

PERFORMANCE AUDIT

West Branch Area School District Clearfield County, Pennsylvania

November 2019



Commonwealth of Pennsylvania
Department of the Auditor General

Eugene A. DePasquale • Auditor General



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**EUGENE A. DePASQUALE
AUDITOR GENERAL**

Mrs. Michelle Dutrow, Superintendent
West Branch Area School District
516 Allport Cutoff
Morrisdale, Pennsylvania 16858

Mr. Chad Diviney, Board President
West Branch Area School District
516 Allport Cutoff
Morrisdale, Pennsylvania 16858

Dear Mrs. Dutrow and Mr. Diviney:

We have conducted a performance audit of the West Branch 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:

- Transportation Operations
- Health Services Reimbursement
- 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 bulleted areas listed above, except as noted in the following finding:

- The District Inaccurately Reported Transportation Data to PDE Resulting in an Underpayment to the District of at Least \$13,620

Mrs. Michelle Dutrow
Mr. Chad Diviney
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

November 4, 2019

cc: **WEST BRANCH AREA SCHOOL DISTRICT** Board of School Directors

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Background Information

School Characteristics 2018-19 School Year ^A	
County	Clearfield
Total Square Miles	165
Number of School Buildings	1 ¹
Total Teachers	79
Total Full or Part-Time Support Staff	62
Total Administrators	9
Total Enrollment for Most Recent School Year	1,037
Intermediate Unit Number	10
District Vo-Tech School	Clearfield County Career & Technology Center

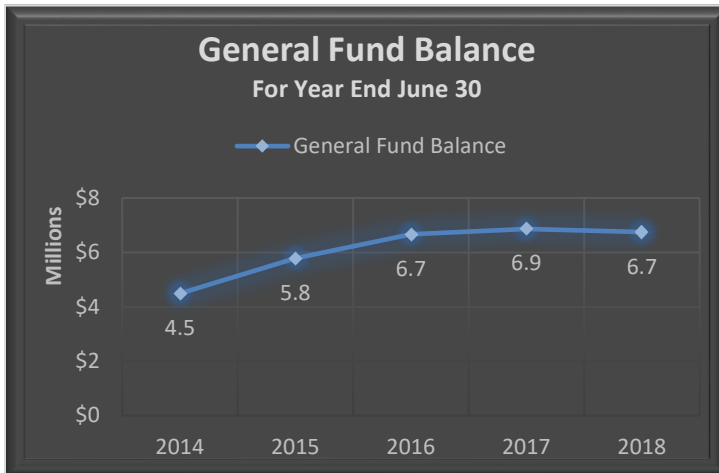
A - Source: Information provided by the District administration and is unaudited.

Mission Statement^A

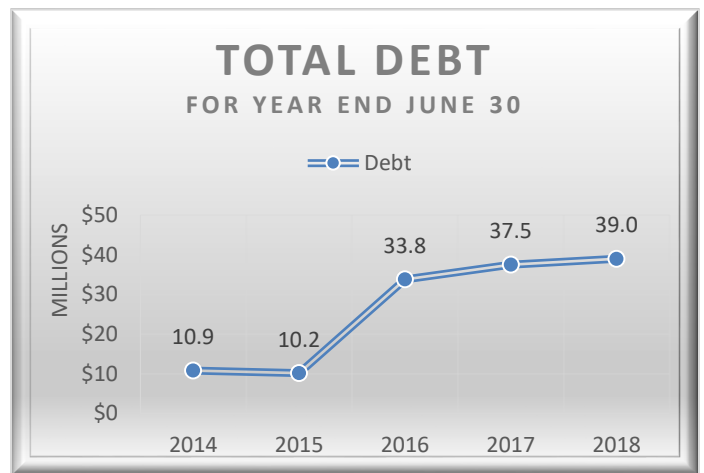
Inspiring Today... Improving Tomorrow...
Learning Always.

Financial Information

The following pages contain financial information about the West Branch 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**.



