Plan, Memorandum of Understanding, and Bullying Prevention Policy as Required By Law

Criteria relevant to the finding:

Emergency Management Services Code (EMS Code)

Subsection (g) of Section 7701 (relating to Duties concerning disaster prevention) of the EMS Code provides:

“Plans.--Every school district [and other school entities] and custodial child care facility, in cooperation with the local Emergency Management Agency and the Pennsylvania Emergency Management Agency, shall develop and implement a comprehensive disaster response and emergency preparedness plan consistent with the guidelines developed by the Pennsylvania Emergency Management Agency and other pertinent State requirements. The plan shall be reviewed **annually** and modified as necessary. A copy of the plan shall be provided to the county emergency management agency.” (Emphasis added.) See 35 Pa.C.S. § 7701(g).

The State Board of Education’s Safe Schools regulations,

Subsections (a) and (b) of Section 10.24 (relating to Emergency and nonemergency response and preparedness). See 22 Pa. Code § 10.24(a) and (b).

Our review found that the District failed to adequately maintain its safety plan as required by the state Emergency Management Services Code (EMS Code) and its associated regulations.¹⁰ The District did not provide sufficient and ongoing planning for disaster response and emergency preparedness pursuant to the EMS Code. We further found that the District failed to update its Memorandum of Understanding (MOU) with local police departments and review its bullying prevention policy within the required timeframes. The “Safe Schools Act” (Act) and its associated regulations require that public schools update and re-execute their MOUs with local law enforcement every two years, and it requires that their bullying prevention policies be reviewed every three years. The District also did not follow its own board policy related to anti-bullying, as well as best practices related to recognition and intervention, training, and monitoring of bullying situations. The failure to comply with these important provisions could jeopardize the safety and security of District students and staff.

Background on Disaster Response and Emergency Preparedness Plans

Pursuant to the EMS Code, all Pennsylvania school entities are required to develop and implement a comprehensive disaster response and emergency preparedness plan (Plan) consistent with the guidelines developed by the Pennsylvania Emergency Management Agency (PEMA) and other pertinent State requirements.¹¹ The Plan is required to be developed in cooperation with local emergency management agencies, as well as with PEMA. School entities are also required to *annually* review and modify the Plan, as necessary. Further, a copy of the Plan must be provided to the respective county emergency management agency.¹²

When properly written and executed, a Plan serves as the primary directive in the event of a disaster or emergency situation. According to the Pennsylvania *All Hazards School Safety Planning Toolkit*, a guide for assisting districts with the development of such plans, “Schools should use this plan to form a reference document that can be used in training,

¹⁰ 35 Pa.C.S. § 7101 *et seq.* and the State Board of Education’s Safe Schools regulations, 22 Pa. Code § 10.24.

¹¹ See 35 Pa.C.S. §§ 7313(4) and 7701(g). Subsection (4) of Section 7313 (relating to Powers and duties) of the EMS Code, PEMA is “[t]o provide technical advice and assistance to Commonwealth agencies, **political subdivisions, schools** and custodial child care facilities in the preparation of disaster emergency management plans or components thereof and to **periodically review such plans and suggest or require** revisions.” (Emphases added.) Ibid.

¹² 35 Pa.C.S. § 7701(g).

Criteria relevant to the finding
(continued):

The Pennsylvania *All Hazards School Safety Planning Toolkit* offers best practices specific to comprehensive disaster response and emergency preparedness planning that applies to all school entities. See <http://www.pema.pa.gov/planningandpreparedness/communityandstateplanning/Pages/All-Hazards-School-Safety-Planning-Toolkit.aspx>.

Memorandum of Understanding

Subsection (c) of Section 1303-A (relating to Reporting) of the PSC's "Safe Schools Act" (Act) states, in part:

"...each chief school administrator shall enter into a memorandum of understanding with police departments having jurisdiction over school property of the school entity. Each chief school administrator shall submit a copy of the memorandum of understanding to the office by June 30, 2011, and **biennially update and re-execute a memorandum of understanding with local law enforcement and file such memorandum with the office on a biennial basis...**" (Emphasis added.) See 24 P.S. § 13-1303-A(c).

exercising and collaboration with responders, and as a reference during an incident."¹³ Further, the Plan should be customized to meet local needs and capabilities.

According to both the Pennsylvania *All Hazards School Safety Planning Toolkit* and the U.S. Department of Education's (DOE) *Guide for Developing School Emergency Operations Plans*, the Plan should address the four phases of an emergency: 1) prevention/mitigation; 2) preparedness; 3) response; and 4) recovery. A well-detailed comprehensive plan should include, but not be limited to the following:¹⁴

- Organization and assignment of responsibilities
- Direction, control, and coordination
- Information collection, analysis, and dissemination
- Training and exercises
- Plan development and maintenance

In addition, the Plan should address the following functions, at a minimum:¹⁵

- Communication
- Evacuation
- Shelter-on-Place
- Lockdown
- Accounting for all persons
- Reunification
- Continuity of Operation
- Security
- Recovery
- Health and Medical

Weaknesses Identified in The District's Planning Efforts

We found several areas of concern during our review of the District's planning efforts regarding disaster response and emergency preparedness. While the District had some emergency procedures in place, the only Plan documentation it could provide was outdated, being from 2017, and was missing key components. Overall, we found the planning efforts to be inadequate. Due to the sensitive nature of these issues, we did not include the specifics of these issues in this public report. Rather, we confidentially shared the results of our review of the District's safety planning efforts with the Superintendent and distributed them via an encrypted, confidential email to appropriate law enforcement agencies having jurisdiction over the District.

