

PERFORMANCE AUDIT

McGuffey School District Washington County, Pennsylvania

April 2022



Commonwealth of Pennsylvania
Department of the Auditor General

Timothy L. DeFoor • Auditor General



**Commonwealth of Pennsylvania
Department of the Auditor General
Harrisburg, PA 17120-0018
Facebook: Pennsylvania Auditor General
Twitter: @PAAuditorGen
www.PaAuditor.gov**

**TIMOTHY L. DEFOOR
AUDITOR GENERAL**

Dr. Andrew Oberg, Superintendent
McGuffey School District
90 McGuffey Drive
Claysville, Pennsylvania 15323

Ms. Zonie Jackson, Board President
McGuffey School District
90 McGuffey Drive
Claysville, Pennsylvania 15323

Dear Dr. Oberg and Ms. Jackson:

We have conducted a performance audit of the McGuffey School District (District) for the period July 1, 2016 through June 30, 2020, except as otherwise indicated in the audit scope, objective, and methodology section of the report. We evaluated the District's performance in the following areas as further described in Appendix A of this report:

- Transportation Operations
- Bus Driver Requirements

We also evaluated the application of best practices in the area of school safety and determined compliance with certain requirements in this area, including compliance with fire and security drills. 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.

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.

Our audit identified noncompliance and significant internal control deficiencies in the area of transportation operations and those deficiencies are detailed in the finding in this report titled:

The District's Failure to Implement an Adequate Internal Control System Resulted in a \$50,571 Underpayment and an Unauditable \$1 Million in Transportation Reimbursements

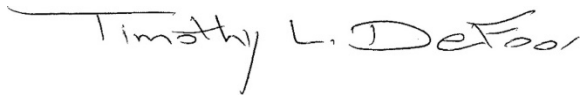
In addition, we identified internal control deficiencies in the area of bus driver qualifications that were not significant but warranted attention of District management and those charged with governance. These deficiencies were communicated to District management and those charged with governance for their consideration.

Dr. Andrew Oberg
Ms. Zonie Jackson
Page 2

Our audit finding and recommendations have been discussed with the District's management, and their response is 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 that reads "Timothy L. DeFoor". The signature is written in a cursive style with a horizontal line above the first name.

Timothy L. DeFoor
Auditor General

April 25, 2022

cc: **MCGUFFEY SCHOOL DISTRICT** Board of School Directors

Table of Contents

	Page
Background Information	1
Finding	6
Finding – The District’s Failure to Implement an Adequate Internal Control System Resulted in a \$50,571 Underpayment and an Unauditable \$1 Million in Transportation Reimbursements	6
Status of Prior Audit Findings and Observations	11
Appendix A: Audit Scope, Objectives, and Methodology	12
Appendix B: Academic Detail	17
Distribution List	21

Background Information

School Characteristics 2020-21 School Year*	
County	Washington
Total Square Miles	198
Number of School Buildings	4
Total Teachers	137
Total Full or Part-Time Support Staff	86
Total Administrators	14
Total Enrollment for Most Recent School Year	1,539
Intermediate Unit Number	1
District Career and Technical School	Western Area Career and Technology Center

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

Mission Statement*

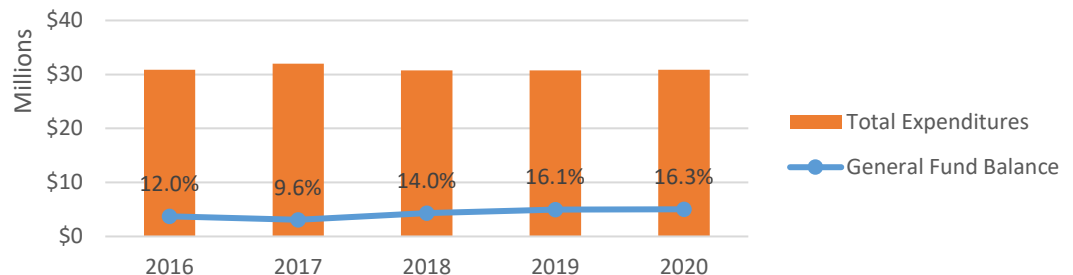
In partnership with our community, McGuffey School District empowers all learners to grow and excel.

Financial Information

The following pages contain financial information about the McGuffey School 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**.

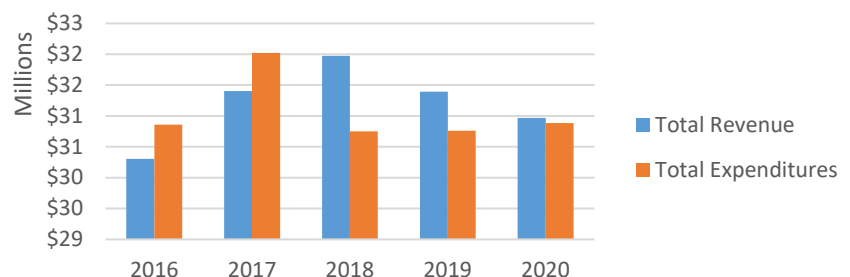
General Fund Balance as a Percentage of Total Expenditures

	General Fund Balance
2016	\$3,709,271
2017	\$3,089,356
2018	\$4,316,254
2019	\$4,948,714
2020	\$5,031,825



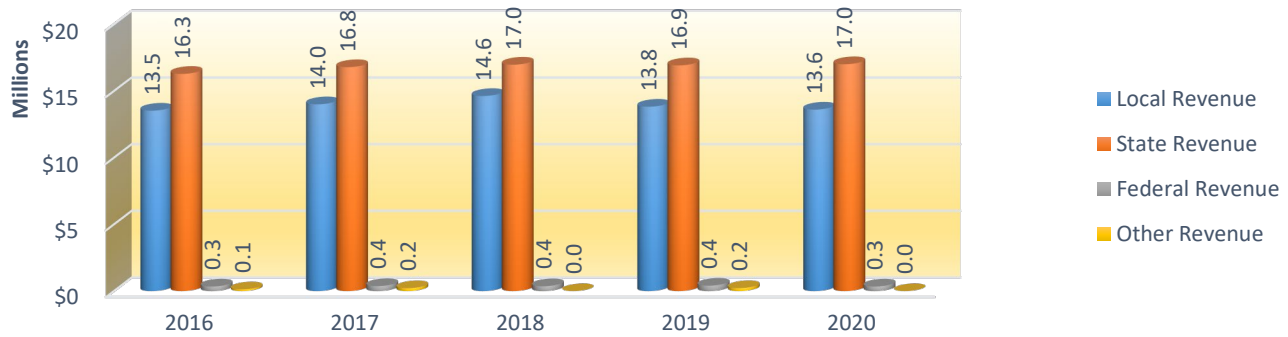
Revenues and Expenditures

	Total Revenue	Total Expenditures
2016	\$30,303,732	\$30,857,879
2017	\$31,401,723	\$32,021,639
2018	\$31,975,868	\$30,748,969
2019	\$31,392,467	\$30,760,009
2020	\$30,968,712	\$30,885,603

