

PERFORMANCE AUDIT

Titusville Area School District Venango County, Pennsylvania

February 2020



Commonwealth of Pennsylvania
Department of the Auditor General

Eugene A. DePasquale • Auditor General



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**EUGENE A. DePASQUALE
AUDITOR GENERAL**

Mrs. Stephanie A. Keebler, Superintendent
Titusville Area School District
301 East Spruce Street
Titusville, Pennsylvania 16354

Mrs. Lynn Cressman, Board President
Titusville Area School District
301 East Spruce Street
Titusville, Pennsylvania 16354

Dear Mrs. Keebler and Mrs. Cressman:

We have conducted a performance audit of the Titusville Area School District (District) for the period July 1, 2014 through June 30, 2018, 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 the appendix of this report:

- Nonresident Student Data
- Administrator Separations
- Bus Driver Requirements

We also evaluated the application of best practices in the area of school safety. Due to the sensitive nature of this issue and the need for the results of this review to be confidential, we did not include the results in this report. However, we communicated the 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 found that the District performed adequately in the areas listed above, except as noted in the following finding:

- The District Inaccurately Reported Nonresident Student Data to the Pennsylvania Department of Education Resulting in an Overpayment of \$51,250

Mrs. Stephanie A. Keebler
Mrs. Lynn Cressman
Page 2

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

February 25, 2020

cc: **TITUSVILLE AREA SCHOOL DISTRICT** Board of School Directors

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Background Information

School Characteristics 2018-19 School Year ^A	
County	Venango
Total Square Miles	200
Number of School Buildings	6 ¹
Total Teachers	150
Total Full or Part-Time Support Staff	110
Total Administrators	18
Total Enrollment for Most Recent School Year	2,023
Intermediate Unit Number	6
District Vo-Tech School	Venango Technology Center

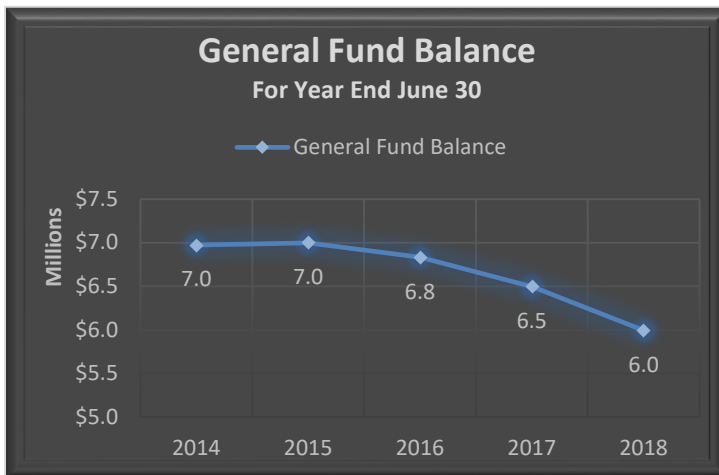
A - Source: Information provided by the District administration and is unaudited.

Mission Statement^A

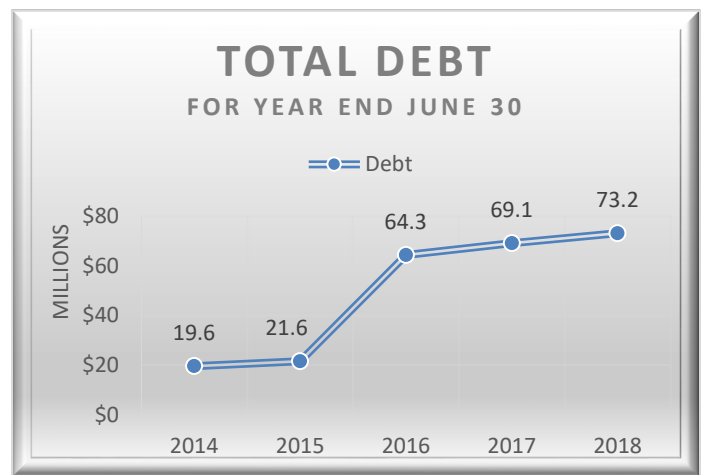
The mission of the Titusville Area School District, a partnership with parents and community members, is to ensure that all students are challenged by quality academic and social experiences to achieve their fullest potential as life-long learners.