¹³ The Pennsylvania Department of Education's Office of Safe Schools webpage provides a link to the Pennsylvania *All Hazards School Safety Planning Toolkit*, which provides guidance to districts, charter schools, and other LEAs in developing safety plans. <http://www.pema.pa.gov/planningandpreparedness/communityandstateplanning/Pages/All-Hazards-School-Safety-Planning-Toolkit.aspx>. Chapter I, Introduction, 0010 Purpose and Guidance Section A (2). Accessed June 20, 2019.

¹⁴ Issued by the DOE, the Federal Emergency Management Agency, and several other agencies, "*Guide for Developing School Emergency Operations Plans*" 2013. pgs. 25-27. https://rems.ed.gov/docs/REMS_K-12_Guide_508.pdf. Accessed June 20, 2019. Link also accessible from the Readiness and Emergency Management for Schools, U.S. DOE's Technical Assistance Center. <https://rems.ed.gov/>. Accessed June 20, 2019.

¹⁵ Ibid. pg. 18. Accessed June 20, 2019.

*Criteria relevant to the finding
(continued):*

Subsections (a), (c), and (d) of Section 10.11 (relating to Memorandum of understanding) of the **State Board of Education's regulations** provide as follows, in part:

“(a) Each chief school administrator shall execute and update, **on a biennial basis**, a memorandum of understanding with each local police department having jurisdiction over school property of the school entity.***

(c) In developing a memorandum of understanding to execute with a local police department, a school entity shall consult and consider the **model memorandum** of understanding promulgated by the Board in Appendix A (relating to model memorandum of understanding) [of the regulations].

(d) On a biennial basis, a school entity shall **file with the Department's Office for Safe Schools a memorandum of understanding** with each local police department having jurisdiction over property of the school entity....” (Emphases added.) See 22 Pa. Code § 10.11(a), (c), and (d).

Additionally, at the time of our review, the District had not filed a current Plan with its county emergency management agency (EMA) as required by the EMS Code. In the District's case, the Plan should have been shared with the Allegheny County EMA. As a result of our review, the District did file the current Plan with the Allegheny County EMA in February of 2020.

The District's administration stated they will be revising the existing Plan over the summer months, and the updated Plan will be implemented in the 2020-21 school year.

The District's failure to provide sufficient and ongoing planning for disaster response and emergency preparedness and to ensure proper distribution of a current Plan to its county EMA increases the possibility of the District not adequately preparing for, responding to, and recovering from a potential emergency.

Lack of Timely Update to Joint MOU with Local Law Enforcement Agencies

In accordance with the Act, the MOUs with local law enforcement agencies establish agreed-upon procedures and responsibilities to be followed by district staff and local law enforcement in the event of an actual or potentially threatening situation.¹⁶ The Act and its regulations clearly mandate districts to update and biennially re-execute MOUs with all local law enforcement agencies having jurisdiction over any school property in the District. These MOUs must also be filed with PDE's Office of Safe Schools in accordance with a June 30th filing deadline every two years.¹⁷

The District is required to execute MOUs with three local law enforcement agencies having jurisdiction over the District's schools buildings, which it does through a joint MOU. The District's prior joint MOU was dated January 18, 2017 and should have been updated by January 18, 2019 in order to satisfy the Act's two year requirement.¹⁸ However, the District did not **update and re-execute** the joint MOU until September 18, 2019, which was eight months late.

Additionally, since the District did not update and re-execute its MOU until September 2019, it missed the **filing deadline of June 30, 2019**. The District filed its MOU with PDE on October 4, 2019. According to the

¹⁶ According to the Model MOU promulgated by the State Board of Education, the purpose of the MOU is to:

“...establish...procedures to be followed when certain incidents [as specified in the MOU]...occur on school property, at any school sponsored activity, or on a conveyance as described in the Safe Schools Act (such as a school bus) providing transportation to or from a school or school sponsored activity. This Memorandum does not cover incidents that are outside of those school settings and create no substantial disruption to the learning environment.” See 22 Pa. Code 10, APPENDIX A, Part I, Subsection (B).

¹⁷ 24 P.S. § 13-1303-A(c).

¹⁸ Ibid.

*Criteria relevant to the finding
(continued):*

Bullying Prevention

Subsection (c) of Section 1303.1-A of the Act states:

“Each school entity shall review its policy every three (3) years and annually provide the office with a copy of its policy relating to bullying, including information related to the development and implementation of any bullying prevention, intervention and education programs. The information required under this subsection shall be attached to or made part of the annual report required under section 1303-A(b).”
See 24 P.S. § 13-1303.1-A(c).

School Board Policy #249 Anti-Bullying states, “The district shall review this policy every three (3) years.”

Best Practices

The Pennsylvania *Bullying Prevention Toolkit* offers best practices specific to bullying prevention efforts, and states the following related to the role of educators, “[e]ducators have an important role in addressing acts of bullying they observe or that are reported to them.” Additionally, the toolkit states, “It is important that you address all instances of peer aggression and take all reports of bullying seriously. Follow your school’s protocol for investigation and response.”

See
<https://bptoolkit.safeschools.info/toolkit/the-role-of-educators/the-role-of-educators/>

District’s administration, there appears to have been an oversight in January 2019 to get Board approval of the biennial MOU.

