

Division of School Audits

Performance Audit

Pendergast Elementary School District

October • 2010 Report No. 10-14



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DEBRA K. DAVENPORT, CPA AUDITOR GENERAL

STATE OF ARIZONA OFFICE OF THE AUDITOR GENERAL

MELANIE M. CHESNEY DEPUTY AUDITOR GENERAL

October 29, 2010

Members of the Arizona Legislature

The Honorable Janice K. Brewer, Governor

Governing Board
Pendergast Elementary School District

Dr. Ron Richards, Superintendent Pendergast Elementary School District

Transmitted herewith is a report of the Auditor General, *A Performance Audit of the Pendergast Elementary School District*, conducted pursuant to A.R.S. §41-1279.03. I am also transmitting within this report a copy of the Report Highlights for this audit to provide a quick summary for your convenience.

As outlined in its response, the District agrees with one of the two findings and the recommendation.

My staff and I will be pleased to discuss or clarify items in the report.

This report will be released to the public on November 1, 2010.

Sincerely,

Debbie Davenport Auditor General





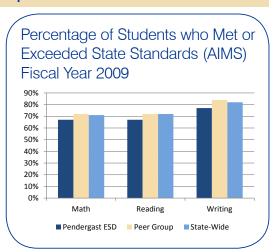
REPORT HIGHLIGHTS PERFORMANCE AUDIT

Our Conclusion

Pendergast Elementary School District compares favorably to peer districts in operational efficiencies, but not as well in student achievement with AIMS scores lower than both peer district and state averages. The District operates efficiently overall with administration, plant operation, and food service costs similar to peer averages and transportation costs lower than those of peer districts. However, the District's shift in classroom spending, particularly since fiscal year 2006, indicates the District may have used Classroom Site Fund (CSF) monies to supplant non-CSF monies in the classroom. Had the District continued to direct its monies into the classroom at the same rate it did in fiscal year 2001, it would have spent an additional \$3 million in the classroom in fiscal vear 2009.

Student achievement lower than peer districts'

In fiscal year 2009, Pendergast ESD's students' AIMS scores were lower than those of peer districts and state averages. Although 11 of the District's 14 schools met "Adequate Yearly Progress" (AYP) for the federal No Child Left Behind Act, 3 schools did not. Students at 2 of the schools did not demonstrate sufficient academic achievement. The third school, the District's alternative school, did not meet AYP because too few students were tested and student attendance was too low.



District operates efficiently overall with similar or lower costs

In fiscal year 2009, Pendergast ESD's administrative, plant operations, and food service costs were similar to peer districts', and its transportation program operated efficiently, with costs lower than peer districts'. One way the District controls its plant operations costs is by hiring general helpers to assist custodians at schools. These helpers perform activities, such as mopping and waxing floors and emptying the trash. The District saved over \$200,000 in fiscal year 2009 using these helpers.

However, despite operating efficiently in these areas, the District spent about \$300

less per pupil in the classroom than peer districts, in part because it received less funding.

Expenditures by Function Fiscal Year 2009				
Per Pupil	Pendergast ESD	Peer Group Average		
Administration	\$690	\$655		
Plant operations	737	776		
Food service	494	491		
Transportation	177	274		

District's transportation program operates efficiently



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Despite Pendergast's high percentage of special education route miles, which generally are more expensive than regular education route miles, the District achieved a \$715 cost per rider in fiscal year 2009, which was \$118 (14 percent) lower than the peer districts' average. The District employed several cost-saving methods, including making use of

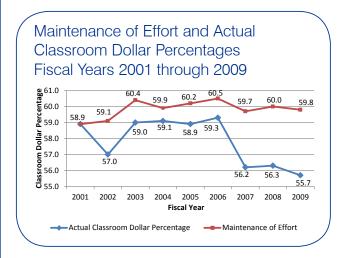
transportation technology, establishing an effective preventive maintenance program, and monitoring performance measures and employee time. Specifically, the District:

 Uses a global positioning system (GPS) for various purposes such as driver inspections of the bus before and after each trip. The GPS also allows the District

- to monitor and analyze bus location, stops, speed, and the time taken for inspections and routes.
- Uses special software to closely monitor fuel usage, including the date, time, and quantity of fuel pumped.
- Uses data from the GPS and fuel software to track when buses are due for routine preventative maintenance. In fiscal year 2009, the District's repair and maintenance costs were 23 percent lower than peer districts' with comparable fleets. As a result of this efficiency, the District was able to limit the number of spare buses it needed as substitutes because of service repairs.
- Monitors performance measures such as cost per rider, cost per mile, and bus capacity utilization. Because of this monitoring, the District was able to determine that it would save about \$38,000 in fiscal year 2011 by consolidating most of its special needs programs at one central location instead of transporting these students to various locations.
- Monitors employees' adherence to work schedules.
 The District estimates that it saves almost \$9,000 in
 salaries annually by ensuring that employees do not
 add unapproved time to time sheets by clocking in
 early or out late.