Financial Information

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



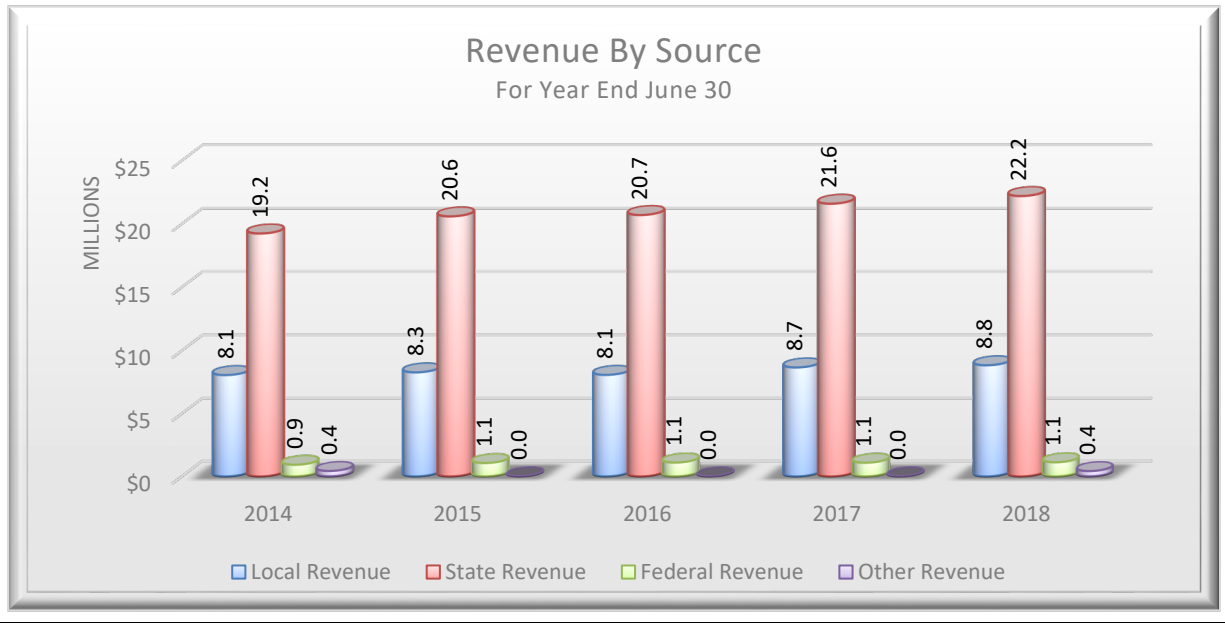
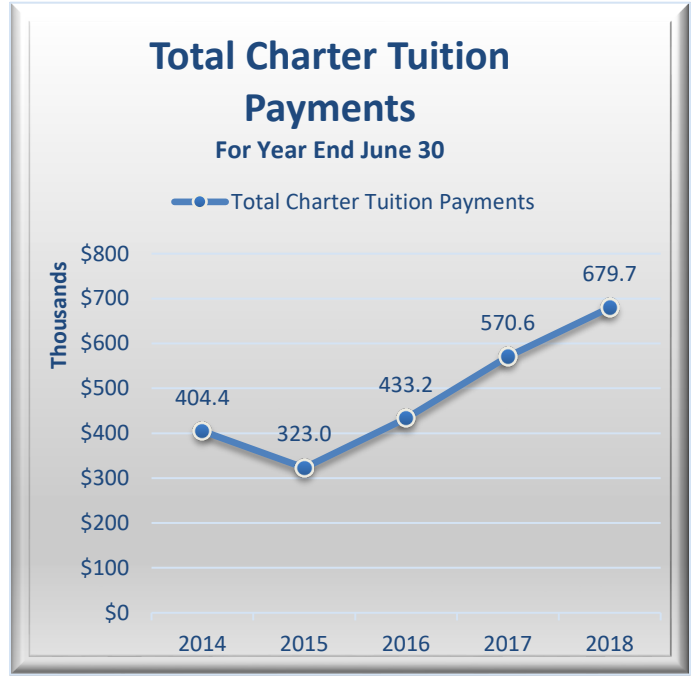
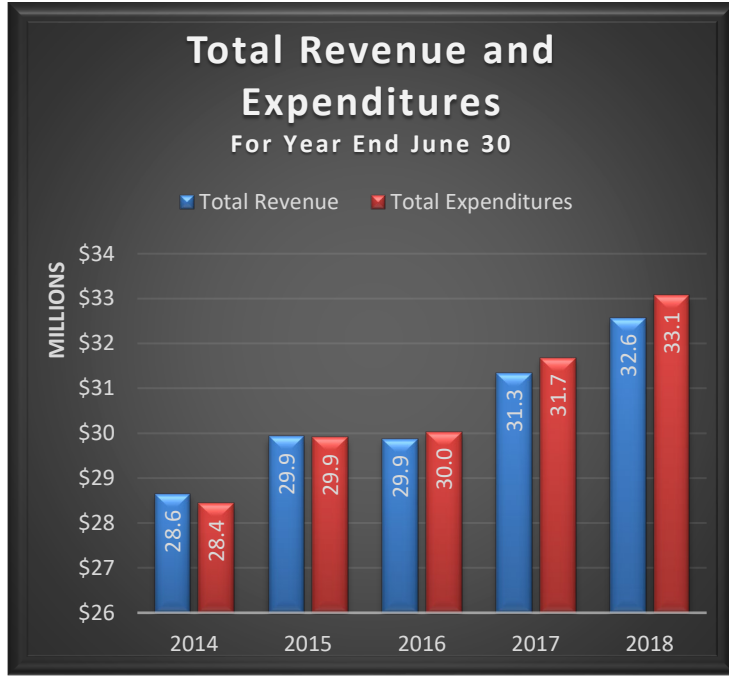
Note: General Fund Balance is comprised of the District's Committed, Assigned and Unassigned Fund Balances.



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

¹ School performance data in this report shows academic for five District schools. The sixth District school is an early childhood learning center which houses K4 and K5 students only.

Financial Information Continued

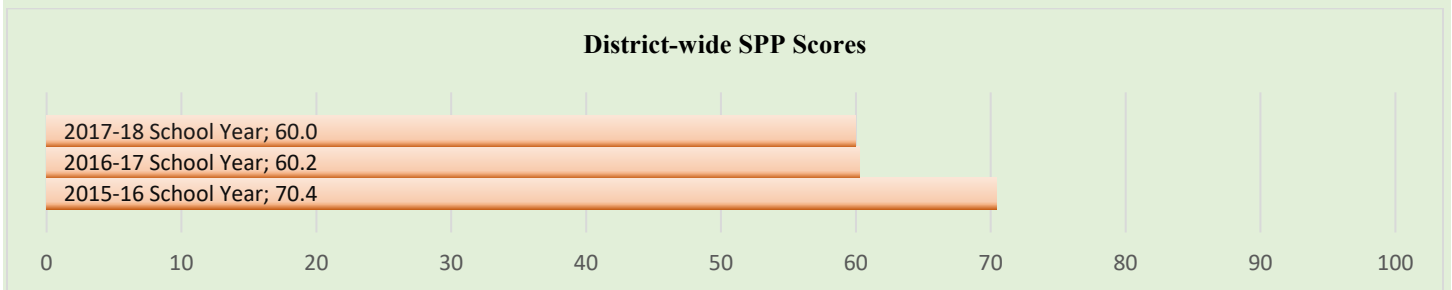


Academic Information

The graphs on the following pages present the District-wide School Performance Profile (SPP) scores, Pennsylvania System of School Assessment (PSSA) scores, Keystone Exam results, and 4-Year Cohort Graduation Rates for the District obtained from PDE's data files for the 2015-16, 2016-17, and 2017-18 school years.² 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. 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

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.⁴



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

³ 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.

