

PERFORMANCE AUDIT

Pequea Valley School District Lancaster County, Pennsylvania

July 2021



Commonwealth of Pennsylvania
Department of the Auditor General

Timothy L. DeFoor • Auditor General



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**TIMOTHY L. DEFOOR
AUDITOR GENERAL**

Dr. Erik Orndorff, Superintendent
Pequea Valley School District
166 South New Holland Road, P.O. Box 130
Kinzers, Pennsylvania 17535

Mr. Bryant Ferris, Board President
Pequea Valley School District
166 South New Holland Road, P.O. Box 130
Kinzers, Pennsylvania 17535

Dear Dr. Orndorff and Mr. Ferris:

We have conducted a performance audit of the Pequea Valley School District (District) for the period July 1, 2015 through June 30, 2019, 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:

- Nonresident Student Data
- Bus Driver Requirements
- Transportation Operations

We also evaluated the application of best practices in the area of school safety and determined compliance with certain requirements in the area of school safety, including compliance with the fire and security drill requirements. 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 areas of noncompliance and significant internal control deficiencies in the area of nonresident student data and those deficiencies are detailed in the finding in this report entitled:

The District's Failure to Implement Adequate Internal Controls Led to Inaccurate Reporting of Nonresident Student Data to PDE Resulting in an Overpayment of \$33,905

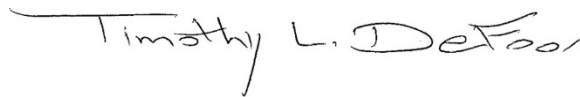
In addition, we identified internal control deficiencies in the areas of bus driver requirements and transportation operations that were not significant, but warranted the attention of District management and those charged with governance. Those deficiencies were communicated to District management and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

Dr. Erik Orndorff
Mr. Bryant Ferris
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Our audit finding and recommendations have been discussed with the District's management and those charged with governance, 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 other 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 long horizontal line extending to the left of the first letter.

Timothy L. DeFoor
Auditor General

June 25, 2021

cc: **PEQUEA VALLEY SCHOOL DISTRICT** Board of School Directors

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Background Information

School Characteristics 2019-20 School Year*	
County	Lancaster
Total Square Miles	81
Number of School Buildings	4
Total Teachers	135
Total Full or Part-Time Support Staff	44
Total Administrators	11
Total Enrollment for Most Recent School Year	1,560
Intermediate Unit Number	13
District Career and Technical School	Lancaster County Career & Technology Center

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

Mission Statement*

The Pequea Valley School District will strive to create an “Ideal Learning Environment” that inspires each learner to excel.

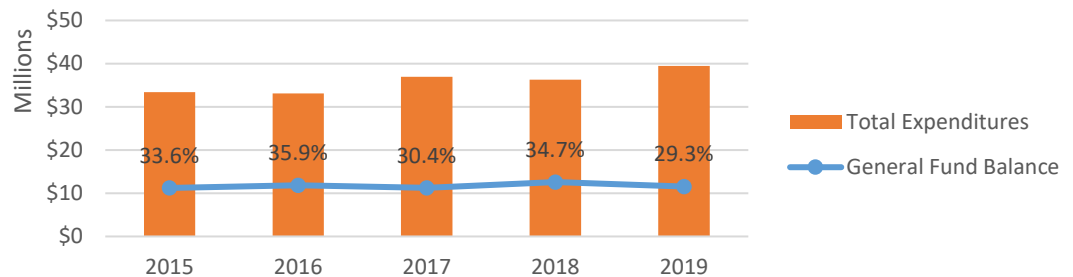
“Ideal Learning Experience” – Meeting each learner at his/her (interest/learning) level, challenging them, so that everyone is motivated to return tomorrow.

Financial Information

The following pages contain financial information about the Pequea Valley 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**.

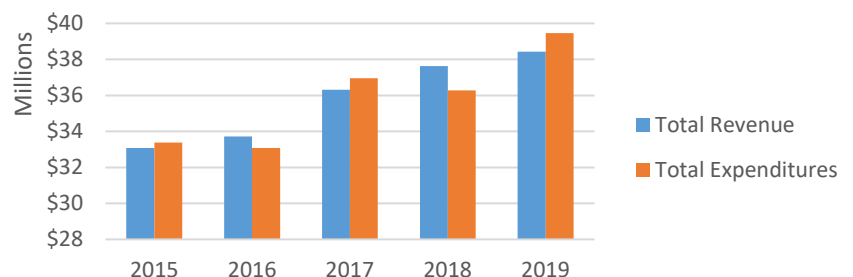
General Fund Balance as a Percentage of Total Expenditures

	General Fund Balance
2015	\$11,226,578
2016	\$11,872,593
2017	\$11,235,024
2018	\$12,590,957
2019	\$11,563,561



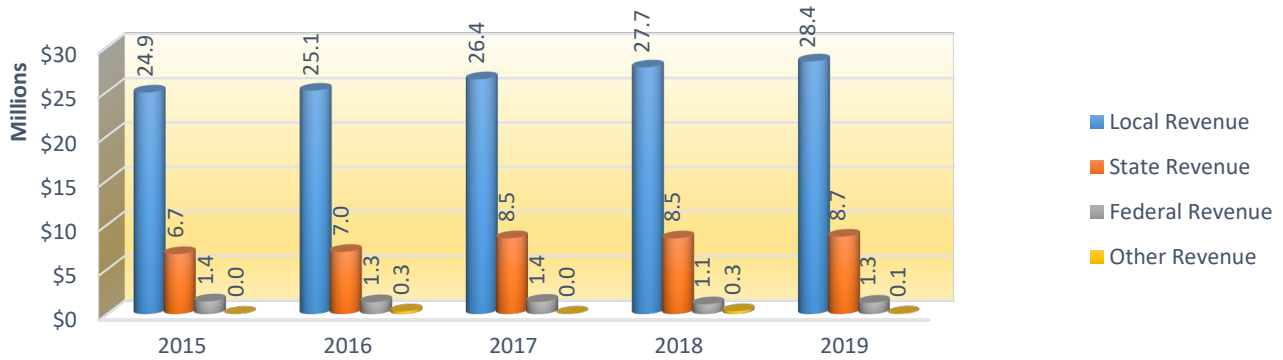
Revenues and Expenditures

	Total Revenue	Total Expenditures
2015	\$33,083,852	\$33,380,174
2016	\$33,721,955	\$33,075,941
2017	\$36,317,276	\$36,954,846
2018	\$37,635,580	\$36,279,647
2019	\$38,426,791	\$39,454,187