The MOU is a critical component of a District’s overall safety plan. The failure to update the MOU with local law enforcement agencies could result in a lack of cooperation, direction, and guidance between District employees and the police departments if an incident occurs on school grounds, at any school-sponsored activity, or any public conveyance providing transportation to or from a school or school-sponsored activity. Non-compliance with the statutory requirement to biennially update and re-execute a MOU could have an impact on police department notification and response, and ultimately, the resolution of a potential problem situation.

Noncompliance with Bullying Prevention Requirements and Policy

The District failed to review its bullying policy every three years in accordance with the Act and District Policy 249, Anti-bullying.¹⁹ The District has a bullying prevention policy, but it had not been reviewed since it was adopted on April 1, 2009. Under the three year requirement of the Act and the District’s own policy, the bullying policy should have been reviewed, at a minimum, in 2012, 2015, and 2018.

According to District administration, they are currently in the process of reviewing and revising their Anti-Bullying Policy.

Additionally, the District is lacking in bullying prevention best practices as specified below.

- The District does not have written procedures for administrators and staff to follow as to how to recognize and intervene in bullying situations.
- The District does not provide training to administrators or staff on how to recognize and intervene in bullying situations and on the proper procedures to follow if a student reports bullying or harassment.
- The District’s administration could not provide evidence that it monitors whether teachers, building administrators, and counselors are reporting and investigating complaints of bullying.

By not complying with the Act’s requirements and its own anti-bullying policy, the District increased its risk of being inadequately prepared to address the prevention, reporting, and the investigation of instances of bullying at its schools.

¹⁹ 24 P.S. § 13-1303.1-A(c).

*Criteria relevant to the finding
(continued):*

Act 44 of 2018

Please note that the Pennsylvania General Assembly adopted enhanced school safety and security provisions through Act 44 of 2018 with varying effective dates. A PowerPoint presentation linked below provides a good overview of this new legislation: [https://www.pccd.pa.gov/schoolsafety/Documents/Website%20Powerpoint%20\(Overview%20of%20Act%2044\).pdf](https://www.pccd.pa.gov/schoolsafety/Documents/Website%20Powerpoint%20(Overview%20of%20Act%2044).pdf)

Summary

In conclusion, the District failed to: 1) update and annually review its emergency preparedness plan and file it with the local EMA; 2) timely update and re-execute its MOU; and 3) review its bullying policy every three years which resulted in significant noncompliance with the Act, certain provisions of the related regulations, and board policy, in conjunction with the failure to follow best business practices. It is vital that the District increase its emergency preparedness and planning efforts, including meeting established deadlines for reviewing its MOU and anti-bullying policy, for the sake of its students, staff, contractors, and visitors and to ensure readiness to be able to resolve potential emergency situations.

Recommendations

The *Elizabeth Forward School District* should:

1. Ensure that it has a comprehensive disaster response and emergency preparedness plan, developed in collaboration with community partners, which addresses all four phases of emergency management.
2. Immediately take steps to rectify the specific concerns expressed confidentially by the Pennsylvania Department of the Auditor General with regard to the District's planning efforts in the area of disaster response and emergency preparedness.
3. Immediately submit a copy of the District's Plan to the local emergency management agency and file any revisions to the Plan as needed thereafter. This should include any confidential building floor plans.
4. Adopt an official board policy requiring District administration to biennially update and re-execute all MOUs with the local police departments having jurisdiction over school property consistent with the State Board of Education's model MOU and file a copy with PDE's Office of Safe Schools on a biennial basis as required by the "Safe Schools Act" and its associated regulations.
5. Review its anti-bullying policy at least every three years, as required by the PSC, in consultation with the District's solicitor and maintain documentation to show the results of the review.
6. Establish written procedures and monitoring steps to ensure compliance with the bullying prevention requirements in the Act and the District's own bullying policy.

7. Implement procedures specific to best practices related to bullying prevention recognition and intervention, training, and monitoring of reporting and investigating complaints of bullying.

Management Response

District management provided the following response:

“Each year, the Elizabeth Forward School District reviews its Bullying Policy and Anti-Bullying efforts in each of the district schools at a Board meeting each Spring. While the date of the policy was not changed each year that the Board authorized support of Policy #249 (Anti-Bullying), a number of Anti-Bullying, PBIS and Olweus efforts are done annually in each school to minimize issues of bullying. The minimal number of bullying incidents identified in our Safe Schools Reports evidences our proactive approach to address bullying. Please be aware that the School Board will be adopting an updated Anti-Bullying/Cyber bullying policy (#249) at the July 2020, Regular School Board meeting.

“The School District is currently in the process of updating both its Emergency Preparedness Plan and its Emergency Operations Plan. The Emergency Operations Plan is following the Pennsylvania Emergency Management Agency (PEMA) model with guidance from the Allegheny County Emergency Management Specialist.

“The Elizabeth Forward Act 44 School Safety and Security Coordinator, has made arrangements with the Allegheny County Emergency Services Homeland Security/Law Enforcement Coordinator, to conduct Risk and Vulnerability Assessments for all District buildings in January, 2021.

“To address the concerns about administrators/staff lacking training to address bullying prevention best practices, administrators and teachers are completing an online course titled '*Bullying Prevention & Response Training*'. This continuing education online course is through **stopbullying.gov** and identifies how staff can recognize and intervene in bullying situations. This is a professional development activity is required over the summer.

“The School District has contacted the PA Office of Safe Schools about re-executing and submitting the MOU with local law enforcement at the safe (sic) time of year (currently, the MOU due date is 6 months earlier than the submission date).”