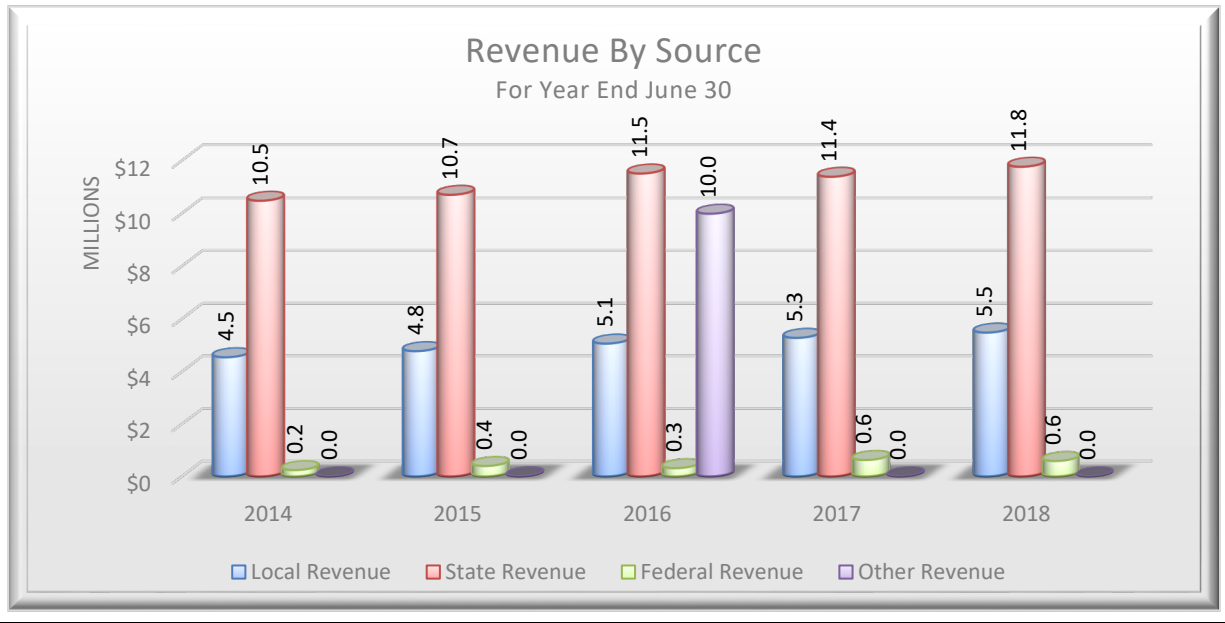
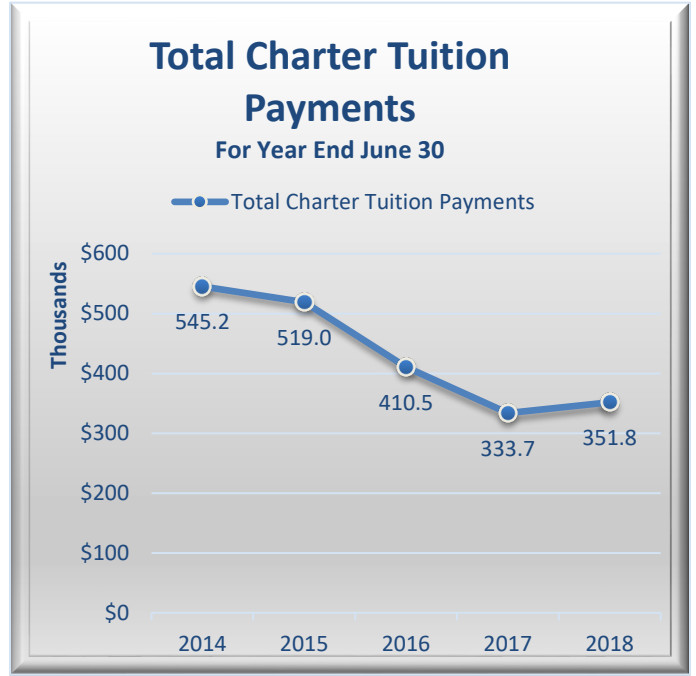
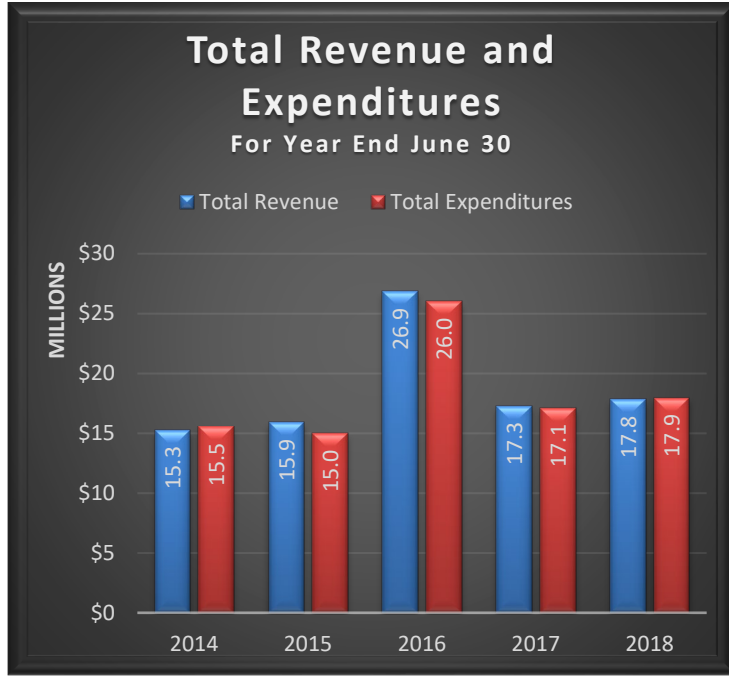
Note: General Fund Balance is comprised of the District's Committed, Assigned and Unassigned Fund Balances.



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 The elementary and secondary students are housed in one physical building. Academic scores are presented separately in the Appendix of this report.

Financial Information Continued

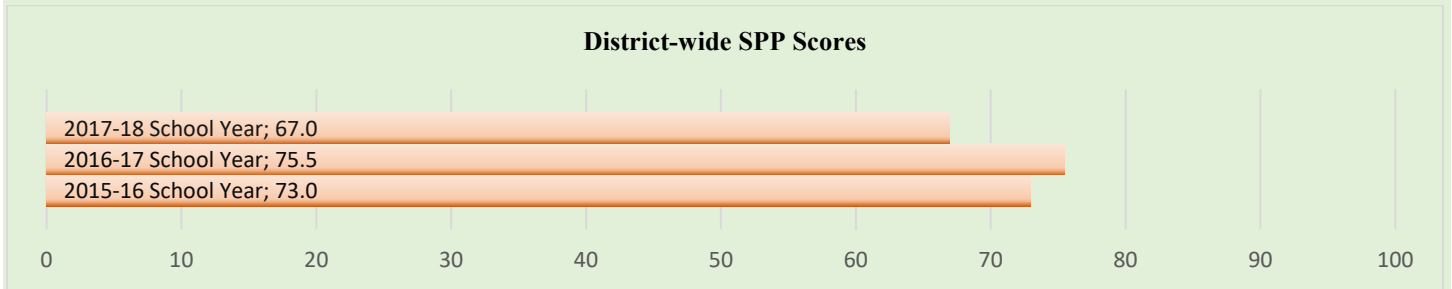


Academic Information

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.

