

PERFORMANCE AUDIT

Neshannock Township School District Lawrence County, Pennsylvania

April 2019



Commonwealth of Pennsylvania
Department of the Auditor General

Eugene A. DePasquale • Auditor General



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**EUGENE A. DePASQUALE
AUDITOR GENERAL**

Dr. Terence P. Meehan, Superintendent
Neshannock Township School District
3834 Mitchell Road
New Castle, Pennsylvania 16105

Mr. David Antuono, Board President
Neshannock Township School District
3834 Mitchell Road
New Castle, Pennsylvania 16105

Dear Dr. Meehan and Mr. Antuono:

Our performance audit of the Neshannock Township School District (District) determined the District's compliance with certain relevant state laws, regulations, contracts, and administrative procedures (relevant requirements). This audit covered the period July 1, 2013 through June 30, 2017, except as otherwise indicated in the audit scope, objective, and methodology section of the report. The audit was conducted pursuant to Sections 402 and 403 of The Fiscal Code (72 P.S. §§ 402 and 403), and in accordance with the Government Auditing Standards issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

We also evaluated the application of best practices in the area of school safety. A portion of the results of our review of this objective can be found in the first finding of this report. Due to the sensitive nature of the safe school review, the full results of our review are confidential. However, we communicated the full results of our review of school safety with appropriate District management, the Pennsylvania Department of Education, and other appropriate agencies deemed necessary.

Our audit found that the District complied, in all significant respects, with relevant requirements, except as detailed in our two findings noted in this audit report. A summary of the results is presented in the Executive Summary section of the audit report.

Dr. Terence P. Meehan

Mr. David Antuono

Page 2

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

Sincerely,

A handwritten signature in black ink, appearing to read "Eugene A. DePasquale". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Eugene A. DePasquale

Auditor General

April 2, 2019

cc: **NESHANNOCK TOWNSHIP SCHOOL DISTRICT** Board of School Directors

Table of Contents

| | Page |
|---|------|
| Executive Summary | 1 |
| Background Information | 3 |
| Findings | 11 |
| Finding No. 1 – The District Failed to Adequately Maintain Safety Plans and Fully Comply with Bullying Prevention Requirements | 11 |
| Finding No. 2 – The District Has Failed to Meet Its Legal Duty to Monitor Bus Drivers’ Qualifications and Other Credentials, Thereby Putting Students at Risk of Harm | 19 |
| Status of Prior Audit Findings and Observations | 24 |
| Appendix: Audit Scope, Objectives, and Methodology | 30 |
| Distribution List | 33 |

Executive Summary

Audit Work

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

Our audit scope covered the period July 1, 2013 through June 30, 2017, except as otherwise indicated in the audit scope, objectives, and methodology section of the report (See Appendix).

Audit Conclusion and Results

Our audit found that the District applied best practices and complied, in all significant respects, with certain relevant state laws, regulations, contracts, and administrative procedures, except as detailed in two findings.

Finding No. 1: The District Failed to Adequately Maintain Safety Plans and Fully Comply with Bullying Prevention Requirements.

The District failed to adequately maintain its safety plan as required by the Emergency Management Services Code (Code) and comply with certain bullying prevention provisions in the "Safe Schools Act" (Act). The District did not provide sufficient and ongoing planning for disaster response and

emergency preparedness pursuant to the Code. Among other issues of noncompliance, the District's bullying policy and procedures do not include all of the information required to be in the policy or satisfy several other bullying prevention requirements under the Act. All of these issues could jeopardize the safety and security of District students and staff (see page 11).

Finding No. 2: The District Has Failed to Meet Its Legal Duty to Monitor Bus Drivers' Qualifications and Other Credentials, Thereby Putting Students at Risk of Harm.

In October 2018, we obtained a list of all of the District's bus drivers for the 2018-19 school year and requested the background clearances and qualification documents for all 20 drivers. We found that some of the required criminal history and child abuse documents were either missing or were outdated, meaning the documents were more than five years old. Several of the drivers' files had more than one deficiency. This poor record keeping and lack of oversight by the District ultimately put District students at potential risk of harm (see page 19).

Status of Prior Audit Findings and Observations.

With regard to the status of our prior audit recommendations to the District from an audit released on March 5, 2015, we found that the District had taken appropriate corrective action. The District implemented our recommendations pertaining to poor internal controls in the business office (see page 24), errors in reporting pupil membership (see page 25), lack of Board

governance over student activity funds (see page 26), hiring of annuitants (see page 28), and weaknesses in the school board minutes (see page 29).

Background Information

| School Characteristics 2017-18 School Year ^A | |
|--|---|
| County | Lawrence |
| Total Square Miles | 17.24 |
| Number of School Buildings | 1 ¹ |
| Total Teachers | 80.5 |
| Total Full or Part-Time Support Staff | 49.5 |
| Total Administrators | 7 |
| Total Enrollment for Most Recent School Year | 1,204 |
| Intermediate Unit Number | 4 |
| District Vo-Tech School | Lawrence County Career & Technical Center |

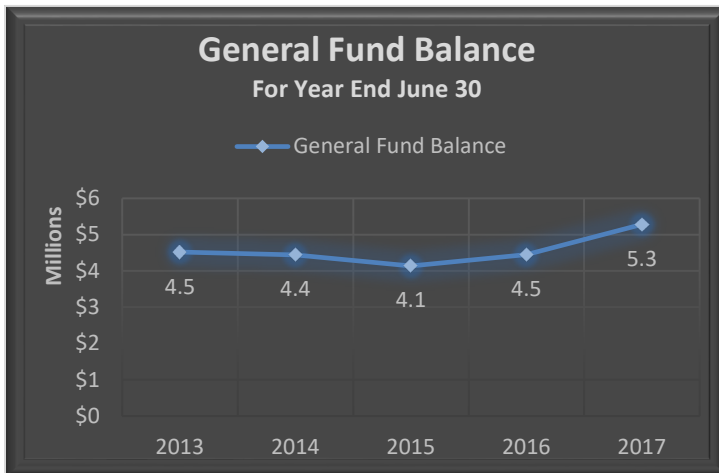
A - Source: Information provided by the District administration and is unaudited.

Mission Statement^A

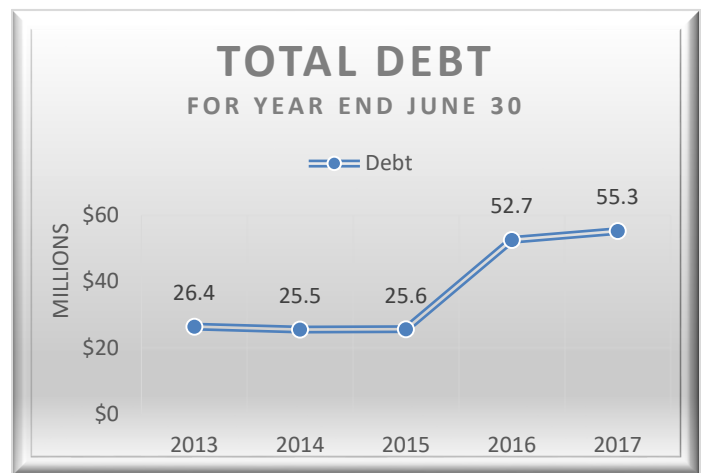
The Neshannock Township School District is committed to providing every student the opportunity to develop and utilize their academic and social skills through an exemplary, rigorous educational experience in a safe and caring environment.

Financial Information

The following pages contain financial information about the Neshannock Township School District (District) 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**.



