

# LIMITED PROCEDURES ENGAGEMENT

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## Huntingdon County Career and Technology Center Huntingdon County, Pennsylvania

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June 2019



Commonwealth of Pennsylvania  
Department of the Auditor General

Eugene A. DePasquale • Auditor General



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Mr. Don Burd, Executive Director  
Huntingdon County Career and  
Technology Center  
11893 Technology Drive  
P.O. Box E  
Mill Creek, Pennsylvania 17060

Mr. Aden Russell, Chair  
Huntingdon County Career and  
Technology Center  
11893 Technology Drive  
P.O. Box E  
Mill Creek, Pennsylvania 17060

Dear Mr. Burd and Mr. Russell:

We conducted a Limited Procedures Engagement (LPE) of the Huntingdon County Career and Technology Center (Center) to determine its compliance with certain relevant state laws, regulations, policies, and administrative procedures (relevant requirements). The LPE covers the period July 1, 2013 through June 30, 2017, except for any areas of compliance that may have required an alternative to this period. The engagement was conducted pursuant to authority derived from Article VIII, Section 10 of the Constitution of the Commonwealth of Pennsylvania and The Fiscal Code (72 P.S. §§ 402 and 403), but was not conducted in accordance with *Government Auditing Standards* issued by the Comptroller General of the United States.

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

- Did the Center have documented board policies and administrative procedures related to the following?
  - Internal Controls
  - Budgeting Practices
  - Retirement Provisions
  - Updating Center Policies
- Were the policies and procedures adequate and appropriate, and have they been properly implemented?
- Did the Center comply with relevant requirements of the Public School Employees' Retirement System Employer's Reference Manual, and did the Center adhere to contracted provisions when calculating and paying severance amounts to retired employees?

Mr. Don Burd  
Mr. Aden Russell  
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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 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.

During our engagement, we found significant instances of failing to implement policies and procedures for the areas mentioned above and noncompliance with relevant requirements, as detailed in the three findings in this report.

We appreciate the Center's cooperation during the conduct of the engagement.

Sincerely,



Eugene A. DePasquale  
Auditor General

June 11, 2019

cc: **HUNTINGDON COUNTY CAREER AND TECHNOLOGY CENTER**  
Joint Operating Committee

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## Background Information

School Characteristics 2018-19 School Year <sup>A</sup>	
County	Huntingdon
Full-Time or Part-Time School	Part-Time
Secondary Pupils Enrolled	293
Post-Secondary Pupils Enrolled	30
Total Teachers	13
Total Full or Part-Time Support Staff	10
Total Administrators	5
Intermediate Unit Number	11

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

### Mission Statement<sup>A</sup>

The Huntingdon County Career and Technology Center is committed to providing quality career and technical education opportunities for students through integrated academic and technical experiences in order for students to gain and maintain employment, pursue post-secondary education, and develop an appreciation for lifelong learning in a globally competitive workplace.

The operation, administration, and management of the Huntingdon County Career and Technology Center (Center) are directed by a joint operating committee (JOC), which is comprised of eight members from the following school districts:

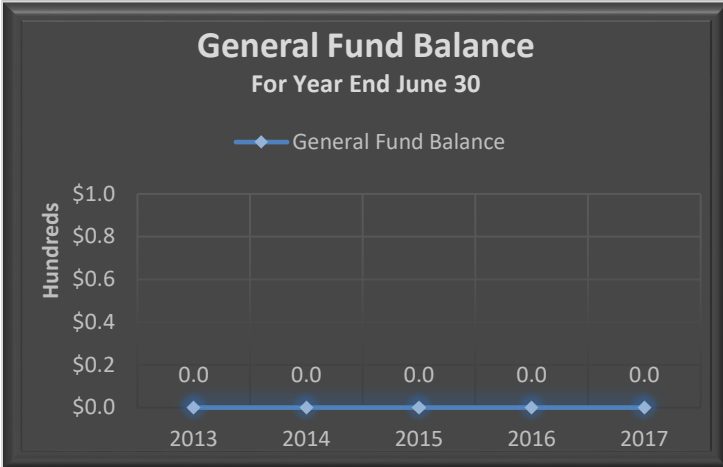
Huntingdon Area  
Juniata Valley

Mount Union Area  
Southern Huntingdon County

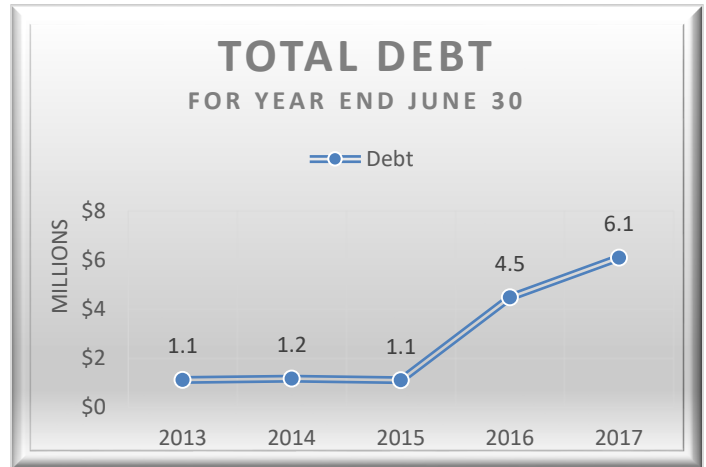
The JOC members are appointed by the individual school boards at the December meeting, each to serve a three-year term.