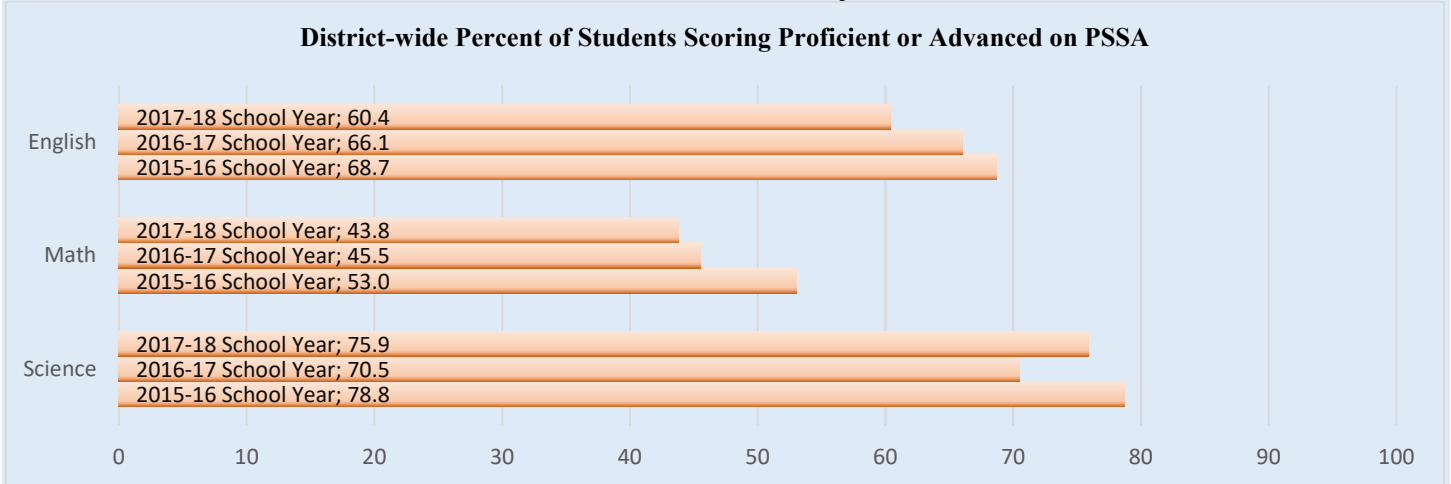
⁴ PDE started issuing a SPP score for all public school buildings beginning with the 2012-13 school year. For the 2014-15 school year, PDE only issued SPP scores for high schools taking the Keystone Exams as scores for elementary and middle scores were put on hold due to changes with PSSA testing. PDE resumed issuing a SPP score for all schools for the 2015-16 school year.

Academic Information Continued

What is the PSSA?

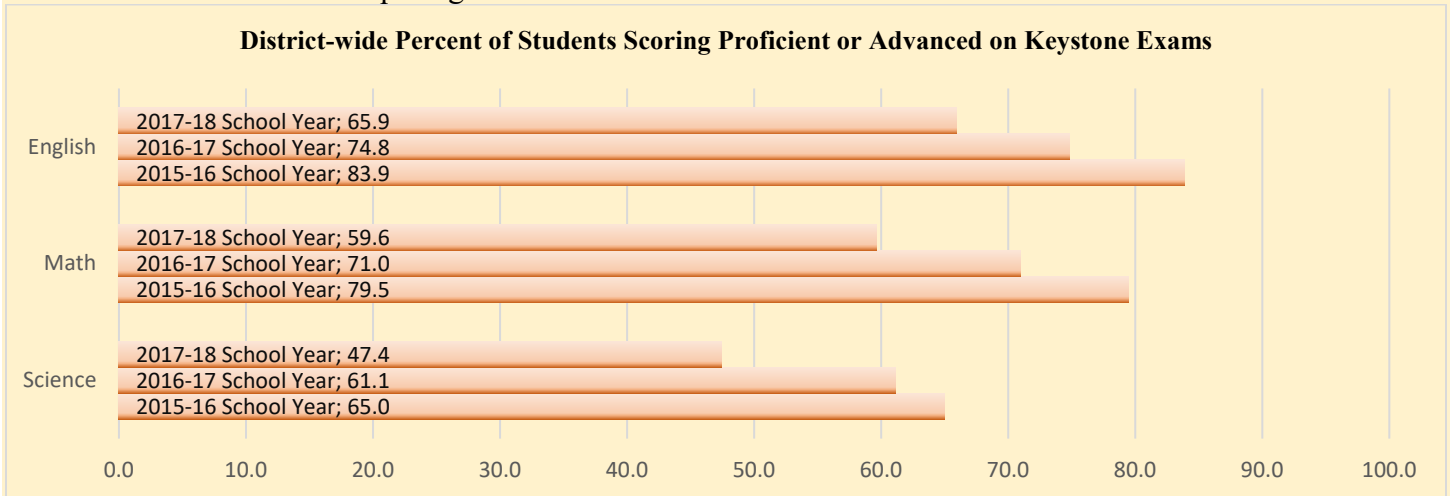
The PSSA is an annual, standardized test given across the Commonwealth to students in grades 3 through 8 in core subject areas, including English, Math and Science. The PSSAs help Pennsylvania meet federal and state requirements and inform instructional practices, as well as provide educators, stakeholders, 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.⁵ 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.

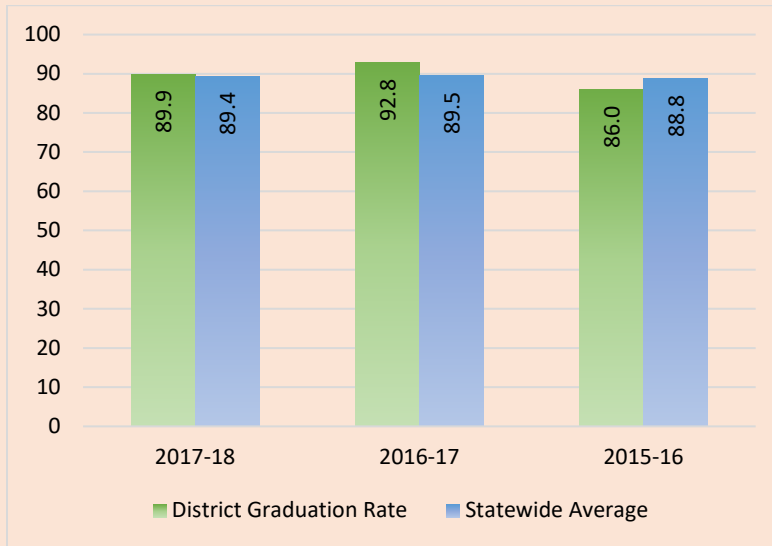


⁵ Act 158 of 2018, effective October 24, 2018, amended the Public School Code to further delay the use of Keystone Exams as a graduation requirement for an additional year until the 2021-22 school year. See 24 P.S. § 1-121(b)(1).

Academic Information Continued

What is a 4-Year Cohort Graduation Rate?