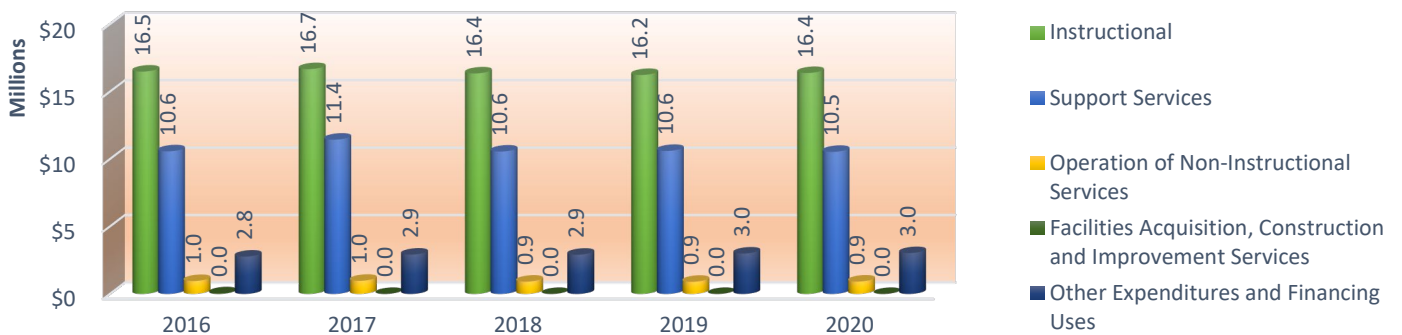


Financial Information Continued

Revenues by Source

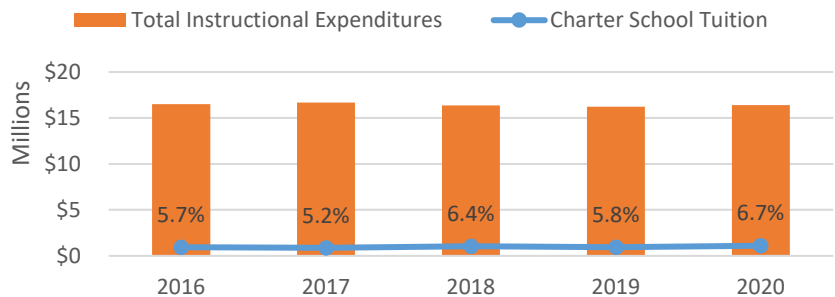


Expenditures by Function

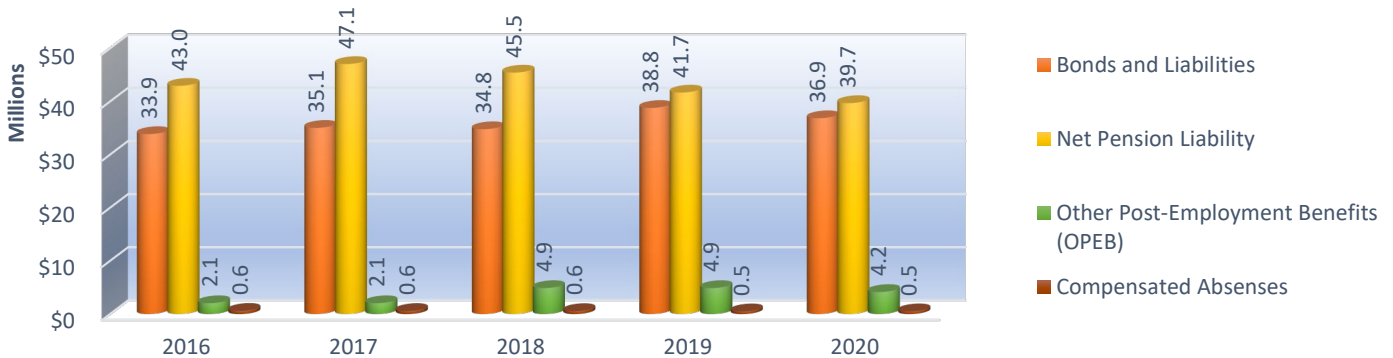


Charter Tuition as a Percentage of Instructional Expenditures

	Charter School Tuition	Total Instructional Expenditures
2016	\$939,164	\$16,496,770
2017	\$874,476	\$16,678,922
2018	\$1,041,416	\$16,359,997
2019	\$940,909	\$16,244,714
2020	\$1,100,890	\$16,392,196



Long-Term Debt

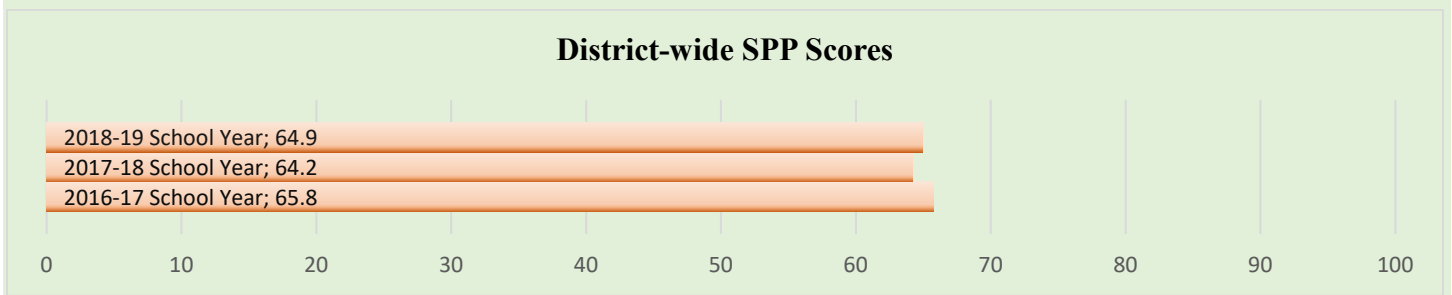


Academic Information¹

The graphs on the following pages present the District-wide School Performance Profile (SPP) scores, Pennsylvania System of School Assessment (PSSA) scores, and Keystone Exam results for the District obtained from PDE's data files for the 2016-17, 2017-18, and 2018-19 school years.² In addition, the District's 4-Year Cohort Graduation Rates are presented for the 2017-18 through 2019-20 school years.³ 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.



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

² Due to the COVID-19 pandemic the PSSA and Keystone Exam requirements were waived for the 2019-20 school year; therefore, there is no academic data to present for this school year.