## Financial Information

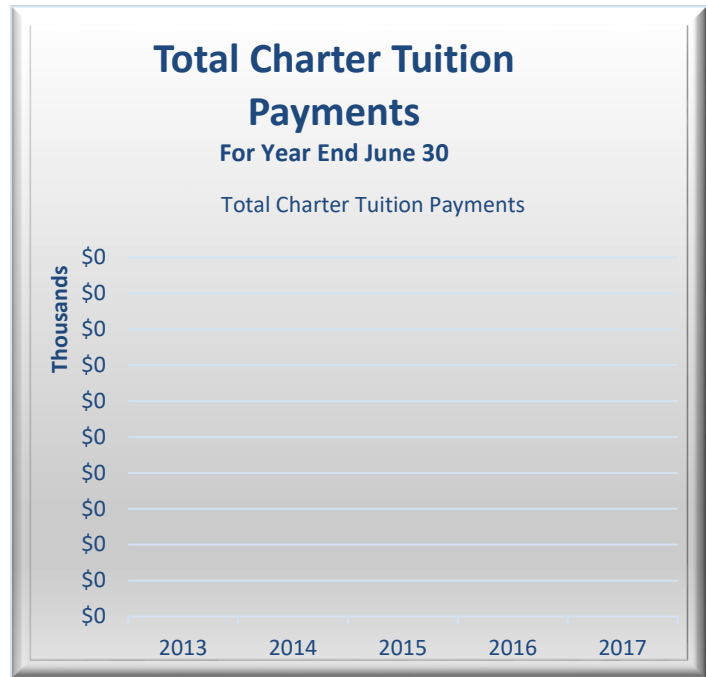
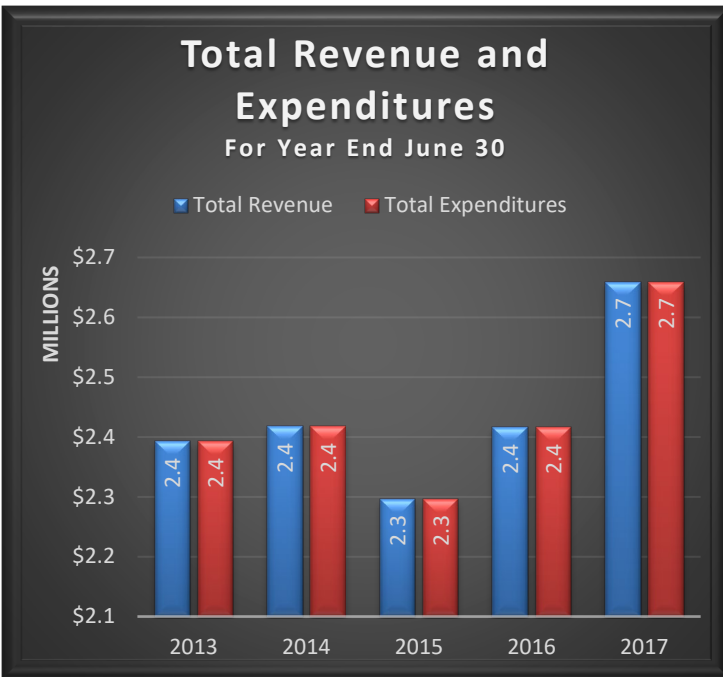
The following pages contain financial information about the Center obtained from annual financial data reported to the Pennsylvania Department of Education (PDE) and available on the PDE's public website. This information was not audited and is presented for **informational purposes only**.



