

PERFORMANCE AUDIT

Williamsport Area School District Lycoming County, Pennsylvania

February 2022



Commonwealth of Pennsylvania
Department of the Auditor General

Timothy L. DeFoor • Auditor General



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**TIMOTHY L. DEFOOR
AUDITOR GENERAL**

Dr. Timothy Bowers, Superintendent
Williamsport Area School District
2780 West Fourth Street
Williamsport, Pennsylvania 17701

Ms. Lori Baer, Board President
Williamsport Area School District
2780 West Fourth Street
Williamsport, Pennsylvania 17701

Dear Dr. Bowers and Ms. Baer:

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

- Transportation Operations
- Bus Driver Requirements
- Administrator Separations

We also evaluated the application of best practices in the area of school safety and determined compliance with certain requirements in this area, including compliance with fire and security drills. Due to the sensitive nature of this issue and the need for the results of this review to be confidential, we did not include the full results in this report. However, we communicated the full results of our review of school safety to District officials, the Pennsylvania Department of Education, and other appropriate officials as deemed necessary.

The audit was conducted pursuant to Sections 402 and 403 of The Fiscal Code (72 P.S. §§ 402 and 403), and in accordance with the Government Auditing Standards issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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

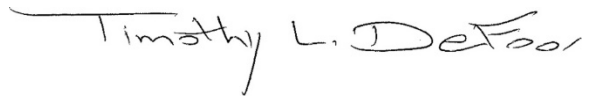
The District's Failure to Implement an Adequate Internal Control System Resulted in an Unauditable \$4.2 Million in Transportation Reimbursements

Our audit finding and recommendations have been discussed with the District's management, and their responses are included in the audit report. We believe the implementation of our recommendations will improve the District's operations and facilitate compliance with legal and relevant requirements. We found that the District performed adequately in the areas of bus driver requirements and administrator separations and we did not identify any internal control deficiencies in these areas.

Dr. Timothy Bowers
Ms. Lori Baer
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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

January 28, 2022

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

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Background Information

School Characteristics 2020-21 School Year*	
County	Lycoming
Total Square Miles	98
Number of School Buildings	8
Total Teachers	383
Total Full or Part-Time Support Staff	289
Total Administrators	45
Total Enrollment for Most Recent School Year	4,850
Intermediate Unit Number	17
District Career and Technical School	In-House Program

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

Mission Statement*

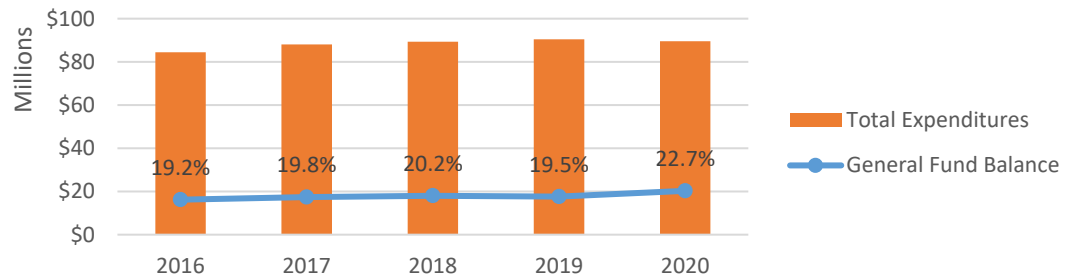
Develop responsible citizens through excellence in education.

Financial Information

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

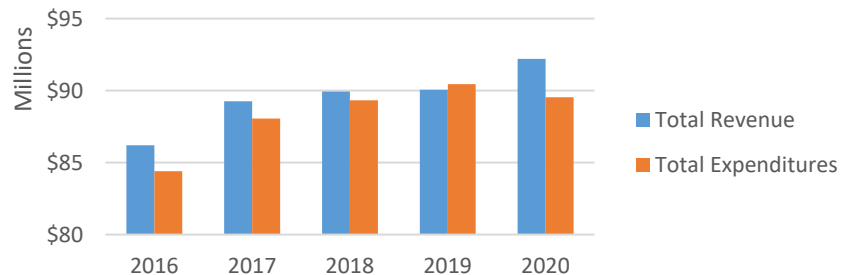
General Fund Balance as a Percentage of Total Expenditures

	General Fund Balance
2016	\$16,196,312
2017	\$17,395,933
2018	\$18,007,433
2019	\$17,621,115
2020	\$20,286,439



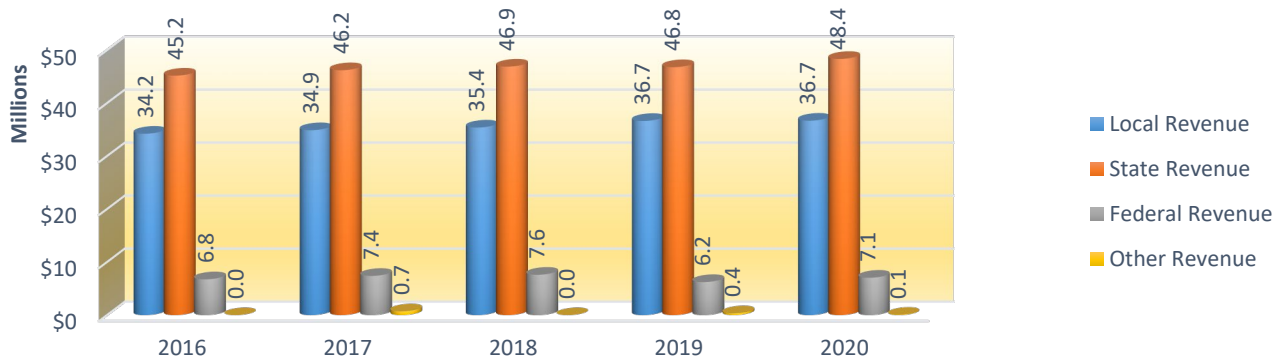
Revenues and Expenditures

	Total Revenue	Total Expenditures
2016	\$86,203,037	\$84,407,643
2017	\$89,255,645	\$88,056,023
2018	\$89,933,806	\$89,322,307
2019	\$90,059,068	\$90,445,385
2020	\$92,198,610	\$89,533,286

