

CORRECTIVE ACTION PLAN (CAP) TO FISCAL YEAR END JUNE 30, 2023
INTERNAL AUDIT FINDINGS AND RECOMMENDATIONS.

The Internal Audit findings were presented to the Audit Committee on April 17, 2023. Corrective action plan components will be managed by Dr. Kathleen J. Acker, Assistant Superintendent for Finance and Management Services. All corrective actions will be completed by June 30, 2023.

I. STAC

In-District Placements

The auditors noted some instances in which costs were incorrectly calculated and input into the STAC. They also noted that the difference in cost was minimal. The auditors recommend that the rates, duration, and number of sessions calculated by the Senior Account Clerk be periodically reviewed to ensure the information is calculated correctly.

Management's Response:

1. *Management agrees with the findings and the District has already implemented processes designed to eliminate mathematical errors, which include utilizing the DCPUB High-Cost worksheet.*
2. *Management agrees with the findings and the District has contracted with School Aid Specialists to periodically review the data entered into the STAC system*

Planned Completion Date:

1. *Implementation began October 1, 2022*
2. *The review will be concluded by June 30, 2023*

Public and State-Approved Private School Placements

The auditors noted that there was 1 instance in which the District did not STAC for a student that attended a State-approved private school during the 2018-2019 school year. It was again recommended that the District review the STACs entered by the Senior Account Clerk to ensure all students have been captured appropriately. The auditors recommended that the District develop standard procedures and requirements for issuing payment for invoices received from districts of attendance for parentally-placed students with disabilities outside of the District.

Management's Response:

Management agrees with the findings and the District has contracted with School Aid Specialists to periodically review the data entered into the STAC system.

Planned Completion Date:

The review will be concluded by June 30, 2023

II. PARENTALLY-PLACED (Revenue & Expenses)

Expenses

The auditors noted that the Business Office can improve the documentation received to verify the accuracy of the amounts being billed to the District (i.e., requiring detailed vendors invoices, attendance, contracts between the non-State approved private schools and the related service providers, etc.). The auditors recommend that the District develop standard procedures and requirements for issuing payment for invoices received from districts of attendance for parentally-placed students with disabilities outside of the District.

Management's Response:

Management agrees and in order to verify the accuracy of rates the District will now require documentation as to whether charges for any and all parentally placed students should be credited for IDEA Proportionate Share. The primary form will be an explanatory cover letter accompanying the billing. If a cover letter is not provided billings will not be processed until direct, documented correspondence or clarification is provided, i.e., by letter, or phone with confirming follow-up email correspondence.

Planned Completion Date:

Implementation was completed February 28, 2023

Revenue

The auditors noted that the District is not providing the payors with consistent documentation to support attendance. In addition, there were 2 instances (2 different students) in which the District billed the DoR for less days than the expected number of billable days (based on the attendance support provided). The auditors recommend that the District develop standard procedures and requirements for billing non-resident students parentally-placed within the District borders to ensure District invoices are properly capturing costs incurred.

Management's Response:

Management agrees and in order to verify the accuracy of billable days referred in the finding, the district will now supplement the billings with continuing, additional support. The cases referred to in the finding involved modifications to the billings. These modifications were agreed upon by the district and outside district after initial processing, receipt, and review of the billings by the Outside District; they were a result of corrections made. The district will now document and add to the billing record any such agreed upon modifications and/or corrections that take place upon review of the billing.

Planned Completion Date:

Implementation was completed February 28, 2023

III. CONTRACTED RELATED SERVICE EXPENSES

The auditors noted 2 instances (2 different students and 2 different vendors) in which the vendor charged the District an incorrect rate.

Management's Response:

Management agrees and has contracted with an auditing firm that has been verifying all rates. Rates are also reviewed in the Business office and the PPS Department.

Planned Completion Date:

Implementation was completed on June 30, 2021