Auditor Conclusion

We are pleased that the District acknowledges that updates to its safety plans and policies are needed and that the District is in the process of taking immediate action to implement our recommendations. Our review noted that although the District states that they have annually reviewed

their anti-bullying policy, we could find no evidence, such as reviewed dates added to the policy, to reflect this action. We also noted that the policy in its current form lacks critical legally required elements. We will review the effectiveness of these actions and any other measures taken as part of our next audit.

Status of Prior Audit Findings and Observations

Our prior audit of the Elizabeth Forward School District resulted in no findings or observations.

Appendix A: Audit Scope, Objectives, and Methodology

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 (PDE), and other concerned entities.

Our audit, conducted under authority of Sections 402 and 403 of The Fiscal Code,²⁰ is not a substitute for the local annual financial 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. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit.

Scope

Overall, our audit covered the period July 1, 2014 through June 30, 2018. In addition, the scope of each individual audit objective is detailed on the next page.

The Elizabeth Forward School District's (District) 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, and administrative procedures (relevant requirements).²¹ In conducting our audit, we obtained an understanding of the District's internal controls, including any information technology controls, if applicable, that we considered 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.

²⁰ 72 P.S. §§ 402 and 403.

²¹ 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; and compliance with certain relevant state laws, regulations, contracts, and administrative procedures.

Objectives/Methodology

In order to properly plan our audit and to guide us in selecting objectives, we reviewed pertinent laws and regulations, board meeting minutes, annual financial reports, annual budgets, new or amended policies and procedures, and the independent audit report of the District's basic financial statements for the fiscal years July 1, 2014 through June 30, 2018. We also determined if the District had key personnel or software vendor changes since the prior audit.

Performance audits draw conclusions based on an evaluation of sufficient, appropriate evidence. Evidence is measured against criteria, such as laws, regulations, third-party studies, and best business practices. Our audit focused on the District's efficiency and effectiveness in the following areas:

- Bus Driver Requirements
- Transportation Operations
- Nonresident Student Data
- School Safety
- Financial Stability
- Administrator Separations

As we conducted our audit procedures, we sought to determine answers to the following questions, which served as our audit objectives:

- Did the District ensure that all bus drivers transporting District students are board approved and had the required driver's license, physical exam, training, background checks, and clearances²² as outlined in applicable laws?²³ Also, did the District adequately monitor driver records to ensure compliance with the ongoing five-year clearance requirements and ensure it obtained updated licenses and health physical records as applicable throughout the school year?
 - To address this objective, we interviewed District personnel to get an understanding of the District's procedures for ensuring drivers had required documentation. We tested all 25 bus drivers from the District's primary contractor transporting District students as of February 5, 2020. We also tested all 34 bus drivers from the District's secondary contractor transporting District students as of January 10, 2020. We reviewed documentation for each driver to ensure they met all requirements to transport District students. We also determined if the District had monitoring procedures in place to ensure that all drivers' clearances, licenses, and qualifications were up to date. Finally, we reviewed to ensure that each driver was Board approved. The results of our review of this objective can be found on page 8 in Finding No. 1 of this report.
- Did the District ensure compliance with applicable laws and regulations governing transportation operations, and did the District receive the correct transportation reimbursement from the Commonwealth?²⁴

²² Auditors reviewed the required state, federal and child abuse background clearances that the District obtained from the most reliable sources available, including the FBI, the Pennsylvania State Police and the Department of Human Services. However, due to the sensitive and confidential nature of this information, we were unable to assess the reliability or completeness of these third-party databases.

²³ 24 P.S. § 1-111, 23 Pa.C.S. § 6344(a.1), 24 P.S. § 2070.1a *et seq.*, 75 Pa.C.S. §§ 1508.1 and 1509, and 22 Pa. Code Chapter 8.

²⁴ See 24 P.S. §§ 13-1301, 13-1302, 13-1305, 13-1306; 22 Pa. Code Chapter 11.

- To address this objective, we interviewed District personnel to get an understanding of the District’s procedures for obtaining and reporting transportation data to PDE. We also assessed the District’s internal controls for obtaining, processing and reporting transportation data to PDE. Initially, we randomly selected 10 of 54 vehicles used to transport District students during the 2017-18 school year. For each vehicle selected, we attempted to review odometer readings, vehicle rosters, school calendars, and sample/weighted average calculations to ensure that the District accurately reported data to PDE and was reimbursed accurately. However, the District did not retain the required source documentation to verify the accuracy of the data reported to PDE. Additionally, we attempted to review the remaining 44 vehicles used to transport students during the 2017-18 school year and all vehicles used to transport students during the 2014-15 through 2016-17 school years.²⁵ The District was unable to provide the following: Route documentation provided by the District’s contracted drivers and odometer readings to verify the accuracy of miles with and without students reported to PDE; Student rosters to verify the number of students transported as reported to PDE; Support documentation for the number of days each vehicle traveled, to compare with the District’s school calendar. The results of our review of this portion of the objective can be found on page 17 in Finding No. 2 of this report.
 - Additionally, we reviewed all 43 nonpublic school and charter school students reported to PDE as transported by the District during the 2017-18 school year. We reviewed bus rosters, requests for transportation, and other supporting documentation to determine if all nonpublic and charter school students transported by the District were accurately reported to PDE and that the District received the correct reimbursement for these students. Our review of this portion of the objective did not disclose any reportable issues.
- Did the District accurately report nonresident students to PDE? Did the District receive the correct reimbursement for these nonresident students?²⁶
- To address this objective, we assessed the District’s internal controls for obtaining and processing nonresident student data to PDE. We attempted to review all 21 nonresident foster students reported by the District to PDE during the 2014-15 through 2017-18 school years. We attempted to obtain documentation to verify that the custodial parent/guardian was not a resident of the District and that the foster parent received a stipend for caring for the student. However, the District did not retain the required source documentation. The results of our review of this objective can be found on page 22 in Finding No. 3 of this report.
- Did the District comply with requirements in the Public School Code and the Pennsylvania Emergency Management Code related to emergency management plans, bullying prevention, memorandums of understanding with local law enforcement, and fire drills?²⁷ Also, did the District follow best practices related to physical building security and providing a safe school environment?
- To address this objective, we reviewed a variety of documentation including, safety plans, evidence of physical building security assessments and school climate surveys, training schedules, anti-bullying policies, safety committee meeting minutes, fire drill documentation,