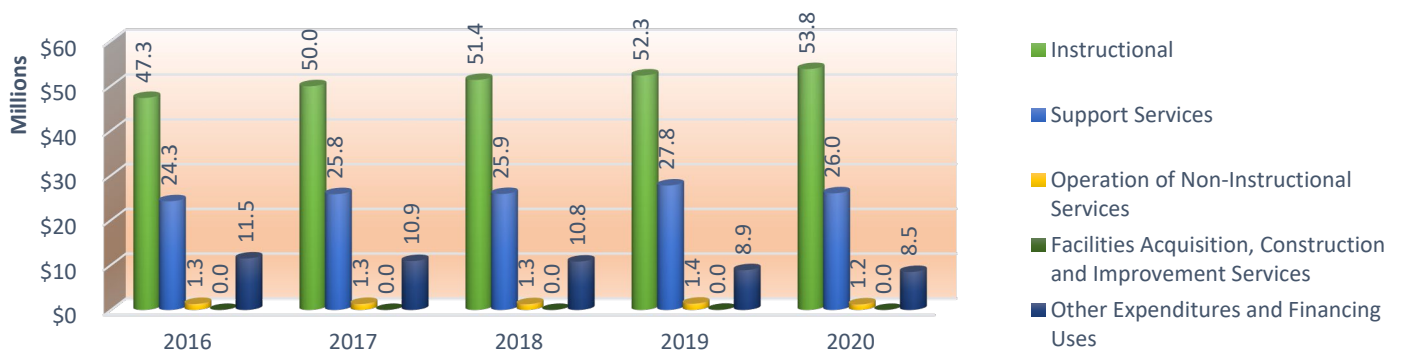


Financial Information Continued

Revenues by Source

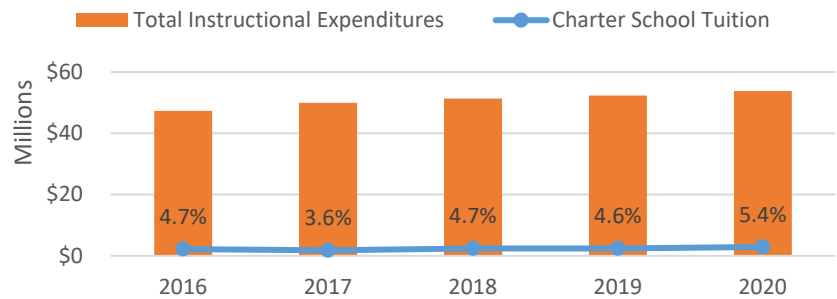


Expenditures by Function

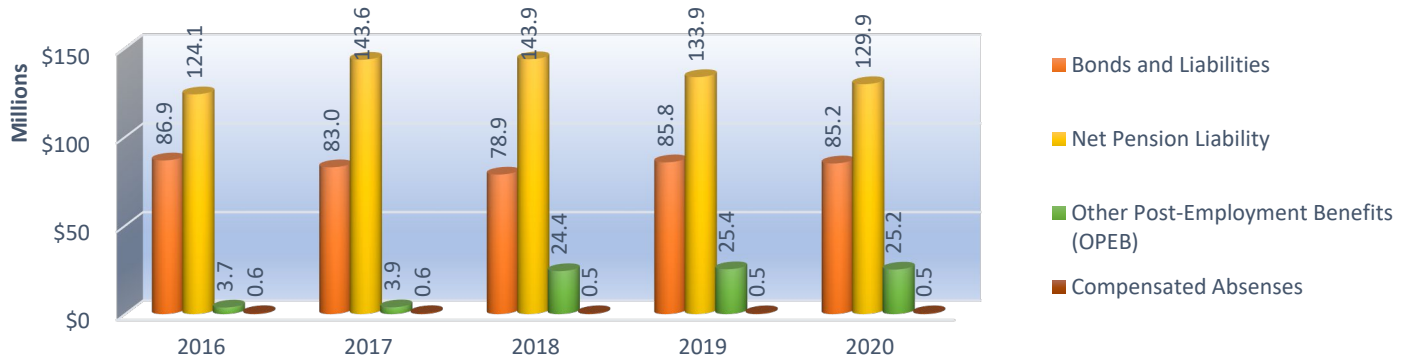


Charter Tuition as a Percentage of Instructional Expenditures

	Charter School Tuition	Total Instructional Expenditures
2016	\$2,209,153	\$47,333,801
2017	\$1,808,348	\$49,956,605
2018	\$2,412,561	\$51,362,938
2019	\$2,409,572	\$52,349,239
2020	\$2,909,052	\$53,792,538



Long-Term Debt

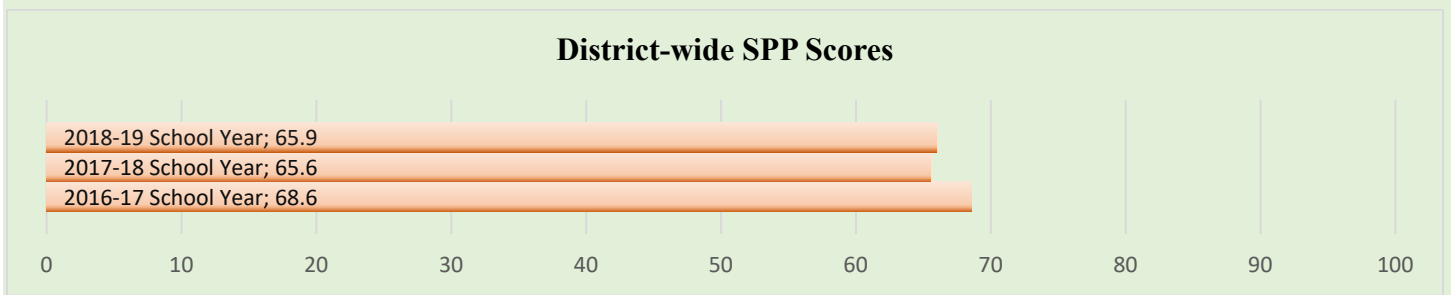


Academic Information¹

The graphs on the following pages present the District-wide School Performance Profile (SPP) scores, Pennsylvania System of School Assessment (PSSA) scores, and Keystone Exam results for the District obtained from PDE's data files for the 2016-17, 2017-18, and 2018-19 school years.² In addition, the District's 4-Year Cohort Graduation Rates are presented for the 2017-18 through 2019-20 school years.³ The District's individual school building scores are presented in Appendix B. These scores are provided in this audit report for **informational purposes only**, and they were not audited by our Department.

What is a SPP score?

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



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

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

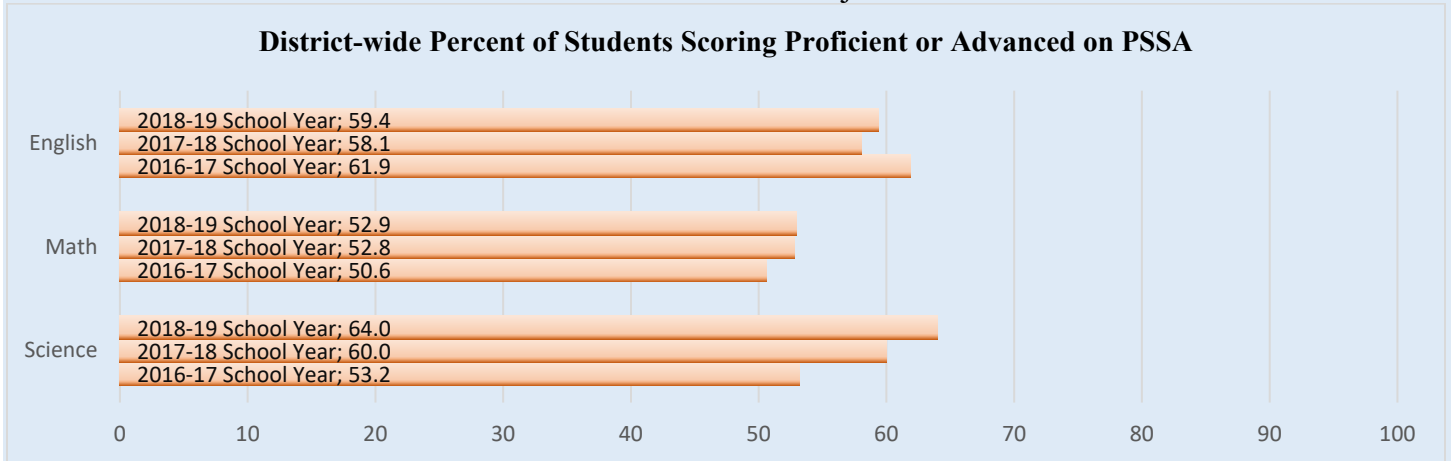
³ Graduation rates were still reported for the 2019-20 school year despite the COVID-19 pandemic.