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

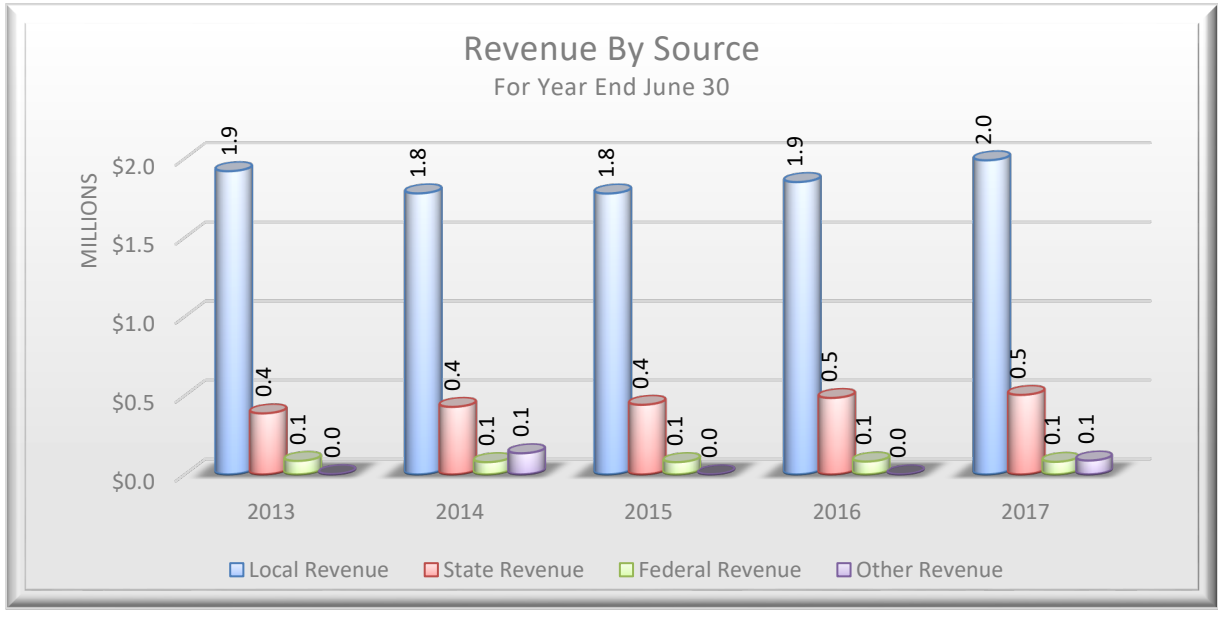


**Note:** Total Debt is comprised of Short-Term Borrowing, General Obligation Bonds, Authority Building Obligations, Other Long-Term Debt, Other Post-Employment Benefits, Compensated Absences and Net Pension Liability.



**Note:** Career and technical centers do not make payments to charter schools for tuition. These payments are made by the home district of each student.

**Financial Information Continued**



Local revenues were primarily obtained from direct payments by the member districts based on the approved budget. Each district’s proportionate share of the operating expenditures was determined by a formula involving average daily membership as specified in the Articles of Agreement.

## **Academic Information**

SPP benchmarks represent the statewide average of all district school buildings in the Commonwealth.<sup>1</sup> PSSA benchmarks and goals are determined by the PDE each school year and apply to all public school entities.<sup>2</sup>

Part-time career and technical centers, such as the Huntingdon County Career and Technology Center, do not receive academic scores. Academic instruction in the core content areas occurs in the students' home district and are therefore reported within the scores of the students' home district.<sup>3</sup> Full-time comprehensive career and technical centers providing core content receive academic scores.

### **4 Year Cohort Graduation Rates**

Part-time career and technical centers do not report a graduation rate. Each students' graduation rate is reported through the home district for that student. Full-time comprehensive career and technical centers report graduation rates to the PDE.

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<sup>1</sup> Statewide averages for SPP scores were calculated based on all district school buildings throughout the Commonwealth, excluding charter and cyber charter schools.

<sup>2</sup> PSSA benchmarks apply to all district school buildings, charters, and cyber charters. In the 2011-12 school year, the state benchmarks reflect the Adequate Yearly Progress targets established under No Child Left Behind. In the 2012-13 and 2013-14 school years, the state benchmarks reflect the statewide goals based on annual measurable objectives established by the PDE.

<sup>3</sup> <http://paschoolperformance.org/FAQ>



## Finding(s)

### Finding No. 1

### The Center Failed to Adequately Maintain Safety Plans and Fully Comply with Bullying Prevention Requirements in Law

*Criteria relevant to the finding:*

#### Emergency Planning

Subsection (g) of Section 7701 (relating to Duties concerning disaster prevention) of the Emergency Management Services Code (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.” *See* 35 Pa.C.S. § 7701(g).

*See also* Subsections (a) and (b) of Section 10.24 (relating to Emergency and nonemergency response and preparedness) of the State Board of Education’s regulations, 22 Pa. Code § 10.24(a) and (b).

The Huntingdon County Career and Technology Center (Center) failed to adequately maintain its safety plan as required by the Emergency Management Services Code (Code) and its associated regulations<sup>4</sup> and comply with certain bullying prevention provisions in the “Safe Schools Act” (Act).<sup>5</sup> Specifically, the Center did not provide sufficient and ongoing planning for disaster response and emergency preparedness pursuant to the Code and was unable to provide evidence that it follows best practices related to training and emergency procedures. Further, the Center failed to review its bullying policy every **three years** in accordance with the Act and the Center’s policy, satisfy several other bullying prevention requirements under the Act, and provide evidence of compliance with and monitoring of the Act’s bullying prevention requirements. All of these issues could have put the Center’s students and personnel at risk of harm in the event of a disaster or an emergency situation.

#### Background on Disaster Response and Emergency Preparedness Plans

Pursuant to the Code, all Pennsylvania schools 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.<sup>6</sup> The Plan is supposed to be developed in cooperation with local emergency management agencies, as well as with PEMA.<sup>7</sup> Schools are also required to *annually* review and modify the Plan, as necessary.<sup>8</sup> Further, a copy of the Plan must be

<sup>4</sup> 35 Pa.C.S. § 7101 *et seq.* and the State Board of Education’s Safe Schools regulations, 22 Pa. Code § 10.24.

<sup>5</sup> 24 P.S. § 13-1301-A *et seq.*

<sup>6</sup> 35 Pa.C.S. § 7701 within Chapter 77, Miscellaneous Provisions of the Code.

<sup>7</sup> 35 Pa.C.S. § 7701(g).

<sup>8</sup> *Ibid.*

*Criteria relevant to the finding  
(continued):*

### **Bullying Prevention**

Subsection (a) of Section 1303.1-A of the Public School Code's "Safe Schools Act" (Act) states, in part:

"... each school entity shall adopt a policy of amend its existing policy relating to bullying and incorporate the policy into the schools entity's code of conduct as required under 22 Pa. Code § relating to school rules. . . ." See 24 P.S. § 13-1303.1-A(a).