²⁵ The District reported 67 vehicles used to transport students for the 2014-15 school year, 76 vehicles for the 2015-16 school year, 48 vehicles for the 2016-17 school year, and 54 vehicles for the 2017-18 school year.

²⁶ See 24 P.S. §§ 13-1301, 13-1302, 13-1305, 13-1306; 22 Pa. Code Chapter 11.

²⁷ 24 P.S. § 13-1301-A *et seq.*, 35 Pa.C.S. § 7701, and 24 P.S. § 15-1517.

and after action reports. We assessed if the District had implemented best safety practices.²⁸ Due to the sensitive nature of school safety, the full results of our review of this objective area are not described in our audit report. The full results were shared with District officials, PDE, and other appropriate law enforcement agencies deemed necessary.²⁹ See Finding No. 4 on page 26 of this report for the results of our review of some of this objective.

- Based on an assessment of financial indicators, was the District in a declining financial position, and did it comply with all statutes prohibiting deficit fund balances and the over expending of the District's budget?
 - To address this objective, we reviewed the District's annual financial reports, General Fund budgets, and independent auditor's reports for the 2014-15 through 2017-18 fiscal years. The financial and statistical data was used to calculate the District's General Fund balance, operating position, charter school costs, debt ratio, and current ratio. These financial indicators were deemed appropriate for assessing the District's financial stability. The financial indicators are based on best business practices established by several agencies, including Pennsylvania Association of School Business Officials, the Colorado Office of the State Auditor, and the National Forum on Education Statistics. Our review of this objective did not disclose any reportable issues.

- Did the District ensure that all individually contracted employees who separated employment from the District were compensated in accordance with their contract? Also, did the District comply with the Public School Code³⁰ and the Public School Employees' Retirement System (PSERS) guidelines when calculating and disbursing final salaries and leave payouts for these contracted employees?
 - To address this objective, we reviewed the contracts, settlement agreements, board meeting minutes, board policies, and payroll records for the three individually contracted administrators who separated employment from the District during the period July 1, 2014 through June 30, 2018. We verified the reasons for separation and reviewed payroll records to ensure that all payments were made in accordance with the individual administrator's contract, and that these payments were correctly reported to PSERS. Our review of this objective did not disclose any reportable issues.

²⁸ Basic safety practices evaluated were building security, bullying prevention, visitor procedures, risk and vulnerability assessments, and preparedness.

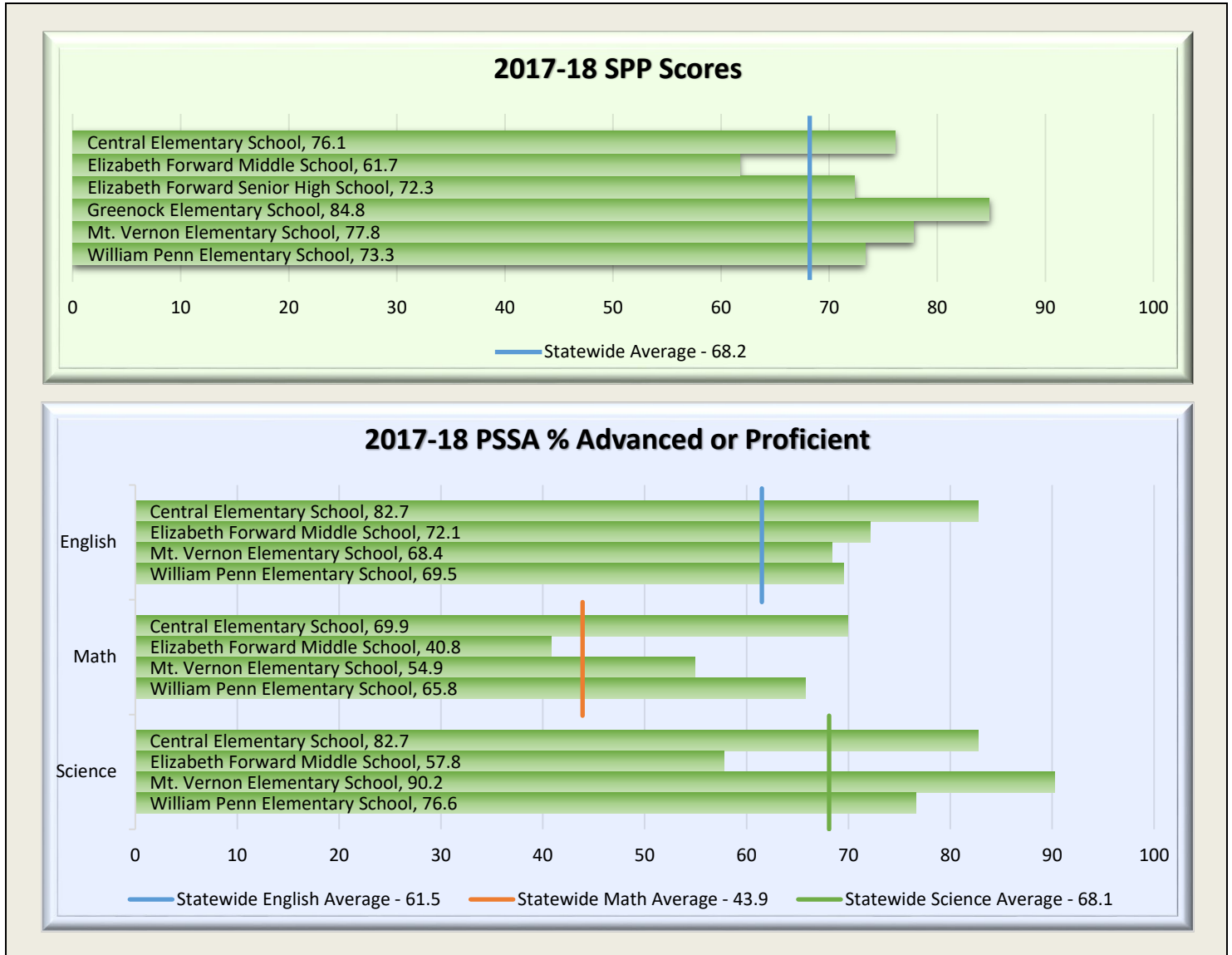
²⁹ Other law enforcement agencies include the Pennsylvania State Police, the Attorney General's Office, and local law enforcement with jurisdiction over the District's school buildings.