PDE collects enrollment and graduate data for all Pennsylvania public schools, which is used to calculate graduation rates. Cohort graduation rates are a calculation of the percentage of students who have graduated with a regular high school diploma within a designated number of years since the student first entered high school. The rate is determined for a cohort of students who have all entered high school for the first time during the same school year. Data specific to the 4-year cohort graduation rate is presented in the graph below.⁶



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

Finding

Finding

The District Inaccurately Reported Nonresident Student Data to the Pennsylvania Department of Education Resulting in an Overpayment of \$51,250

Criteria relevant to the finding:

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

Payment of Tuition

Section 1305(a) of the Public School Code (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 Titusville Area School District (District) inaccurately reported nonresident student data to the Pennsylvania Department of Education (PDE) for the 2014-15, 2015-16, and 2017-18 school years.⁷ During these school years, the District educated both resident and nonresident students and inaccurately reported some students to PDE as nonresident foster students. The District received \$51,250 in Commonwealth-paid tuition for these students that it was not eligible to receive. The District could have billed other school districts for tuition totaling \$15,588 for some of the students that were inaccurately reported, but failed to do so.

As discussed in the criteria box to the left, school districts are entitled to receive Commonwealth-paid tuition for educating some types of nonresident students. To be eligible to receive Commonwealth-paid tuition, the student's parent/guardian must not be a resident of the educating district and the student must have been placed in a private home of a resident within the district by order of the court or by arrangement with an association, agency, or institution.⁸ Additionally, the resident must be compensated for care of the student and the student cannot be in adoptive status with the resident. These students are commonly referred to as “foster students” and it is the mandate of the educating district to obtain the required documentation to correctly categorize and accurately report the number of foster students to PDE.

Further, students educated in therapeutic care homes within a district are not eligible for Commonwealth-paid subsidy. However, the costs to educate students educated in therapeutic care homes are to be borne by each of the student's respective home district.⁹ It is the responsibility of the educating District to bill the student's home district and collect the tuition payments for educating these students.

⁷ Our review found the District accurately reported nonresident student data to PDE for the 2016-17 school year.

⁸ For example, the applicable county children and youth agency.

⁹ A student's home district would be the district of residency of the student's parent(s) or legal guardian.

*Criteria relevant to the finding
(continued):*

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

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

Section 2562 of the PSC specifies payments by Districts for Pupils Attending in Other Districts by providing, in part:

“For each elementary or high school pupil attending a public school of another district, the receiving district shall bill the sending district, and the sending district shall pay the amount of tuition charge per elementary pupil, or the tuition charge per high school pupil, as the case may be. In the case of pupils attending the receiving district’s public schools for less than a full school term, the tuition charge per elementary or high school pupil shall be prorated by reference to the period of time over which such pupils actually attended the receiving district’s schools.” See 24 P.S. § 25-2562.

The table below details the number of nonresident students inaccurately reported by the District as foster students to PDE and the corresponding amount of Commonwealth-paid tuition that the District was overpaid.

Titusville Area School District Nonresident Student Data		
School Year	Over reported Number of Foster Students	Overpayment
2014-15	4	\$22,809
2015-16	4	\$15,588
2017-18	2	\$12,853
Total	10	\$51,250

During the 2014-15 school year, the District inaccurately overstated the number of foster students it reported to PDE by four students. Three of those students should have been classified as resident students because one student was adopted prior to the 2014-15 school year and the two other students were adopted during the 2014-15 school year. Once a student is adopted, he/she should be reported as a resident student. The fourth student withdrew from the District prior to the 2014-15 school year. However, due to a clerical error when entering the withdrawal date, the student was inaccurately reported as being educated by the District as a foster student during the 2014-15 school year.

During the 2015-16 school year, the District educated four nonresident students who were placed in therapeutic care homes within the District and inaccurately reported these students as foster students. While the District was eligible to receive tuition reimbursement for these students from each student’s home district, the District failed to bill for these students to obtain the proper reimbursement.

During the 2017-18 school year, the District inaccurately reported two resident students as foster students. One student was homeless and was inaccurately reported as a foster student. The other student was a foster student, but because the natural parent was also a resident of the District, the District was ineligible for tuition reimbursement for this student.

The errors identified in this finding were the result of the District’s Registrar misclassifying students upon registration and not having a good understanding of the differences in the types of nonresident students and who is responsible for the tuition costs to educate nonresident students. The District also lacked internal controls over its enrollment and child accounting reporting. The District did not have a process in place to ensure that student residency was correct after registration, and the District failed to review withdrawal dates that were entered into its software. The District also lacked a process to monitor the status of foster students that

*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) 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 a resident of the district, 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).

PDE Guidelines state the following:

“Resident (includes 1302 Guardianship and Resident Foster Children): Student whose natural/adoptive parent or legal guardian resides in the reporting school district; affidavit student residing with an adult other than natural/adoptive parent (see PA Public School Code, 24 P.S. § 13-1302); emancipated student (see Chapter 11 §11.11); pre-adoptive student; foreign exchange student with a J-1 visa; homeless student not living in a shelter or institution; student whose natural/adoptive parent or guardian is a migrant worker; and student whose natural/adoptive parent or legal guardian and foster parent reside in the reporting school district. The district code of residence and the funding district code are the same.”

were in the adoption process and lacked an annual review of nonresident students to ensure that classifications were updated and accurate.

It is critical that the District personnel who are responsible for reporting nonresident data to PDE are properly trained on the classifications of nonresident students and how to accurately report these students. It is also vitally important that a District official, who is independent of classifying a student’s residency status and entering data into its software, closely review this information for accuracy.

We provided PDE with reports detailing the errors we identified for the 2014-15, 2015-16, and 2017-18 school years. PDE requires these reports to verify the overpayments to the District. The District’s future subsidy reimbursements should be adjusted by the amount of this overpayment.

Recommendations

The *Titusville Area School District* should:

1. Ensure that District personnel responsible for enrolling and reporting nonresident students are properly trained on the types of nonresident students and the supporting documentation necessary to support the classification of nonresident students reported to PDE.
2. Ensure that a District official other than the person who enters the nonresident student data reviews this data prior to reporting to PDE.
3. Implement controls that would ensure nonresident student statuses are reviewed at least annually and are updated as circumstances change.
4. Review membership reports submitted to PDE for the 2018-19 school year and, if errors are found, submit revised reports to PDE.
5. Bill the home districts for tuition for the four students placed in therapeutic care homes and educated by the District during the 2015-16 school year.

The *Pennsylvania Department of Education* should:

6. Adjust the District’s allocations to correct the \$51,250 overpayment.

Management Response

District management provided the following response:

1. Training for all Titusville Area School District registrars was held at 1:00 pm on Tuesday, January 14, 2020 to review the audit finding. This training included definitions of nonresident students and the related codes. The training also included the review of supporting

documentation that is necessary for nonresident classification. Registrars were exposed to the Summary of Child Accounting Membership report in order to improve understanding and ownership of data.