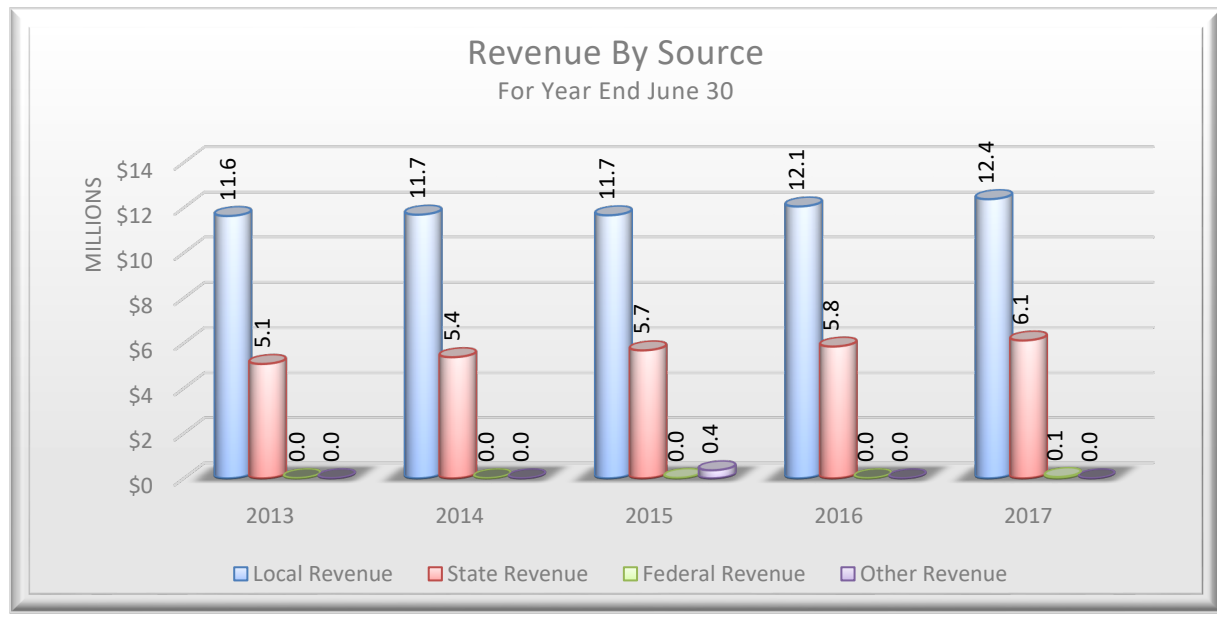
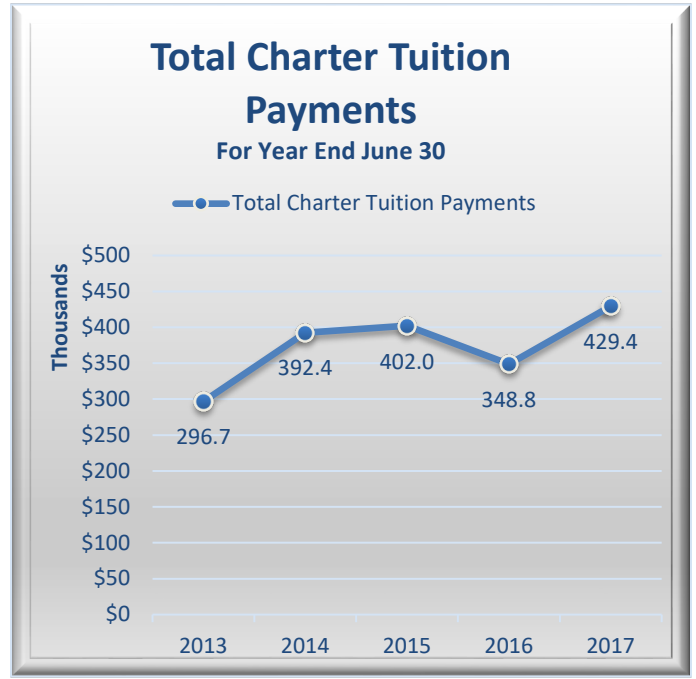
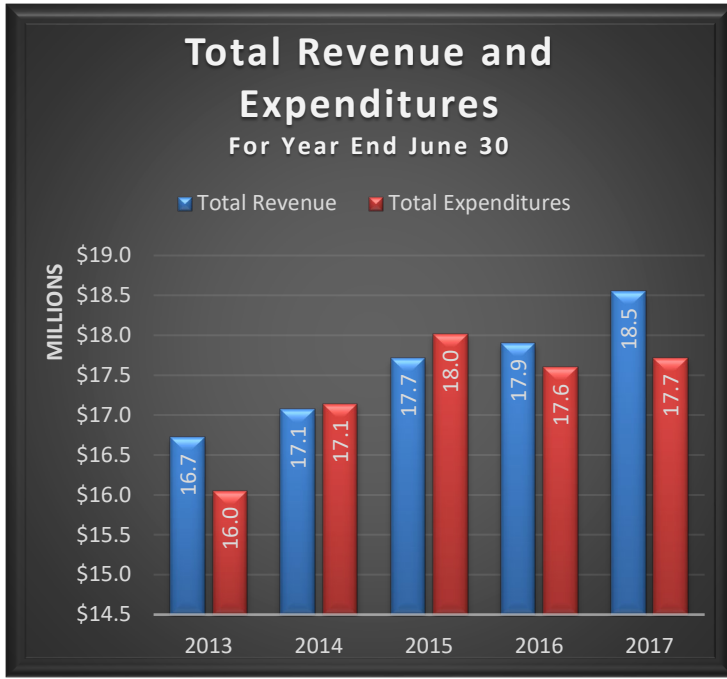
Note: General Fund Balance is comprised of the District's Committed, Assigned and Unassigned Fund Balances.



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.

¹ The elementary and secondary students are housed in one physical building. Academic scores are presented separately.

Financial Information Continued



Academic Information

The graphs on the following pages present School Performance Profile (SPP) scores, Pennsylvania System of School Assessment (PSSA) scores, Keystone Exam results, and 4-Year Cohort Graduation Rates for the District obtained from the PDE's data files for the 2014-15, 2015-16 and 2016-17 school years.² These scores are provided in the District's audit report for **informational purposes only**, and they were not audited by our Department. 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.³ Finally, 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.⁴

What is a SPP score?

A SPP score serves as a benchmark for schools to reflect on successes, achievements, and yearly growth. The PDE issues a SPP score using a 0-100 scale for all school buildings in the Commonwealth annually, 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.

The PDE started issuing a SPP score for all public school buildings beginning with the 2012-13 school year. For the 2014-15 school year, the PDE only issued SPP scores for high schools taking the Keystone Exams as scores for elementary and middle schools were put on hold due to changes with PSSA testing.⁵ The PDE resumed issuing a SPP score for all schools for the 2015-16 school year.

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.⁶ 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.

What is the PSSA?

² The PDE is the sole source of academic data presented in this report. All academic data was obtained from the PDE's publically available website.

³ The 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 the PDE's website for general information regarding the issuance of academic scores.

⁴ 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.

⁵ According to the PDE, SPP scores for elementary and middle schools were put on hold for the 2014-15 school year due to the state's major overhaul of the PSSA exams to align with PA Core standards and an unprecedented drop in public schools' PSSA scores that year. Since PSSA scores are an important factor in the SPP calculation, the state decided not to use PSSA scores to calculate a SPP score for elementary and middle schools for the 2014-15 school year. Only high schools using the Keystone Exam as the standardized testing component received a SPP score.

⁶ Act 39 of 2018, effective July 1, 2018, amended the Public School Code to further delay the use of Keystone Exams as a graduation requirement for an additional year until the 2020-21 school year. *See* 24 P.S. § 1-121(b)(1).

The PSSA is an annual, standardized test given across the Commonwealth to students in grades 3 through 8 in core subject areas, including English and Math. 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.⁷ 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.