Subsection (b) of Section 1303.1-A of the Act provides:

"Each school entity shall made the policy available on its publicly accessible Internet website. Each school entity shall ensure that the policy and procedures for reporting bullying incidents are reviewed with students within ninety (90) days after their adoption and thereafter at least once each school year." See 24 P.S. § 13-1303.1-A(b).

provided to the respective county emergency management agency.<sup>9</sup> In the Center's case, the Plan should have been shared with the Huntingdon County Emergency Management Agency, but this never occurred.

When properly written and executed, the Plan serves as the primary directive in the event of a disaster or emergency situation. According to Pennsylvania's *All Hazards School Safety Planning Toolkit*, a guide for assisting centers with the development of such plans, "Schools should use this plan to form a reference document that can be used in training, exercising and collaboration with responders, and as a reference during an incident."<sup>10</sup> The Plan should be customized to meet local needs and capabilities.<sup>11</sup>

According to both the Pennsylvania *All Hazards School Safety Planning Toolkit* and the U.S. Department of Education's *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:<sup>12</sup>

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

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<sup>9</sup> Ibid.

<sup>10</sup> 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 all other LEAs in developing safety plans. <http://www.pema.pa.gov/planningandpreparedness/communityandstateplanning/Pages/All-Hazards-School-Safety-Planning-Toolkit.aspx>. See in particular, Chapter I, Introduction, 0010 Purpose and Guidance Section A(2). Accessed April 19, 2019.

<sup>11</sup> Ibid.

<sup>12</sup> Federal Emergency Management Agency "Guide for Developing School Emergency Operations Plans" 2013. pgs. 25-27. [https://rems.ed.gov/docs/REMS\\_K-12\\_Guide\\_508.pdf](https://rems.ed.gov/docs/REMS_K-12_Guide_508.pdf). Accessed April 15, 2019. Link also accessible from the Readiness and Emergency Management for Schools, Technical Assistance Center. <https://rems.ed.gov/>. Accessed April 15, 2019.

*Criteria relevant to the finding (continued):*

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).” [Emphasis added.] See 24 P.S. § 13-1303.1-A(c).

The Center’s Board Policy No. 249 Bullying/Cyberbullying states, “The Administrative Director or designee, in cooperation with other appropriate administrators, shall review this policy every three (3) years and recommend necessary revisions to the Board.”

**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, “Educators 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.”

In addition, the Plan should address the following functions, at a minimum:<sup>13</sup>

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

**Weaknesses Identified in Center’s Planning and Training Efforts**

Our review of the Center’s planning efforts regarding disaster response and emergency preparedness identified several areas of concern. Although we found some specific elements of planning to be adequate, others were not. Additionally, the Center was unable to provide evidence that it provides annual training on emergency procedures. However, due to the sensitive nature of these issues, we did not include further specifics on these issues in this public report. Rather, we confidentially shared the results of our review of the Center’s safety planning efforts with the Center’s Executive Director and distributed them via an encrypted confidential email to the Pennsylvania Department of Education (PDE) and the appropriate law enforcement agencies having jurisdiction over the Center.

**Weaknesses in Bullying Prevention Procedures**

Although the Center had a Joint Operating Committee (JOC) approved bullying prevention policy in compliance with the Act, officials acknowledged that they had not reviewed the policy every three years as required by the Public School Code (PSC) and the Center’s own policy.<sup>14</sup> The last date of review was September 10, 2013, so the policy should have been reviewed again by no later than September 10, 2016. Other areas of statutory noncompliance with the Act and state regulations by the Center include the following:

<sup>13</sup> Ibid.

<sup>14</sup> 24 P.S. § 13-1303.1-A(c) and JOC policy #249 Bullying/Cyberbullying, adopted August 5, 2009 and revised August 10, 2010.

*Criteria relevant to the finding  
(continued):*

See

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

#### **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 which do not apply to this audit period. A PowerPoint presentation linked below provides a good overview of this new legislation:

[https://www.pccd.pa.gov/schoolsafety/Documents/Website%20Powerpoint%20\(Overview%20of%20Act%204\).pdf](https://www.pccd.pa.gov/schoolsafety/Documents/Website%20Powerpoint%20(Overview%20of%20Act%204).pdf)

- The bullying prevention policy was not incorporated into the Center’s Code of Student Conduct.<sup>15</sup>
- The bullying prevention policy was not made available on the Center’s publicly accessible website.<sup>16</sup>
- The bullying prevention policy has no associated written policies and procedures for how students are to report bullying incidents.<sup>17</sup>
- The bullying prevention policy and procedures for reporting bullying incidents have no related supporting documentation showing that they have been reviewed at least annually with students.<sup>18</sup>
- The bullying prevention policy was not consistently submitted annually to the PDE as part of the Annual School Safety Report, as required by the Act.<sup>19</sup>

Additionally, the Center did not follow recommended best practices in bullying prevention, as specified below:

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

### **Conclusion**

The Center’s failure to provide sufficient and ongoing planning for disaster response and emergency preparedness assessments increased the possibility of the Center not adequately preparing for, responding to, and recovering from a potential emergency situation. It is imperative that the Center increase its emergency preparedness and

<sup>15</sup> 24 P.S. § 13-1303.1-A(a) and 22 Pa. Code § 12.3(c).

<sup>16</sup> 24 P.S. § 13-1303.1-A(b).

<sup>17</sup> Ibid.

<sup>18</sup> Ibid.

<sup>19</sup> 24 P.S. § 13-1303.1-A(c).

planning for the sake of its students and staff. Moreover, the Center's failure to comply with bullying prevention requirements and best practices increased the risk that its students were subjected to bullying and that instances of bullying were not properly reported or investigated.