Shift in spending away from classroom indicates District may have supplanted using Classroom Site Fund (CSF) monies

In recent years, Pendergast ESD has shifted some of its spending away from the classroom. Statute requires that districts use CSF monies to supplement and not supplant—that is add to rather than replace—other monies spent in the classroom. In fiscal year 2001, before it received CSF monies, the District spent 58.9 percent of its operating dollars in the classroom. In fiscal year 2009, despite receiving over \$3 million in CSF monies earmarked for the classroom that year, the District spent only 55.7 percent of its dollars in the classroom, 3.2 percentage points less than in fiscal year 2001. As seen in the figure below, had the District continued to direct its other monies into the classroom at the same rate as in fiscal year 2001 (maintained its level of effort), the additional CSF monies would have boosted the District's classroom dollar percentage to 59.8 percent, and it would have spent an



additional \$3 million in the classroom in fiscal year 2009.

Drop in enrollment growth at same time new school was opening—The initial shift in spending from the classroom in fiscal year 2007 appears to have resulted from the opening of a new school and a sudden drop in the rate of student enrollment increases. The District's growth in student enrollment came to a standstill after plans to build a new school were well underway. Therefore, when the new school opened in fiscal year 2007, the District did not have the enrollment for it to operate efficiently.

Increased spending for instructional support services—However, when student growth resumed in fiscal year 2008, the District's classroom dollar percentage did not increase as would be expected. The District's classroom dollar percentage remained low in fiscal years 2008 and 2009 apparently because of district officials' decision to spend more money on instructional support services (ISS). The District's ISS spending increased from less than 6 percent in fiscal year 2007 to over 8 percent in fiscal year 2009. Although ISS activities are necessary and closely tied to the classroom, they should not come from monies that would otherwise have been spent in the classroom.

Recommendation—The District should ensure that CSF monies are used to supplement, and not supplant, other monies spent on classroom instruction.





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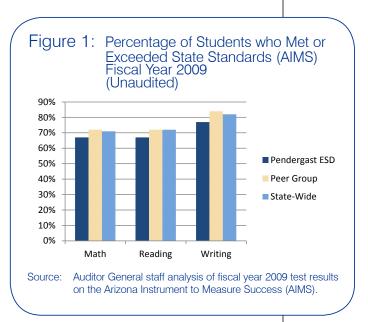
DISTRICT OVERVIEW

Pendergast Elementary School District is an urban district serving students in Glendale, Avondale, and west Phoenix. In fiscal year 2009, the District served 9,921 students at its 14 schools: 11 kindergarten through 8th grade schools, 1 kindergarten through 4th grade school, 1 5th through 8th grade school, and 1 alternative school serving kindergarten through 8th grade students.

The District compares favorably to its peer group in operational efficiencies, but not as well in student achievement.¹ Its student achievement was below both peer district and state averages. Overall, the District operated its administration, plant operations, food service, and student transportation efficiently with costs that were similar to or lower than the peer districts' averages. However, the District should ensure that it directs its monies into the classroom at a rate necessary to avoid supplanting with Classroom Site Fund Monies.

Student achievement below peer district and state averages

For fiscal year 2009, 67 percent of the District's students met or exceeded state standards in math, 67 percent in reading and 77 percent in writing. As shown in Figure 1, these scores were below both the peer district and state averages for each area. In this same fiscal year, 11 of the District's schools met all applicable Adequate Yearly Progress objectives for the federal No Child Left Behind act, while three schools did not. The District's alternative school did not test a sufficient number of students and its student attendance rate was too low. Further, two schools did not demonstrate sufficient academic progress, one in third grade reading and the other in sixth grade math. One of these schools is involved in a required school improvement process monitored by the Arizona Department of Education. But all three of these schools maintained their "performing" or "performing plus" labels under the Arizona LEARNS Achievement Profile.



Auditors developed two peer groups for comparative purposes. See page a-1 of this report's Appendix for further explanation of the peer groups.

District operates efficiently with most noninstructional costs lower than or similar to peer districts'

As shown in Table 1 and based on auditors' reviews of various performance measures, for fiscal year 2009, Pendergast ESD operated its administration, plant operations, food service, and student transportation programs efficiently, at costs that were lower than or similar to the peer districts' averages. Despite operating efficiently in these areas, Pendergast ESD spent \$336 less per pupil in the classroom than the peer districts in part because it received less funding than the eight peer districts, on average. Specifically, the District received (1) significantly less federal grant funding because its poverty rate is lower than six of the peer districts' poverty rates, (2) less budget override monies than six of the peer districts, and (3) no desegregation monies, unlike three of the peer districts. In addition, the District also spent less per pupil in the classroom because it spent more per pupil than the peer districts for student and instructional support.