2. The Director of Student Services will review all nonresident enrollments and related coding at the time of enrollment and prior to reporting to the state.
3. Formal controls will be implemented that will ensure nonresident student statuses are reviewed at least annually. These controls will include procedures for updating records as necessary. The registrars of Titusville Area School District will work collaboratively with the Director of Student Services to complete a Child Accounting Procedural Manual for the school district. This document will include written procedures for enrollment, PIMS state reporting, nonresident student coding, and all child accounting processes.
4. The Summary of Child Accounting Membership for the 2018-2019 school year has been reviewed. Errors in nonresident student membership have been corrected. Data has been uploaded through the PIMS system. Additionally, the Preliminary Summary of Child Accounting published on December 17 has been reviewed to verify the receipt of data. Also, requests for proper documentation of nonresident students for the 2018-2019 school year have been sent to various Children and Youth Services offices. All forms have been returned and reviewed by the district office registrar for necessary data.
5. The Titusville Area School District will bill the home districts for tuition for the four students placed in therapeutic care homes and educated by the District during the 2015-2016 school year.

Auditor Conclusion

We are pleased that the District agrees with our finding and has already initiated corrective actions. We will review the effectiveness of the corrective action cited in the District's management response and any other actions taken by the District during our next audit.

Status of Prior Audit Findings and Observations

Our prior Limited Procedures Engagement of the Titusville Area 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,¹⁰ is not a substitute for the local annual financial audit required by the Public School Code of 1949, as amended. We conducted our audit in accordance with *Government Auditing Standards* issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit.

Scope

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

The Titusville Area 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).¹¹ In conducting our audit, we obtained an understanding of the District's internal controls, including any information technology controls, if applicable, that we considered to be significant within the context of our audit objectives. We assessed whether those controls were properly designed and implemented. Any deficiencies in internal controls that were identified during the conduct of our audit and determined to be significant within the context of our audit objectives are included in this report.

¹⁰ 72 P.S. §§ 402 and 403.

¹¹ Internal controls are processes designed by management to provide reasonable assurance of achieving objectives in areas such as: effectiveness and efficiency of operations; relevance and reliability of operational and financial information; and compliance with certain relevant state laws, regulations, contracts, and administrative procedures.

Objectives/Methodology

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

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

- ❖ Nonresident Student Data
- ❖ Administrator Separations
- ❖ Bus Driver Requirements
- ❖ School Safety

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

- Did the District accurately report nonresident students to PDE? Did the District receive the correct reimbursement for these nonresident students?¹²
 - ✓ To address this objective, we reviewed all nonresident foster students reported by the District during the 2014-15, 2015-16, 2016-17, and 2017-18 school years.¹³ We obtained the documentation to verify that the custodial parent or guardian was not a resident of the District and the foster parent received a stipend for caring for the student. The student listings were compared to the total days reported on the *Instructional Time and Membership Report* to ensure that the District received the correct reimbursement for these nonresident students. The results of our review of this objective can be found in the finding beginning on page 6 in this report.
- Did the District ensure that all individually contracted employees who separated employment from the District were compensated in accordance with their contract? Also, did the District comply with the Public School Code¹⁴ and the Public School Employees' Retirement System (PSERS) guidelines when calculating and disbursing final salaries and leave payouts for these contracted employees?
 - ✓ To address this objective, we reviewed the contract, board policies, and leave and payroll records for the one individually contracted administrator who separated employment from the District during the period of July 1, 2014 through July 1, 2019. We reviewed the final payouts to determine that they were calculated correctly. We verified that leave payouts were not reported as eligible wages to PSERS. We verified the reason for the separation was made public through the board meeting minutes¹⁵ and that a board vote was conducted according to Section 508 of the Public School Code. Our review of this objective did not disclose any reportable issues.

¹² See 24 P.S. §§ 13-1301, 13-1302, 13-1305, 13-1306; 22 Pa. Code Chapter 11.

¹³ The District reported 15 nonresident students for the 2014-15 school year, 23 nonresident students for the 2015-16 school year, 25 nonresident students for the 2016-17 school year, and 14 nonresident students for the 2017-18 school year.

¹⁴ 24 P.S. § 10-1073(e) (2) (v).

¹⁵ Required for all superintendent and assistant superintendent contracts signed or renewed from the date of September 12, 2012, forward.

- Did the District ensure that bus drivers transporting District students had the required driver's license, physical exam, training, background checks, and clearances¹⁶ as outlined in applicable laws?¹⁷ In addition, 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 randomly selected 10 of the 46 bus drivers transporting District students as of September 26, 2019.¹⁸ 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, if followed, ensure compliance with bus driver hiring requirements. Our review of this objective did not result in any reportable issues.

- Did the District take actions to ensure it provided a safe school environment?¹⁹
 - ✓ To address this objective, we reviewed a variety of documentation including, safety plans, training schedules, anti-bullying policies, and after action reports, and fire drill reports. In addition, we conducted on-site reviews at all three of the District's school buildings to assess whether the District had implemented basic safety practices.²⁰ Due to the sensitive nature of school safety, the results of our review of this objective area are not described in our audit report. The results of our review of school safety are shared with District officials, PDE, and other appropriate agencies deemed necessary.

¹⁶ 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.

¹⁷ 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*.

¹⁸ 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.