³⁰ 24 P.S. § 10-1073(e) (2) (v).

Appendix B: Academic Detail by Building

Benchmarks noted in the following graphs represent the statewide average of all public school buildings in the Commonwealth that received a score in the category and year noted.³¹ Please note that if one of the District's schools did not receive a score in a particular category and year presented below, the school will not be listed in the corresponding graph.³²

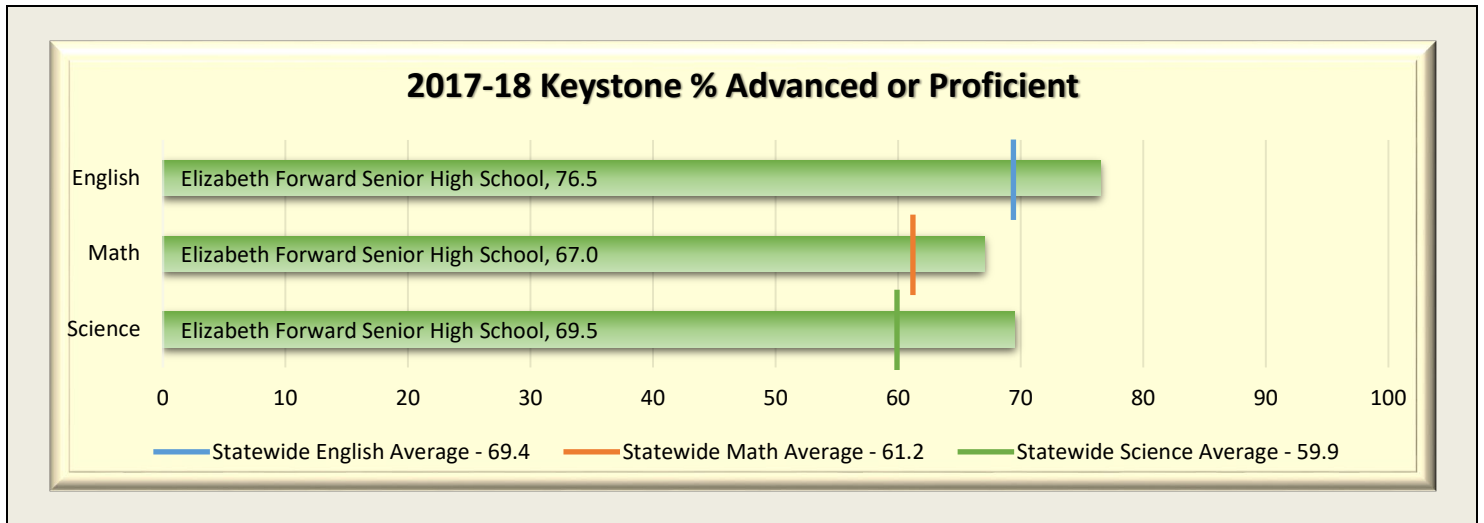
2017-18 Academic Data School Scores Compared to Statewide Averages



³¹ Statewide averages were calculated by our Department based on individual school building scores for all public schools in the Commonwealth, including district schools, charters schools, and cyber charter schools.