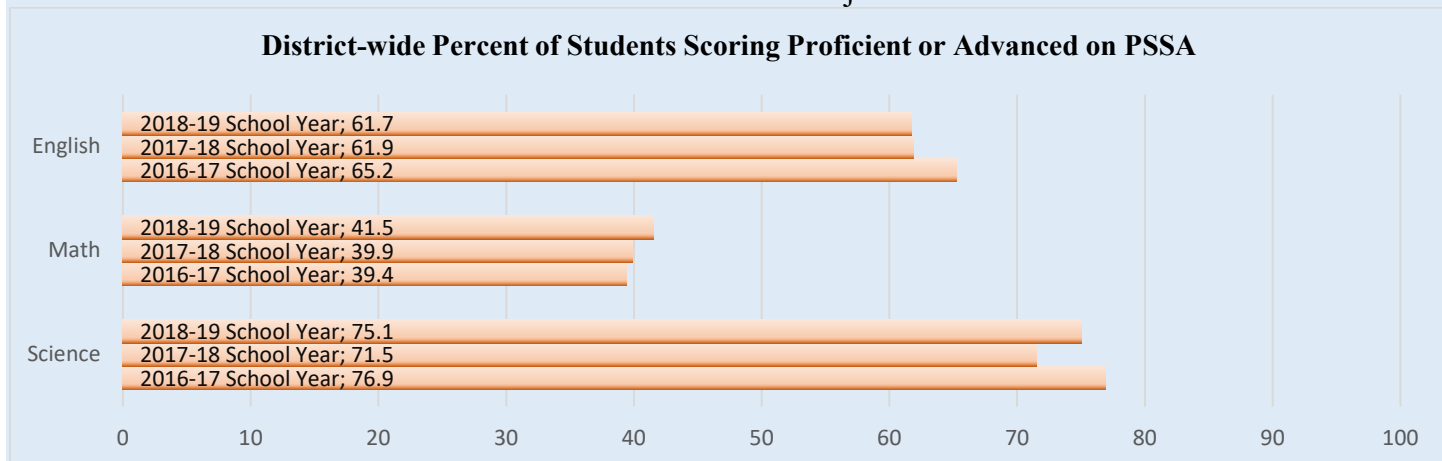
³ Graduation rates were still reported for the 2019-20 school year despite the COVID-19 pandemic.

Academic Information Continued

What is the PSSA?

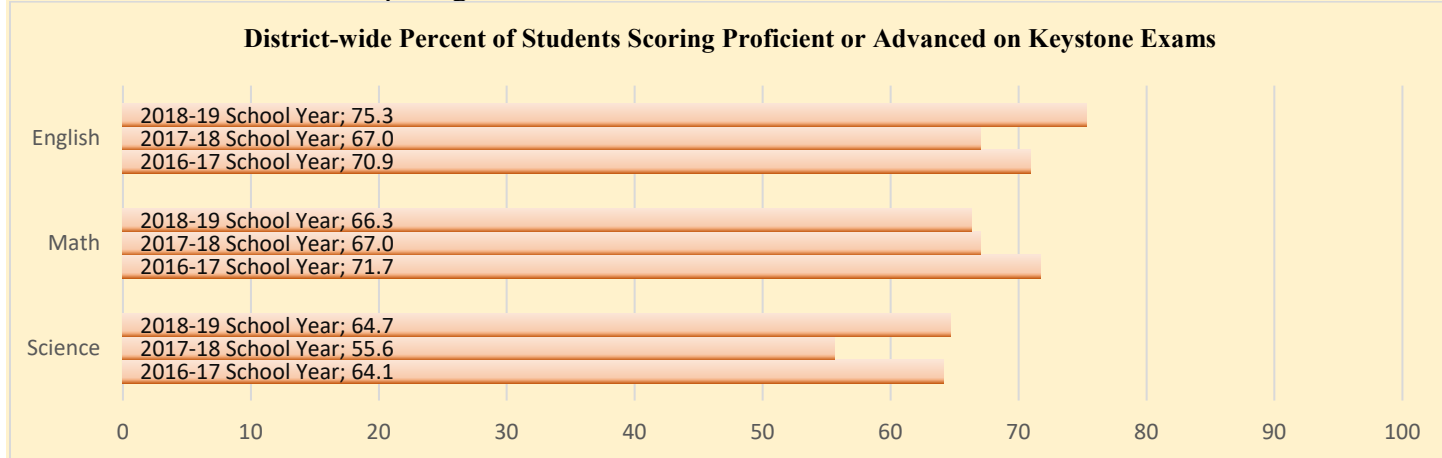
The PSSA is an annual, standardized test given across the Commonwealth to students in grades 3 through 8 in core subject areas, including English, Math and Science. The PSSAs help Pennsylvania meet federal and state requirements and inform instructional practices, as well as provide educators, stakeholders, 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.⁴ 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.

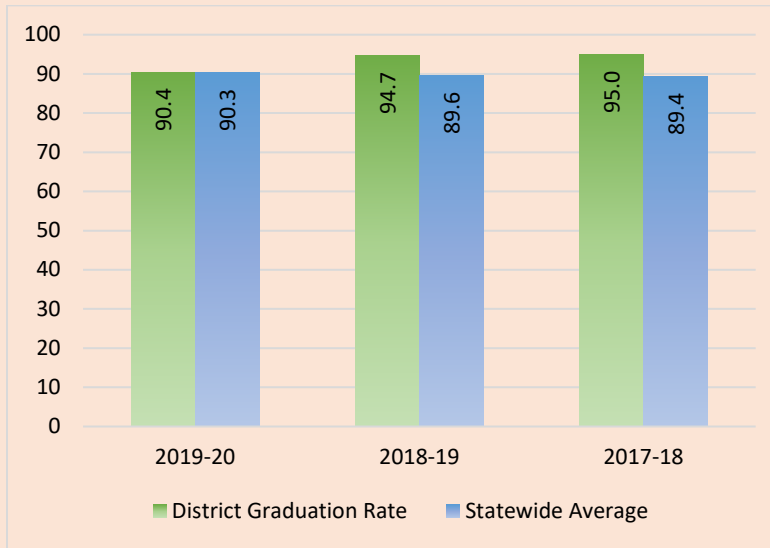


⁴ Act 158 of 2018, effective October 24, 2018, amended the Public School Code to further delay the use of Keystone Exams as a graduation requirement until the 2021-22 school year. See 24 P.S. § 1-121(b)(1). Please refer to the following link regarding further guidance to local education agencies (LEAs) on Keystone end-of-course exams (Keystone Exams) in the context of the pandemic of 2020: <https://www.education.pa.gov/Schools/safeschools/emergencyplanning/COVID-19/Pages/Keystone-Exams.aspx>

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.⁵



⁵ PDE also calculates 5-year and 6-year cohort graduation rates. Please visit PDE's website for additional information:
<https://www.education.pa.gov/DataAndReporting/CohortGradRate/Pages/default.aspx>.

Finding

Finding

The District's Failure to Implement an Adequate Internal Control System Resulted in a \$50,571 Underpayment and an Unauditable \$1 Million in Transportation Reimbursements

Criteria relevant to the finding:

Student Transportation Subsidy

The Public School Code (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 Pennsylvania Department of Education (PDE), 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).

We found that the McGuffey School District (District) did not implement an adequate internal control system over its process of calculating and reporting regular transportation data. Consequently, the District inaccurately reported transportation data to the Pennsylvania Department of Education (PDE), which resulted in the District receiving \$50,571 less than it was eligible to receive in regular transportation reimbursement for the 2017-18 and 2018-19 school years.⁶ Additionally, the District failed to retain documentation to support the regular transportation data it reported to PDE for the 2016-17 school year, and therefore, we could not audit the reported data and determine the accuracy of the more than \$1 million the District received for that year.⁷

Background: 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 solely based on the number of nonpublic school and charter school students transported at any time during the school year. The errors detailed in this finding pertain to the District's regular transportation reimbursement.