Academic Information Continued

What is the PSSA?

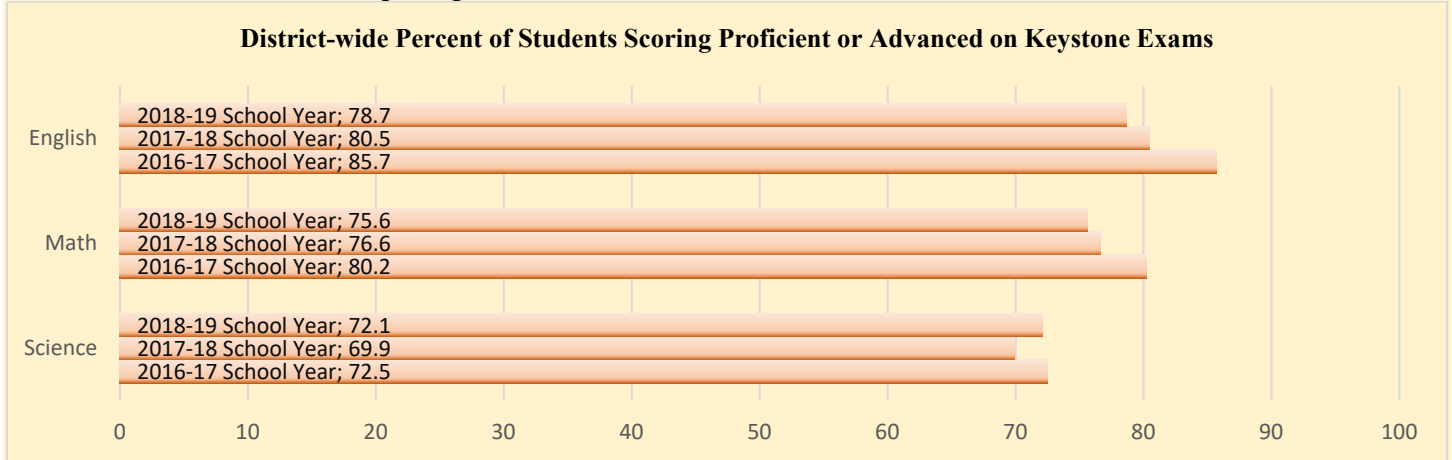
The PSSA is an annual, standardized test given across the Commonwealth to students in grades 3 through 8 in core subject areas, including English, Math and Science. The PSSAs help Pennsylvania meet federal and state requirements and inform instructional practices, as well as provide educators, stakeholders,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

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



What is the Keystone Exam?

The Keystone Exam measures student proficiency at the end of specific courses, such as Algebra I, Literature, and Biology. The Keystone Exam was intended to be a graduation requirement starting with the class of 2017, but that requirement has been put on hold until the 2020-21 school year.⁴ In the meantime, the exam is still given as a standardized assessment and results are included in the calculation of SPP scores. The Keystone Exam is scored using the same four performance levels as the PSSAs, and the goal is to score Proficient or Advanced for each course requiring the test.

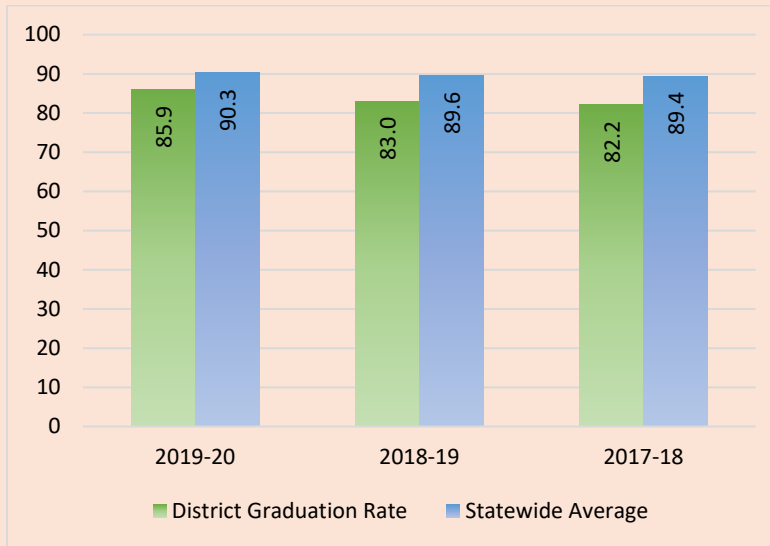


⁴ Act 158 of 2018, effective October 24, 2018, amended the Public School Code to further delay the use of Keystone Exams as a graduation requirement until the 2021-22 school year. See 24 P.S. § 1-121(b)(1). Please refer to the following link regarding further guidance to local education agencies (LEAs)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

Academic Information Continued

What is a 4-Year Cohort Graduation Rate?

PDE collects enrollment and graduate data for all Pennsylvania public schools, which is used to calculate graduation rates. Cohort graduation rates are a calculation of the percentage of students who have graduated with a regular high school diploma within a designated number of years since the student first entered high school. The rate is determined for a cohort of students who have all entered high school for the first time during the same school year. Data specific to the 4-year cohort graduation rate is presented in the graph below.⁵



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

Finding

Finding

The District's Failure to Implement an Adequate Internal Control System Resulted in an Unauditable \$4.2 Million in Transportation Reimbursements

Criteria relevant to the finding:

Student Transportation Subsidy

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

Total Students Transported

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

We found that the Williamsport Area School District (District) did not implement an adequate internal control system over obtaining, inputting, calculating, and reporting regular transportation data. Additionally, the District did not comply with the record retention provisions of the Public School Code (PSC) when it failed to obtain and retain adequate documentation to support the \$4.2 million in regular transportation reimbursements it received for the 2016-17 through 2019-20 school years. Without supporting documentation, we could not determine the accuracy of the reimbursements the District received.