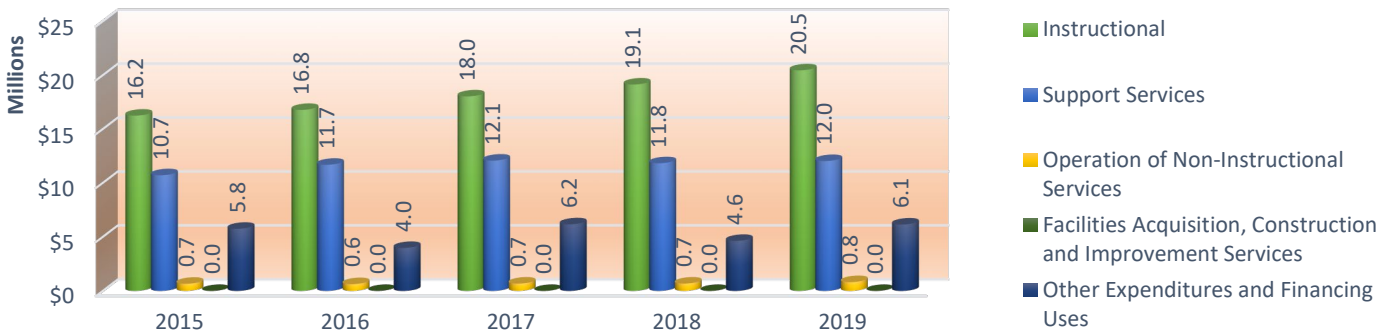


Financial Information Continued

Revenues by Source

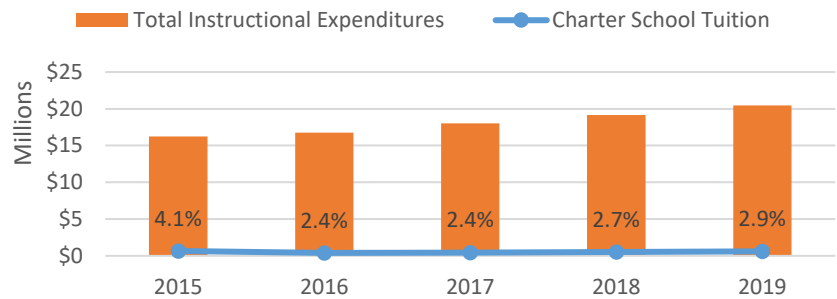


Expenditures by Function

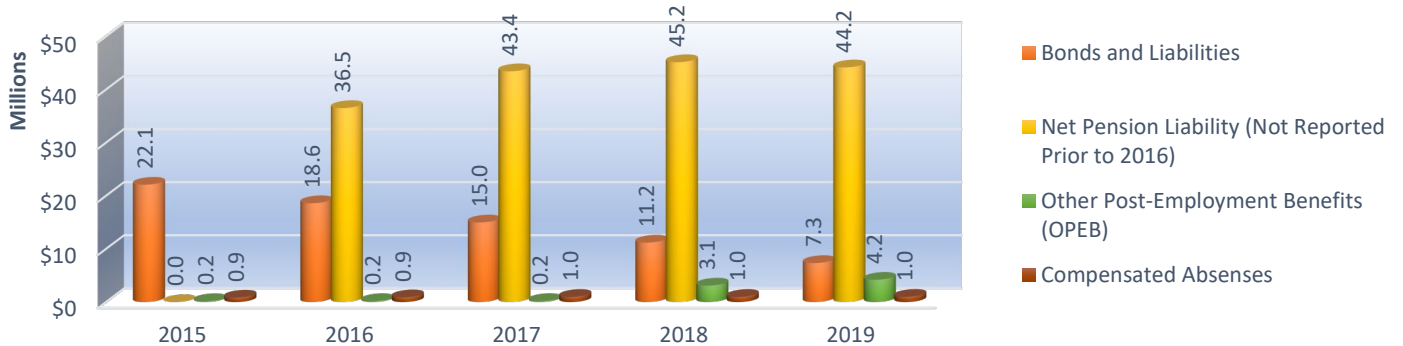


Charter Tuition as a Percentage of Instructional Expenditures

	Charter School Tuition	Total Instructional Expenditures
2015	\$662,499	\$16,247,367
2016	\$399,544	\$16,779,067
2017	\$424,100	\$18,034,367
2018	\$508,283	\$19,137,122
2019	\$591,750	\$20,454,150



Long-Term Debt

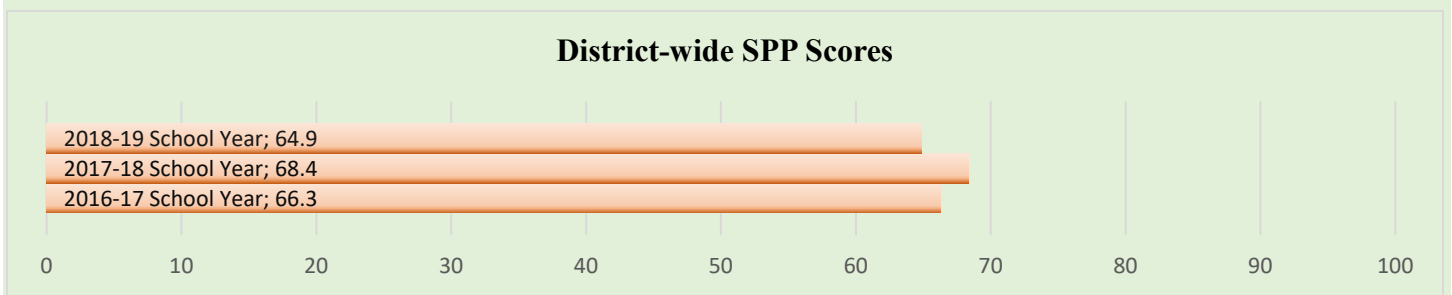


Academic Information

The graphs on the following pages present the District-wide School Performance Profile (SPP) scores, Pennsylvania System of School Assessment (PSSA) scores, Keystone Exam results, and 4-Year Cohort Graduation Rates for the District obtained from PDE's data files for the 2016-17, 2017-18, and 2018-19 school years.¹ The District's individual school building scores are presented in Appendix B. These scores are provided in this audit report for **informational purposes only**, and they were not audited by our Department.