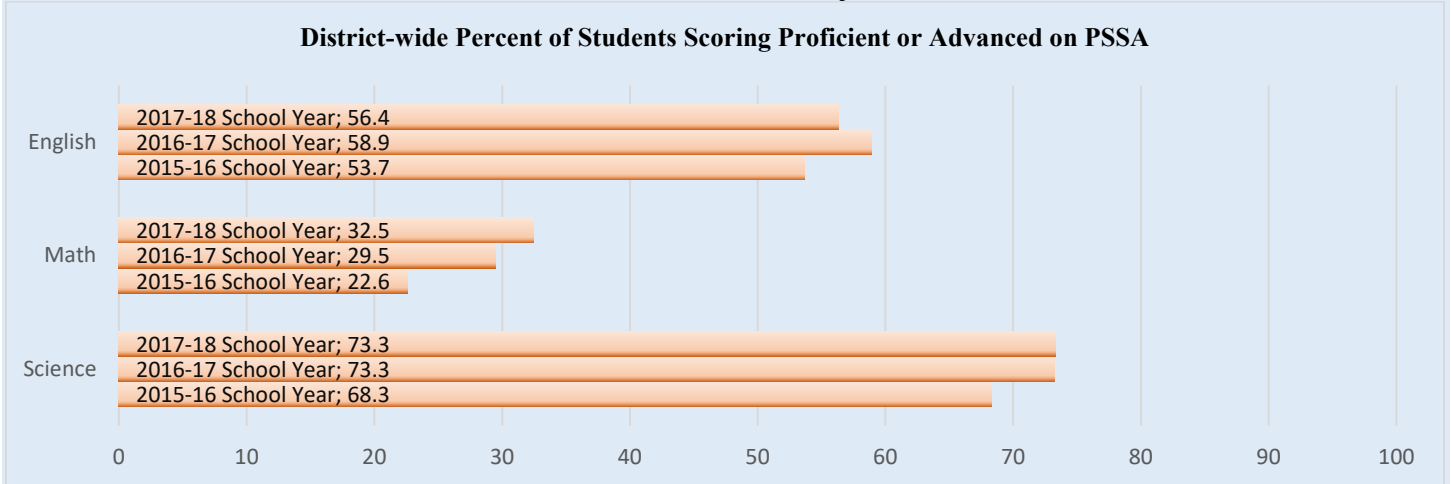
⁴ PDE started issuing a SPP score for all public school buildings beginning with the 2012-13 school year. For the 2014-15 school year, PDE only issued SPP scores for high schools taking the Keystone Exams as scores for elementary and middle scores were put on hold due to changes with PSSA testing. PDE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

Academic Information Continued

What is the PSSA?

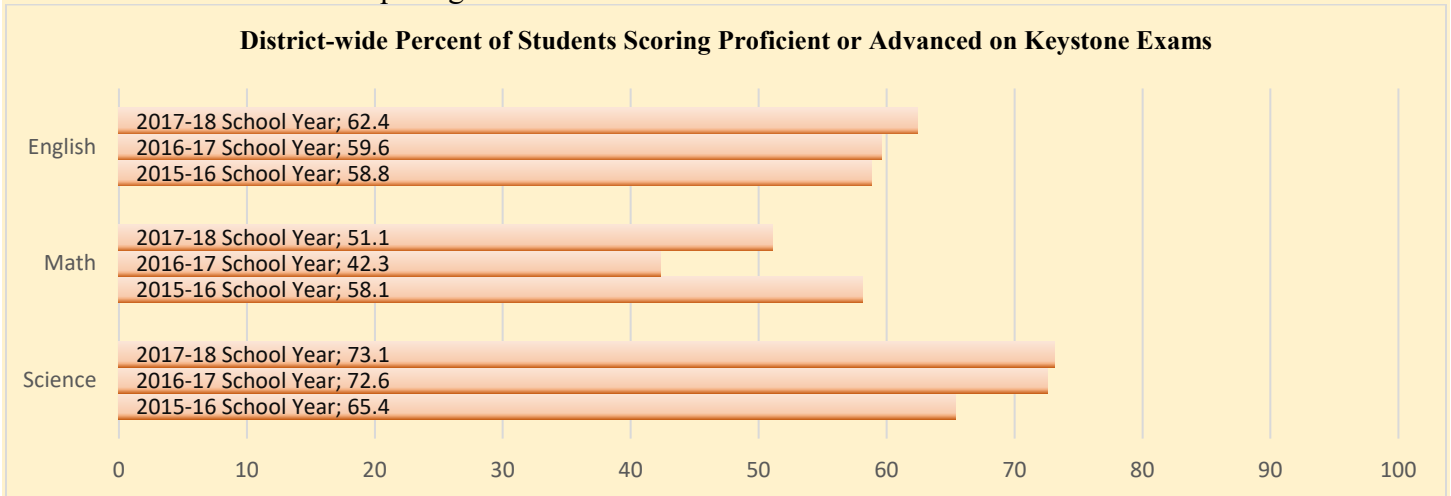
The PSSA is an annual, standardized test given across the Commonwealth to students in grades 3 through 8 in core subject areas, including English, Math and Science. The PSSAs help Pennsylvania meet federal and state requirements and inform instructional practices, as well as provide educators, stakeholders,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

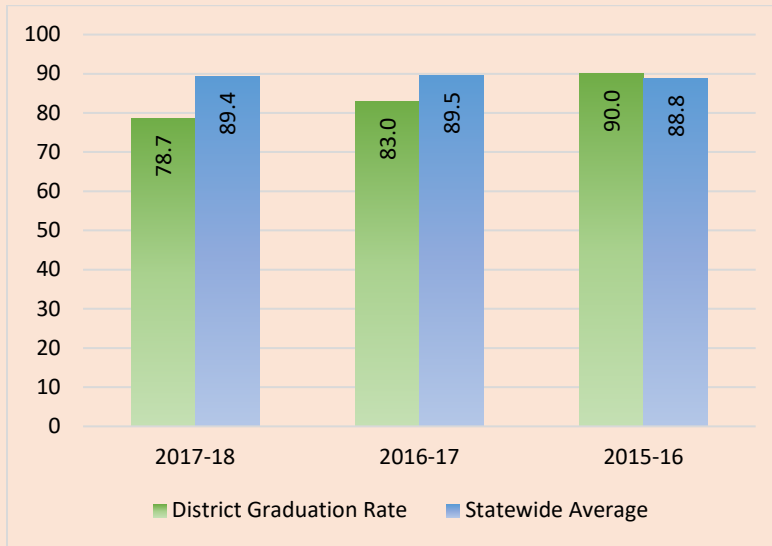


⁵ Act 39 of 2018, effective July 1, 2018, amended the Public School Code to further delay the use of Keystone Exams as a graduation requirement for an additional year until the 2020-21 school year. See 24 P.S. § 1-121(b)(1).

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 Transportation Data to PDE Resulting in an Underpayment to the District of at Least \$13,620

Criteria relevant to the finding:

Student Transportation Subsidy:

The Public School Code (PSC) provides that school districts receive a transportation subsidy for most students who are provided transportation. Section 2541 of the PSC specifies the transportation formula and criteria. *See* 24 P.S. § 25-2541.