### **Recommendations**

The *Huntingdon County Career and Technology Center* should:

1. Immediately take steps to rectify the specific concerns expressed confidentially by the Pennsylvania Department of the Auditor General with regard to the Center's planning and training efforts regarding disaster response and emergency preparedness.
2. Review its bullying policy, at least every three years as required by the PSC and JOC Policy No. 249 Bullying/Cyberbullying, and maintain documentation to show the results of the review.
3. Incorporate the bullying policy into the Center's Code of Student Conduct.
4. Post its bullying prevention policy on the Center's publicly accessible website.
5. Establish written policies and procedures, either in the bullying prevention policy or elsewhere, for how students are to report bullying incidents, train students on these reporting procedures at least annually, and maintain documentation to support student training.
6. Ensure the bullying policy is submitted annually to the PDE.
7. Establish standard, written procedures regarding bullying prevention to ensure consistent compliance with its own policy and the "Safe Schools Act" and its associated regulations.

## **Management Response**

*HCCTC* management agreed with the finding and provided the following response:

“HCCTC administration was not aware of some of the provisions required (i.e., bullying policy posted on website and in student code of conduct). HCCTC did contract with an outside vendor in the Fall of 2018 to review the HCCTC Safety Plan. Recommendations were provided to HCCTC and administration will be adopting recommendations and revising the safety plan.

HCCTC will implement recommendations as provided by the audit report.”

## **Auditor Conclusion**

We are encouraged that the Center agrees that it failed to adequately maintain safety plans and fully comply with bullying prevention requirements in law. We are also glad that the Center plans to implement our recommendations. We will evaluate the effectiveness of the Center’s corrective action during our next engagement.

## Finding No. 2

## The Center Failed to Conduct All Required Monthly Fire Drills in Accordance with the Public School Code and Inaccurately Reported Fire Drill Data to the PDE

### Criteria relevant to the finding:

The following PSC provisions are relevant to the finding:

Section 1517(a) of the PSC requires:

“... in all school buildings of school entities where fire-escapes, appliances for the extinguishment of fires, or proper and sufficient exits in case of fire or panic, either or all, are required by law to be maintained, fire drills shall be periodically conducted, **not less than one a month**, by the teacher or teachers in charge, under rules and regulations to be promulgated by the chief school administrator under whose supervision such school entities are. In such fire drills the pupils and teachers shall be instructed in, and made thoroughly familiar with, the use of the fire-escapes, appliances and exits. **The drill shall include the actual use thereof, and the complete removal of the pupils and teachers**, in an expeditious and orderly manner, by means of fire-escapes and exits, from the building to a place of safety on the ground outside.” [Emphases added.] See 24 P.S. § 15-1517(a). (Act 55 of 2017, effective November 6, 2017.)

Further, Section 1517(b) of the PSC requires: “Chief school administrators are hereby required to see that the provisions of this section are faithfully carried out in the school entities over which they have charge.” See 24 P.S. § 15-1517(b). (Ibid.)

Our review of the Center’s fire drill reports for the 2016-17 and 2017-18 school years disclosed that the Center failed to conduct fire drills each month as required by Section 1517(a) of the PSC.<sup>20</sup> We also found that the Center did not maintain documentation to support the fire drills reported to the PDE. Moreover, based on alarm records obtained from an outside company, we found discrepancies between the fire drill data reported to the PDE and the alarm records. Consequently, the Center’s Executive Director inappropriately attested to the accuracy of the fire drill data in the PDE-required certification statement.

As part of our review, we obtained the Center’s 2016-17 and 2017-18 Fire Drill Accuracy Certification Statement (ACS) reports filed with the PDE. We found that the Center documented fire drill dates in a hard-copy notebook, but there was no additional information to support that fire drills were actually conducted. Due to a lack of supporting documentation, we reviewed the Center’s alarm company reports available for the entire 2017-18 school year and part of the prior 2016-17 school year to determine if fire drills were conducted each month from September through May and to verify the accuracy of the data reported to the PDE.

For the 2017-18 school year, we found the Center reported to the PDE that fire drills were conducted every month. However, we found that no fire drills were actually conducted for three of the nine months reviewed, as the alarm reports did not show drills in October 2017, December 2017, and May 2018. Additionally, the fire drill conducted in April 2018 occurred on a day that students were not in attendance, which was not in compliance with the PSC requiring that fire drills include students and staff. Therefore, fire drills were not conducted as required for **four of the nine months** during the 2017-18 school year.

<sup>20</sup> 24 P.S. § 15-1517(a).

*Criteria relevant to the finding  
(continued):*

Finally, Section 1517(e) of the PSC requires: “On or before the tenth day of April of each year, each chief school administrator shall certify to the Department of Education that the emergency evacuation drills and school security drills herein required have been conducted in accordance with this section.” See 24 P.S. § 15-1517(e). (Ibid.)

Please note that the prior related statutory language used the term “district superintendents,” but was amended and replaced with the term “chief school administrators” through Act 55 of 2017, because the fire drill requirements have always applied to all local education agencies. See former 24 P.S. § 15-1517(b) and (e).