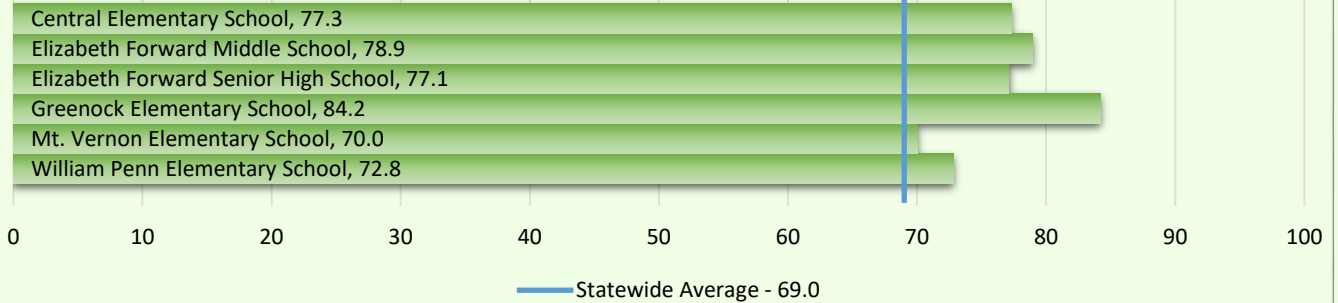
³² PDE's data does not provide any further information regarding the reason a score was not published for a specific school. However, readers can refer to PDE's website for general information regarding the issuance of academic scores.

2017-18 Academic Data
School Scores Compared to Statewide Averages (continued)