Total Students Transported:

Section 2541(a) of the PSC, states, in part:

“School districts shall be paid by the Commonwealth for every school year on account of pupil transportation which, and the means and contracts providing for which, have been approved by the Department of Education, in the cases hereinafter enumerated, an amount to be determined by multiplying the cost of approved reimbursable pupils transportation incurred by the district by the district’s aid ratio. In determining the formula for the cost of approved reimbursable transportation, the Secretary of Education may prescribe the methods of determining approved mileages and the utilized passenger capacity of vehicles for reimbursement purposes.” *See* 24 P.S. § 25-2541(a).

We found that the West Branch Area School District (District) was underpaid at least \$13,620 in regular transportation reimbursements from the Pennsylvania Department of Education (PDE). This underpayment was due to the District inaccurately reporting to PDE the number of students transported during the 2017-18 school year who were eligible for reimbursement. Additionally, the District under-reported total mileage data during the 2014-15 through 2017-18 school years. However, we were unable to quantify the amount the District was underpaid for the mileage reporting errors due to the District’s failure to obtain mileage readings from its transportation contractor.

School districts receive transportation reimbursement payments from PDE. One reimbursement is based upon the number of students transported and the number of miles vehicles were in service both with and without students (regular transportation reimbursement). The other reimbursement is based upon the number of charter school and nonpublic school students transported by the District (supplemental transportation reimbursement). The issues discussed in this finding involve the District’s regular transportation reimbursements received.

It is also important to note that the Public School Code (PSC) requires that all school districts must annually file a sworn statement of student transportation data for the prior and current school years with PDE in order to be eligible for the transportation subsidies. The West Branch Area School District completed this sworn statement for all four school years discussed in this finding. It is essential that the District accurately report transportation data to PDE and retain the support for this transportation data. Further, the sworn statement of student transportation data should not be filed with the state Secretary of Education unless the data has been double-checked for accuracy by personnel trained on PDE’s reporting requirements. An official signing a sworn statement must be aware that by submitting the transportation data to PDE, he/she is asserting that the information is true and that they have verified evidence of accuracy.⁷

⁷ Please note that while a sworn statement is different from an affidavit, in that a sworn statement is not typically signed or certified by a notary public but are, nonetheless, taken under oath. See <https://legaldictionary.net/sworn-statement/> (accessed September 4, 2019).

Criteria relevant to the finding (continued):

Sworn Statement and Annual Filing Requirement

Section 2543 of the PSC sets forth the requirement for school districts to annually file a sworn statement, in a format prescribed by the Secretary of Education, of student transportation data for the prior and current school year with the Pennsylvania Department of Education in order to be eligible for the transportation subsidies. *See* 24 P.S. § 25-2543.

Section 2543 of the PSC, entitled, “Sworn statement of amount expended for reimbursable transportation; payment; withholding” states, in pertinent part:

“Annually, each school district entitled to reimbursement on account of student transportation shall provide in a format prescribed by the Secretary of Education, data pertaining to student transportation for the prior and current school year. . . . The Department of Education may, for cause specified by it, withhold such reimbursement, in any given case, permanently, or until the school district has complied with the law or regulations of the State Board of Education.” *Ibid.*

Non-reimbursable students

Non-reimbursable students are elementary students who reside within 1.5 miles of their elementary school and secondary students who reside within 2 miles of their secondary school. Non reimbursable students do not include special education students or students who reside on routes determine by PennDot to be hazardous. *See* 24 P.S. § 25-2541(b)(1).

Non-reimbursable Student Reporting Errors

Non-reimbursable students are defined as elementary students residing less than 1.5 miles from school and secondary students residing less than 2 miles from school, excluding special education and vocational students. Districts can choose to transport these students, but if transported, the District must report these students as non-reimbursable to PDE. Districts that transport non-reimbursable students receive a reduced regular transportation reimbursement from PDE compared to if the students were reimbursable. Students who reside on a hazardous walking route are similar to non-reimbursable students with the key distinction being that the District is eligible to be reimbursed for transporting students who reside on a Pennsylvania Department of Transportation defined hazardous walking route.

For the 2017-18 school year, the District misclassified 130 students who were transported and were eligible for reimbursement due to residing on a hazardous walking route as non-reimbursable students.⁸ The errors were due to a lack of internal controls and written procedures over transportation operations. Additionally, the District official responsible for reporting transportation data for this school year was new to the role and had the definitions of the two classifications confused. The error resulted in an underpayment of \$13,620. If proper internal controls and written procedures were in place, the likelihood of this error occurring would have been reduced.

Mileage Reporting Errors

The regular transportation reimbursement is based on several components that are reported by the District to PDE for use in calculating the District’s annual reimbursement amount. These components include, but are not limited to, the following:

- Total number of days each vehicle is used to transport students to and from school.
- Miles with and without students for each vehicle.
- Number of students assigned to each vehicle.

Since the above listed components are integral to the calculation of the District’s transportation reimbursement, it is essential for the District to properly calculate, record, and report this information to PDE.

For the four year audit period, the District under-reported mileage by not reporting the mileage traveled by its transportation contractor to transport students to its area vocational technical school and nonpublic schools. However, because the District does not require actual mileage readings

⁸ We found that the District accurately reported the number of non-reimbursable students and the number of students eligible for reimbursement due to residing on a hazardous walking route in the other three years of our audit period.

*Criteria relevant to the finding
(continued):*

HAZARDOUS ROUTE - Route certified by the Department of Transportation as having conditions, i.e., heavy traffic, no sidewalks, etc., which make it dangerous for pupils to walk along the road to school or to a bus stop.

HAZARDOUS PUPIL - Any pupil living in an area where the highway, road, or traffic conditions are such that walking constitutes a hazard to the safety of the child, as so certified by the Department of Transportation.

from its contracted vehicles, we were unable to determine the amount of miles that were under-reported. The District did not perform any type of review process prior to submitting the transportation data to PDE for reimbursement.

We provided PDE with discrepancy forms detailing the errors for the 2017-18 school year to assist in verifying the underpayment and increasing the District's future transportation subsidy by the amount of the underpayment.