Background: School districts receive two separate transportation reimbursement payments from the Pennsylvania Department of Education (PDE). The **regular** transportation reimbursement is broadly based on the number of students transported, the number of days each vehicle was used for transporting students, and the number of miles that vehicles are in service, both with and without students. The **supplemental** transportation reimbursement is based on the number of nonpublic school and charter school students transported. The issues identified in this finding pertain to the District's regular transportation reimbursement.

It is absolutely essential that records related to the District's transportation reimbursements be retained in accordance with the PSC's record retention provisions (for a period of not less than six years) and be readily available for audit. Periodic auditing of such documents is extremely important for District accountability and verification of accurate reporting. Therefore, the District should have a strong system of internal controls over its regular transportation data operations that should include, but not be limited to, the following:

- Segregation of duties.
- Comprehensive written procedures that include record retention procedures.
- Training on PDE reporting requirements.

It is also important to note that the PSC requires that all school districts annually file a sworn statement of student transportation data for the prior and current school years with PDE in order to be eligible for transportation reimbursements.⁶ The sworn statement includes the superintendent's

⁶ See 24 P.S. § 25-2543.

Criteria relevant to the finding (continued):

Sworn Statement and Annual Filing Requirements

Section 2543 of the PSC, which is entitled, “Sworn statement of amount expended for reimbursable transportation; payment; withholding” sets forth the requirement for school districts to annually file a sworn statement of student transportation data for the prior and current school year with PDE in order to be eligible for the transportation subsidies and states, in part:

“Annually, each school district entitled to reimbursement on account of pupil transportation shall provide in a format prescribed by the Secretary of Education, data pertaining to pupil transportation for the prior and current school year. . . . The Department of Education may, for cause specified by it, withhold such reimbursement, in any given case, permanently, or until the school district has complied **with the law or regulations** of the State Board of Education.” (Emphasis added.) See 24 P.S. § 25-2543.

signature attesting to the accuracy of the reported data. Because of this statutorily required attestation, the District should ensure it has implemented an adequate internal control system to provide the superintendent with the confidence needed to sign the sworn statement.

Unauditable Regular Transportation Reimbursements of \$4.2 million

The District was unable to provide source documents to support the transportation data (days, miles, and students) it reported to PDE for all years of the audit period. Without this supporting documentation, we were unable to determine the accuracy of the data reported to PDE and, therefore, could not conclude if the District’s regular transportation reimbursements were appropriate and accurate.

The District utilized a contracted vendor to provide transportation services during the audit period. The District failed to obtain and retain adequate documentation to support the reported data for total mileage per vehicle and the number of students transported for the 2016-17 through 2019-20 school years. We found that the District was reliant on its contractor to provide and calculate this data. The District did not review this data for accuracy and the District officials responsible for reporting this data were not adequately trained on the PDE reporting requirements and were therefore unaware of the documentation that must be retained.

Even though we were unable to audit the reported data, a cursory review of the reported data as detailed in the table below, shows potential irregularities that warranted further review. For example, we noted that the District reported that it transported 67 fewer students in the 2019-20 school year than in the 2018-19 school year but used the same number of vehicles and reported over 7,000 more miles traveled.

Williamsport Area School District Regular Transportation Data				
Data Reported to PDE				
School Year	Number of Students Transported	Total Number of Vehicles	Approved Annual Miles	Reimbursement Received
2016-17	3,907	49	550,059	\$1,065,725
2017-18	3,364	44	528,472	\$1,026,389
2018-19	3,517	47	553,642	\$1,035,415
2019-20	3,450	47	560,758	\$1,073,435
Totals	14,238	187	2,192,931	\$4,200,964

Criteria relevant to the finding (continued):

Record Retention Requirement

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

PDE Instructions for Local Education Agencies on how to complete the PDE-2089.

<https://www.education.pa.gov/Documents/Teachers-Administrators/Pupils%20Transportation/eTransp%20Application%20Instructions/PupilTransp%20Instructions%20PDE-2089%20SummPupilsTransp.pdf> (Accessed on December 3, 2021).

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 schools. Non-reimbursable students do not include special education students or students who reside on routes determined by Pennsylvania Department of Transportation (PennDOT) to be hazardous. *See* 24 P.S. § 25-2541(c)(1) and (c)(2).

Hazardous route – Route certified by PennDOT 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 PennDOT.

Irregularities in Hazardous Route and Non-Reimbursable Student Reporting

Students transported fall into multiple reporting categories including, but not limited to: (1) students transported and eligible for reimbursement due to residing on a Pennsylvania Department of Transportation (PennDOT) determined public hazardous walking route and (2) students transported who are not eligible for reimbursement. Elementary students residing within 1.5 miles of their respective school or secondary students residing within 2 miles of their school are not eligible to be reported as reimbursable unless the student resides on a PennDOT determined hazardous walking route.

Our review of reported hazardous route student data revealed irregularities that are further evidence of the lack of adequate controls over transportation data. For example, we found that for the 2018-19 and 2019-20 school years the District reported to PDE that it transported 297 students that resided on a hazardous walking route; however, the District did not obtain the required determination from PennDOT for 235 of these students. Instead, the District classified and reported these 235 students as residing on a hazardous walking route based on an internal hazardous route determination made by District officials who are no longer employed by the District.

According to current District personnel, the determination was made based on the fact that there were no sidewalks on the district-owned road leading to the high school which had public access. Because the District did not obtain a hazardous route determination from PennDOT as required, technically these 235 students reported in this category were not eligible for reimbursement. However, due to the lack of documentation in the other areas of regular transportation, we were unable to calculate the monetary effect of the inaccurate reporting of these 235 students.

Significant Internal Control Deficiencies

Our review revealed that the District did not have adequate controls over the process of obtaining, inputting, maintaining, and reporting regular transportation data to PDE. Specifically, we found that the District did not do the following:

- Ensure that the employee responsible for reporting transportation data to PDE was adequately trained on PDE’s reporting requirements and the supporting documentation required to be obtained and retained.
- Implement adequate segregation of duties when it assigned responsibility to one employee for reporting regular transportation data to PDE without having a different employee review the data before it was submitted to PDE.
- Develop detailed written procedures for obtaining and maintaining the documentation needed to accurately report vehicle data to PDE.

- Ensure it obtains adequate source documentation to support the vehicle and student data reported to PDE.

All of the above control deficiencies resulted in our inability to fully audit the District's regular transportation reimbursements for the 2016-17 through 2019-20 school years.

Recommendations

The *Williamsport Area School District* should:

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

Management Response

District management provided the following response:

“The District experienced significant turnover in the transportation department during the years associated with this audit. There were at least three individuals in the Transportation Director role with one of these individuals returning to temporarily fill a vacancy. This inconsistency led to the lack of appropriate recordkeeping and retention of records. The current transportation director has received training on PDE's requirements and continues to participate in professional development opportunities.

Beginning in 2019, internal control processes were implemented to include a review of transportation data by someone other than the individual preparing data prior to submission to PDE.

The District is developing specific procedures related to regular and supplemental transportation data calculations, PDE reporting, and obtaining and retaining supporting documentation from contractors.