Similar administration costs—At \$690 per pupil, the District's administrative costs were similar to the peer districts' average.

Similar plant operation costs—
Pendergast ESD's plant operation and maintenance costs of \$737 per pupil were similar to the peer districts' average. One way the District controls these costs is by hiring general helpers at each school to assist custodians with nontechnical tasks, such as mopping and waxing floors, emptying trash containers, and arranging furniture and equipment for meetings. The District saved over \$200,000 in fiscal year 2009 by hiring general helpers instead of only custodians because general helpers are paid at a lower rate.

Table 1: Comparison of Per-Pupil Expenditures by Function Fiscal Year 2009 (Unaudited)

	Chanding	Pendergast ESD	Peer Group	State	
_	Spending		Average	Average	
	Total per pupil	\$7,341	\$7,657	\$7,908	
	Classroom dollars	4,092	4,428	4,497	
	Nonclassroom dollars				
	Administration	690	655	729	
	Plant operations	737	776	920	
	Food service	494	491	382	
	Transportation	177	274	343	
	Student support	567	522	594	
	Instructional support	584	511	431	
	Other	0	0	12	

Source: Auditor General staff analysis of fiscal year 2009
Arizona Department of Education student membership
data and district-reported accounting data.

Food service program costs were

Similar—Pendergast ESD's per-pupil food service cost was similar to peer districts', and its per-meal cost of \$2.46 was similar to the \$2.37 peer district average.

Transportation program operates efficiently—Pendergast ESD's per-pupil student transportation cost of \$177 was nearly \$100 lower than the peer districts' average. The District's per-mile and per-rider transportation costs were also lower than peer districts'. Despite already lower costs, the District has made efforts to reduce its costs further, such as using technology to help manage the program and calculating and monitoring key transportation performance measures (see Finding 1 on page 3).

FINDING 1

District's transportation program operates efficiently

In fiscal year 2009, Pendergast ESD operated an efficient transportation program with lower perrider and per-mile costs than peer district averages. The District had lower costs despite having a larger percentage of its miles associated with transporting special needs students, which typically results in higher costs. Although efficient, the District subsidized its transportation program with more than \$590,000 that otherwise potentially could have been spent in the classroom. To help control and further reduce its transportation costs, the District has implemented several cost-saving measures, such as effectively using technology, and calculating and monitoring transportation performance measures.

District's transportation program has lower costs and efficient routes

As shown in Table 2, in fiscal year 2009, Pendergast ESD's \$715 cost per rider was \$118 (14 percent) lower than the peer districts' average, and its \$4.65 cost per mile was \$0.07 (2 percent) lower. In part, these lower costs reflected the District's ability to operate efficient regular education bus routes, filling buses to 86 percent of seat capacity, on average. Costs were lower despite the

Table 2: Comparison of Transportation Cost Per Rider and Cost Per Mile Fiscal Year 2009 (Unaudited)

	Cost Per	Cost Per
District Name	Rider	Mile
Pendergast ESD	\$715	\$4.65
Average of the peer group	\$833	\$4.72

Source: Auditor General staff analysis of fiscal year 2009 Arizona Department of Education district mileage reports and district-reported accounting data.

District's driving 69 percent of its miles for the more expensive special education routes, which is substantially higher than the peer districts' average of 43 percent. The costs for transporting special needs students are inherently higher because transporting these students often requires special buses and routes that each typically transport significantly fewer students than regular bus routes, as well as additional employees to assist the students.

Although the District's transportation program is efficient and costs are lower than peer districts', Pendergast ESD spent about \$590,000 more to operate its transportation program in fiscal year 2009 than it received in transportation revenues. The District's transportation revenues fell short of its expenditures because it drove fewer miles per rider than the peer districts averaged. Driving fewer miles impacts the District's transportation revenues and its ability to cover costs because the State's transportation funding formula is based primarily on the number of route miles driven, with more route miles resulting in higher funding. To make up the difference, the District used monies that otherwise potentially could have been spent in the classroom. Thus, the District should continue its efforts to find ways to operate the transportation program at an even lower cost.

District employs various cost-saving methods

The District uses various methods to control and reduce transportation costs, including making effective use of technology, providing required bus preventative maintenance, calculating and monitoring performance measures, and monitoring employees' work schedules. All of these steps potentially are available to other districts to help control their transportation costs, and for that reason, they are discussed in more detail below.