Recommendations

The *West Branch Area School District* should:

1. Establish internal controls and written procedures over the reporting of transportation data.
2. Prepare a trend analysis of the number of non-reimbursable students who reside on a hazardous route and are transported annually as reported to PDE to help identify extreme variances in this data.
3. Require actual vehicle mileage data from its transportation contractor in order to calculate miles with and without students throughout the school year.
4. Implement procedures for a District official, other than the individual who prepares the data, to review the transportation data for accuracy and approve it prior to submission to PDE.
5. Ensure personnel in charge of calculating and reporting transportation data receive training in regard to PDE's transportation reporting requirements.
6. Review transportation reports subsequent to our audit beginning with the 2018-19 school year and submit revised reports to PDE, if necessary.

The *Pennsylvania Department of Education* should:

7. Adjust the District's future transportation subsidies to resolve the \$13,620 underpayment to the District.

Management Response

District management provided the following response:

Management agrees with the finding and corresponding recommendations aimed at correcting the concerns addressed within the finding. The school district has already implemented several significant procedural changes in

the transportation department during the 2019-2020 school year, not exclusive to: (1) the district has commenced a process in which each bus driver will record the odometer readings of his/her bus from the start of the day to the end of the day by recording odometer readings while students are on the bus and when the bus is vacant, (2) the District has requested that the busing transportation vendor change the formatting of their invoice to reflect the number of days that each bus was in service during the invoicing period, (3) and the District has started the practice of collecting Transportation Request or Waiver forms from all of the parents that have students enrolled in non-public schools.

The district employee that compiles and enters the fiscal data in eTran attended two school district transportation training sessions facilitated by the Pennsylvania Association of School Business Officials. He will continue to seek professional development in all district fiscal matters, including school district transportation. The district agrees with the other recommendations not specifically addressed, and will take steps to ensure the district's compliance with the recommendations.

Auditor Conclusion

We are encouraged that the District is taking proper measures to implement our recommendations. We will determine the effectiveness of the District's corrective actions during our next audit of the District.

Status of Prior Audit Findings and Observations

Our prior audit of the West Branch Area School District (District) released on February 5, 2015, resulted in one finding, 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 reviewed the District's written response provided to the Pennsylvania Department of Education (PDE), interviewed District personnel, and performed audit procedures as detailed in each status section below.

Auditor General Performance Audit Report Released on February 5, 2015

Prior Finding: **Failure to Have All School Bus Drivers' Qualifications on File**

Prior Finding Summary: Our prior audit of the District's bus drivers' qualifications for the 2014-15 school year found that not all required records were on file at the time of audit.

Prior Recommendations: We recommended that the District should:

1. Ensure that the transportation director reviews each driver's current qualifications and obtains Board of School Directors (Board) approval prior to that driver transporting students.
2. Review all drivers' personnel files and obtain any missing documentation.
3. Maintain files at the District, separate from the transportation contractor, for all drivers, and work with the contractor to ensure that the District's files are always up-to-date and complete.
4. Annually present to the Board a list of drivers to be approved prior to the start of each school year.

Current Status: We determined that the District did implement all of the prior audit recommendations in August 2015. The District's transportation director reviews each driver's qualifications and the Board approves all driver's after the transportation director's review.

Appendix A: Audit Scope, Objectives, and Methodology

School performance audits allow the Pennsylvania Department of the Auditor General to determine whether state funds, including school subsidies, are being used according to the purposes and guidelines that govern the use of those funds. Additionally, our audits examine the appropriateness of certain administrative and operational practices at each local education agency (LEA). The results of these audits are shared with LEA management, the Governor, the Pennsylvania Department of Education (PDE), and other concerned entities.

Our audit, conducted under authority of Sections 402 and 403 of The Fiscal Code,⁹ is not a substitute for the local annual financial audit required by the Public School Code of 1949, as amended. We conducted our audit in accordance with *Government Auditing Standards* issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit.

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 West Branch 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).¹⁰ 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.

⁹ 72 P.S. §§ 402 and 403.

¹⁰ 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, 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:

- ❖ Transportation Operations
- ❖ Health Service Reimbursements
- ❖ 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 ensure compliance with applicable laws and regulations governing transportation operations, and did the District receive the correct transportation reimbursement from the Commonwealth?¹¹
 - ✓ To address this objective, we assessed the District's internal controls over the inputting and processing of transportation data along with reporting of this data to PDE. Additionally, we reviewed all 15 nonpublic school students reported to PDE for the 2017-18 school year. We reviewed requests for transportation to determine if all nonpublic school students were accurately reported to PDE and that the District was receiving the correct subsidy for these students. Next, we also randomly selected 10 of the 30 vehicles reported to PDE as transporting students during the 2017-18 school year.¹² We attempted to verify odometer readings, bus rosters, and vehicle invoices to ensure that mileage, student counts, and days of service were accurately reported to PDE for reimbursement. Finally, we reviewed all non-reimbursable students and students transported due to hazardous walking conditions for the 2014-15 through 2017-18 school years.¹³ The results of our review can be found in the finding on page 6 in this report.
- Was accurate health reimbursement data submitted to the Pennsylvania Department of Health for reimbursement?
 - ✓ To address this objective, we reviewed the District's School Health Annual Reimbursement Request System (SHARRS) reports for the 2014-15, 2015-16, 2016-17, and 2017-18 school years. We compared average daily membership (ADM) information reported to PDE on the Instructional Time and Membership report to the ADM membership information listed on the

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

¹² 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.

¹³ The District reported 130 non-reimbursable students in the 2017-18 and did not report any for the 2014-15 through 2016-17 school years. The District reported 122 students who reside on a hazardous route as transported during the 2014-15 school year, 203 in the 2015-16 school year, 133 in the 2016-17 school year, and 0 in the 2017-18 school year.

District's SHARRS reports to determine if the ADM information on each of the reports was in agreement. Our review of the objective did not disclose any reportable issues.

- Did the District ensure that bus drivers transporting District students had the required driver's license, physical exam, training, background checks, and clearances¹⁴ as outlined in applicable laws?¹⁵ 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 randomly selected 10 of the 51 bus drivers transporting District students as of July 23, 2018.¹⁶ 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, when followed, ensure compliance with bus driver hiring requirements. Our review of this objective did not disclose any reportable issues.