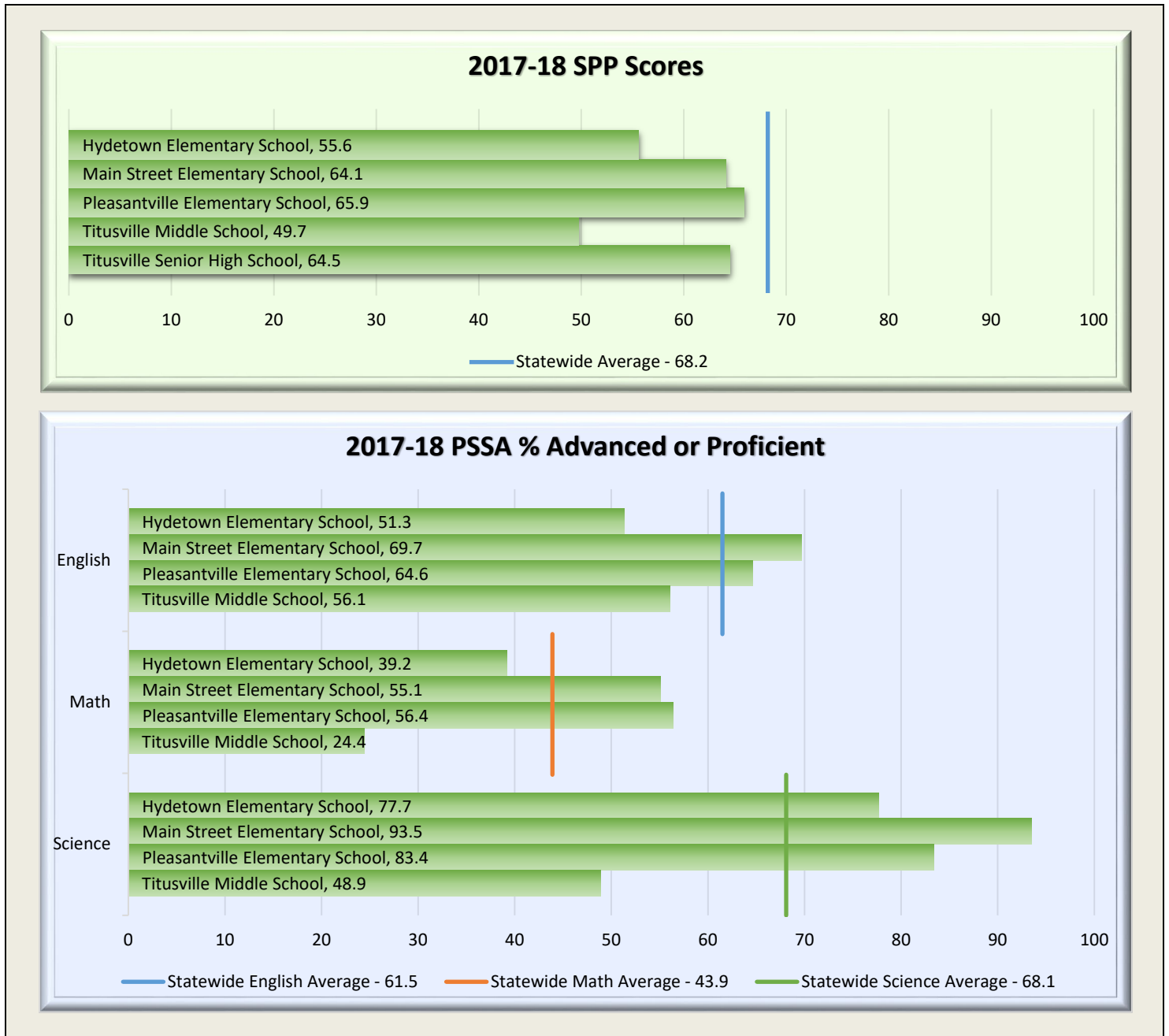
¹⁹ 24 P.S. § 13-1301-A *et seq.*

²⁰ Basic safety practices evaluated were building security, bullying prevention, visitor procedures, risk and vulnerability assessments, and preparedness.

Appendix B: Academic Detail

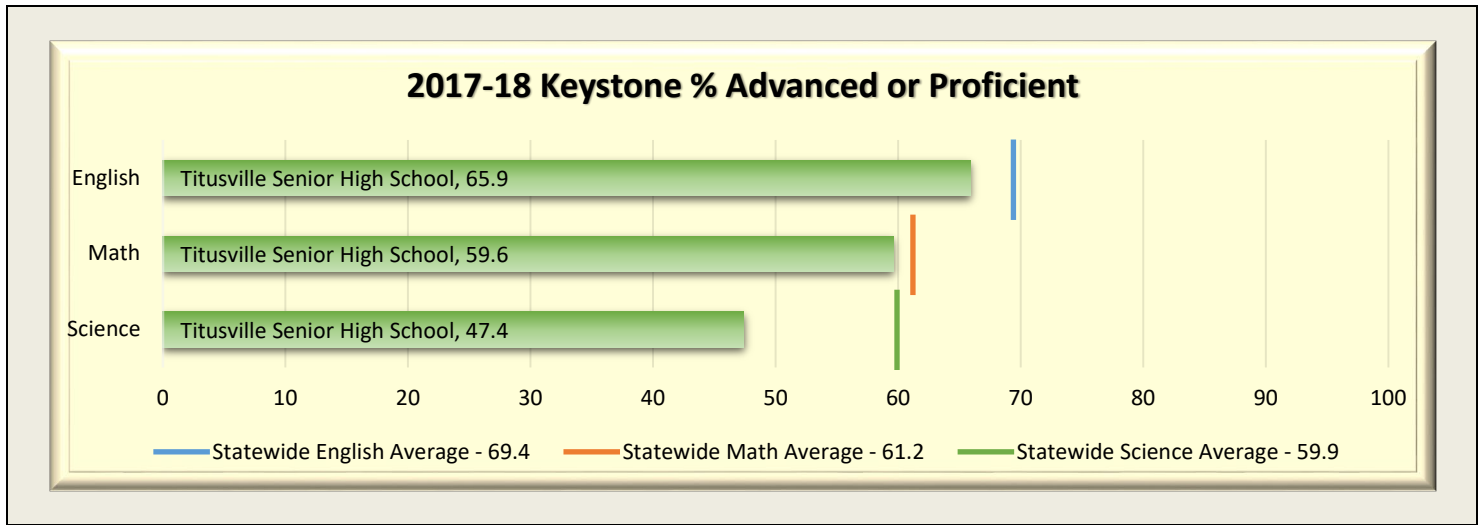
Benchmarks noted in the following graphs represent the statewide average of all public school buildings in the Commonwealth that received a score in the category and year noted.²¹