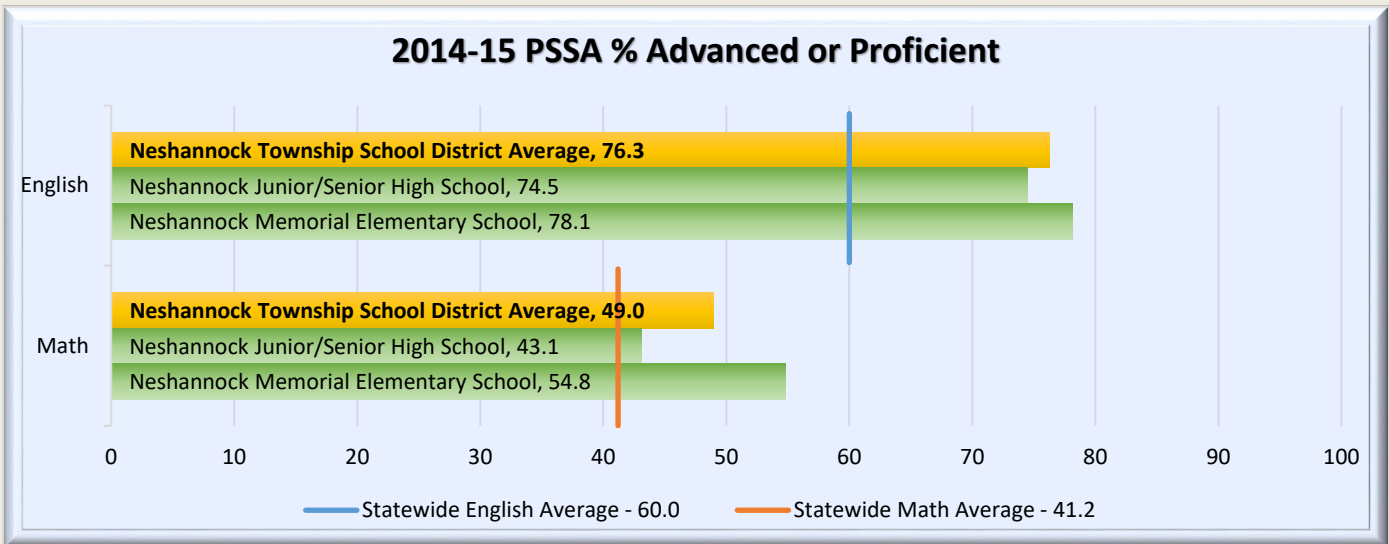
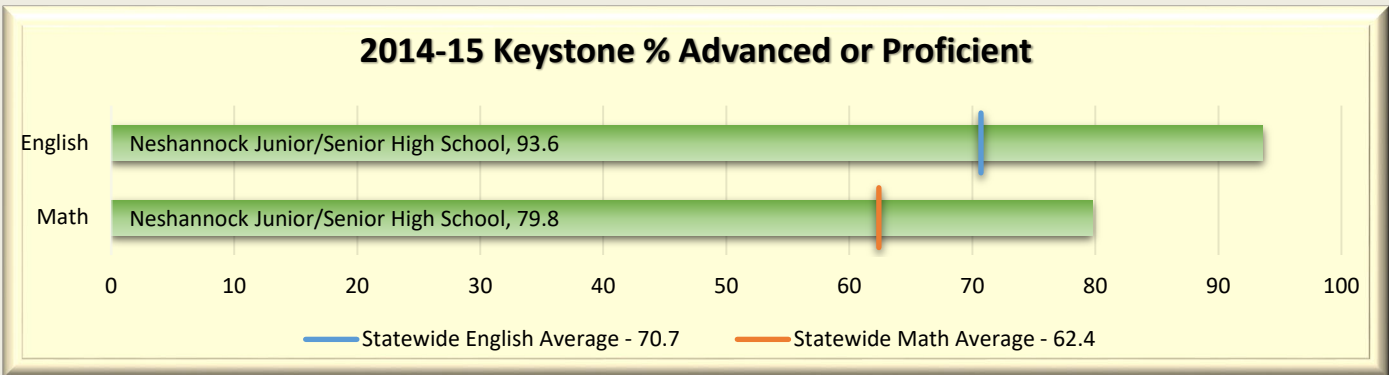
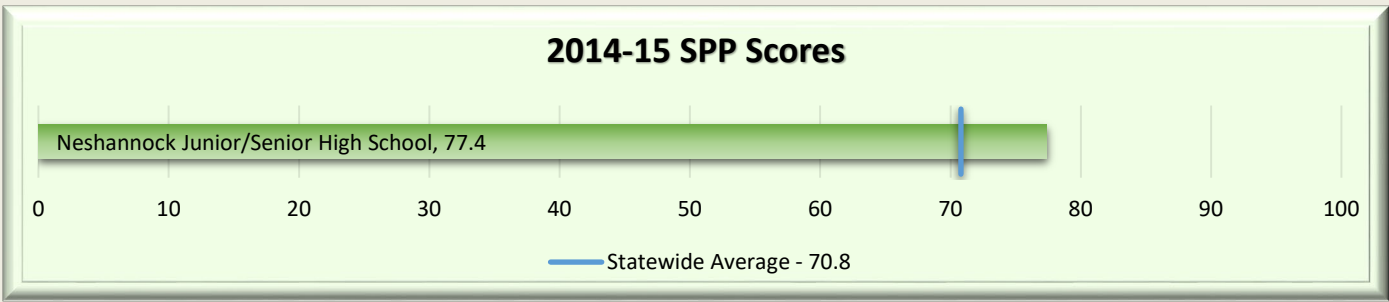
What is a 4-Year Cohort Graduation Rate?

The 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.⁸

⁷ The PDE has determined that PSSA scores issued beginning with the 2014-15 school year and after are not comparable to prior years due to restructuring of the exam.

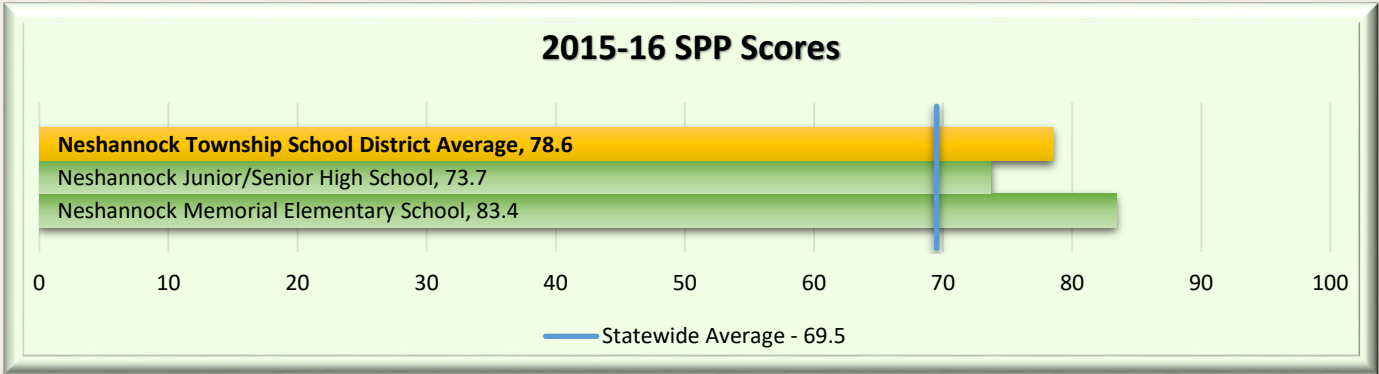
⁸ The PDE also calculates 5-year and 6-year cohort graduation rates. Please visit the PDE's website for additional information: <http://www.education.pa.gov/Data-and-Statistics/Pages/Cohort-Graduation-Rate.aspx>.