- Did the District take actions to ensure it provided a safe school environment?¹⁷
 - ✓ To address this objective, we reviewed a variety of documentation including, safety plans, training schedules, anti-bullying policies, after action reports, and fire drill results. In addition, we conducted on-site reviews at the District's only physical school building to assess whether the District had implemented basic safety practices.¹⁸ 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.

¹⁴ Auditors reviewed the required state, federal and child abuse background clearances that the District obtained from the most reliable sources available, including the FBI, the Pennsylvania State Police and the Department of Human Services. However, due to the sensitive and confidential nature of this information, we were unable to assess the reliability or completeness of these third-party databases.

¹⁵ 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*.

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.

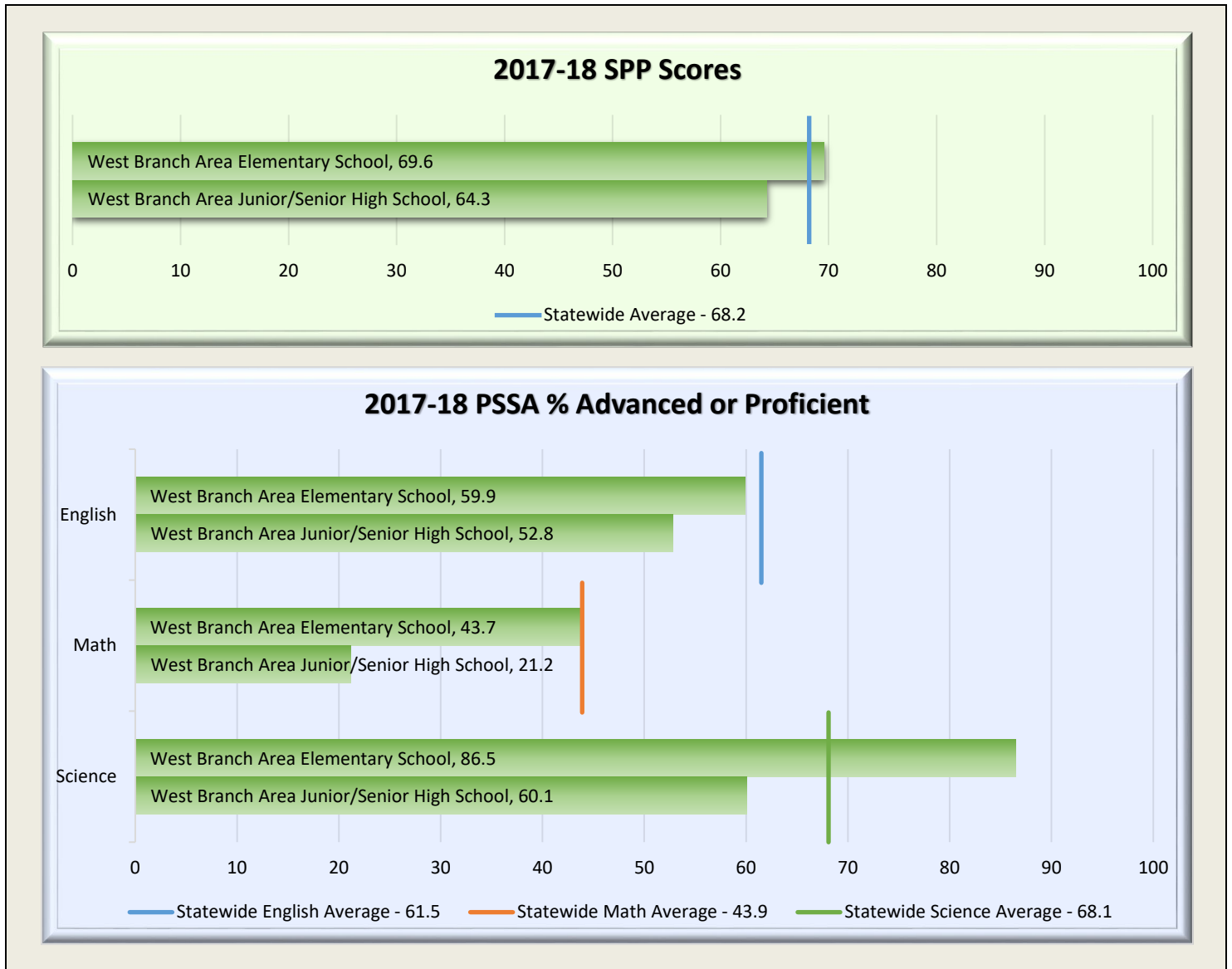
¹⁷ 24 P.S. § 13-1301-A *et seq.*

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

Appendix B: Academic Detail

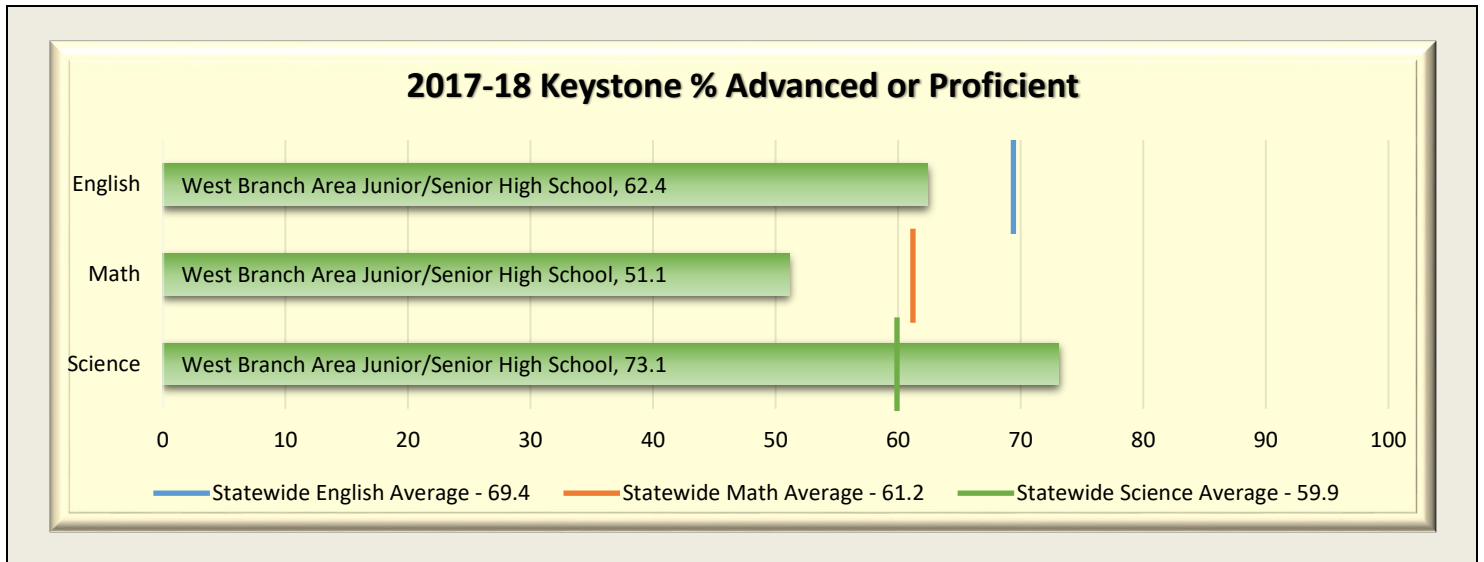
Benchmarks noted in the following graphs represent the statewide average of all public school buildings in the Commonwealth that received a score in the category and year noted.¹⁹