What is a SPP score?

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



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

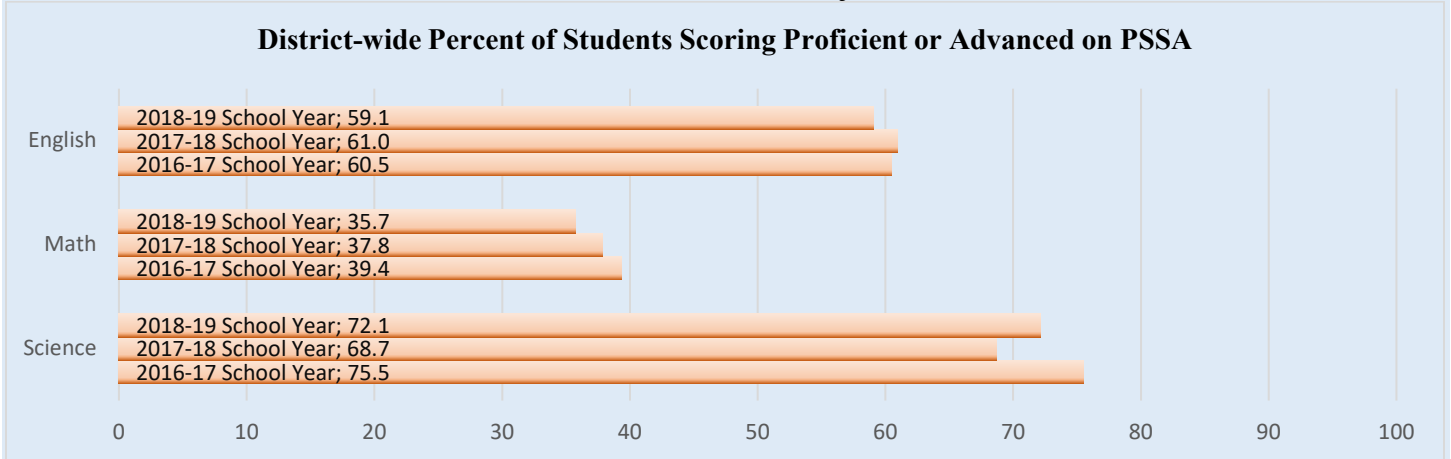
² PDE started issuing a SPP score for all public school buildings beginning with the 2012-13 school year. For the 2014-15 school year, PDE only issued SPP scores for high schools taking the Keystone Exams as scores for elementary and middle scores were put on hold due to changes with PSSA testing. PDE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

Academic Information Continued

What is the PSSA?

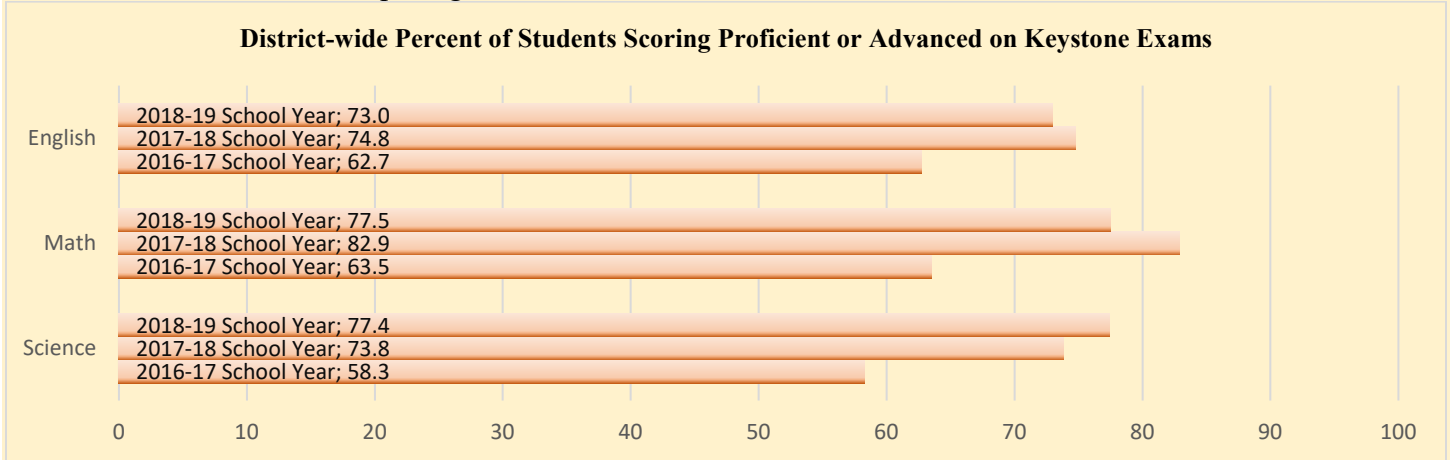
The PSSA is an annual, standardized test given across the Commonwealth to students in grades 3 through 8 in core subject areas, including English, Math and Science. The PSSAs help Pennsylvania meet federal and state requirements and inform instructional practices, as well as provide educators, stakeholders,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

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



What is the Keystone Exam?