2014-15 Academic Data
School Scores Compared to Statewide Averages

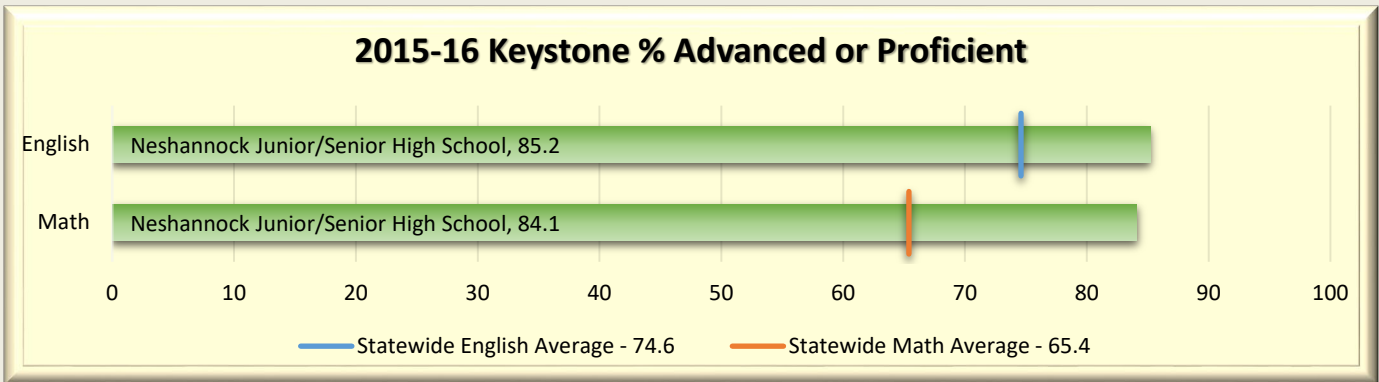


2015-16 Academic Data
School Scores Compared to Statewide Averages

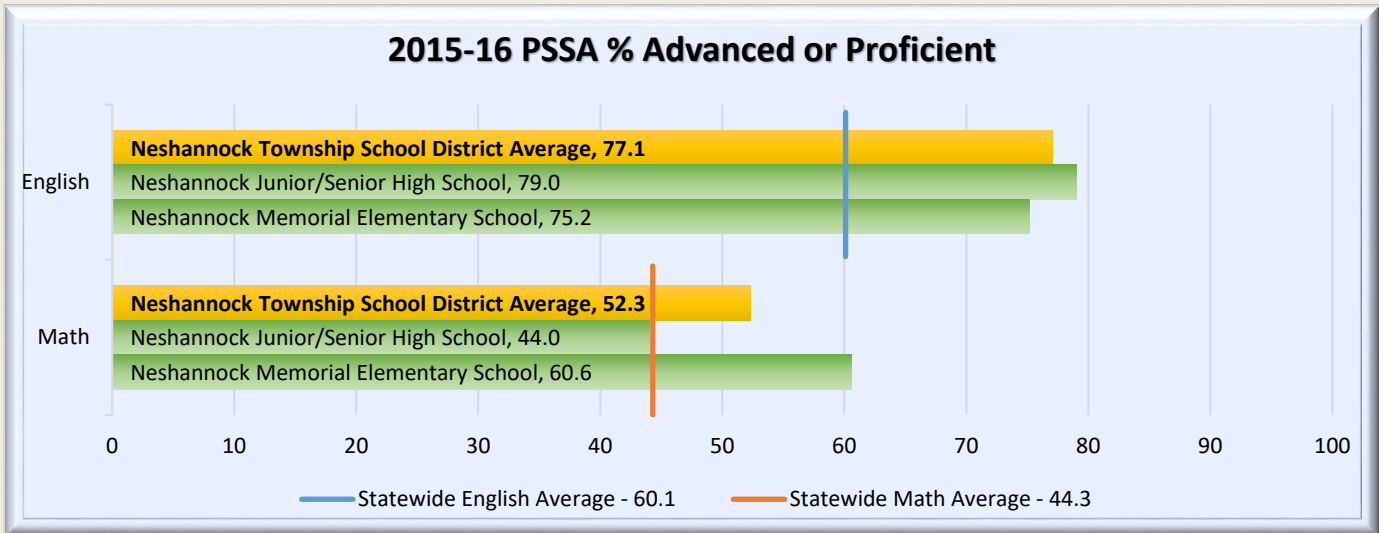
2015-16 SPP Scores



2015-16 Keystone % Advanced or Proficient

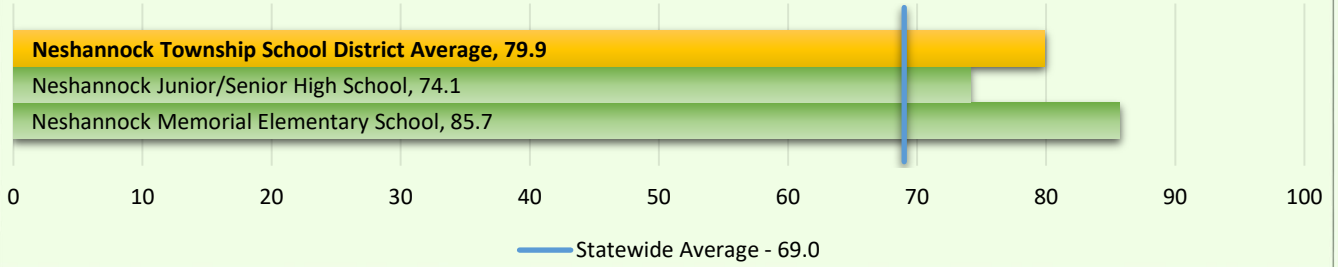


2015-16 PSSA % Advanced or Proficient

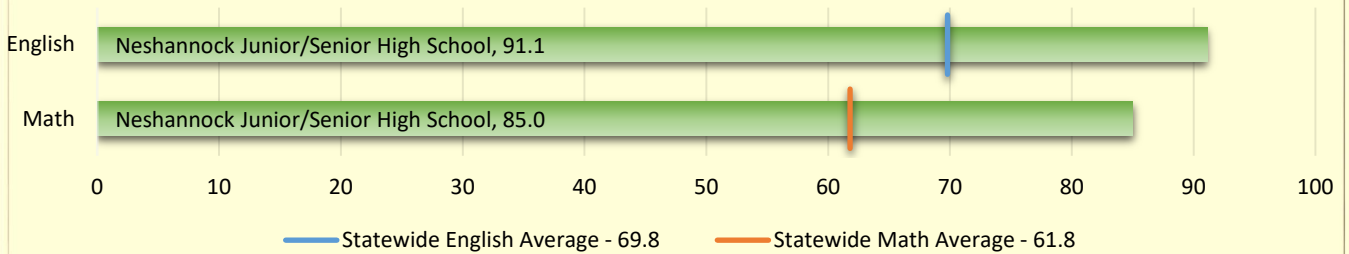


2016-17 Academic Data
School Scores Compared to Statewide Averages

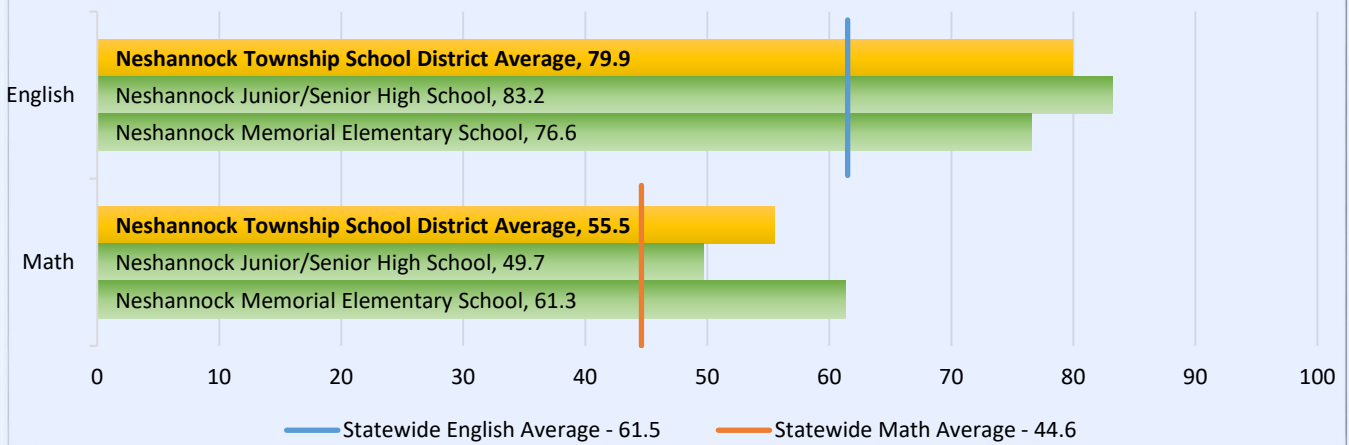
2016-17 SPP Scores



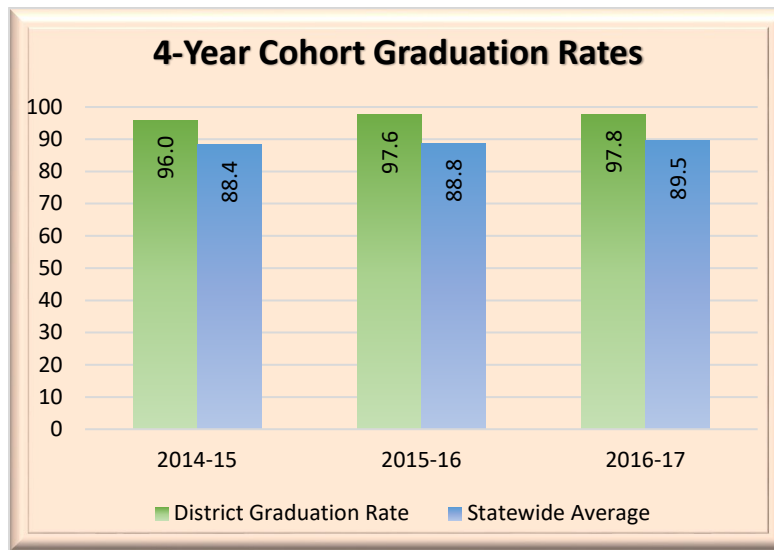
2016-17 Keystone % Advanced or Proficient



2016-17 PSSA % Advanced or Proficient



Graduation Data
District Graduation Rates Compared to Statewide Averages



Findings

Finding No. 1

The District Failed to Adequately Maintain Safety Plans and Fully Comply with Bullying Prevention Requirements

Criteria relevant to the finding:

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.” 35 Pa.C.S. § 7701(g). *See also* State Board of Education’s regulations, Subsections (a) and (b) of Section 10.24 (relating to Emergency and nonemergency response and preparedness), 22 Pa. Code § 10.24(a) and (b).