2017-18 Academic Data School Scores Compared to Statewide Averages



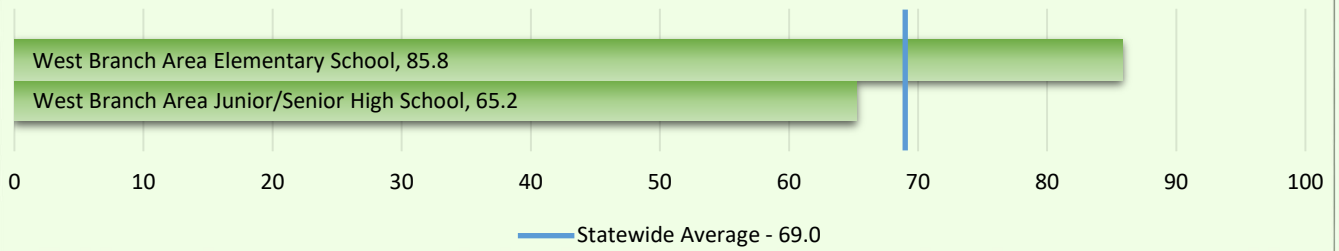
¹⁹ Statewide averages were calculated by our Department based on individual school building scores for all public schools in the Commonwealth, including district schools, charters schools, and cyber charter schools.