According to the PDE guidance emailed to all public schools on October 7, 2016, and its Basic Education Circular entitled, *Fire Drills and School Bus Evacuations*, annual certification of the completion of fire drills must be provided to the PDE. Beginning with the 2016-17 school year, annual reporting was required through the PDE’s Pennsylvania Information Management System (PIMS) and fire drill certifications require each school entity to report the date on which each monthly fire drill was held. Fire Drill Accuracy Certification Statements must be electronically submitted to the PDE by July 31 following the end of a school year. Within two weeks of the electronic PIMS submission, a printed, signed original must be sent to PDE’s Office for Safe Schools.

For the 2016-17 school year, reports from the alarm company were only available for January through May 2017; therefore, they were the only months that we could verify against the data reported to the PDE. While the Center reported to the PDE that fire drills were conducted for every month, we again found this data to be inaccurate. According to the alarm records, no fire drill was conducted for the month of May 2017, and an incorrect date was reported for the April 2017 fire drill on the ACS. Additionally, we were not able to confirm if fire drills actually occurred for the months of September through December 2016 due to the Center’s lack of documentation and unavailability of alarm records.

During the review period, the PSC required that fire drills be conducted in every public school at least once a month while school is in session. Practicing monthly fire drills helps to ensure that staff and students are properly trained to respond in a quick and safe manner to an emergency evacuation situation. The Executive Director stated that all fire drills were conducted for the 2016-17 and 2017-18 school years, to the best of his recollection. However, the Center’s alarm company reports told a different story and did not support the fire drill data reported to the PDE.

Although the PSC does not directly address fire drill documentation requirements, it is reasonable to conclude that the General Assembly’s intent was for school entities to document the practicing of fire drills, particularly given the filing requirements with the PDE. Moreover, it is a best practice for a school entity to maintain documentation because it serves both as a verification of the drills and an after action report of lessons learned. As such, we believe it would be in the Center’s best interest to utilize a detailed form for each fire drill conducted. This form would allow the Center to better track the drills, would provide detailed information the Center could use to improve the effectiveness and efficiency of future drills, and would assist it in completing its PDE required ACS. While it is understandable that unforeseen circumstances may arise that may affect the Center’s ability to conduct a fire drill for a particular month, the Center must accurately report whether or not a fire drill actually occurred on its mandated annual ACS report filed with the PDE.



*Criteria relevant to the finding  
(continued):*

The Fire Drill Accuracy Certification Statement that the chief school administrator was required to sign during both the 2016-17 and 2017-18 school years states, in part:

“I acknowledge that 24 PS 15-157 ...[requires that] fire drills shall be periodically conducted, not less than one a month...under rules and regulations to be promulgated by the district superintendent under whose supervision such schools are... District superintendents are hereby required to see that the provisions of this section are faithfully carried out in the schools over which they have charge. I certify that drills were conducted in accordance with 24 PS 15-157 and that information provided on the files and summarized on the above School Safety Report is correct and true to the best of my knowledge....”

**Important Note:** The following summary is provided as a courtesy for informational purposes only to highlight recent amendments to the PSC, but does **not** apply to the audit period (i.e., 2017-18 school year) for this finding.

In **2018**, the General Assembly amended Section 1517 of the PSC through Act 39 which **mandates** that each school entity conduct one school security drill per school year in each school building in place of a required fire drill within 90 days of the commencement of the school year after the subsection’s effective date (July 1, 2018) and in each school year thereafter. The school security drill **must** be conducted while the school entity is in session and students are present. Further, Act 39 provides that each school entity may conduct two school security drills per school year in each school building in place of two fire drills after 90 days from the commencement of each school year. [Emphases added.] See 24 P.S. § 15-1517 (as most recently amended by Act 39 of 2018, effective July 1, 2018).

Under Section 1517(b) of the PSC effective for the 2017-18 school year, chief school administrators are required to ensure that all the requirements of Section 1517 are “faithfully carried out in the schools over which they have charge.” The chief school administrator also has a duty to affirm that all of the information reported on the ACS reports filed with the PDE was correct and true to the best of his knowledge (*see* Criteria box). Given the inconsistencies between the ACS reports and the alarm records, along with the unavailable documentation, the Center’s Executive Director, as the chief school administrator, inappropriately attested to the accuracy of the fire drill data.

In conclusion, it is vitally important that the Center’s students and staff regularly participate in fire drills and other emergency drills while school is in session throughout the school year, and that fire drill data is timely and accurately reported to the PDE. In addition, the chief school administrator is responsible for attesting to the accuracy of the fire drill data reported in accordance with the PSC and the certification statement on the ACS report. The PSC specifically mandates that fire drills be conducted **each and every** month while school is in session with students and staff present. In fact, as further explained in the criteria to the left, recent amendments to the PSC reinforce the importance of conducting both monthly fire drills and school security drills. Additionally, it is essential that the Center maintain adequate and accurate documentation to support the fire drill data reported to the PDE.

## Recommendations

The *Huntingdon County Career and Technology Center* should:

1. Conduct monthly fire drills with staff and students while school is in session, as required by the PSC.
2. Ensure the Center is reporting factually correct data as certified by its chief school administrator to the PDE in its annual fire drill reports that can be evidenced by supporting documentation

3. Maintain detailed documentation for each fire drill conducted to ensure that the results of each drill are specifically noted so the Center can efficiently identify and correct any weaknesses. This could be best accomplished by utilizing a detailed form for each fire drill, which would assist the Center in better tracking its drills, would provide detailed information for the enhancement of future drills, and assist it in its completion of the PDE required certification statement.