The Neshannock Township School District (District) failed to adequately maintain its safety plan as required by the Emergency Management Services Code (Code) and comply with certain bullying prevention provisions in the “Safe Schools Act” (Act). The District did not provide sufficient and ongoing planning for disaster response and emergency preparedness pursuant to the Code.⁹ Among other issues of noncompliance, the District’s bullying policy and procedures do not include all of the information required to be in the policy or satisfy several other bullying prevention requirements under the Act. All of these issues could jeopardize the safety and security of District students and staff.

Background on Disaster Response and Emergency Preparedness Plans

Pursuant to the Code, all Pennsylvania school districts 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 and other pertinent State requirements.¹⁰ School districts are also required to *annually* review and modify the Plan, as necessary. Further, a copy of the Plan must be provided to the respective county emergency management agency.¹¹

When properly written and executed, a Plan serves as the primary directive in the event of a disaster or emergency situation. According to the Pennsylvania *All Hazards School Safety Planning Toolkit*, a guide for assisting districts with the development of such plans, “[s]chools

⁹ 24 P.S. § 13-1301-A *et seq.* (note: the Act is also known as Article XIII-A “Safe Schools”). *See also* 35 Pa.C.S. § 7101 *et seq.* (i.e., Emergency Management Services Code) as amended.

¹⁰ 35 Pa.C.S. § 7701(g).

¹¹ *Ibid.*

Criteria relevant to the finding (continued):

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

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

“No later than January 1, 2009, each school entity shall adopt a policy or amend its existing policy relating to bullying and incorporate the policy into the school entity’s code of student conduct required under 22 Pa. Code § 12.3(c) (relating to school rules). . . .” See 24 P.S. § 13-1303.1-A(a).

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.”¹² The Plan should be customized to meet local needs and capabilities.¹³

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:¹⁴

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

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

- Communications
- Evacuation
- Shelter-in-place
- Lockdown
- Accounting for all persons
- Reunification
- Continuity of Operations
- Security
- Recovery
- Health and Medical

¹² The Pennsylvania Department of Education’s Office of Safe Schools webpage provides a link to the Pennsylvania *All Hazards School Safety Planning Toolkit*, which provides guidance to districts, charter schools, and other LEAs in developing safety plans. <http://www.pema.pa.gov/planningandpreparedness/communityandstateplanning/Pages/All-Hazards-School-Safety-Planning-Toolkit.aspx>. Chapter I, Introduction, 0010 Purpose and Guidance Section A(2). Accessed November 7, 2018.

¹³ Ibid.

¹⁴ 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. Accessed December 6, 2018. Link also accessible from the Readiness and Emergency Management for Schools, Technical Assistance Center. <https://rems.ed.gov/>. Accessed November 7, 2018.

¹⁵ Ibid., pg. 18

*Criteria relevant to the finding
(continued):*

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

“Each school entity shall make the policy available on its publicly accessible Internet website, if available, and in every classroom. Each school entity shall post the policy at a prominent location within each school building where such notices are usually posted. 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).

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

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

Section 1301-A (relating to Definitions) of the Act defines a “School entity” as “any public school district, intermediate unit, area vocational-technical school or charter school.” See 24 P.S. § 13-1301-A.

Weaknesses Identified in the District’s Planning Efforts

We found several areas of concern during our review of the District’s planning efforts regarding disaster response and emergency preparedness. Due to the sensitive nature of these issues, we did not include these issues in this public report. Rather, we confidentially shared the specific results of our review of the District’s safety planning efforts with the District’s Superintendent and distributed them via an encrypted confidential email to appropriate law enforcement agencies having jurisdiction over the District and its school buildings.

We found that the District’s current Plan is a compilation and condensed version of the last formal plan adopted May 2007. According to District administrators, the teachers requested a shortened version of the Plan so that it was easier to use and access. As a result of this revision, we determined the Plan was inadequate to comply with the Code. Additionally, the District did not file its most recent Plan with its local emergency management agency as required by the Code.

After discussing the weaknesses in the Plan with District administrators, we were informed that those weaknesses are currently being addressed by the District’s Safety Committee Chairman, who is working with the Pennsylvania Department of Education (PDE) to create an all-hazard plan for the District.

We also found that, as of December 6, 2018, the District has never conducted a risk and vulnerability assessment of its school buildings as a matter of best practice. Such assessments can be conducted internally or by an outside organization for use as a planning tool in the development of a school district’s disaster response and emergency preparedness plan.¹⁶ For example, a Risk and Vulnerability Assessment is offered to all Commonwealth school districts free of charge by the Pennsylvania State Police (PSP) to “provide comprehensive examinations of physical facilities and operational procedures; identify critical assets, threat

¹⁶ Pennsylvania *All Hazards School Safety Planning Toolkit*. 2013. Chapter IV. “Prevention and Mitigation.” Pg. 2 of 9.

*Criteria relevant to the finding
(continued):*

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.”

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\(Overview%20of%20Act%2044\).pdf](https://www.pccd.pa.gov/schoolsafety/Documents/Website%20Powerpoint%20(Overview%20of%20Act%2044).pdf)

potential and vulnerabilities; and offer recommendations to improve security.”¹⁷

On March 2, 2018, the District submitted a request to the PSP for a Risk and Vulnerability Assessment and has been placed on the waiting list. When asked why there was no internal risk assessment performed, the District’s administration stated that:

They do assess the procedures on a daily basis. There are multiple examples of upgrades and improvements that have been the result of these internal assessments. However, we are certainly not experts in the field and in order to do an assessment that is completely valid, we are seeking the professional support and direction of those who specialize in safety assessments. The District will be conducting an assessment in conjunction with the Act 44 implementation and we are in line to be evaluated by the PSP and will take their recommendations into consideration in future planning and upgrades.

The District’s failure to provide sufficient and ongoing planning for disaster response and emergency preparedness and perform building risk assessments increased the possibility of the District not adequately preparing for, responding to, and recovering from a potential emergency situation.

Noncompliance in Bullying Prevention Requirements

We found several areas of noncompliance with bullying prevention requirements of the “Safe Schools Act” (Act). While the District has a bullying policy that has been recently reviewed and updated, we found that the policy is missing key elements required by the Act. The District’s bullying policy was revised on March 12, 2015, and again on September 13, 2018. During this current revision, the District removed significant and required sections from its bullying policy. For example, the current policy does not include information related to the development and

¹⁷ Center for Safe Schools, Risk and Vulnerability Assessments, <http://www.safeschools.info/emergency-management/emergency-management/254-risk-and-vulnerability-assessments>. Accessed November 7, 2018. See also, Pennsylvania Commission on Crime and Delinquency, School Safety and Security webpage specific to Act 44 of 2018 requirements, [https://www.pccd.pa.gov/schoolsafety/Documents/Website%20Powerpoint%20\(Overview%20of%20Act%2044\).pdf](https://www.pccd.pa.gov/schoolsafety/Documents/Website%20Powerpoint%20(Overview%20of%20Act%2044).pdf). Accessed October 2, 2018.

implementation of any bullying prevention, intervention, and education programs required by the Act.

When asked why the bullying policy was revised to remove sections required by the Act, the District's administration failed to provide a specific response and instead noted that the Policy Committee will review the bullying policy and follow Pennsylvania School Board Association recommendations.