2017-18 Academic Data School Scores Compared to Statewide Averages

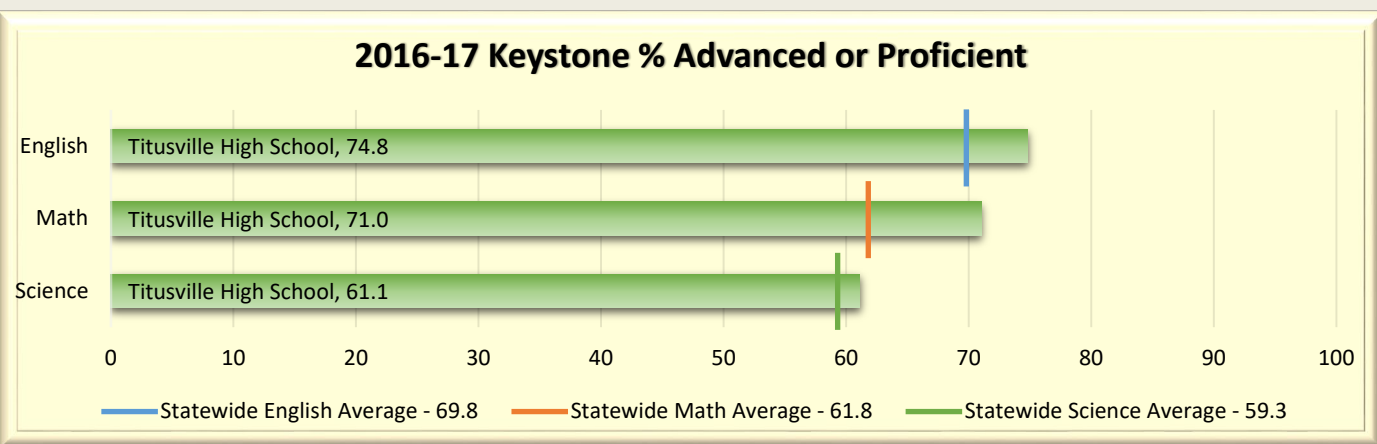
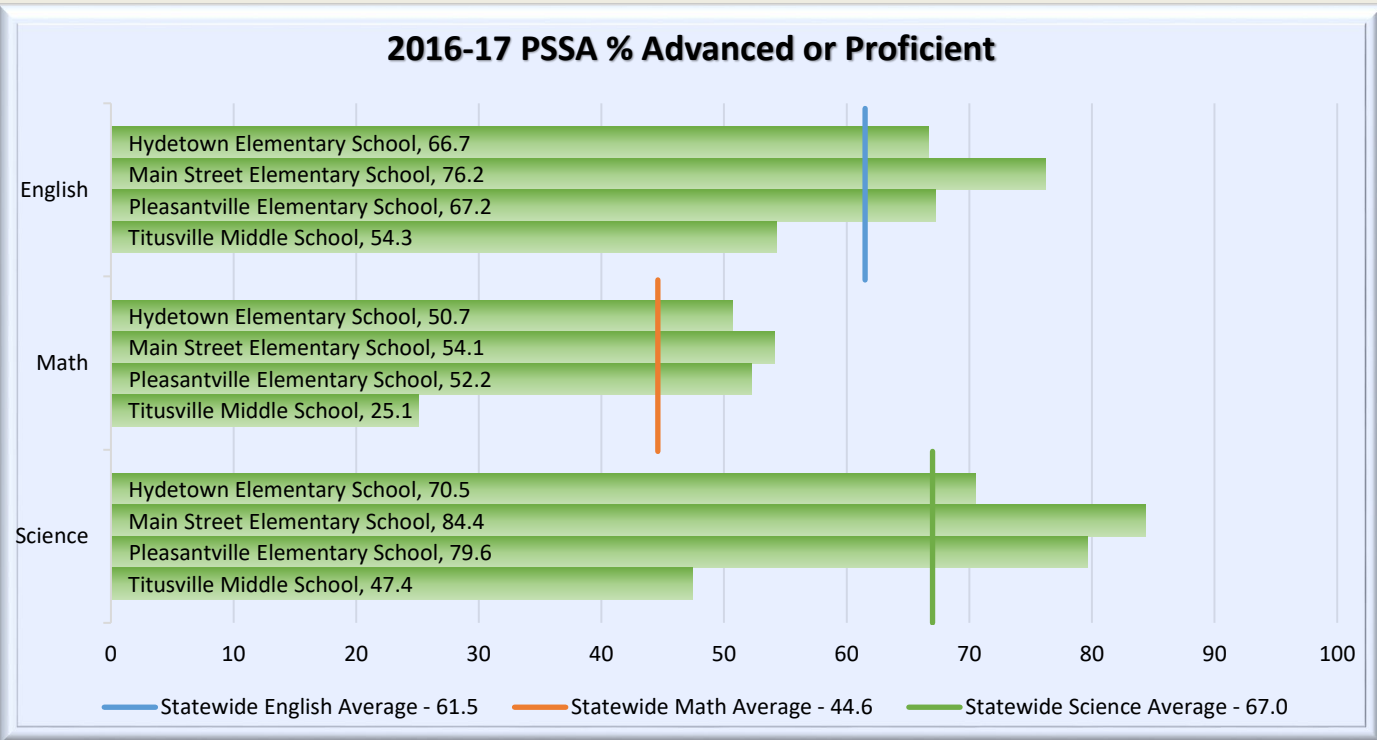
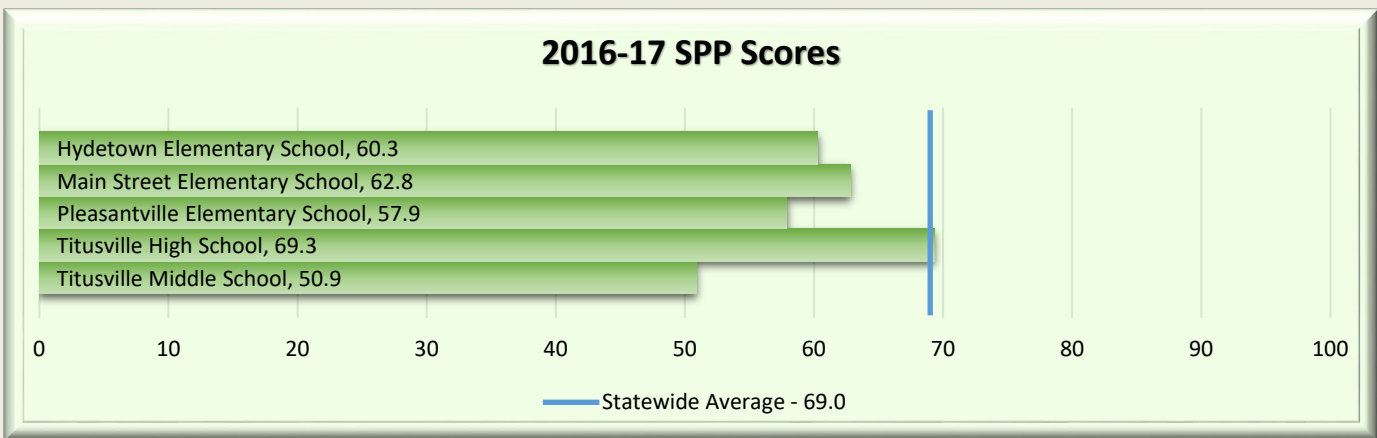


²¹ Statewide averages were calculated by our Department based on individual school building scores for all public schools in the Commonwealth, including district schools, charters schools, and cyber charter schools.