Since the above listed components are integral to the calculation of the District's transportation reimbursements, it is essential that the District properly record, calculate, and report transportation data to PDE. Therefore, the District should have a strong system of internal control over its transportation operations that should include, but not be limited to, the following:

- Training on PDE reporting requirements.
- Segregation of duties.
- Comprehensive written procedures.

⁶ The District received a total of \$3,825,157 in regular transportation reimbursements during the four-year audit period of July 1, 2016 through June 30, 2020.

⁷ Our review of the regular transportation data reported for the 2019-20 school year did not disclose any errors.

*Criteria relevant to the finding
(continued):*

**Sworn Statement and Annual
Filing Requirements**

Section 2543 of the PSC sets forth the requirement for school districts to 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. *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.)

Record Retention Requirement

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

It is also important to note that the Public School Code (PSC) requires that all school districts annually file with PDE a sworn statement of student transportation data for the prior and current school years in order to be eligible for transportation reimbursements.⁸ The sworn statement includes the Superintendent’s signature attesting to the accuracy of the reported data. Because of that statutorily required attestation, the District should ensure it has implemented an adequate internal control system so its submission to PDE can be made with the utmost confidence.

Regular Transportation Data Reporting Errors

PDE requires school districts to report the number of miles per day to the nearest tenth that each vehicle travels with and without students. Districts are also required to report the number of students assigned to each vehicle. If the miles traveled and/or students assigned changes during the school year, an average must be calculated and reported. Districts are also required to report the number of days each vehicle transported students.

We found that the District underreported annual miles traveled and/or the number of students transported for 25 of the 45 vehicles used for the 2017-18 school year and for 7 of the 45 vehicles used in the 2018-19 school year. The table below details the errors we identified for each year and the related underpayment that we calculated.

Table

McGuffey School District Transportation Data Reporting Errors			
School Year	Annual Miles (Under) Reported	Students (Under) Reported	Underpayment
2017-18	(6,017)	(160)	\$47,927
2018-19	(1,390)	0	\$ 2,644
Total	(7,407)	(160)	\$50,571

The errors we identified occurred because District personnel inaccurately entered transportation data from supporting documentation (student rosters and odometer readings) into the spreadsheet that was used to calculate average data. Additionally, we found errors in the “formulas” used in the spreadsheet which resulted in inaccurate calculations. The District’s current employee responsible for calculating and reporting transportation data corrected the formula errors in the spreadsheet before performing the calculations related to the 2019-20 school year data.

⁸See 24 P.S. § 25-2543.

*Criteria relevant to the finding
(continued):*

Instructions to Local Education Agencies (LEA) on how to complete the PDE-1049. The PDE-1049 is the electronic form used by LEAs to submit transportation vehicle data annually to PDE.
<http://www.education.pa.gov/Documents/Teachers-Administrators/Pupil%20Transportation/eTran%20Application%20Instructions/PupilTransp%20Instructions%20PDE%201049.pdf>
(Accessed on 3/16/22.)

Daily Miles With

Report the number of miles per day, to the nearest tenth, that the vehicle traveled with pupils. If this figure changed during the year, calculate a weighted average or sample average.

Daily Miles Without

Report the number of miles per day, to the nearest tenth, that the vehicle traveled without pupils. If this figure changed during the year, calculate a weighted average or sample average.

Pupils Assigned

Report the greatest number of pupils assigned to ride this vehicle at any one time during the day. Report the number of pupils assigned to the nearest tenth. The number cannot exceed the seating capacity. If the number of pupils assigned changed during the year, calculate a weighted average or a sample average.

Unauditable Regular Transportation Reimbursements of Over \$1 Million for the 2016-17 School Year

The District employee responsible for calculating and reporting transportation data for the 2016-17 school year is no longer employed by the District. Current District officials were unable to provide monthly rosters for students transported during the 2016-17 school year. Without this supporting documentation, we were unable to determine the accuracy of the data reported to PDE and, therefore, we also could not verify the accuracy of the \$1,006,933 the District received in regular transportation reimbursement for the 2016-17 school year.

Due to errors we identified in the 2017-18 and 2018-19 school years, a detailed review of the reported information for the 2016-17 school year was warranted; however, the District's failure to retain appropriate supporting documentation precluded us from conducting such a review. While we recognize that the District experienced staff turnover in this operational area, it was the District's failure to implement procedures to ensure appropriate supporting documentation was obtained and retained for review that ultimately resulted in the unauditable reimbursements.

Significant Internal Control Deficiencies

Our review revealed that the District did not have an adequate internal control system over the process of inputting, categorizing, and reporting regular transportation data to PDE. Specifically, we found that the District did not do the following:

- Ensure that all of the employees involved in the reporting of transportation data were adequately trained on the documentation required to be obtained and retained to support the reported data for the regular transportation reimbursements.
- Develop detailed written procedures for accurately categorizing and reporting transportation data to PDE and obtaining and maintaining appropriate supporting documentation.
- Ensure that an employee, other than the employee responsible for inputting and reporting regular transportation data, has reviewed the data before it was submitted to PDE.

Future Reimbursement Adjustment: We provided PDE with reports detailing the transportation data reporting errors we identified for the 2017-18 and 2018-19 school years. We recommend that PDE adjust the District's future transportation reimbursements to account for the \$50,571 that we calculated as an underpayment.

Recommendations

The *McGuffey School District* should:

1. Develop and implement an internal control system over its regular transportation data reporting process. The internal control system should include, but not be limited to, the following:
 - All personnel involved in inputting, categorizing, and reporting transportation data are trained on PDE's reporting requirements including the supporting documentation necessary to be obtained and retained.
 - Clear and concise written procedures are developed to document the transportation data collection, categorization, and reporting process.
 - A review of the transportation data is conducted by an employee other than the employee who prepared the data before it is submitted to PDE.
2. Ensure that complete supporting documentation for all vehicle data is obtained, reviewed, and retained in accordance with PSC requirements. Record retention procedures should be documented and staff should be trained on these procedures.

The *Pennsylvania Department of Education* should:

3. Adjust the District's future transportation subsidy to resolve the \$50,571 underpayment for the regular transportation reimbursements.

Management Response

District management provided the following response:

“The cause of the problem at McGuffey School District is related to a number of factors. First, there was a great deal of staff turnover during the years that were audited. This turnover created inconsistencies in practices related to the collection and reporting of transportation data. Second, training provided to the transportation staff was focused on transportation logistics and creation of bus routes for the purpose of ensuring our students were transported to and from school each day. Lastly, the lack of standardized processes and procedures regarding the reporting of transportation data also created inconsistencies in reporting practices.

McGuffey School District recognizes the need for improvements in a number of areas regarding the reporting of regular transportation data. Starting with feedback we received during the audit process in the spring of 2022, we have made or will make the following changes to begin to

correct the following problems:

1) Internal Control System

- a. “Written Procedures (Data Reporting) - Written procedures are being developed to identify the process by which the transportation department collects, categorizes, and reports transportation data to PDE. Retention of supporting documentation will also be addressed within these procedures.
- b. “Written Procedures (Review Process) - Written procedures are being developed to identify the process by which transportation data is reviewed and acknowledged prior to the submission to PDE. These procedures will identify employees required to review data, other than the person preparing the data, prior to the submission of the data to PDE.
- c. “Training - Training has been/will be provided to the staff of the transportation department specific to the PDE requirements for reporting transportation data to include the identification of the necessary supporting documentation required to support the data being reported. Examples of best practices in reporting data will also be provided to the transportation department staff.