Additionally, while conducting physical security reviews at the District's two buildings on October 17, 2018, we observed that the District's bullying policy was not posted in prominent locations in school buildings, nor was it accessible in every classroom as required by the Act. It is critical for the District and each of its school buildings to follow the Act by publicizing its bullying policy in an effort to heighten awareness and communicate reporting procedures, which could help to deter bullying and increase staff and student reporting. The District's administration stated that its failure to post its bullying policy in school buildings and have it accessible in classrooms was an oversight.

Finally, the District was in noncompliance with several other bullying prevention requirements under the Act, as well as recommended by best practices in bullying prevention, as specified below.

- The bullying policy is not incorporated into either the Elementary or Junior/Senior High School Code of Student Conduct.
- The District does not have written procedures for how students are to report bullying incidents or provide annual training on reporting procedures. While the District held bullying prevention trainings with students, there was no evidence that specific instruction regarding student reporting procedures was covered.
- The District does not have written procedures for administrators and staff to follow on how to recognize and intervene in bullying situations or on the proper procedures to follow if a student reports bullying or harassment, as suggested by best practices in bullying prevention. However, the District noted that these issues are discussed with staff as part of in-service

training. Additionally, we acknowledge that the District has standardized forms for staff, students, and parents to use to report incidents of bullying.

As noted above, the District's bullying policy is not incorporated into the Elementary and Junior/Senior High School Student Code of Conduct which are part of the student handbook. The District's administration noted that bullying is addressed in the student handbook as a narrative, not a written policy. The Act requires that the District's bullying policy be incorporated in the student code of conduct as a "policy" and not merely in narrative format.¹⁸

As stated, the District does not have written procedures for how students are to report bullying; however, they noted that unwritten procedures are covered during student orientation, and students are encouraged to speak to teachers, guidance counselors, and principals regarding any issues they are having. The District's administration noted that they will create written procedures as part of the current Act 44 of 2018 requirements.¹⁹

The District's failure to post the bullying policy in a prominent location within the school, have it available in classrooms, and to meet policy and procedure requirements related to bullying resulted in noncompliance with the Act. By not complying with the Act's requirements, the District increased its risk of being inadequately prepared to address the prevention, reporting, and the investigation of instances of bullying at its schools.

Recommendations

The *Neshannock Township School District* should:

1. Immediately take steps to rectify the specific concerns expressed confidentially by the Department of the Auditor General with regard to the District's planning efforts in the area of disaster response and emergency preparedness.

¹⁸ 24 P.S. § 13-1303.1-A(a).

¹⁹ The webpage for the PDE's Office of Safe Schools provides a link to the Pennsylvania bullying prevention webpage, which contains resources for parents, educators, and professionals serving children and youth in school and out of school settings. <http://www.education.pa.gov/Schools/safeschools/bullying/pages/default.aspx> Accessed December 6, 2018.

2. Immediately submit a copy of the District's Plan to the local emergency management agency.
3. Conduct a risk and vulnerability assessment for all school buildings within the District, either internally or by an outside agency, such as the PSP, and ensure that the results are incorporated into the District's Plan. This assessment should be reviewed annually and updated, as necessary.
4. Post the bullying policy in prominent locations in school buildings and have it accessible in every classroom.
5. Review and revise the Student Code of Conduct to include the District's bullying policy and related information, such as the District's Bullying Consequences Rubric.
6. Revise the bullying policy to include information related to the development and implementation of any bullying prevention, intervention, and education programs.
7. Establish written policies and procedures for how students are to report bullying incidents and annually train students on the reporting procedures.

Management Response

District management provided the following response:

“Through the newly implemented requirements of Act 44, the District has established a safety committee and is in the process of updating the disaster response and emergency preparedness plans. We believe the condensed version provides a more effective resource to staff and will continue to use this as well as making the larger, more detailed, plan available to all employees. An All Hazard Plan per Act 44 will be completed prior to the start of the 2019-2020 school year. The District is on a waiting list with the Pennsylvania State Police for a complete risk assessment of schools.

“The student code of conduct will be updated to include the actual bullying policy. This will also include posting in all classrooms and visible areas of the school. The recent Safe 2 Say program will be included with information in the handbooks and posted throughout the schools. Written

procedures for reporting of bullying are being developed as part of Act 44 requirements as well as through the new Safe 2 Say program which has just been unveiled to students and is a new requirement for all PA schools. We will comply with Act 44 and Safe 2 Say and provide appropriate procedures and resources to all students.”

Auditor Conclusion

We are encouraged that the District has begun to implement our recommendations, including the creation and implementation of a comprehensive master safety plan. We reiterate the importance of having a comprehensive plan that documents and clarifies the roles and responsibilities of all personnel involved in school safety, is reviewed and updated annually, and is shared with all appropriate safety agencies. We are also pleased that the District implemented our recommendations related to the bullying prevention policy.

We will review the District’s comprehensive safety plan, the revised bullying prevention policy, and any other corrective actions the District implemented during our next audit of the District.

Finding No. 2

The District Has Failed to Meet Its Legal Duty to Monitor Bus Drivers' Qualifications and Other Credentials, Thereby Putting Students at Risk of Harm

Criteria relevant to the finding:

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

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

Further, effective as of December 31, 2014, Section 6344.4(1)(ii) of the CPSL requires recertification of the mandated state and federal background checks and the child abuse clearance every 60 months/five years for school employees including independent contractors. (Act 153 of 2014, as amended by Act 15 of 2015, which changed the recertification period from 36 months to 60 months). *See* 23 Pa.C.S. § 6344.4(1)(ii).

The District employs its own bus drivers and is statutorily obligated to ensure that the bus drivers who transport its students meet all of the prescribed driver qualification requirements under state law and regulations, including criminal and child abuse history clearances. In October 2018, we obtained the list of all of the District's bus drivers for the 2018-19 school year and requested the background clearances and qualification documents for all 20 drivers. We found that some of the required criminal history and child abuse documents were either missing or were outdated, meaning the documents were more than five years old. Several of the driver's files had more than one deficiency. This poor record keeping and lack of oversight by the District ultimately put District students at potential risk of harm.

Requirements

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

1. Driver qualification credentials, including:
 - a. Valid commercial driver's license with an "S" endorsement, permitting the operation of a school bus.
 - b. Annual physical examination.²⁰
2. Criminal history credentials through reports/clearances:
 - a. State Criminal History Record. (Less than five years old).

²⁰ Pennsylvania's Vehicle Code, 75 Pa.C.S. §§ 1508.1 (relating to Physical examinations) and 75 Pa.C.S. §§ 1509 (relating to Qualifications for school bus driver endorsement).

*Criteria relevant to the finding
(continued):*

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

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

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

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

- b. Federal Criminal History Record. (Less than five years old).
- c. PA Child Abuse History Clearance. (Less than five years old).
- d. Arrest/Conviction Report and Certification Form (PDE-6004).

No District Review Process

The District's Board of School Directors routinely approves new bus driver candidates for hire, but once hired, they do not reapprove the drivers on an annual basis. The lack of an ongoing review process resulted in the District being unaware that they had drivers with missing or outdated clearances. Our review of the District's Policy No. 513, *Employment of School Bus Drivers* revealed that it did not contain sufficient procedures for a review process that would ensure compliance with all statutory and regulatory bus driver clearance and qualification requirements for new drivers. In addition, the District admitted that it did not have a policy or procedure in place to ensure that clearances for existing drivers are updated every five years as required by law.

Missing Criminal History Records and Child Abuse Clearances

After reviewing the files of the 20 drivers approved to transport students in the 2018-19 school year, we found that at least one criminal history report or child abuse clearance document that is required to be maintained by the District was not in the files of 8 of 20 drivers, or 40 percent, as detailed below:

- For four drivers, the Federal Criminal History Record was either missing or more than five years old.
- For two drivers, the Federal Criminal History Record, the State Criminal History Record, *and* the PA Child Abuse History Clearance were more than five years old.
- For one driver, the State Criminal History Record *and* the PA Child Abuse History Clearance were more than five years old.