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

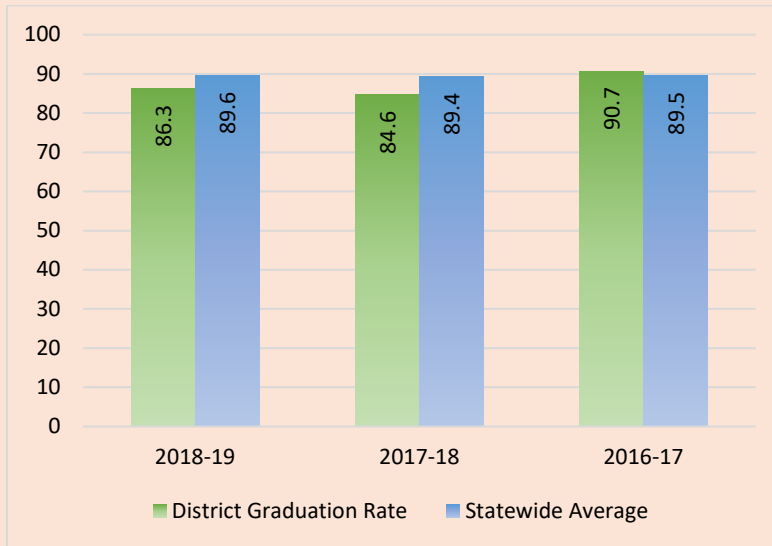


³ Act 158 of 2018, effective October 24, 2018, amended the Public School Code to further delay the use of Keystone Exams as a graduation requirement until the 2021-22 school year. See 24 P.S. § 1-121(b)(1). Please refer to the following link regarding further guidance to local education agencies (LEAs) 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.⁴



⁴ 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 Adequate Internal Controls Led to Inaccurate Reporting of Nonresident Student Data to PDE Resulting in an Overpayment of \$33,905

Criteria relevant to the finding:

The State Board of Education's regulations and Pennsylvania Department of Education guidelines govern the classifications of nonresident children placed in private homes or living in institutions based on the criteria outlined in the Public School Code (PSC).

Payment of Tuition

Subsection (a) of Section 1305 (relating to Nonresident child placed in home of resident) of the PSC provides for Commonwealth payment of tuition for nonresident children placed in private homes as follows:

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

We found that the Pequea Valley School District (District) failed to implement adequate internal controls over the categorization and reporting of nonresident student data resulting in a \$33,905 overpayment from the Pennsylvania Department of Education (PDE). This overpayment was caused by the District inaccurately reporting the number of wards of the Commonwealth and foster students educated by the District during the 2015-16 through 2018-19 school years.⁵

Background: School districts are entitled to receive Commonwealth paid tuition for educating certain nonresident students. Districts are eligible to receive Commonwealth paid tuition for educating students who are wards of the Commonwealth and foster students.

For a district to be eligible to report a student as a ward of the Commonwealth, the District must ensure that the student has met the following conditions:

- 1) The student resided in an institution or group home within District boundaries.
- 2) The student's parents/guardians residency could not be determined by the District after documented attempts to determine residency.

For a district to be eligible to report a student as a foster student, the District must ensure that the student has met the following eligibility criteria:

- 1) The student's parent/guardian must not be a resident of the educating district.
- 2) The student must have been placed in the private home of a resident within the district by order of the court or by arrangement with an association, agency, or institution.⁶
- 3) The district resident must be compensated for the care of the student.
- 4) The student must not be in pre-adoptive status.

⁵ The term “wards” refers to children placed in children's homes or other types of institutions. See 24 P.S. § 13-1306(a).

⁶ For example, the applicable county children and youth agency.

*Criteria relevant to the finding
(continued):*

Subsection (a) of Section 1306 (relating to Nonresident...[children placed in] children's institutions) of the PSC provides for Commonwealth payment of tuition for nonresident children placed in institutions as follows, in part:

“The board of school directors of any school district in which there is located any orphan asylum, home for the friendless, children’s home, or other institution for the care or training of orphans or other children, shall permit any children who are inmates of such homes, but **not legal residents in such district, to attend the public schools in said district**, either with or without charge for tuition, text books, or school supplies, as the directors of the district in which such institution is located may determine....”
(Emphasis added.) See 24 P.S. § 13-1306(a).

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

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

It is the responsibility of the educating district to obtain documentation to ensure that each student met the eligibility criteria to be classified as a nonresident student. Further, the district must obtain updated documentation for each year that the district reports a student as a nonresident.

Because school districts can be eligible for additional revenue for educating nonresident students, it is essential for districts to properly identify, categorize, and report nonresident students that it educated to PDE. Therefore, school districts should have a strong system of internal controls over this process that should include, but not be limited to, the following:

- Training on PDE reporting requirements.
- Written internal procedures to help ensure compliance with PDE requirements.
- Reconciliations of source documents to information reported to PDE.

Nonresident Student Reporting Errors

We found that the District made a total of six errors over the four-year audit period when it reported nonresident data to PDE. These reporting errors involved four students including two students who were inaccurately reported for multiple years. The following table details the number of students that the District inaccurately reported as wards of the Commonwealth and foster students for each school year of the audit period.

Pequea Valley School District Nonresident Student Data		
School Year	Number of Students Inaccurately Reported	Overpayment
2015-16	3	\$12,855 ⁷
2016-17	1	\$ 2,104
2017-18	1	\$18,025
2018-19	1	\$ 921
Totals	6	\$33,905

⁷ The overpayment for the 2015-16 school year is less than the overpayment for the 2017-18 school year even though more errors were made because the total number of ineligible days reported to PDE was lower in 2015-16 than in 2017-18.

*Criteria relevant to the finding
(continued):*

Subsection (a) of Section 11.19 (relating to Nonresident child living with a district resident) of the State Board of Education's regulations provides as follows, in part.

"A nonresident child is entitled to attend the district's public schools if that child is fully maintained and supported in the home of a district resident as if the child were the resident's own child and if the resident receives no personal compensation for maintaining the student in the district. Before accepting the child as a student, the board of school directors of the district shall require the resident to file with the secretary of the board of school directors either appropriate legal documentation to show dependency or guardianship or a sworn statement that the child is supported fully without personal compensation or gain, and that the resident will assume all personal obligations for the child relative to school requirements and intends to so keep and fully support the child continuously and not merely through the school term." See 22 Pa. Code § 11.19(a).

We found that of the four students, three were erroneously reported as wards of the Commonwealth, and one student was erroneously reported as a foster student. The District did not have the required documentation to report each of these students as nonresidents. Without the required documentation, these four students should have been classified as residents and, therefore, the District was not eligible to receive reimbursement for educating these students.

Significant Internal Control Deficiencies

The District did not have adequate internal controls over the categorization and reporting of wards of the Commonwealth and foster student data. Two District employees worked cooperatively to categorize these students; however, this information was reported to PDE for reimbursement without a review by a District official sufficiently knowledgeable of PDE reporting requirements.