2) Supporting Documentation

- a. “McGuffey School District recognizes the need to obtain, review, and retain supporting documentation for the data being reported to PDE. We have reviewed the requirements outlined in the Pennsylvania School Code and have modified our processes internally to comply with these requirements.”

Auditor Conclusion

We are encouraged that the District has agreed to implement corrective actions to address all of our recommendations. We reiterate that implementation of our recommendations should help ensure that the District reports accurate transportation data to PDE.

Status of Prior Audit Findings and Observations

Our prior audit of the McGuffey 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,⁹ 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.

Our audit focused on the District's effectiveness and/or compliance with applicable statutory provisions and related regulations in the areas of Transportation Operations, Bus Driver Requirements, and School Safety, including fire and security drills. The audit objectives supporting these areas of focus are explained in the context of our methodology to achieve the objectives in the next section. Overall, our audit covered the period July 1, 2016 through June 30, 2020. The scope of each individual objective is also detailed in the next section.

The District's management is responsible for establishing and maintaining effective internal control to provide reasonable assurance that the District's objectives will be achieved.¹⁰ *Standards for Internal Control in the Federal Government* (also known as and hereafter referred to as the Green Book), issued by the Comptroller General of the United States, provides a framework for management to establish and maintain an effective internal control system. The Department of the Auditor General used the Green Book as the internal control analysis framework during the conduct of our audit.¹¹ The Green Book's standards are organized into five components of internal control. In an effective system of internal control, these five components work together in an integrated manner to help an entity achieve its objectives. Each of the five components of internal control contains principles, which are the requirements an entity should follow in establishing an effective system of internal control. We illustrate the five components and their underlying principles in Figure 1 on the following page.

⁹ 72 P.S. §§ 402 and 403.

¹⁰ District objectives can be broadly classified into one or more of the following areas: effectiveness of operations; reliability of reporting for internal and external use; and compliance with applicable laws and regulations, more specifically in the District, referring to certain relevant state laws, regulations, contracts, and administrative procedures.

¹¹ Even though the Green Book was written for the federal government, it explicitly states that it may also be adopted by state, local, and quasi-government entities, as well as not-for-profit organizations, as a framework for establishing and maintaining an effective internal control system. The Green Book is assessable at <https://www.gao.gov/products/GAO-14-704G>

Figure 1: Green Book Hierarchical Framework of Internal Control Standards

Principle	Description
Control Environment	
1	Demonstrate commitment to integrity and ethical values
2	Exercise oversight responsibility
3	Establish structure, responsibility, and authority
4	Demonstrate commitment to competence
5	Enforce accountability
Risk Assessment	
6	Define objectives and risk tolerances
7	Identify, analyze, and respond to risks
8	Assess fraud risk
9	Identify, analyze, and respond to change

Principle	Description
Control Activities	
10	Design control activities
11	Design activities for the information system
12	Implement control activities
Information and Communication	
13	Use quality information
14	Communicate internally
15	Communicate externally
Monitoring	
16	Perform monitoring activities
17	Evaluate issues and remediate deficiencies

In compliance with generally accepted government auditing standards, we must determine whether internal control is significant to our audit objectives. We base our determination of significance on whether an entity's internal control impacts our audit conclusion(s). If some, but not all, internal control components are significant to the audit objectives, we must identify those internal control components and underlying principles that are significant to the audit objectives.

In planning our audit, we obtained a general understanding of the District's control environment. In performing our audit, we obtained an understanding of the District's internal control sufficient to identify and assess the internal control significant within the context of the audit objectives. Figure 2 represents a summary of the internal control components and underlying principles that we identified as significant to the overall control environment and the specific audit objectives (denoted by an "X").

Figure 2 – Internal Control Components and Principles Identified as Significant

	Internal Control Significant ?	Control Environment					Risk Assessment				Control Activities			Information and Communication			Monitoring	
Principle →		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
General/overall	Yes	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X
Transportation	Yes				X			X	X		X		X	X	X	X	X	
Bus Drivers	Yes										X		X			X	X	
Safe Schools	No																	

With respect to the principles identified, we evaluated the internal control(s) deemed significant within the context of our audit objectives and assessed those controls to the extent necessary to address our audit objectives. The results of our evaluation and assessment of the District's internal control for each objective is discussed in the following section.

Objectives/Scope/Methodology

In order to properly plan our audit and to guide us in selecting objectives, we reviewed pertinent laws and regulations, the District's annual financial reports, annual General Fund budgets, and the independent audit reports of the District's basic financial statements for the July 1, 2016 through June 30, 2020 fiscal years. We conducted analytical procedures on the District's state revenues and the transportation reimbursement data. We reviewed the prior audit report and we researched current events that possibly affected District operations. 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 effectiveness in four areas as described below. As we conducted our audit procedures, we sought to determine answers to the following questions, which served as our audit objectives.

Transportation Operations

- 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?¹²
 - ✓ To address this objective, we assessed the District's internal controls for obtaining, processing, and reporting transportation data to PDE. We reconciled the reported mileage and student data on the PDE-2518 (*Summary of Individual Vehicle Data for Contracted Service*) to the District created summary weighted average calculations for all 186 vehicles reported for the 2016-17 through 2019-20 school years.¹³ We requested vehicle odometer readings, student rosters, and school calendars for all 186 vehicles used to transport District students during the 2016-17 through 2019-20 school years. However, the District could not provide the required supporting documentation needed to verify the accuracy of the reported number of students reported for all 49 vehicles reported for the 2016-17 school year. Therefore, we were unable to determine the accuracy of the regular transportation reimbursement received from PDE for the 2016-17 school year. For the vehicles reported for the 2017-18 through 2019-20 school years, we determined if the mileage traveled, students transported, and days in operation were correctly calculated and reported to PDE.

Conclusion: The results of our review of this objective identified reporting errors, areas of noncompliance and significant internal control deficiencies related to this objective. Those results are detailed in the Finding beginning on page 6 of this report.

¹² See 24 P.S. § 25-2541(a).

¹³ The District reported the following number of vehicles for each school year: 49 vehicles in 2016-17, 45 vehicles in 2017-18, 45 vehicles in 2018-19, and 47 vehicles in 2019-20.

Bus Driver Requirements

- 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 clearances¹⁴ as outlined in applicable laws?¹⁵ 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 assessed the District's internal controls for obtaining, reviewing, maintaining, and monitoring required bus driver qualification and clearance documents. We determined if all drivers were approved by the District's Board of School Directors. We reviewed all 77 of the District's contracted drivers who transported District students as of January 11, 2022. We reviewed documentation to ensure the District complied with the qualification and clearance requirements for those drivers. We also determined if the District had monitoring procedures to ensure all drivers had updated clearances, licenses, and physicals.