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

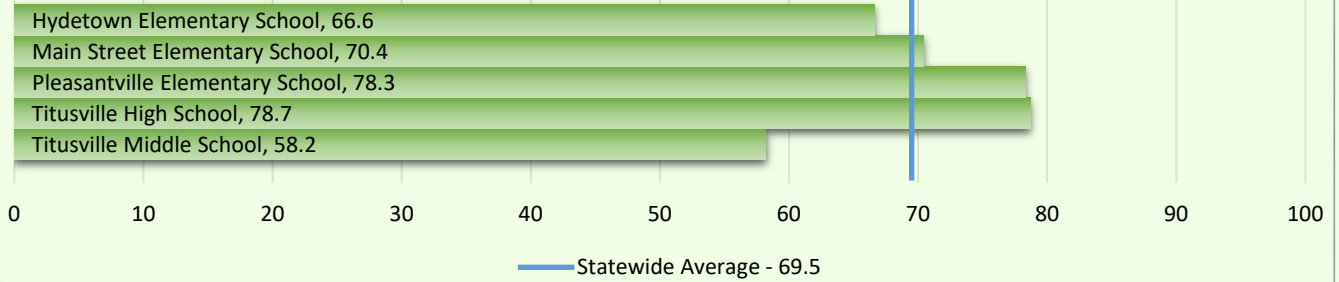


2016-17 Academic Data
School Scores Compared to Statewide Averages

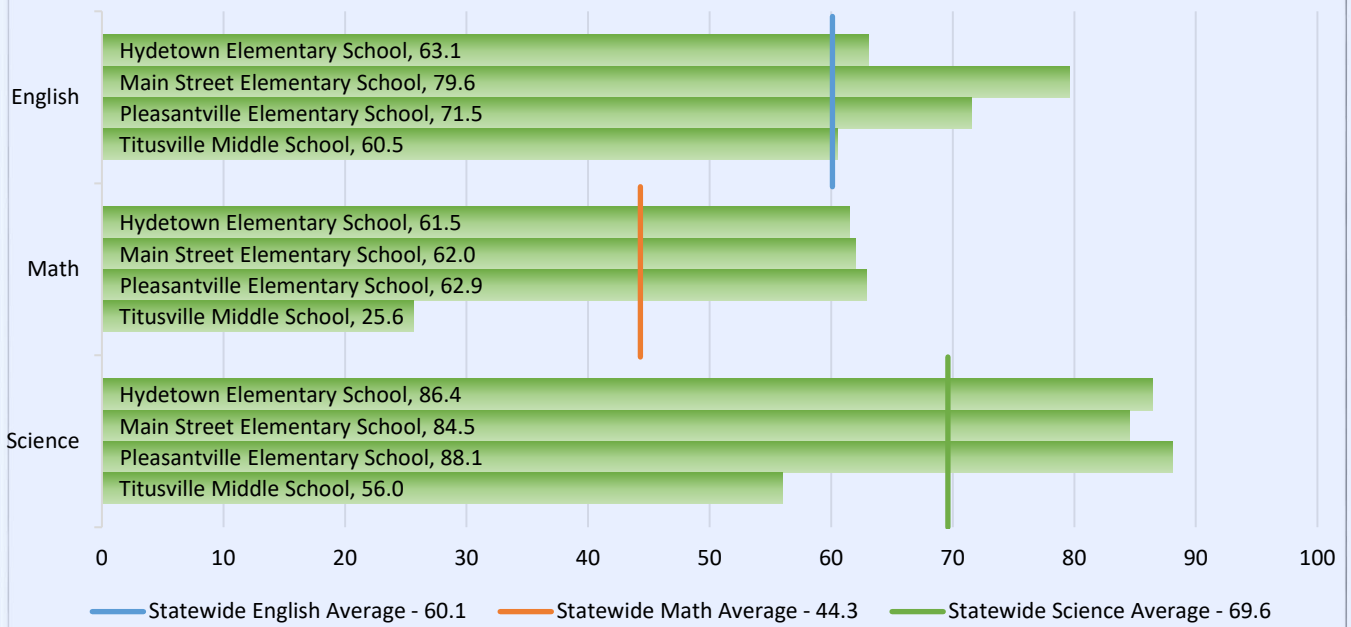


2015-16 Academic Data
School Scores Compared to Statewide Averages

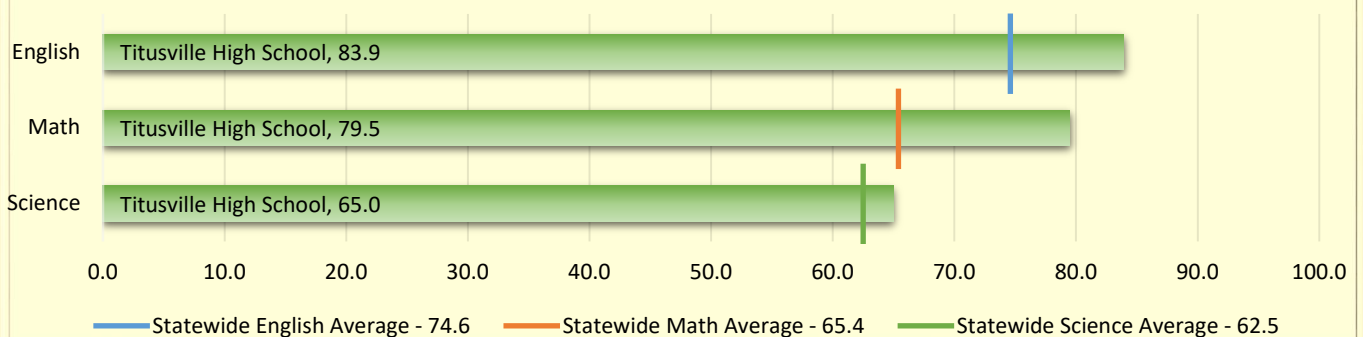
2015-16 SPP Scores



2015-16 PSSA % Advanced or Proficient



2015-16 Keystone % Advanced or Proficient



Distribution List

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