A reconciliation to source documents to ensure each ward of the Commonwealth and foster student met the eligibility requirements was also not performed during the audit period. Additionally, these two employees were not adequately trained on the PDE requirements, as well as on the documentation needed to demonstrate compliance with the eligibility criteria. Finally, the District did not have written policies and procedures to assist its employees in accurately identifying wards of the Commonwealth and foster students by obtaining the required documentation needed to support this categorization.

Future Reimbursement Adjustment: We provided PDE with documentation detailing the reporting errors we identified for the 2015-16 through 2018-19 school years. We recommend that PDE adjust the District's future reimbursement amount by the \$33,905 that we calculated as an overpayment.

Recommendations

The *Pequea Valley School District* should:

1. Develop and implement an internal control system governing the process for categorizing and reporting data for wards of the Commonwealth and foster students. The internal control system should include, but not be limited to, the following:
 - All personnel involved in categorizing and reporting nonresident student data are trained on PDE's reporting requirements.
 - A review of nonresident student data is conducted by an employee—other than the employee who prepared the data—before it is submitted to PDE.
 - Written procedures are developed to document the categorization and reporting process for nonresident student data.

The *Pennsylvania Department of Education* should:

2. Adjust the District's future reimbursements to resolve the overpayment of \$33,905.

Management Response

District management provided the following response:

“At this time the district has created a procedure and documentation that we have started to use and will continue to use as we monitor our non-resident students.

1. When a student is registered in the district and the parents do not reside in the district, we will begin the process of requiring additional information to be provided by the agency who is supporting the student.
2. We have created a form with the information that we will need to request prior to us enrolling a student in the District. The following information is critical in the determination of funding for these students. We will need student's name, date of birth, natural parent(s) name and last known address. We will need to know the foster family name, address and if foster family is receiving a stipend for these services.
3. If we do not receive a placement letter with this information we will follow up with the agency with the form that we created to gain this information.
4. At the end of the school year, we will create a list of students from our SIS and compare it to the students that we will be reporting to PDE for funding purposes.
5. Director of Student Services will check all students' files to confirm all documentation is present prior to reporting. If documentation is missing we will reach out to the agency and obtain the documentation prior to the end of the school year.
6. If forms are not obtained throughout the year, the PIMS Coordinator will reach out to agencies to try to obtain these forms.
7. We will create an electronic folder that is shared with the Director of Student Services and the PIMS Coordinator to create a warehouse of evidence.”

Auditor Conclusion

We are pleased that the District intends to implement corrective actions to address our recommendations. The forms noted in the management reply were provided to us with the District's response, but are not included in this report. These documents support the District's response above. We will evaluate the effectiveness of the District's corrective actions during our next audit.

Status of Prior Audit Findings and Observations

Our prior audit of the Pequea Valley 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,⁸ 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 Nonresident Student Data, Bus Driver Requirements, Transportation Operations 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, 2015 through June 30, 2019. 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.⁹ *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.¹⁰ 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.

⁸ 72 P.S. §§ 402 and 403.

⁹ 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.

¹⁰ 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

Principle →	Internal Control Significant ?	Control Environment					Risk Assessment					Control Activities			Information and Communication			Monitoring	
		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	
Nonresident Student Data	Yes				X			X	X		X		X	X	X	X			
Bus Drivers	Yes										X		X			X	X		
Transportation	Yes				X			X	X		X		X	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, 2015 through June 30, 2019 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.

Nonresident Student Data

- Did the District accurately report nonresident students to PDE? Did the District receive the correct reimbursement for these nonresident students?¹¹
 - ✓ To address this objective, we assessed the District's internal controls for inputting and processing residency status and reporting nonresident students to PDE. We reviewed all 66 nonresident foster students and wards of the state that were reported to PDE as educated by the District during the 2015-16 through 2018-19 school years. We verified that each nonresident foster student's custodial parent or guardian was not a resident of the District and that the foster parent(s) were a resident of the District and received a stipend for caring for the student. For each nonresident ward of the state, we verified the student's placement in a facility within the District boundaries and that the District attempted to determine the student's parent/guardian(s) district of residency. The District's nonresident student listings were compared to the total days reported on the Membership Summary and Instructional Time Membership Report to determine if the District accurately reported nonresident foster student data to PDE and that the District received the correct reimbursement for these students.

Conclusion: The results of our procedures identified areas of noncompliance and significant internal control deficiencies related to the District categorization and reporting of nonresident students. Our results are detailed in the Finding beginning on page 6 of this report.

Bus Driver Requirements

- Did the District ensure that all bus drivers transporting District students are approved by the Board of School Directors (Board) and had the required driver's license, physical exam, training, background

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

checks, and clearances¹² as outlined in applicable laws?¹³ 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 reviewing, maintaining, and monitoring the required bus driver qualification documents. We determined if all drivers were approved by the Board. We selected 24 of 47 bus and van drivers transporting District students as of January 29, 2021. Twenty-three drivers were selected randomly and the remaining driver was selected due to having a higher risk of noncompliance.¹⁴ We reviewed documentation to ensure the District complied with the requirements for bus drivers. We also determined if the District had monitoring procedures to ensure that all drivers had updated clearances, licenses, and physicals.

Conclusion: The results of our procedures did not identify any reportable issues; however, we did identify 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.

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?¹⁵
 - ✓ To address this objective, we assessed the District’s internal controls for obtaining, inputting, processing, and reporting transportation data to PDE. We then randomly selected 15 of 50 vehicles used to transport students during the 2018-19 school year.¹⁶ For each vehicle tested, we obtained and reviewed odometer readings, bus rosters, and school calendars. We determined if the District accurately calculated and reported sample average data to PDE and if the District was accurately reimbursed based on this reported data.

We also obtained and reviewed individual requests for transportation for all 427 nonpublic school students reported to PDE as transported for the 2015-16 and 2016-17 school years. We compared the requests to the number of students reported to PDE. We verified that each student was transported by the District and accurately reported to PDE.

¹² 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.

¹³ 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*.

¹⁴ The one vehicle not randomly selected was chosen due to the driver not being identified by the District on the initial list provided to us upon request. Therefore, the combined selection of drivers is not representative of the population, and the results of this audit procedure are not, and should not be, projected to the population.