Conclusion: The results of our procedures did not identify any reportable issues. However, we did identify internal control deficiencies that were not significant to our objective but warranted the attention of District management and those charged with governance. These deficiencies were communicated to District management and those charged with governance for their consideration.

School Safety

- Did the District comply with requirements in the Public School Code and the Emergency Management Code related to emergency management plans, bullying prevention, and memorandums of understanding with local law enforcement?¹⁶ Also, did the District follow best practices related to physical building security and providing a safe school environment?
 - ✓ To address this objective, we obtained and reviewed a variety of documentation including safety plans, training schedules, risk and vulnerability assessments, anti-bullying policies, school climate surveys, and memorandums of understanding with local law enforcement. In addition, we conducted on-site walk-throughs at three of the District's four school buildings (one from each education level)¹⁷ to assess whether the District had implemented basic safety practices.¹⁸

Conclusion: Due to the sensitive nature of school safety, the results of our review for this objective are not described in our audit report, but they were shared with District officials, PDE's Office of Safe Schools, and other appropriate law enforcement agencies deemed necessary.

¹⁴ 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.

¹⁵ PSC 24 P.S. § 1-111, CPSL 23 Pa.C.S. § 6344(a.1), PSC (Educator Discipline) 24 P.S. § 2070.1a *et seq.*, State Vehicle Code 75 Pa.C.S. §§ 1508.1 and 1509, and State Board of Education's regulations 22 *Pa. Code Chapter 8*.

¹⁶ Safe Schools Act 24 P.S. § 13-1301-A *et seq.*, Emergency Management Services Code 35 Pa.C.S. § 7701.

¹⁷ We selected one of the two elementary schools buildings due to the District stating that the one chosen would remain open as opposed to the other's possible closure in the near future. The District only had one middle and one high school building which were chosen for walkthroughs.

¹⁸ Basic safety practices evaluated were building security, bullying prevention, visitor procedures, risk and vulnerability assessments, and preparedness.

- Did the District comply with the fire and security drill requirements of Section 1517 of the Public School Code?¹⁹ Also, did the District accurately report the dates of drills to PDE and maintain supporting documentation to evidence the drills conducted and reported to PDE?
 - ✓ To address this objective, we obtained and reviewed the District's fire and security drill records for all four District school buildings to determine whether drills were conducted as required for the 2018-19 and 2019-20 school years. We determined if a security drill was held within the first 90 days of the school year for each building in the District and if monthly fire drills were conducted in accordance with requirements. We also obtained the *Accuracy Certification Statement* that the District filed with PDE and compared the dates reported to the supporting documentation.

Conclusion: The results of our procedures did not disclose any reportable issues.

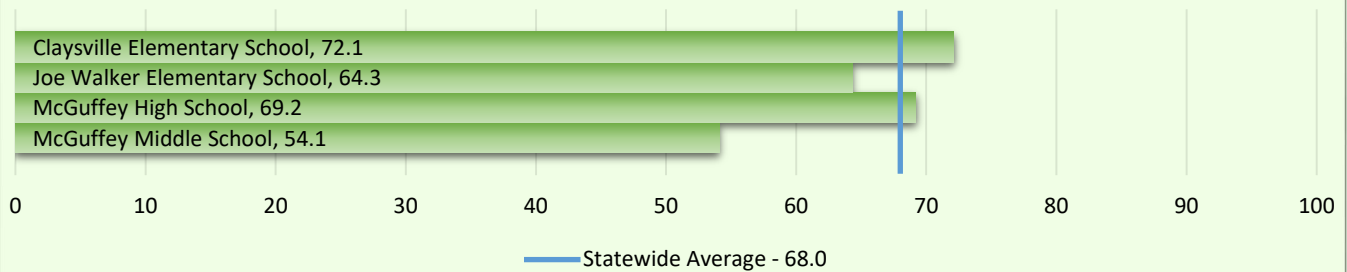
¹⁹ Public School Code (Fire and Security Drills) 24 P.S. § 15-1517.

Appendix B: Academic Detail

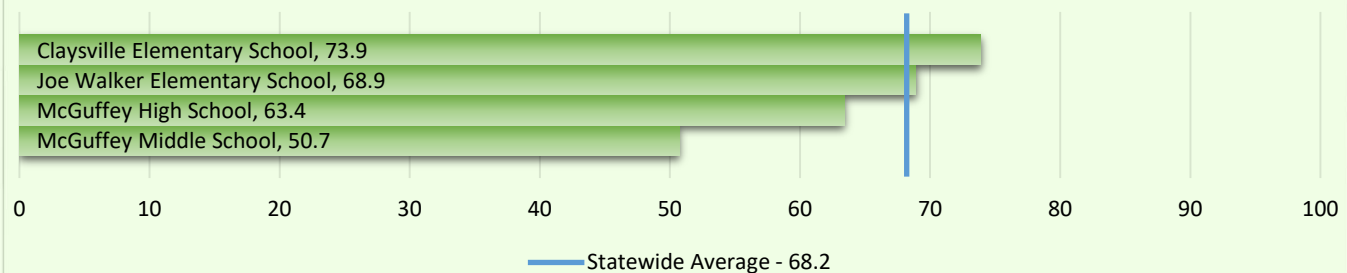
Benchmarks noted in the following graphs represent the statewide average of all public school buildings in the Commonwealth that received a score in the category and year noted.²⁰ Please note that if one of the District's schools did not receive a score in a particular category and year presented below, the school will not be listed in the corresponding graph.²¹