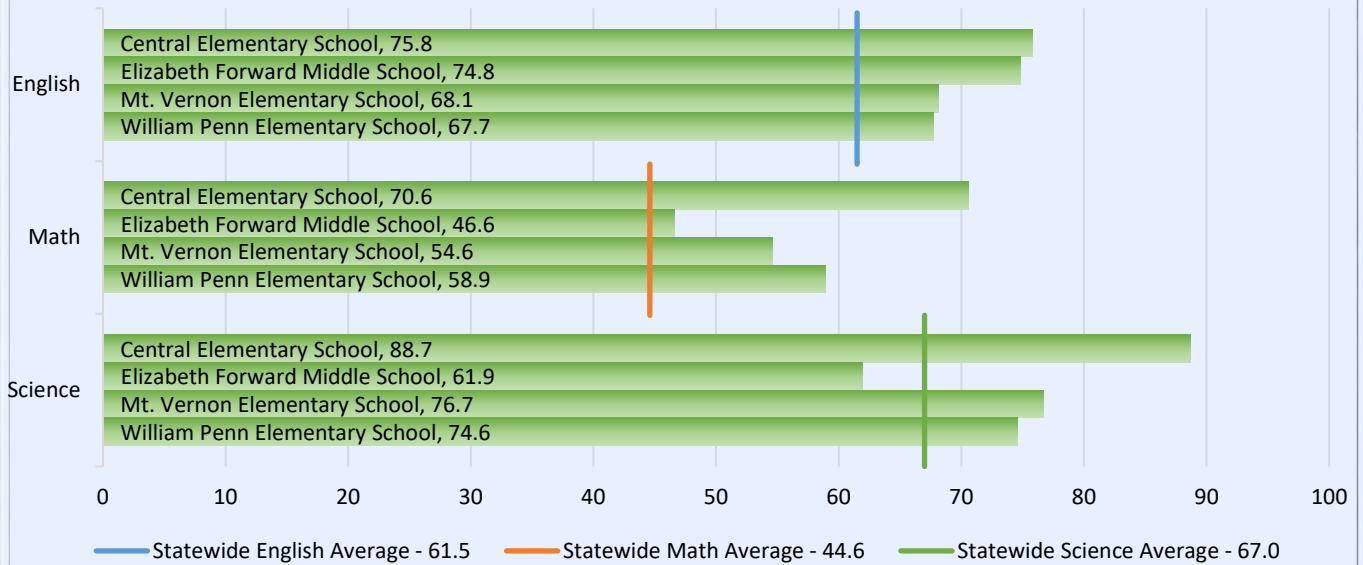


2016-17 Academic Data
School Scores Compared to Statewide Averages

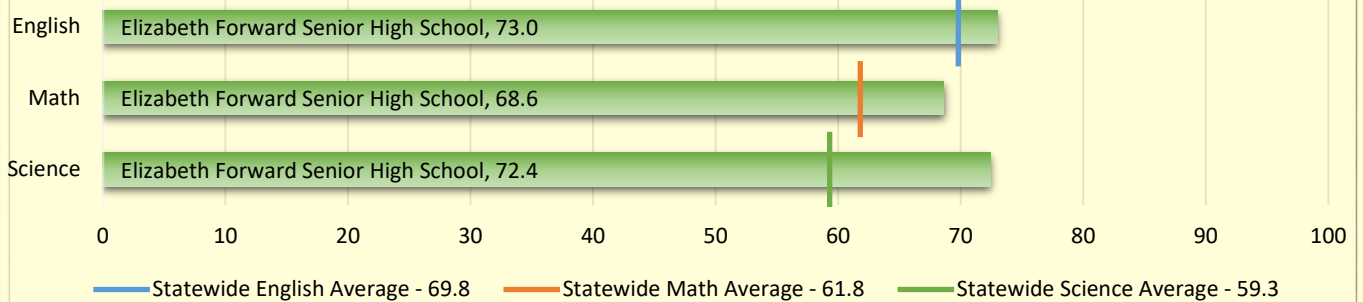
2016-17 SPP Scores



2016-17 PSSA % Advanced or Proficient

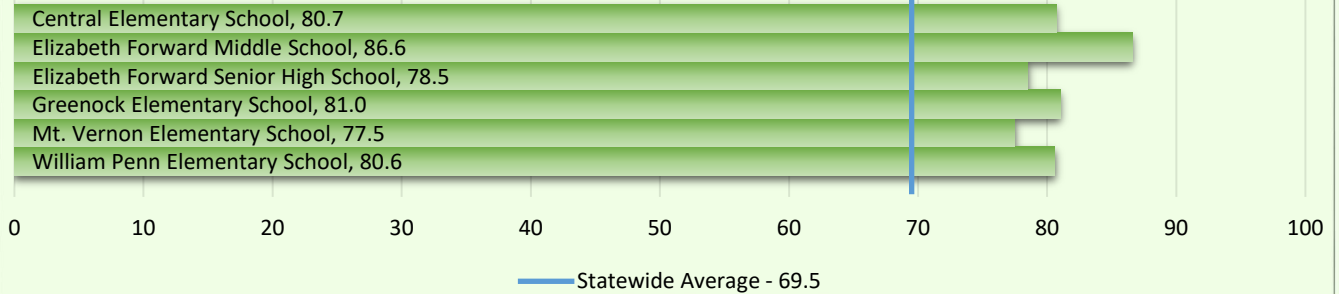


2016-17 Keystone % Advanced or Proficient

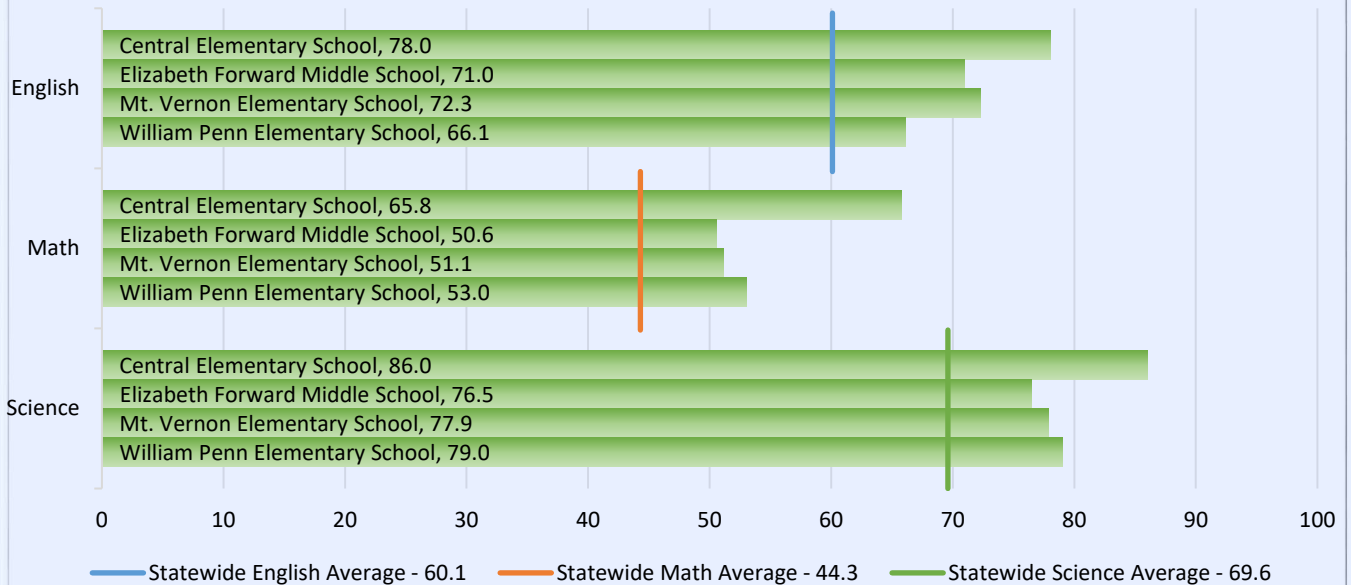


2015-16 Academic Data
School Scores Compared to Statewide Averages

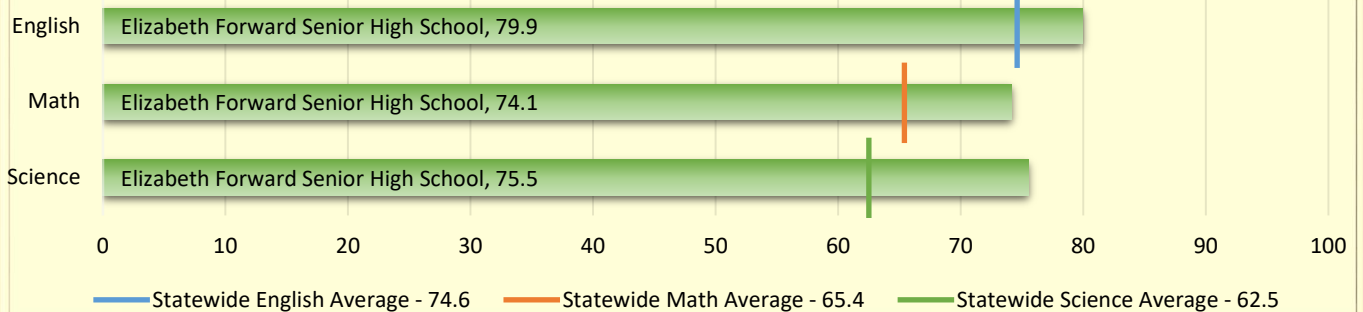
2015-16 SPP Scores



2015-16 PSSA % Advanced or Proficient



2015-16 Keystone % Advanced or Proficient



Distribution List

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

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