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

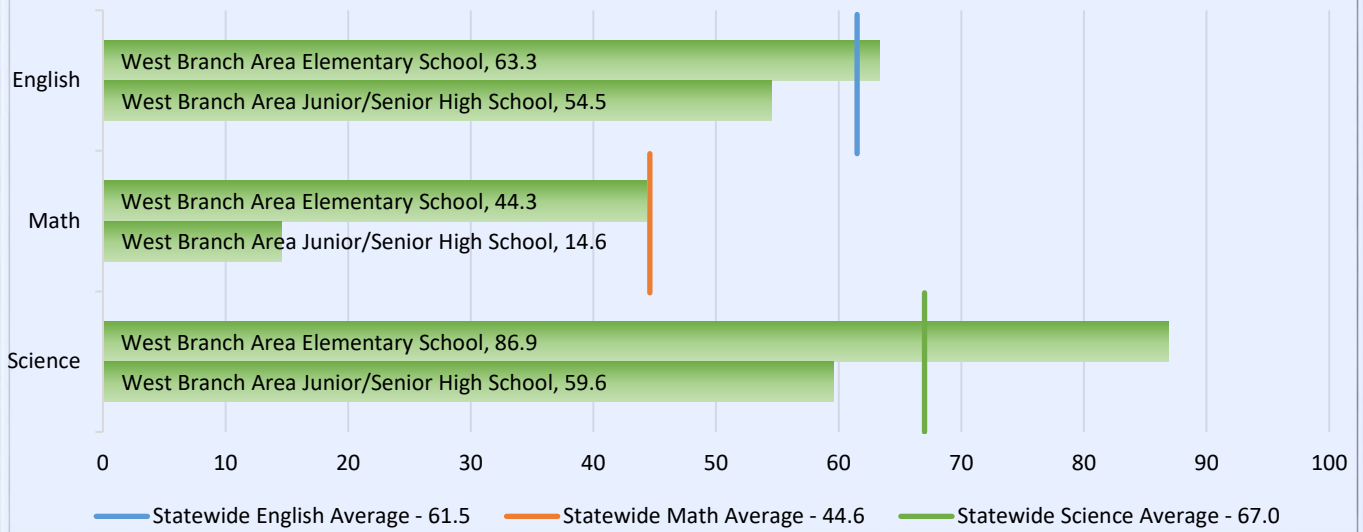


2016-17 Academic Data
School Scores Compared to Statewide Averages

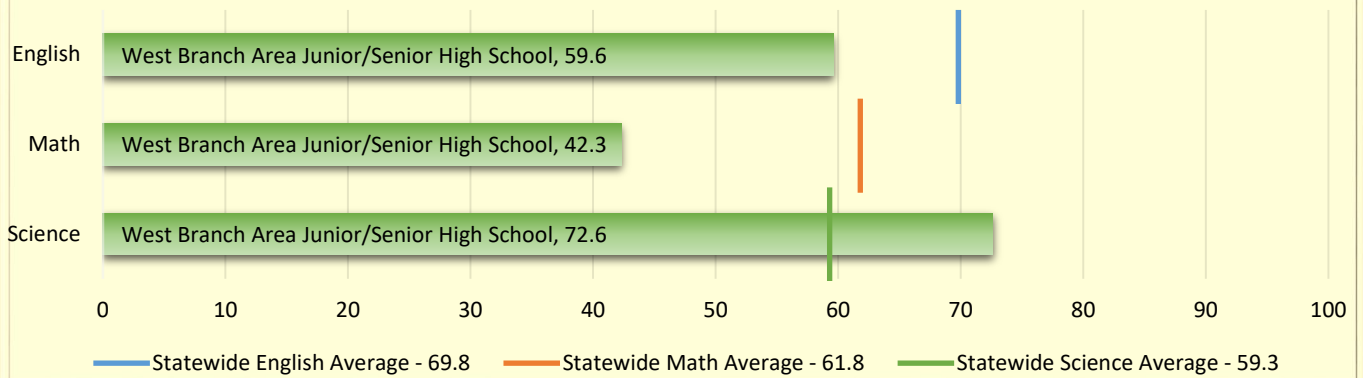
2016-17 SPP Scores



2016-17 PSSA % Advanced or Proficient

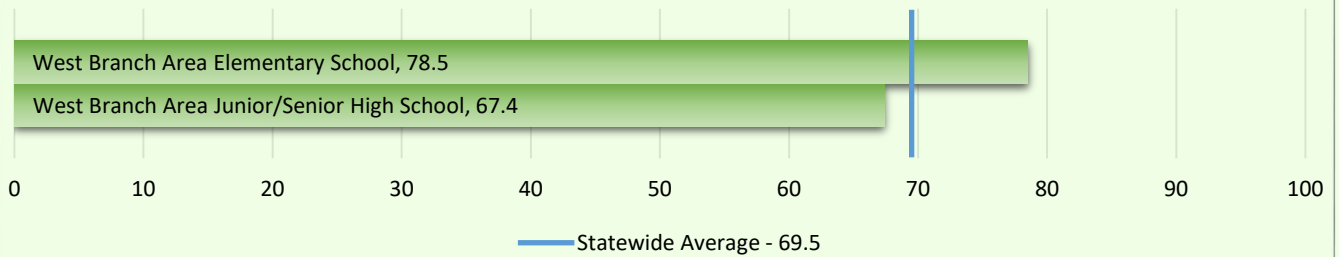


2016-17 Keystone % Advanced or Proficient

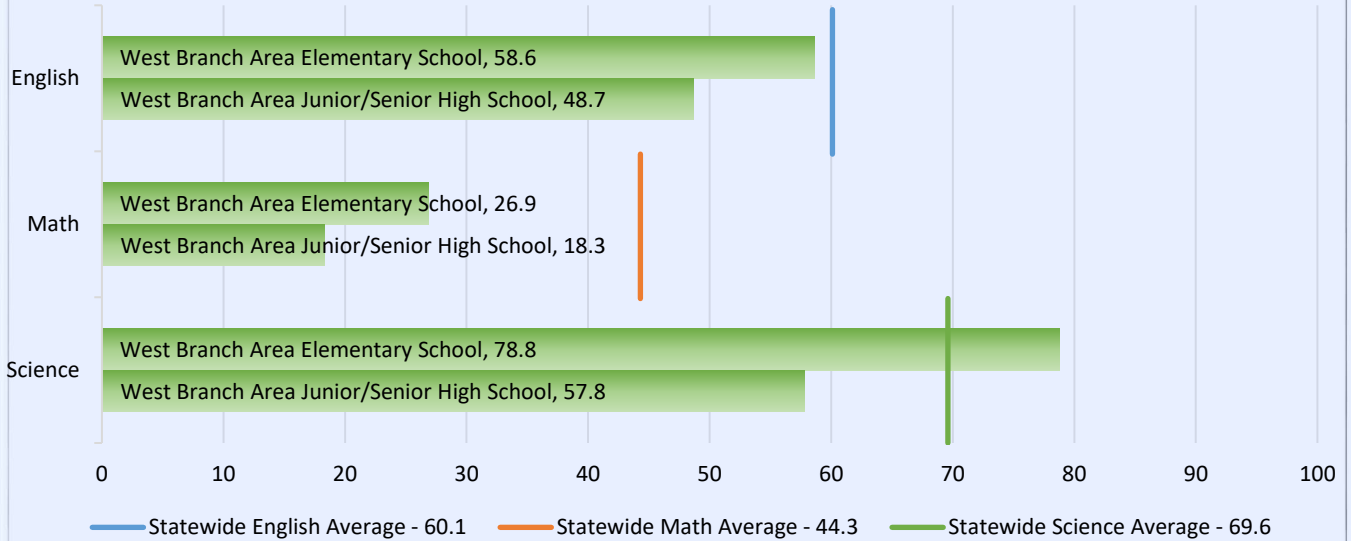


2015-16 Academic Data
School Scores Compared to Statewide Averages

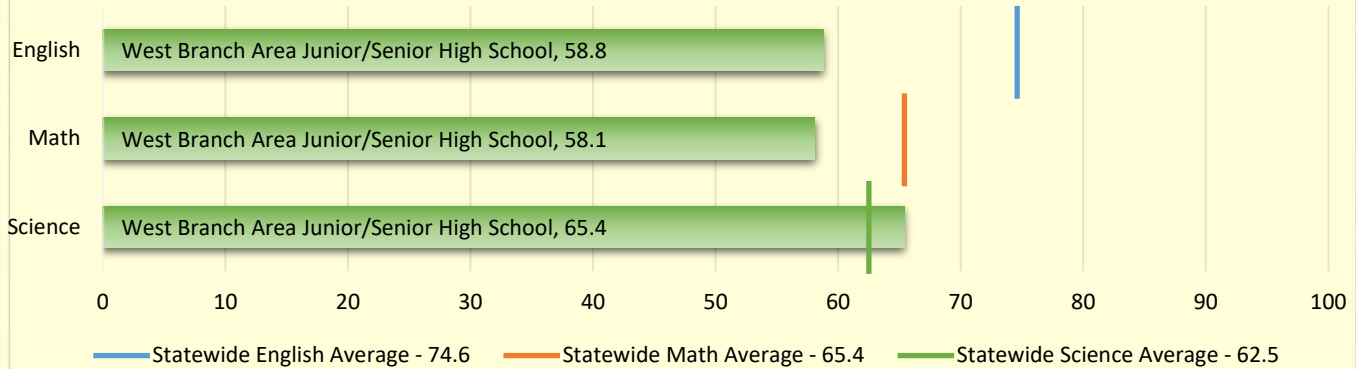
2015-16 SPP Scores



2015-16 PSSA % Advanced or Proficient



2015-16 Keystone % Advanced or Proficient



Distribution List

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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