SPP School Scores Compared to Statewide Averages

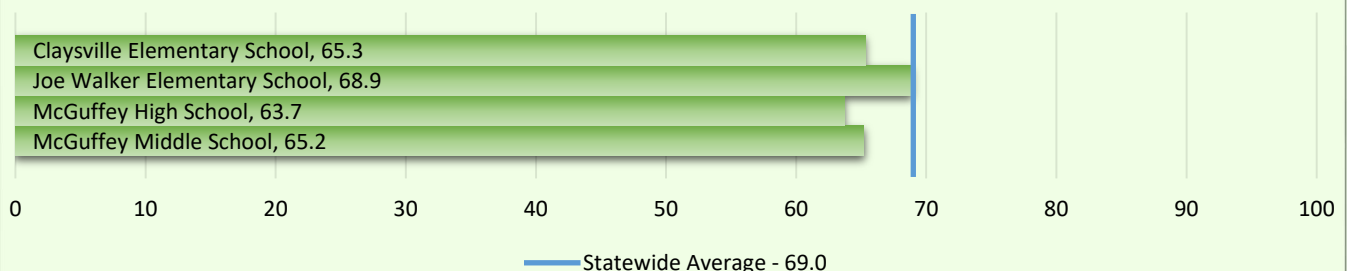
2018-19



2017-18



2016-17

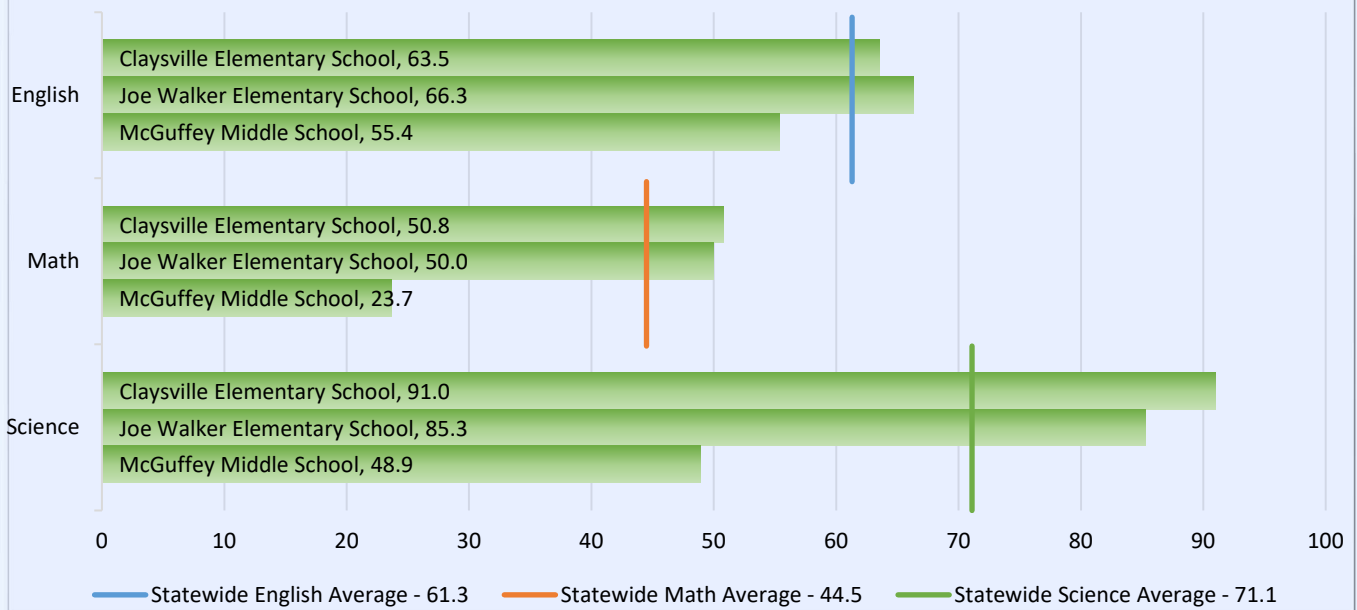


²⁰ Statewide averages were calculated by our Department based on individual school building scores for all public schools in the Commonwealth, including district schools, charters schools, and cyber charter schools.

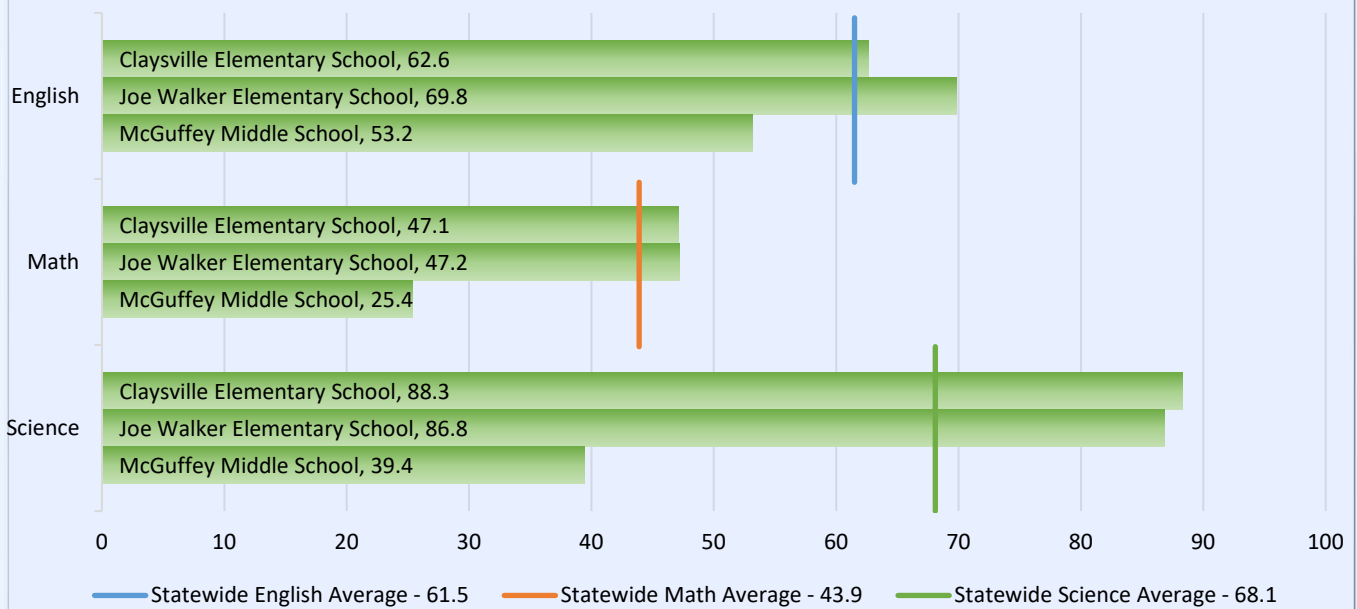
²¹ PDE's data does not provide any further information regarding the reason a score was not published for a specific school. However, readers can refer to PDE's website for general information regarding the issuance of academic scores.

PSSA Advanced or Proficient Percentage School Scores Compared to Statewide Averages