¹⁵ See 24 P.S. § 25-2541(a).

¹⁶ While representative selection is a required factor of audit sampling methodologies, audit sampling methodology was not applied to achieve this test objective; accordingly, the results of this audit procedure are not, and should not be, projected to the population.

Conclusion: The results of our reviews did not identify any reportable issues; however, we did identify 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?¹⁷ Also, did the District follow best practices related to physical building security and providing a safe school environment?

- ✓ To address this objective, we reviewed a variety of documentation including, but not limited to, safety plans, memorandums of understanding with local law enforcement agencies, anti-bullying policies, climate surveys, trainings for staff and students, and risk and vulnerability assessments performed at the District.

Conclusion: Due to the sensitive nature of school safety, the results of our review for this portion of the 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.

- Did the District comply with the fire and security drill requirements of Section 1517 of the Public School Code?¹⁸ 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 fire and security drill records for the 2018-19 and 2019-20 school years. We determined if security drills were held within the first 90 days of each 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 for this portion of the school safety objective did not disclose any reportable issues.

¹⁷ Safe Schools Act 24 P.S. § 13-1301-A *et seq.*, Emergency Management Services Code 35 Pa.C.S. § 7701.

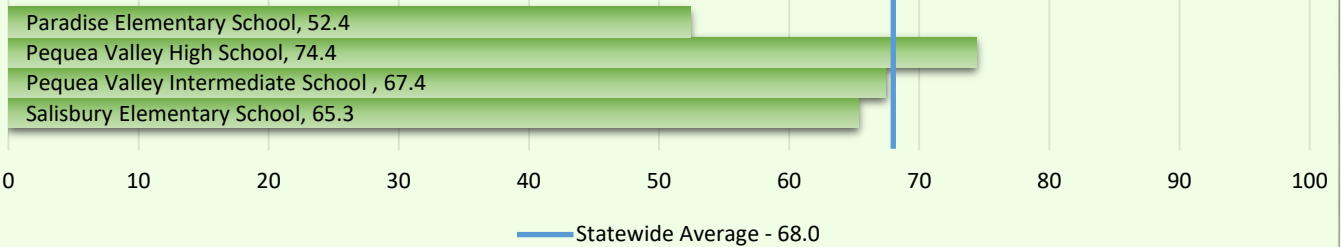
¹⁸ Public School Code (Fire and Security Drills) 24 P.S. § 15-1517.

Appendix B: Academic Detail

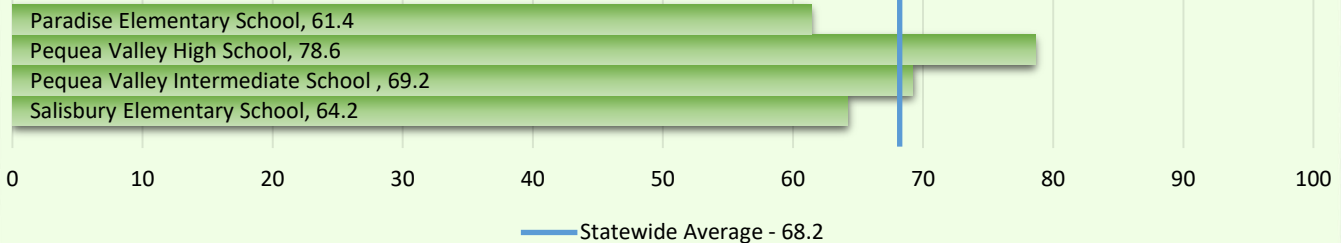
Benchmarks noted in the following graphs represent the statewide average of all public school buildings in the Commonwealth that received a score in the category and year noted.¹⁹ Please note that if one of the District's schools did not receive a score in a particular category and year presented below, the school will not be listed in the corresponding graph.²⁰