### **Management Response**

HCCTC management provided the following response:

“Administration agrees for the most part with audit findings. However, I (Executive Director) stated that I know we (HCCTC) missed some fire drills but did not believe it was that many. I can recall one instance that our maintenance supervisor forgot to place the system in test mode so it would have been reflected as an active alarm. I do not recall the date of that event.

I cannot explain why incorrect dates were reported, but as Executive Director it is my responsibility to ensure that all data reported is accurate.

In the future, we will follow all recommendations provided in the audit.”

### **Auditor Conclusion**

As stated in our finding, we found three noteworthy issues. First, the Center did not conduct the monthly fire drills as required. Second, the Center inaccurately reported that it conducted fire drills to the PDE when it did not. Third, the Center did not maintain any supporting documentation to show that fire drills were conducted. As such, this finding is based on the totality of the circumstances and not just a few missed fire drills. Again, we found that only five fire drills, or 55 percent, were actually conducted during the 2017-18 school year, and we could only confirm that four fire drills were conducted during the 2016-17 school year due to a lack of any available documentation from September through December 2016. Additionally, we found the Center inaccurately reported to the PDE that it conducted fire drills when it did not for 5 of the 14 months

for which documentation was available for our review. As such, however, we are encouraged that the Center plans to implement our recommendations, which we will evaluate during our next engagement.

### Finding No. 3

### The Center Spent \$12,549 for Policy Services but Failed to Complete the Update Process

*Criteria relevant to the finding:*

Section 1303.1-A (relating to Policy relating to bullying) of the “Safe Schools Act”:

“(c) 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).” [Emphasis added.] See 24 P.S. § 13-1303.1-A(c).

According to the National School Boards Association’s *The Key Work of School Boards* stated, in part:

“An important part of achieving academic success is aligning the District’s resources, thinking planning and execution. Policy is an important part of achieving that alignment...to often policies are in place that are outdated and even contradictory to what the board and district are committed to doing...”

The Center failed to update many significant policies even though the Center paid \$7,800 to the Pennsylvania School Boards Association (PSBA) for policy update services starting in March 2015 and more than \$4,700 in annual policy maintenance fees.

The Center’s JOC approved a contract with the PSBA to update the Center’s policies at a meeting on October 14, 2014, and the *Policy Development Service* contract was signed by the Center on November 13, 2014. According to the contract, the PSBA was to do the following:

- Conduct an on-site visit to the Center to review the JOC meeting minutes, the Center’s Articles of Agreement, student/teacher handbooks, and bargaining agreements to assess how the Center operates and to determine what policies would be applicable to the Center’s operations.
- Draft one section of the Center’s policy manual at a time starting with section “000 – Local Joint Operating Committee Procedures.” This would give the Center’s JOC the opportunity to approve each policy section one at a time. Once approved by the Center, the Center would access the PSBA’s website to notify them of the final approval.
- Periodically send a newsletter out to the Center that includes policy update information as well as future training dates.
- Periodically contact the Center over the course of the policy update process to check the Center’s progress in approving the policies.

In addition to payments for the policy update services, the Center paid the PSBA annual policy maintenance fees, and annual dues as noted below.

<b>Huntingdon County CTC Payments to PSBA 2015-2018</b>					
<b>Payment Date</b>	<b>Policy Update Services</b>		<b>Payment Date</b>	<b>Annual Policy Maintenance</b>	<b>Annual Dues</b>
March 2015	\$2,600		July 2015	\$ 999	\$1,575
June 2017	\$2,600		July 2016	\$1,250	\$1,575
August 2017	\$2,600		July 2017	\$1,250	\$1,575
			July 2018	\$1,250	\$1,575
Sub-totals	\$7,800 (a)			\$4,749 (b)	\$6,300
<b>Total for policy services</b>	(a)+(b)=		<b>\$12,549</b>		
<b>Grand total all payments</b>					<b>\$18,849</b>

When the Center paid for the policy update services, the PSBA conducted the on-site visit to gain an understanding on how the Center operates and to determine what policies would be applicable to its operations. In the fall 2015, the PSBA completed the first section of the policy manual entitled, *Joint Operating Committee Operating Procedures* and the JOC approved the final reading on October 13, 2015. The PSBA had also provided written policy update instructions to help the Center’s administration complete the update process and navigate the PSBA’s website. However, we found that the Center’s administration never accessed the PSBA’s website to notify them of the final approval of the first policy section. As a result, the Center was never provided the final adopted policies.

Prior to the start of our engagement, no other policies had been reviewed or updated by the Center. The Executive Director explained that there was not enough time to devote to the update process due to other daily operational responsibilities. He further stated that the Center made no other attempts to correspond with PSBA to keep the policy update process going. In addition, the Executive Director indicated that he found the PSBA’s website difficult to navigate even though the PSBA provided the Center with

detailed instructions for navigating the website. More specifically, the PSBA provided an overview with basic tips such as: searching for policies, accessing the PSBA's personal news network, creating a new policy, revising current policies, sending policies to the PSBA, and activating those policies.

Not only was the Center paying for a service that it was not utilizing, it was also operating with several outdated policies. The Center paid PSBA more than \$4,700 in annual policy maintenance fees but did not ensure that its policies were updated. Having updated policies helps to ensure that the Center is in compliance with state and federal laws and regulations and provides a legal basis for actions by the JOC.