*Criteria relevant to the finding
(continued):*

Effective September 28, 2011, Section 111(j)(2) required all current school employees to submit an “Arrest/Conviction Report and Certification Form” (PDE-6004 Form) to their administrator indicating whether or not they have ever been arrested or convicted of any Section 111(e) criminal offenses by December 27, 2011, effective July 1, 2012, criminal offenses found in Section 111(f.1) were also added. *See* 24 P.S. § 1-111(j)(2).

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

See also the PDE Basic Education Circular on Background Checks, issued December 12, 2011.

- For one driver, the State Criminal History Record was more than five years old.

As stated earlier, the lack of a District review process allowed drivers to transport students despite the District not having all required documents on file, which resulted in the District not complying with Pennsylvania’s Vehicle Code (Vehicle Code), the Public School Code (PSC), the Child Protective Services Law (CPSL), and/or the State Board of Education’s regulations.

We interviewed a District official who indicated that there were multiple reasons that led to their failure to obtain and maintain current clearances. First, the District has experienced substantial turnover in recent years. Since 2014, they have hired a new Superintendent, Business Manager, Superintendent’s Secretary, and Director of Transportation. In addition, the Administration is short-staffed and because they were new to their positions, the official stated that they had to prioritize many competing needs in the first years of the new Administration and that background checks were not one of their top priorities. Finally, in regards to the requirement to renew the criminal background checks and child abuse clearances every five years, the official stated that they were unaware of that requirement.

After we brought the missing documents to District management’s attention, they immediately took action to obtain all of the missing clearances. As of January 8, 2019, we verified that the District has obtained all of the missing clearances and there were no issues identified that would prohibit a driver from transporting students.

Conclusion

The District did not meet its statutory obligations to ensure all bus drivers transporting its students were qualified and met all the criminal and child abuse background check requirements under the law. It had no policies or procedures in place to ensure it would routinely review driver qualifications and clearances to ensure that all drivers are in compliance with legal requirements both at time of hire and continually as applicable. As a result, drivers were authorized to transport students without the District ensuring it received clearances in accordance with

state and federal laws, including the PSC, the CPSL, and the Vehicle Code.

Recommendations

The *Neshannock Township School District* should:

1. Promptly develop and implement written policies and procedures requiring the District's ongoing maintenance and review of bus driver files so that it can ensure that all drivers, regardless of when they are hired, are properly qualified before authorizing them to have direct contact with children, as well as ensuring that all clearances are obtained every five years in accordance with the CPSL. These policies and procedures should require the administration to provide the Board annually with a list of qualified drivers and attest in an open and public forum that the District has obtained all of the required documents and clearances for each driver on the list.
2. Provide training on Section 111 of the PSC, as well as the relevant provisions of the CPSL, Vehicle Code, and/or the State Board of Education Regulations. This training should be provided for all District employees responsible for maintaining up-to-date personnel files for bus drivers *and* for those in charge of reviewing qualifications and clearances *prior* to authorizing drivers to transport students.

Management Response

District management provided the following response:

“Administrative staff turnover contributed to this oversight. However, we in no way minimize the importance of maintaining current clearances and associated credentials for all District employees. All District transportation staff clearances have been reviewed and updated. The auditors reviewed the corrected documents during one of their on-site visits. All District staff records have been reviewed and are currently being updated.

“The District has scheduled a Policy Committee meeting to review and update Policy 513 to reflect on going procedure for review of clearances for all existing staff. The current policy was adopted in 2009, prior to the 5 year window

requirement for employee clearances (Act 153). This policy will be updated and enforced immediately.”

Auditor Conclusion

As stated in the finding, it is vitally important that the District fulfill its responsibilities to ensure that drivers transporting students have the proper credentials and have appropriate clearances prior to transporting students. We continue to emphasize the need for the District to take a proactive role in ensuring that all drivers met all requirements prior to interacting with students. We will review the District’s procedures implemented as a result of our audit and any other corrective action taken during our next audit of the District.

Status of Prior Audit Findings and Observations

Our prior audit of the Neshannock Township School District (District) released on March 5, 2015, resulted in five findings, as shown below. As part of our current audit, we determined the status of corrective action taken by the District to implement our prior audit recommendations. We interviewed District personnel and performed audit procedures as detailed in each status section below.

Auditor General Performance Audit Report Released on March 5, 2015

Prior Finding No. 1: Business Office Beset by Poor Internal Controls

Prior Finding Summary: During our prior audit of the District, we found internal control procedural breakdowns within the business office that resulted in a lack of control over cash and a lack of appropriate preparation/presentation of financial information.

Prior Recommendations: We recommended that the District should:

1. Develop job descriptions and procedures for all business office positions.
2. Ensure that all business office personnel are adequately supervised and budgetary override privileges are removed.
3. Require the Business Manager to develop cash control procedures to guarantee that future overdrafts do not occur and that administration and/or the Board of School Directors (Board) sign off on all reconciliations.
4. Require the Business Manager or their designee to present bills to be paid and timely financial statements and budgetary reports for approval at monthly board meetings for inclusion in the official minutes.

We also recommended that the Pennsylvania Department of Banking should:

5. Determine if the local depository violated state banking regulations through the payment of checks that resulted in the overdraft of a public fund account.
6. Determine if the local depository violated state banking regulations by honoring checks with incorrect signatures.

Current Status:

During our current audit, we found that the District implemented corrective actions to address our recommendations. Specifically, the District contracted with the Midwestern Intermediate Unit 4 to provide assistance with the development and implementation of business office job descriptions. The District eliminated budgetary override privileges by adding a setting to its accounting software that eliminates the override function.

During our audit period, the District's Business Manager provided the Board with a monthly treasurer's report, revenue and expenditure budget comparison summary, and student activity account summary. Additionally, the list of monthly bills/payments is approved along with the treasurer's report.

Finally, the banking institution in question was acquired by another institution in February 2015, which was before the release of this audit report. Therefore, our recommendations to the Pennsylvania Department of Banking could not be implemented.

Prior Finding No. 2: Error in Reporting Pupil Membership Resulted in an Overpayment of \$8,260

Prior Finding Summary: During our prior audit of the District, we noted that the pupil membership reports submitted to the Pennsylvania Department of Education (PDE) for the 2010-11 school year were incorrect. The District incorrectly reported one student as a nonresident student for 183 days which resulted in an overpayment of \$8,260 in the tuition for children placed in private homes (foster children) reimbursement.

Prior Recommendations: We recommended that the District should:

1. Thoroughly review all child accounting data for accuracy prior to submission to the PDE.
2. Establish internal controls that include reconciliations of the data that is uploaded into the PDE's Pennsylvania Information Management System (PIMS) program.
3. Review reports submitted subsequent to the years audited and, if errors are found, submit revised reports to the PDE.

We also recommended that the PDE should:

4. Adjust the District's future allocations to correct the \$8,260 overpayment of tuition for foster children.

Current Status:

During our current audit, we found that the District implemented corrective actions to address our recommendations. Specifically, the District's Director of Pupil Services reviews students' attendance on a monthly basis. At the end of the year, a list of all District students is printed and the student membership data is reviewed prior to submission to the PDE. After entry into the PIMS, the verification reports are reviewed for accuracy. Additionally, the District centralized their enrollment procedures which has increased the integrity of the data entered into the student accounting software.

The District reviewed the documentation submitted to the PDE for the 2012-13, 2013-14, 2014-15, and 2015-16 school years and noted that all foster students were correctly reported to the PDE. On June 1, 2017, the PDE deducted the \$8,260 overpayment from the District's basic education funding.

Prior Finding No. 3: Ineffective Managerial and Board Governance Over Student Activity Funds

Prior Finding Summary: During our prior audit of the District, we noted a lack of internal control and poor record keeping for the student activity records for the 2012-13 school year. There were no written procedures or cash controls over the funds, and the accounts payable clerk was authorized to process checks and payment requisitions without managerial approval or without verification of sufficient funds. Additionally, we noted a lack of involvement by the District's Board even though the District's student activity fund policy placed ultimate responsibility with the Board.

Prior Recommendations: We recommended that the District should:

1. In consultation with the solicitor and the Board, ensure that proper procedures are developed and implemented to comply with the requirements of Section 511 of the Public School Code.
2. Review Board Policy No. 618, Student Activity Funds, to ensure compliance with board-established policy.
3. Establish formal business office procedures regarding deposits, disbursements, managerial approval of all transactions, and account reconciliation inclusive of supervisory and Board review and approval.
4. Ensure that each account operating with the student activity funds is controlled by a formal student organization and that each

account is documented by bylaw, student officer listings, and meeting minutes.