SPP School Scores Compared to Statewide Averages

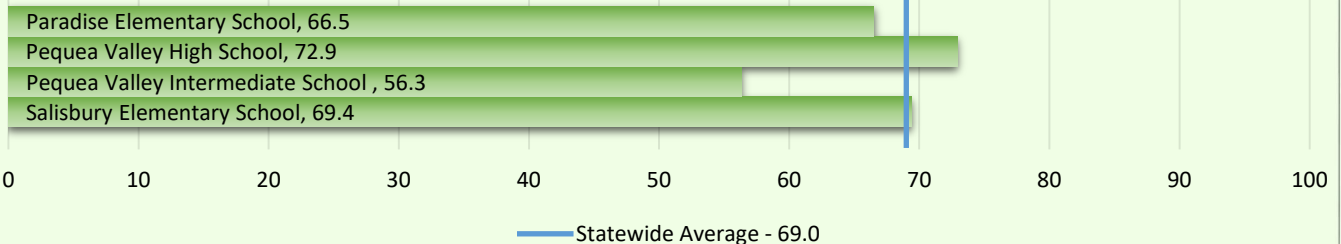
2018-19



2017-18



2016-17

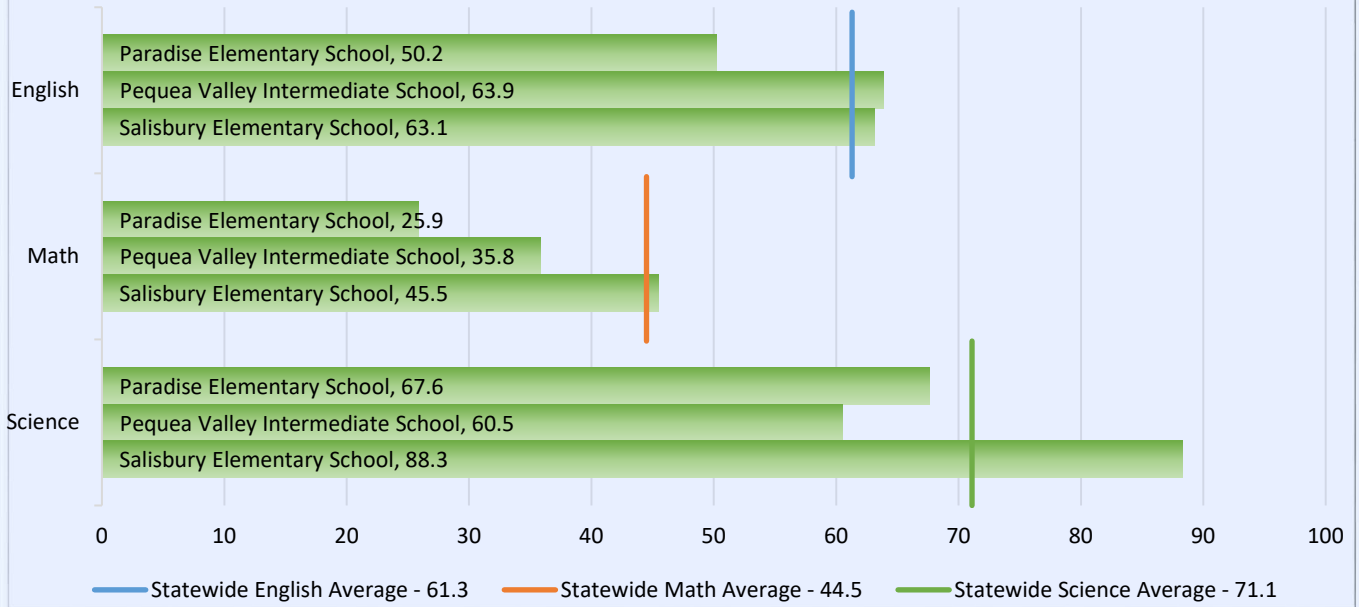


¹⁹ Statewide averages were calculated by our Department based on individual school building scores for all public schools in the Commonwealth, including district schools, charters schools, and cyber charter schools.

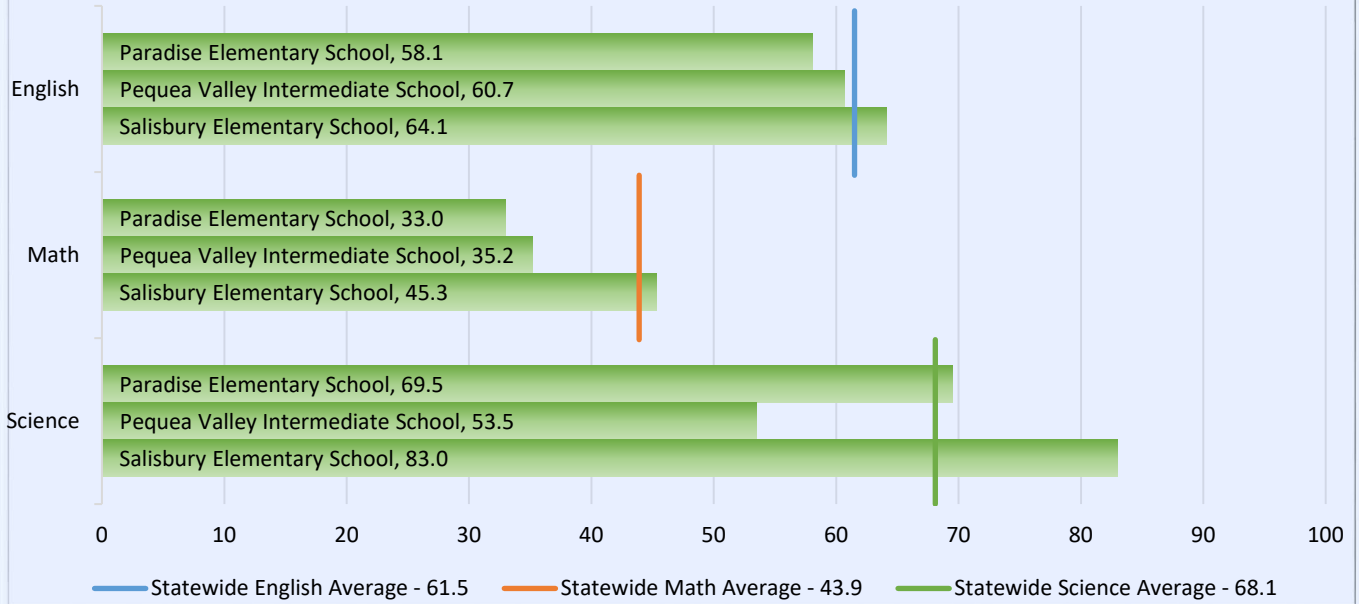
²⁰ PDE's data does not provide any further information regarding the reason a score was not published for a specific school. However, readers can refer to PDE's website for general information regarding the issuance of academic scores.