Our review of the Center's policies found that the Center's *Philosophy of Education/Mission Statement/Goals/Objectives* policy has not been updated since 2001, and does not reflect the Center's current mission statement. The Center's academic policies have also not been updated since 2001.<sup>21</sup> Educational policies such as these form the basic foundations of the educational program and students may be negatively impacted by these out of date policies. We noted other policies that have not been updated since 2002, which include those related to the Center's hiring and employment practices, Right-to-Know Law procedures, and budgeting practices.

In addition, we noted that the Center's *Bullying/Cyber-bullying* policy was last reviewed in September 2013. The PSC requires this policy to be reviewed every three years; therefore, the Center has not complied with this provision of the PSC.<sup>22</sup> (See Finding No. 1 on page 5 for more details.)

These outdated policies may not reflect changes that have occurred in the years since the last update and could contradict the current educational and financial goals that the Center and the JOC are committed to achieving. The JOC must take a proactive role in ensuring that policies are reviewed annually and updated as needed. In addition, the

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<sup>21</sup> Outdated academic policies include: Policy No. 100 - *Strategic Plan*, Policy No. 102-*Academic Standards*, and Policy No. 113 - *Special Education*.

<sup>22</sup> 24 P.S. § 13-1303.1-A(c).

JOC should ensure that the Center utilizes the PSBA services it continues to pay for annually.

### **Recommendations**

The *Huntingdon County Career and Technology Center* should:

1. Contact the PSBA to determine what actions need to be taken to complete the policy manual update, and establish a realistic timeline for follow up to ensure that all policies that were paid for are received, approved, and adopted by the JOC.
2. Have the administration work with the JOC to design and implement a systematic process for reviewing and updating its formal policies on a regular basis by focusing on comparing existing policies to the Center's current goals and priorities to ensure that they are in alignment.

### **Management Response**

HCCTC management agreed with the finding and provided the following response:

“During the year HCCTC contracted with PSBA for policy updates, the management team met on several occasions to review PSBA recommendations and make ready policies for JOC approval. The administrative team completed a review of the first section of the policy manual and took those to the JOC for approval. Around that same time frame we were informed that PSBA was behind on recommendations and would be delayed in sending those to HCCTC. During this same time period, HCCTC switched over to Google Apps for Education, which included new email addresses for all staff. The email address that was given to PSBA was an old email address. We were later informed that emails were being sent to the old, outdated email account and, therefore, administration did not receive notification that policies were ready for review.

“Day to day business of running the building, applying for grants, working securing funds for a building project and other initiatives caused the policy updates to slip out of mind. In the spring of 2018 I began receiving notifications

and informed the Superintendent of Record that we needed to continue the process of policy review. At the August 2018 meeting of the JOC, the board was informed of the intent to reestablish a plan to review and update policies. As Executive Director of Huntingdon County CTC, I take responsibility for failure to update policies in a timely manner.

Administration will work with PSBA and the JOC to develop a plan to review and implement updated policies for HCCTC.”

### **Auditor Conclusion**

We are encouraged that the Center agrees with the finding and is taking action to ensure its outdated policies are updated and to address the policy weaknesses. We will evaluate the effectiveness of these actions, as well as the implementation of our other recommendations, during our next audit.



## Status of Prior Audit Findings and Observations

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Our prior audit of the Huntingdon County Career and Technology Center (Center) released on January 22, 2015, contained one observation, as shown below. As part of our current engagement, we determined the status of corrective action taken by the Center to implement our prior audit recommendations. We interviewed Center personnel and performed audit procedures as detailed in each status section below.

### Auditor General Performance Audit Report Released on January 22, 2015

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**Prior Observation:**                      **The Center Spent \$27,984 on Agreements that Terminated the Employment of the Executive Director and Business Manager**

Prior Observation  
Summary:

Our prior audit found that the Center’s Joint Operating Committee (JOC) entered into two separate settlement agreements with a total cost to the Center of \$27,984. Both employees resigned and subsequently received leave payouts and payments for benefits through separation agreements negotiated with the JOC.

Prior Recommendations:              We recommended that the Center should:

1. Abide by Section 1073 of the Public School Code (PSC) when creating an agreement with an Executive Director.
2. Document in the official JOC meeting minutes, in detail, why the Center chooses to expend large amounts of public money when ending an administrator’s employment.

Current Status:

The Center did not implement recommendation No. 1. The most recent contract for the Executive Director, effective July 1, 2016, does not include or reference the PSC Section 1073.<sup>23</sup> Additionally, since the last audit, the Center hired an Assistant Executive Director whose contract was effective July 1, 2017, and lacks the same PSC Section 1073 provisions. No additional payouts have taken place since the previous audit, so the Center has not had the opportunity to implement the second recommendation.

We again recommend the Center update the contracts for the Executive Director and the Assistant Executive Director to include

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<sup>23</sup> See 24 P.S. § 10-1073.

the PSC Section 1073 provisions to help protect the Center in the event of an early contract termination.

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## **Distribution List**

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This letter was initially distributed to the Executive Director of the Center, the Joint Operating Committee, and the following stakeholders:

**The Honorable Tom W. Wolf**

Governor  
Commonwealth of Pennsylvania  
Harrisburg, PA 17120

**The Honorable Pedro A. Rivera**

Secretary of Education  
1010 Harristown Building #2  
333 Market Street  
Harrisburg, PA 17126

**The Honorable Joe Torsella**

State Treasurer  
Room 129 - Finance Building  
Harrisburg, PA 17120

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