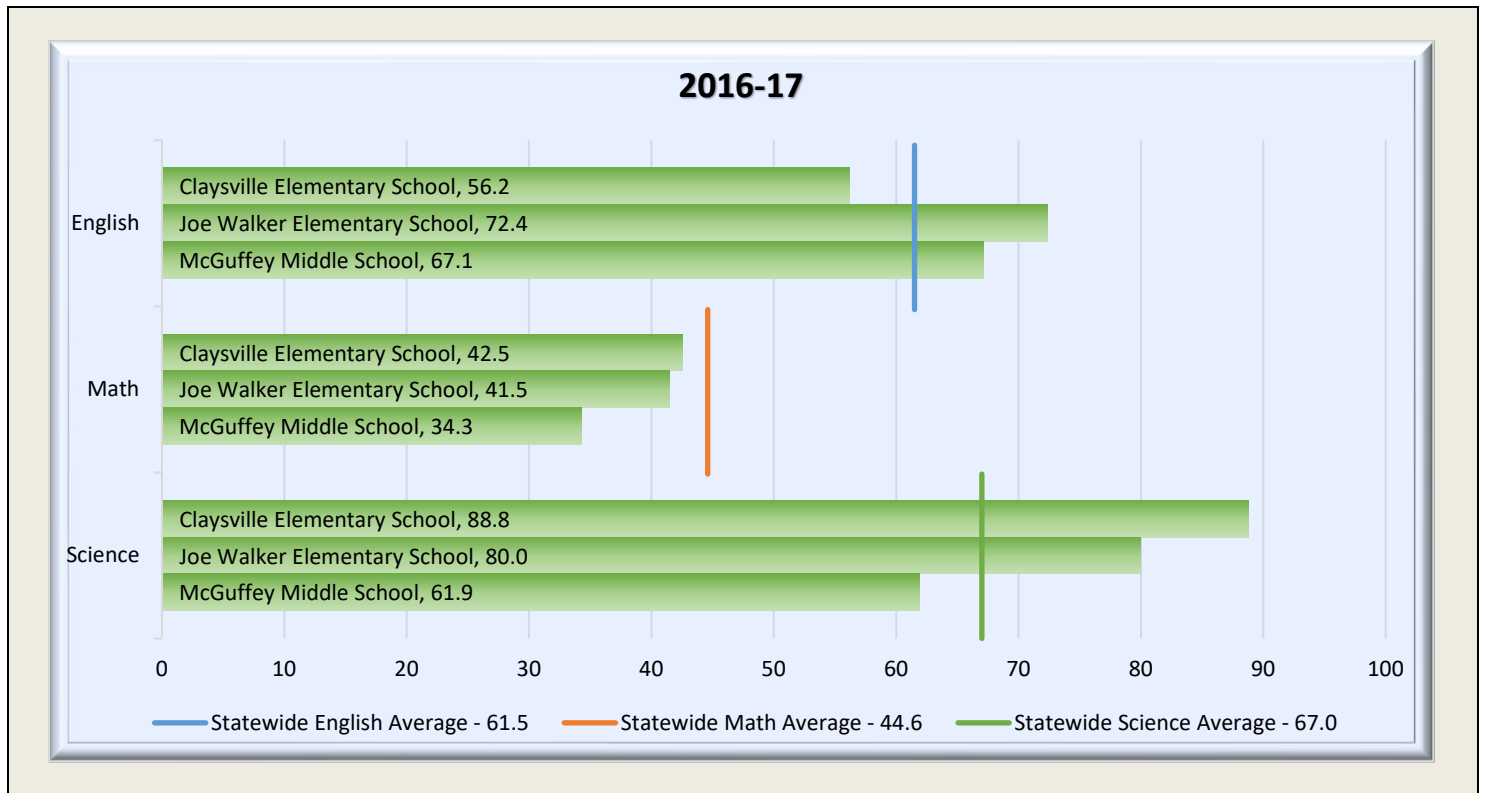
2018-19



2017-18

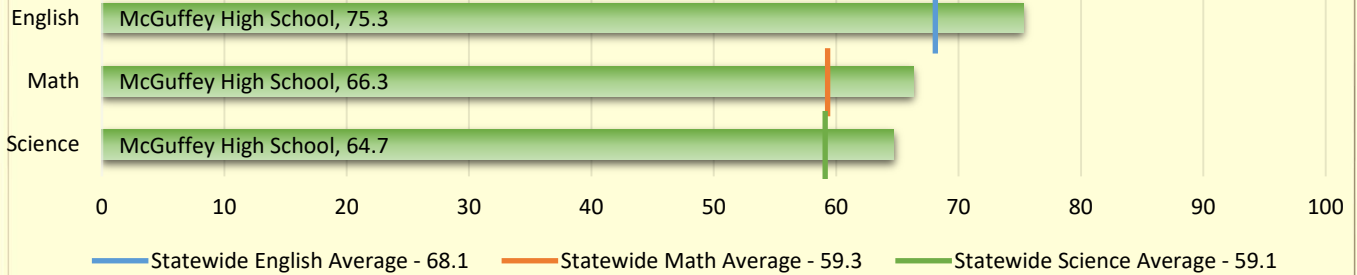


**PSSA Advanced or Proficient Percentage
School Scores Compared to Statewide Averages (continued)**

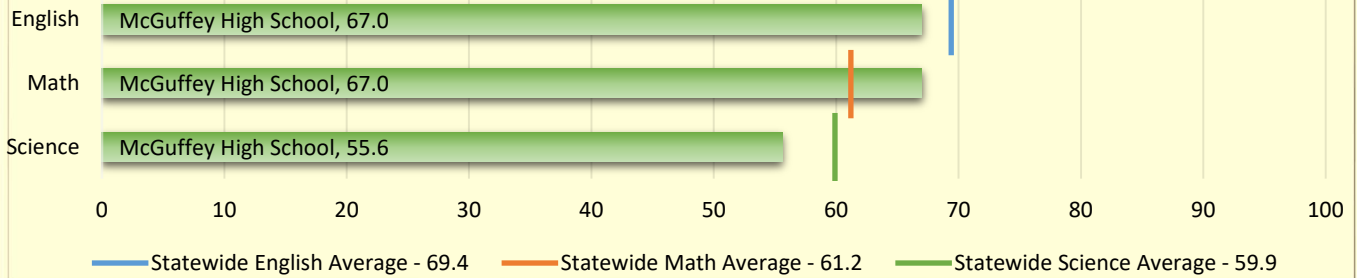


Keystone Advanced or Proficient Percentage School Scores Compared to Statewide Averages

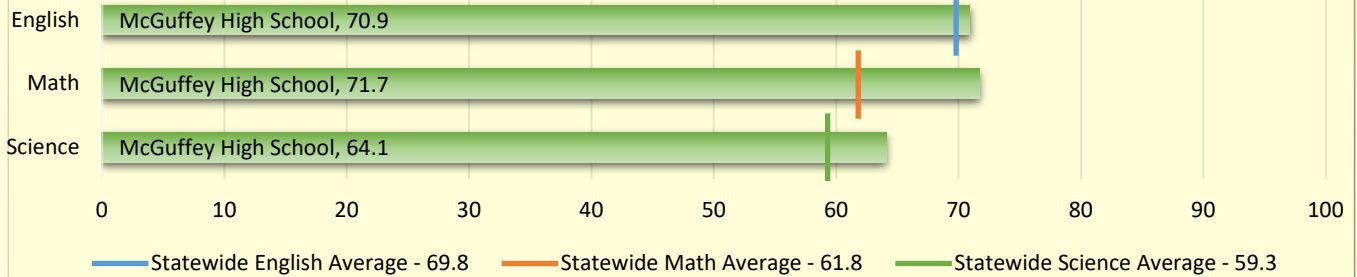
2018-19



2017-18



2016-17



Distribution List

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

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

The Honorable Noe Ortega
Acting Secretary of Education
1010 Harristown Building #2
333 Market Street
Harrisburg, PA 17126

The Honorable Stacy Garrity
State Treasurer
Room 129 - Finance Building
Harrisburg, PA 17120

Ms. Jessica Sites
Director
Bureau of Budget and Fiscal Management
Pennsylvania Department of Education
4th Floor, 333 Market Street
Harrisburg, PA 17126

Dr. David Wazeter
Research Manager
Pennsylvania State Education Association
400 North Third Street - Box 1724
Harrisburg, PA 17105

Mr. Nathan Mains
Executive Director
Pennsylvania School Boards Association
400 Bent Creek Boulevard
Mechanicsburg, PA 17050

This report is a matter of public record and is available online at www.PaAuditor.gov. Media questions about the report can be directed to the Pennsylvania Department of the Auditor General, Office of Communications, 229 Finance Building, Harrisburg, PA 17120; via email to: News@PaAuditor.gov.