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

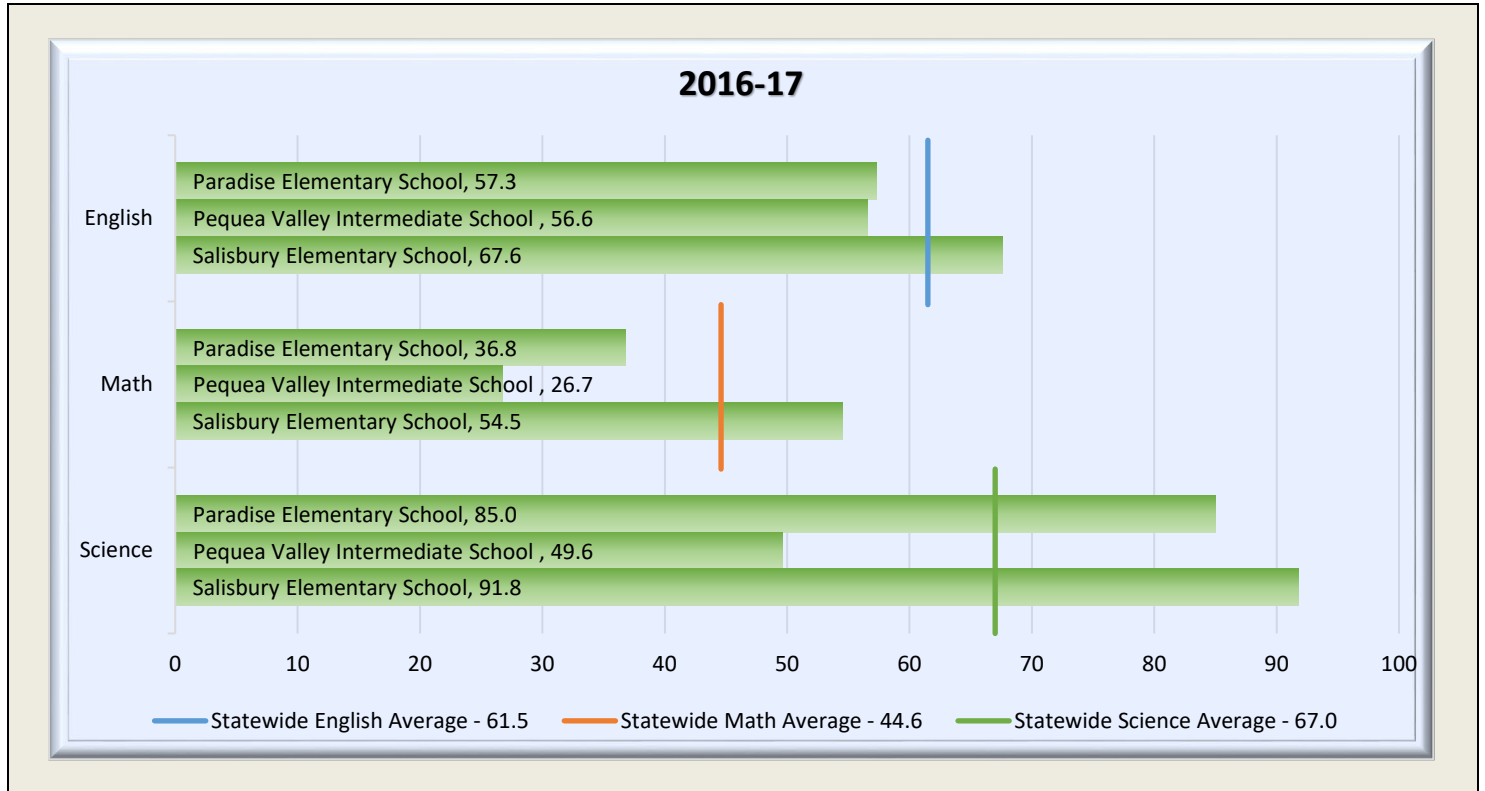
2018-19



2017-18

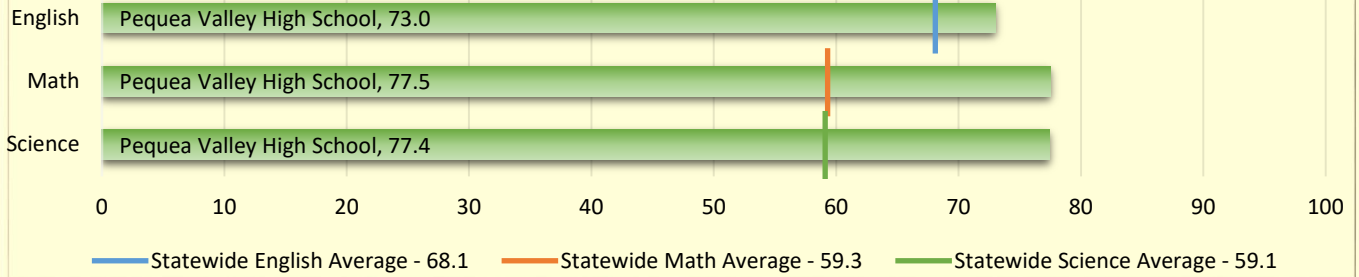


**PSSA Advanced or Proficient Percentage
School Scores Compared to Statewide Averages (continued)**

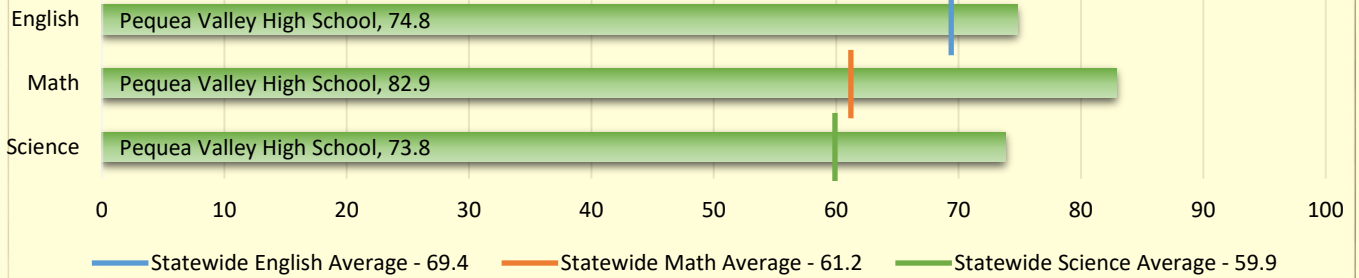


**Keystone Advanced or Proficient Percentage
School Scores Compared to Statewide Averages**

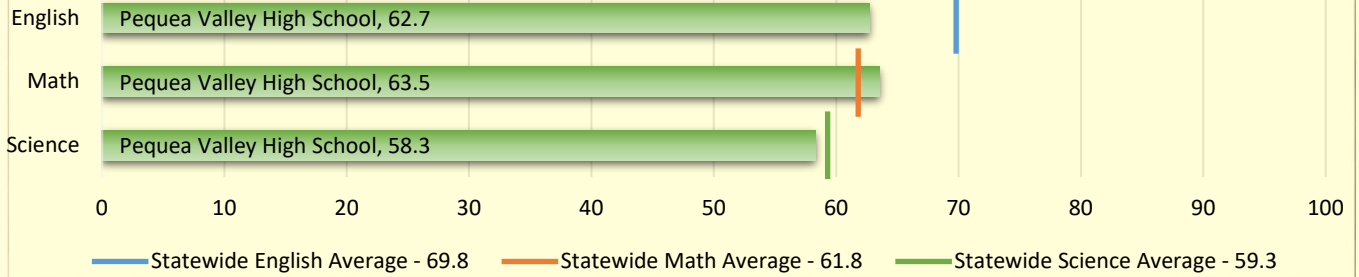
2018-19



2017-18



2016-17



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