Corrective actions have been implemented with the transportation contractor to not only provide the monthly odometer readings but to also provide monthly reports identifying students assigned to each run. These documents will be used to calculate PDE required transportation data and will be maintained by the District for a minimum of 7 years.”

Auditor Conclusion

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

Status of Prior Audit Findings and Observations

Our prior audit of the Williamsport 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,⁷ is not a substitute for the local annual financial audit required by the Public School Code of 1949, as amended. We conducted our audit in accordance with *Government Auditing Standards* issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit.

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

The District's management is responsible for establishing and maintaining effective internal control to provide reasonable assurance that the District's objectives will be achieved.⁸ *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.⁹ 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.

⁷ 72 P.S. §§ 402 and 403.

⁸ 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.

⁹ 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	
Transportation	Yes				X			X	X		X		X	X	X	X	X		
Bus Drivers	Yes										X		X			X	X		
Administrator Separations	Yes										X				X				
Safe Schools	No																		

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

Objectives/Scope/Methodology

In order to properly plan our audit and to guide us in selecting objectives, we reviewed pertinent laws and regulations, the District's annual financial reports, annual General Fund budgets, and the independent audit reports of the District's basic financial statements for the July 1, 2016 through June 30, 2020 fiscal years. We conducted analytical procedures on the District's state revenues and the transportation reimbursement data. We reviewed the prior audit report and we researched current events that possibly affected District operations. We also determined if the District had key personnel or software vendor changes since the prior audit.

Performance audits draw conclusions based on an evaluation of sufficient, appropriate evidence. Evidence is measured against criteria, such as laws, regulations, third-party studies, and best business practices. Our audit focused on the District's effectiveness in four areas as described below. As we conducted our audit procedures, we sought to determine answers to the following questions, which served as our audit objectives.

Transportation Operations

- Did the District ensure compliance with applicable laws and regulations governing transportation operations, and did the District receive the correct transportation reimbursement from the Commonwealth?¹⁰
 - ✓ To address this objective, we assessed the District's internal controls for obtaining, processing, and reporting transportation data to PDE. We requested odometer readings, student and vehicle rosters, and supporting documentation for the number of days vehicles were reported to PDE for all vehicles reported to PDE as transporting students for the 2016-17 through 2019-20 school years.¹¹ The District did not maintain the required supporting documentation for any vehicles; therefore, we were unable to determine the accuracy of the regular transportation reimbursement the District received for the audit period.
 - ✓ We also assessed the District's internal controls for inputting and processing nonpublic school student data and reporting this data to PDE. We reviewed all nonpublic school students reported to PDE as transported during the 2017-18 through 2019-20 school years.¹² For each nonpublic school student reported, we determined if the District had obtained an individual "request for transportation" to ensure that each student was accurately reported to PDE.
 - ✓ Finally, we assessed the District's internal controls for categorizing and reporting students who were reported as reimbursable due to residing on a Pennsylvania Department of Transportation (PennDOT) hazardous walking route and students transported who were reported to PDE as not eligible for reimbursement. We requested and reviewed the individual student address data for all 297 students reported as reimbursable for the 2018-19 and 2019-20 school years. We compared the

¹⁰ See 24 P.S. § 25-2543.

¹¹ The District reported that 49 vehicles were used to transport students during the 2016-17 school year, 44 vehicles during the 2017-18 school year, 47 vehicles during the 2018-19 school year, and 47 vehicles during the 2019-20 school year.

¹² The District reported 22 nonpublic school students during the 2017-18 school year, 17 nonpublic school students during the 2018-19 school year, and 17 nonpublic school students during the 2019-20 school year.

student address data to the PennDOT hazardous route documentation to verify if all the reported students resided on a hazardous route as determined by PennDOT.

Conclusion: The results of our procedures identified areas of noncompliance and significant internal control deficiencies. 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 checks, and clearances¹³ as outlined in applicable laws?¹⁴ Also, did the District adequately monitor driver records to ensure compliance with the ongoing five-year clearance requirements and ensure it obtained updated licenses and health physical records as applicable throughout the school year?
- ✓ To address this objective, we assessed the District's internal controls for obtaining, reviewing, and maintaining bus driver qualification and clearance documents and its procedures for being aware of who transported students daily. We randomly selected for detailed testing¹⁰ of the 63 contracted bus drivers transporting District students as of September 8, 2021.¹⁵ We determined if all drivers were approved by the District's Board. We reviewed documentation to ensure the District complied with the requirements for bus drivers' qualifications and clearances. We 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 disclose any reportable issues, and we did not identify any internal control deficiencies.

Administrator Separations

- Did the District provide any individually contracted employees with excessive payments upon separation of employment? Did the District ensure all payroll wages reported to Public School Employees' Retirement System (PSERS) were appropriate and accurate?
- ✓ To address this objective, we reviewed the contract for one of the two individually contracted administrators who separated employment from the District from July 1, 2016 through September 29, 2021.¹⁶ We reviewed the administrator's employment contract, separation agreement, and the leave and payroll records. We verified the accuracy of the payments made at separation and determined if only qualified wages were reported to PSERS. We also determined whether the payments were made public during a board meeting and verified that the Board voted to approve the separation in accordance with Section 508 of the Public School Code.

¹³ 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.

¹⁴ 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*.

¹⁵ 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.

¹⁶ We judgmentally selected the one individually contracted administrator who separated employment from the District for detailed testing because we considered this administrator's separation to have a higher risk of noncompliance due to the administrator's involvement in reviewing payments to separating employees. Therefore, the selection is not representative of the population, and the results are not, and should not be, projected to that population.

Conclusion: The results of our procedures did not disclose any reportable issues, and we did not identify any internal control deficiencies.

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 safety plans, risk and vulnerability assessments, anti-bullying policies, school climate surveys, and memorandums of understanding with law enforcement.

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

- 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 documentation of the District's fire/security drills at all eight District buildings for the 2018-19 and 2019-20 school years. We determined if a security drill was held within the first 90 days of the school year for each building in the District and if monthly fire drills were conducted in accordance with requirements. We also obtained the *Accuracy Certification Statement* that the District filed with PDE and compared the dates reported to the supporting documentation.

Conclusion: The results of our procedures for this 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.