5. Ensure proper student authorization is obtained on all payment authorization forms and that premature payment is prohibited.
6. Remove all non-student activity funds from the fund listing and balance.
7. Require administrative personnel to ensure accounts have sufficient fund balance prior to check processing and require advisors and club treasurers to keep track of the individual account balances.
8. Provide training for all District administrative personnel, secretaries, and club advisors to ensure that the student activity funds' operations, recordkeeping, and student involvement is appropriate.

We also recommended that the Pennsylvania Department of Banking should:

9. Determine whether the involved depository institution violated banking law by honoring checks with improper signatures.

Current Status:

During our current audit, we found that the District implemented corrective actions to address our recommendations. Specifically, beginning in the 2015-16 school year, procedures were developed and implemented for depositing funds and for requisitioning checks. In addition, the student activity funds are being run through the accounts payable software. We noted that the student activity fund treasurer makes sure sufficient funds are in the student activity fund prior to submitting the check requisition form to the Business Manager. The Business Manager reconciles the bank statements and submits quarterly reports to the Board. The District currently has 15 student activity clubs, each club has a list of student officers and bylaws, but club minutes were not available for all clubs.

On February 12, 2015, the District closed the Physical Education Uniform Student Activity Club which was not a student activity. Training was provided to the advisors. In addition, the student activity fund treasurer meets with any new advisors and explains the procedures.

Finally, the banking institution in question was acquired by another institution in February 2015. Therefore, our recommendations to the Pennsylvania Department of Banking could not be implemented.

Prior Finding No. 4: PSERS and SERS Annuitants Employed by District

Prior Finding Summary: During our prior audit of the District, we noted that annuitants were rehired, and the District was unable to provide evidence to show that Public School Employees' Retirement System (PSERS) was provided adequate and accurate documentation for approval. The District hired a retired teacher as a gifted student consultant/teacher. In addition, the District hired several retired Pennsylvania State Police officers as school security officers without contacting the State Employees' Retirement System (SERS).

Prior Recommendations: We recommended that the District should:

1. Consult with their solicitor to determine if all appropriate information was submitted to the PSERS and determine if additional documentation may be warranted.
2. Request their solicitor to review the security officers' contract to determine if it is in compliance with applicable independent contractor's legal requirements.
3. Consult with their solicitor to determine if separate contracts need to be prepared for the hiring of independent school security officers and the District's Director of Security/School Attendance Officer to ensure Board responsibility is not circumvented.
4. Require the involved annuitants to obtain SERS approval of their employment at the District.

We also recommended that the PSERS and the SERS should:

5. Request the District to provide all information relating to the hired annuitants inclusive of contracts and in the case of the PSERS information relating to the other involved employee.
6. If annuity payments are determined to be improper, make the necessary corrections to future pension benefits.

Current Status:

During our current audit, we found that the District implemented corrective actions to address our recommendations. Specifically, the District contacted PSERS about the rehiring of the gifted student consultant/teacher. After obtaining information from the District, PSERS determined that no adjustments to this individual's retirement account were necessary.

The District entered into a contract with a private company on April 15, 2015, to provide school security and on-site security guards.

This agreement brought all of the previous independent contractors under the employment of the private company, and the District no longer paid these security guards directly.

Additionally, on January 11, 2018, the District provided PSERS with salary and service hours earned by the individual security guards prior to April 15, 2015. PSERS used this information to set up retirement accounts for the security guards who were independent contractors from 2007-08 through 2014-15.

Finally, since the security guards were former Commonwealth employees and not former school district employees, no adjustments to their individual SERS accounts were necessary.

Additionally, the District contacted SERS about the employment of the retired Pennsylvania State Police officers on January 11, 2018.

Prior Finding No. 5: Weaknesses in School Board Minutes and Violation of Sunshine Act

Prior Finding Summary: During our prior audit of the District, we noted inadequacies in the recording and documenting of the Board's actions for the period May 9, 2013 through February 13, 2014. Specifically, violations of provisions of the Sunshine Act related to executive sessions were noted, the minutes were not properly signed and dated by the Board Secretary, and the minutes were not permanently bound.

Prior Recommendations: We recommended that the District should:

1. Require the Board Secretary to sign and date all board meeting minutes in a timely manner.
2. Ensure that the board meeting minutes are complete, permanently bound, and kept in a secure place.
3. Announce at an open board meeting, the date, time, and reason for executive session, in compliance with the Sunshine Act.

Current Status: During our current audit, we found that the District implemented corrective actions to address our recommendations. Specifically, we noted that the board minutes for the period March 13, 2014 through August 9, 2018, were signed and dated by the Board Secretary and the purpose for each executive session was announced.

On October 16, 2018, the District entered into a contract with a company to maintain all meeting minutes online.

Appendix: 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,²¹ is not a substitute for the local annual financial audit required by the Public School Code of 1949, as amended. We conducted our audit in accordance with *Government Auditing Standards* issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit.

Scope

Overall, our audit covered the period July 1, 2013 through June 30, 2017. In addition, the scope of each individual audit objective is detailed on the next page.

The Neshannock Township School District's (District) management is responsible for establishing and maintaining effective internal controls to provide reasonable assurance that the District is in compliance with certain relevant state laws, regulations, contracts, and administrative procedures (relevant requirements).²² In conducting our audit, we obtained an understanding of the District's internal controls, including any information technology controls, which we consider to be significant within the context of our audit objectives. We assessed whether those controls were properly designed and implemented. Any deficiencies in internal controls that were identified during the conduct of our audit and determined to be significant within the context of our audit objectives are included in this report.

²¹ 72 P.S. §§ 402 and 403.

²² Internal controls are processes designed by management to provide reasonable assurance of achieving objectives in areas such as: effectiveness and efficiency of operations; relevance and reliability of operational and financial information; and compliance with certain relevant state laws, regulations, contracts, and administrative procedures.

Objectives/Methodology

In order to properly plan our audit and to guide us in selecting objectives, we reviewed pertinent laws and regulations, board meeting minutes, academic performance data, annual financial reports, annual budgets, new or amended policies and procedures, and the independent audit report of the District's basic financial statements for the fiscal years July 1, 2013 through June 30, 2017. We also determined if the District had key personnel or software vendor changes since the prior audit.

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

- ✓ School Safety
- ✓ Bus Driver Requirements
- ✓ Administrator Contract Buyout

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

- ✓ Did the District take actions to ensure it provided a safe school environment?²³
 - To address this objective, we reviewed a variety of documentation including, safety plans, training schedules, anti-bullying policies, and after action reports. In addition, we conducted an on-site review of the District's elementary and secondary buildings to assess whether the District had implemented basic safety practices.²⁴ The results of our review of this objective can be found in the first finding of this report on page 11.
- ✓ Did the District ensure that bus drivers transporting District students had the required driver's license, physical exam, training, background checks, and clearances as outlined in applicable laws?²⁵ Also, did the District have written policies and procedures governing the hiring of new bus drivers that would, when followed, provide reasonable assurance of compliance with applicable laws?
 - To address this objective, we reviewed all 20 bus drivers transporting District students as of October 4, 2018. We reviewed documentation to ensure the District complied with the requirements for bus drivers. We also determined if the District had written policies and procedures governing the hiring of bus drivers and if those procedures ensure compliance with bus driver hiring requirements. The

²³ 24 P.S. § 13-1301-A *et seq.*

²⁴ Basic safety practices evaluated were building security, bullying prevention, visitor procedures, risk and vulnerability assessments, and preparedness.

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

results of our review of this objective can be found in the second finding of this report on page 19.

- ✓ Did the District pursue a contract buy-out with an administrator and if so, what was the total cost of the buy-out, what were the reasons for the termination/settlement, and did the employment contract(s) comply with the Public School Code²⁶ and Public School Employees' Retirement System guidelines?
 - To address this objective, we reviewed the contracts, settlement agreements, board meeting minutes, board policies, and payroll records for the three administrators who separated employment from District during the period July 1, 2013 through June 30, 2017. Our review of this objective did not result in any reportable issues.

²⁶ 24 P.S. § 10-1073(e)(2)(v).

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 Pedro A. Rivera

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