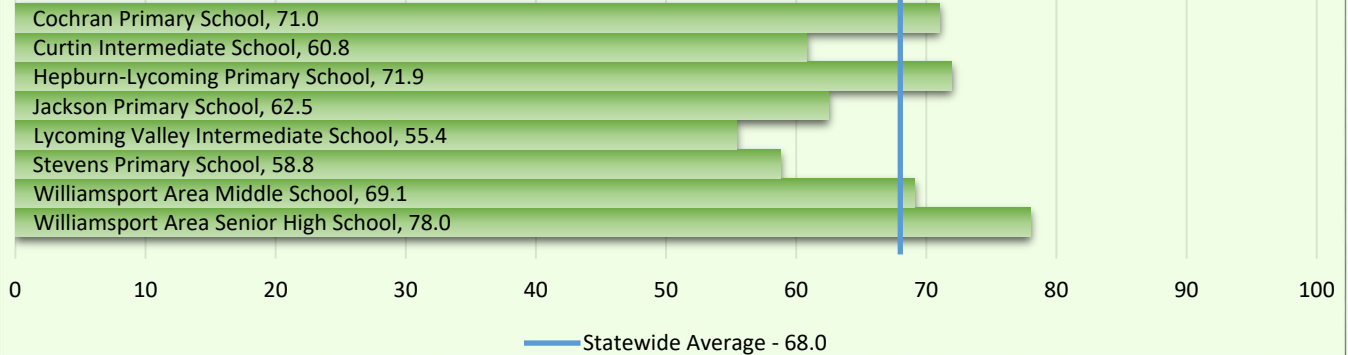
¹⁸ Public School Code (Fire and Security Drills) 24 P.S. § 15-1517.

Appendix B: Academic Detail

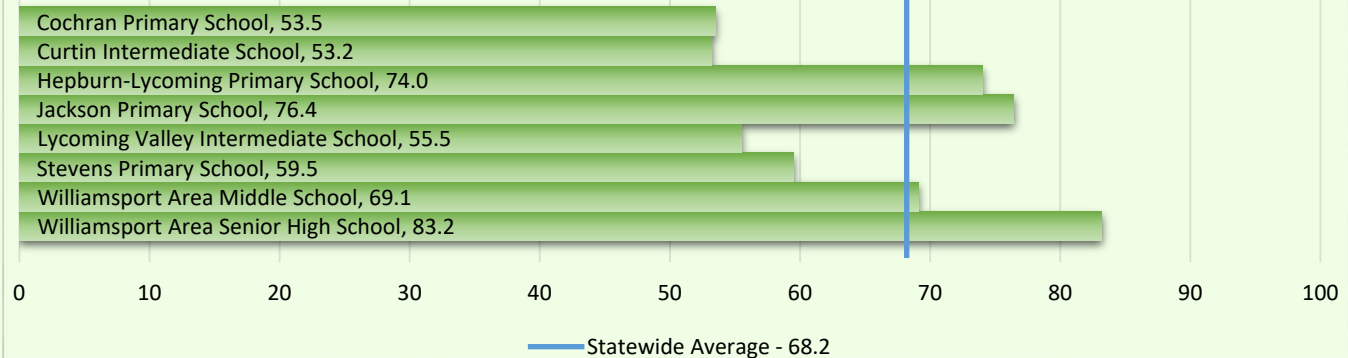
Benchmarks noted in the following graphs represent the statewide average of all public school buildings in the Commonwealth that received a score in the category and year noted.¹⁹ Please note that if one of the District's schools did not receive a score in a particular category and year presented below,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

SPP School Scores Compared to Statewide Averages

2018-19



2017-18

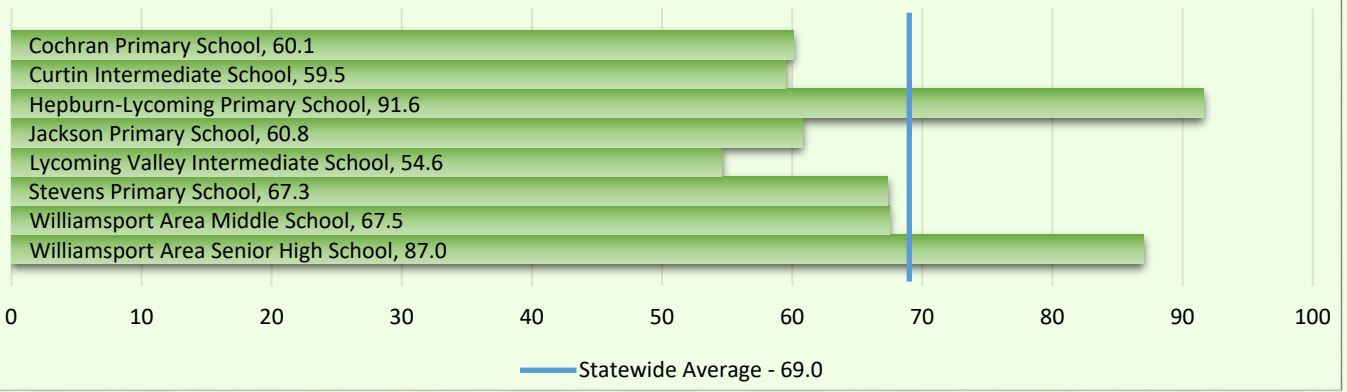


¹⁹ Statewide averages were calculated by our Department based on individual school building scores for all public schools in the Commonwealth, including district schools, charters schools, and cyber charter schools.

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.

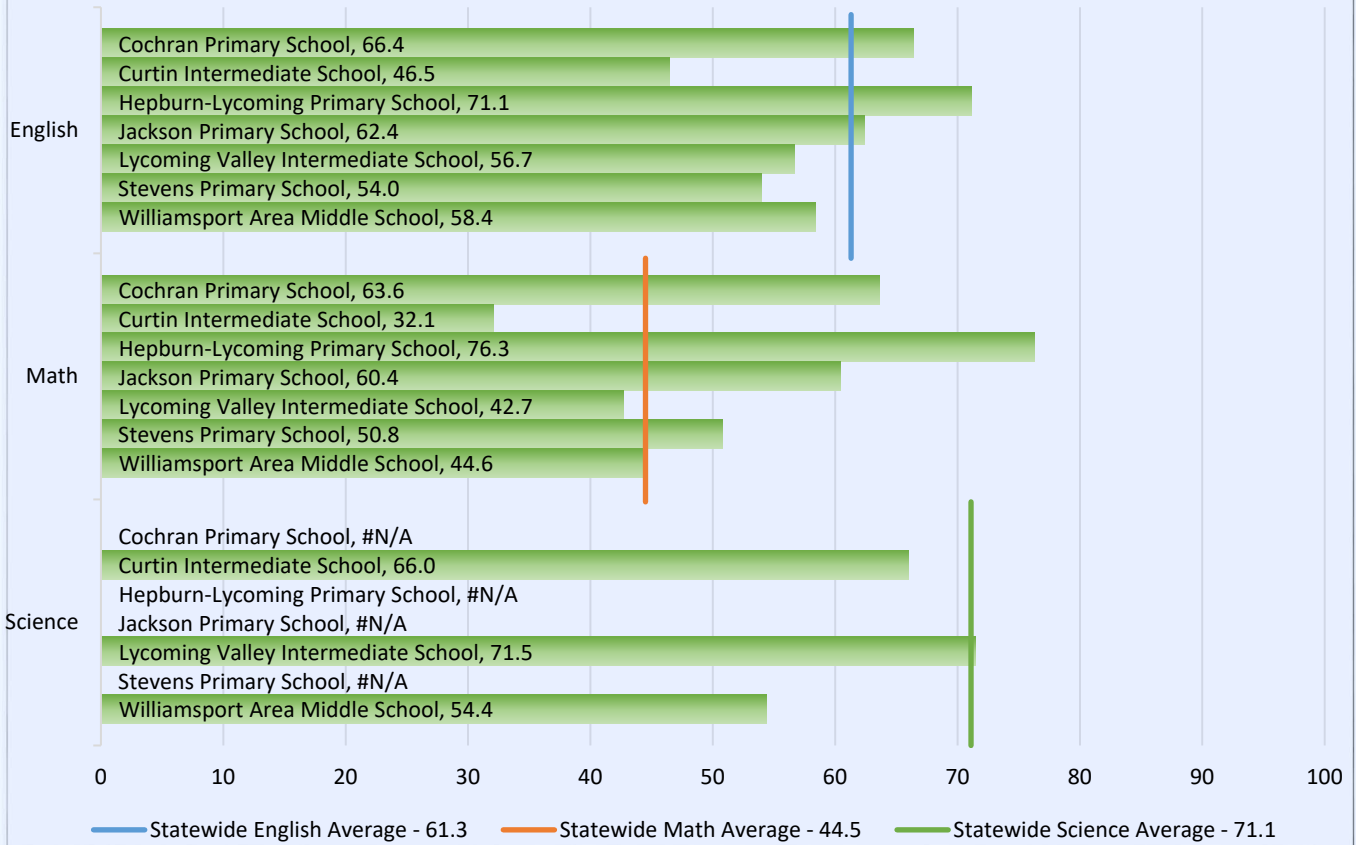
SPP School Scores Compared to Statewide Averages (continued)

2016-17



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

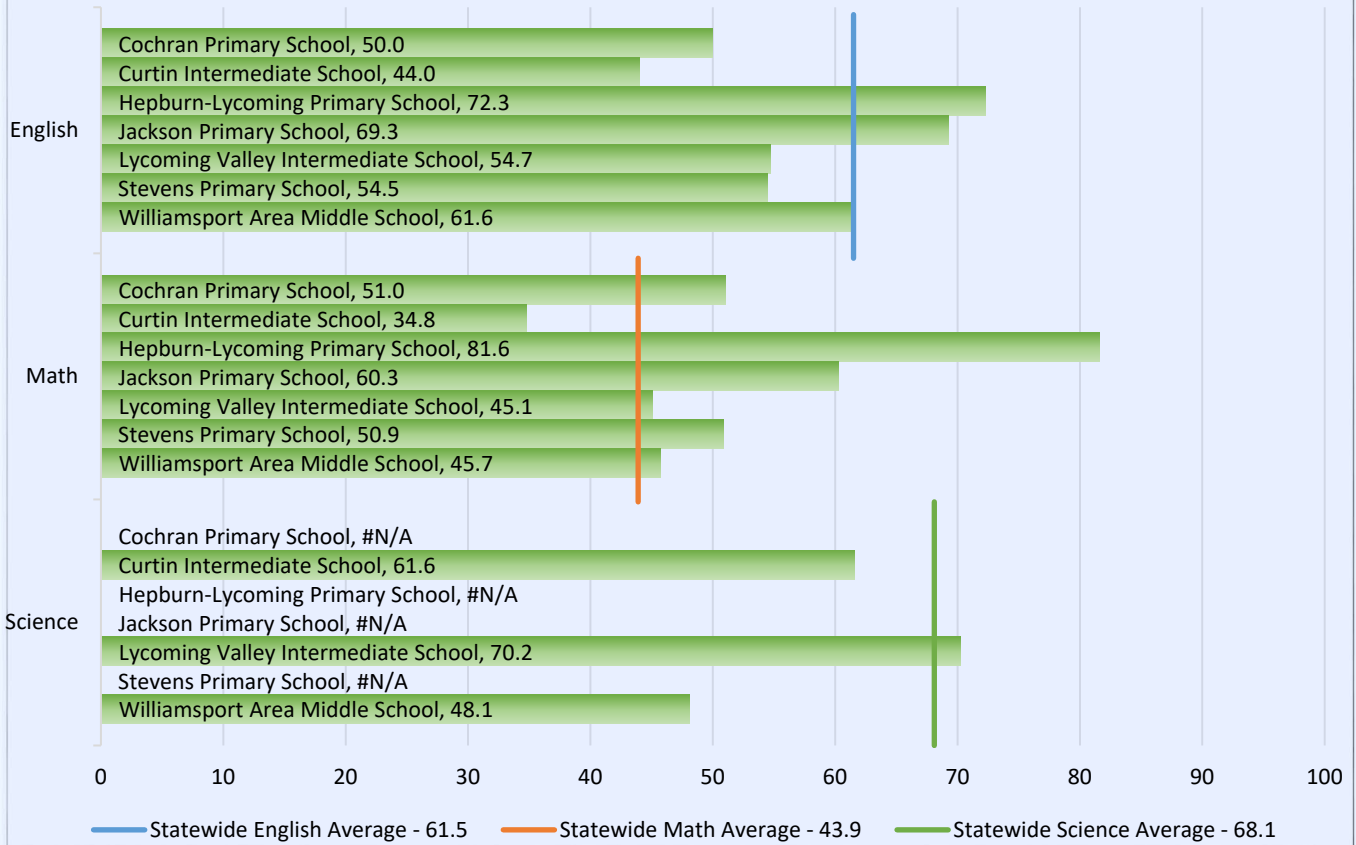
2018-19



#N/A: Students in grades 4 and 8 are administered the Science PSSAs. The District's primary schools are Kindergarten through grade 3 schools; therefore, Science PSSAs are not administered to these schools' students.

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

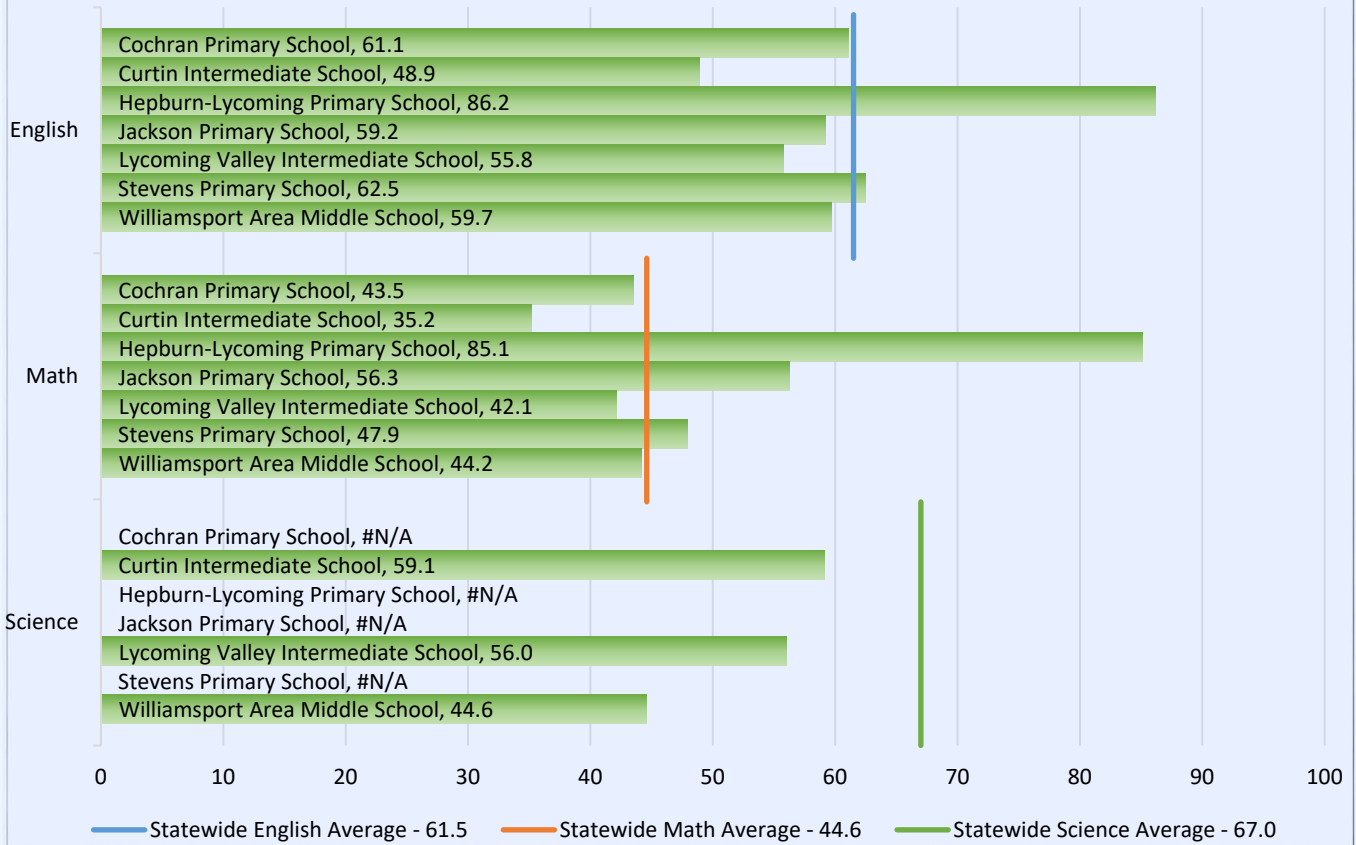
2017-18



#N/A: Students in grades 4 and 8 are administered the Science PSSAs. The District's primary schools are Kindergarten through grade 3 schools; therefore, Science PSSAs are not administered to these schools' students.

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

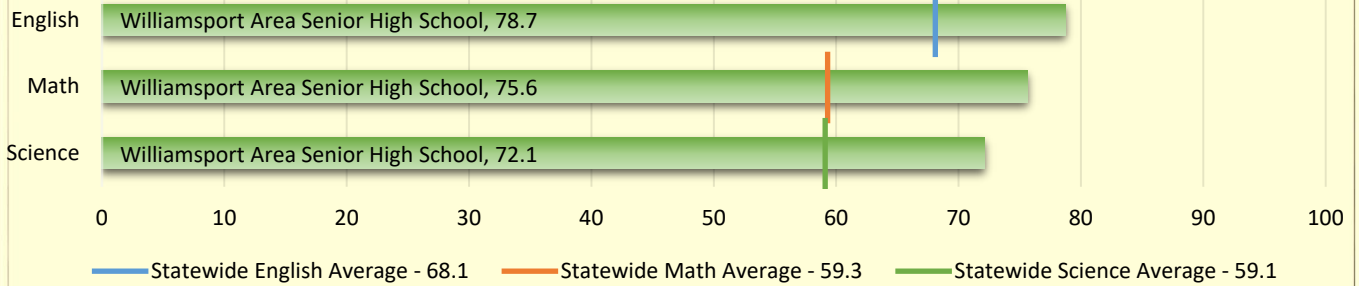
2016-17



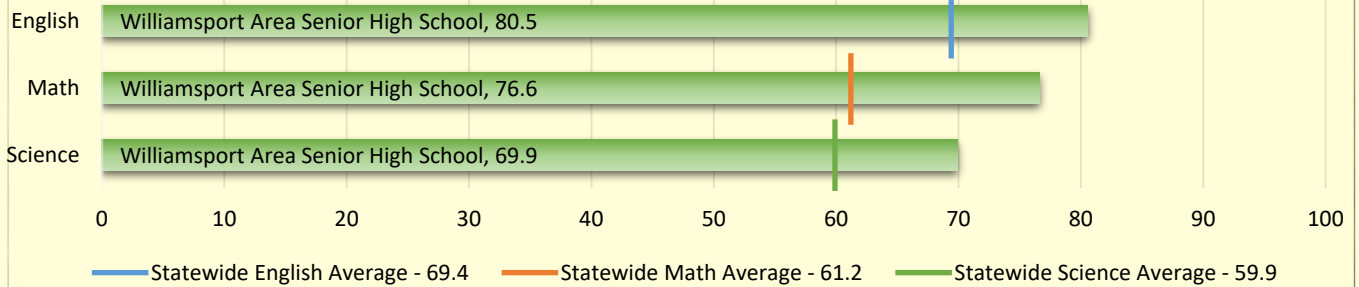
#N/A: Students in grades 4 and 8 are administered the Science PSSAs. The District's primary schools are Kindergarten through grade 3 schools; therefore, Science PSSAs are not administered to these schools' students.

Keystone Advanced or Proficient Percentage School Scores Compared to Statewide Averages

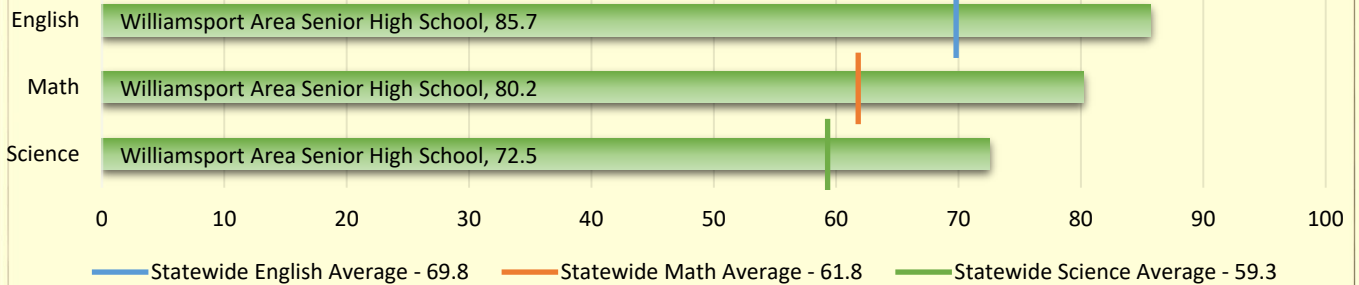
2018-19



2017-18



2016-17



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