District uses technology to help manage program—The District uses computer software programs to help manage its transportation program and improve efficiency. Specifically:

- Global positioning system—The District uses a global positioning system (GPS) for various purposes in operating its transportation program. To perform required pre- and post-trip bus inspections, bus drivers use the system's handheld devices and radio frequency identification tags strategically placed throughout the bus. The GPS reminds drivers of all the items that need to be checked and allows them to notify mechanics when problems are noted during inspections. The GPS also allows the District to monitor the amount of time it takes for drivers to complete the inspections. Further, the District uses its GPS to record and analyze data for bus location, stops, and speed, and route beginning and ending times.
- Fuel—Fuel usage is monitored weekly using specialized software. The software tracks
 fuel usage by bus and provides information such as the date and time when fuel was
 pumped, and in what amount. This allows the District to monitor the vehicles receiving
 fuel, the reasonableness of the fuel amount being pumped, and the dates/times when the
 fuel pumps are being accessed.

Effective preventative maintenance program—In fiscal year 2009, the District's permile repair and maintenance costs were 23 percent lower than the average for the peer districts despite having buses that were about the same age, on average, as the peer districts'. This is due, in part, to an effective preventative maintenance program as required

¹ The peer districts' average excludes one district because its transportation services were outsourced and repair and maintenance costs were not separately identifiable.

by the State's *Minimum Standards* for *School Buses* and *School Bus Drivers* (*Minimum Standards*). These standards are designed to help ensure the school bus passengers' safety and welfare and address such things as bus maintenance and driver qualifications. Following the standards can also help extend the useful life of a district's buses. In fiscal year 2009, to ensure that buses received required service, such as oil changes and brake inspections, in a uniform and systematic manner as required by the *Minimum Standards*, district mechanics tracked preventative maintenance needs manually. However, for fiscal year 2011, the District purchased fleet management software to further improve its preventative maintenance program efficiency. This software uses data from the GPS and fuel software to identify and track when buses are due for routine preventative maintenance. The software can also be used to monitor changes in bus performance, such as increases in fuel or oil consumption. These features will help to maintain the fleet as well as identify any repair trends that could potentially lead to more costly repairs.

Because the District's preventative maintenance program limits the amount of time buses are out of service for repairs, the District is able to limit the number of spare buses it maintains to only two, or 5 percent, of its 37-bus fleet, which is significantly less than federal standards that recommend spare buses make up no more than 20 percent of a bus fleet. Operating fewer spare buses allows the District to reduce the costs associated with maintaining and insuring additional spare buses.

Calculating and monitoring performance measures—To help ensure it operates an efficient transportation program, the District regularly monitors key transportation performance measures, such as cost per mile, cost per rider, and bus capacity utilization. This not only helps the District proactively identify operational issues that may need to be addressed, but the District also uses this as a tool to identify ways to lower costs. For example, by regularly reviewing per-mile and per-rider costs, the District determined that special needs routes made up a large portion of its transportation costs. Therefore, transportation program staff worked with the District's education services department to centralize most of its special needs programs beginning in fiscal year 2011. As a result, most special needs students will be transported to one nearby location rather than to various locations throughout the Phoenix metropolitan area, thus reducing these transportation costs by a district-estimated \$38,000 per year.

Daily monitoring of employee time reduces costs—The District uses information from its GPS, such as inspection times and beginning and ending route times, along with employees' clock-in and clock-out times recorded in its timekeeping software, to monitor employees' adherence to work schedules. Employees are expected to arrive and leave at their scheduled times and not add unapproved time to their pay by clocking in early or clocking out late. The District estimates that monitoring employees' adherence to schedules annually saves about \$8,775 in salaries for nondriving or unproductive time.

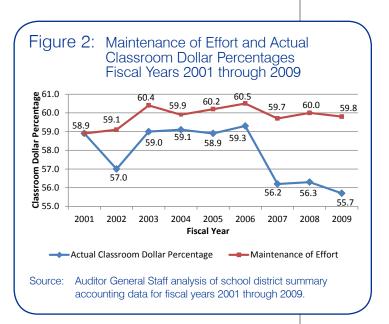
FINDING 2

Shift in classroom spending indicates possible supplanting

In fiscal year 2009, Pendergast ESD spent its Classroom Site Fund (CSF) monies for purposes authorized by statute.¹ However, the District's shift in spending, particularly since fiscal year 2006, indicates possible supplanting, which is prohibited by A.R.S. §15-977. The opening of a new school in fiscal year 2007 without anticipated enrollment growth resulted in a drop in instructional spending over which the District had little control. However, when enrollment increased in fiscal year 2008, instructional spending remained low because the District made the decision to spend more on instructional support services—specifically, teacher training. Although instructional support activities are necessary and closely tied to the classroom, increased instructional support spending should not come from monies that would otherwise have been spent in the classroom.

District has reduced classroom spending from non-CSF sources

Since receiving CSF monies in fiscal year 2002, Pendergast ESD has shifted its spending of other monies away from the classroom, an indication of supplanting. A.R.S. §15-977 requires that CSF monies be used to supplement, not supplant, teacher compensation from other sources. In fiscal year 2001, prior to CSF monies being available, the District spent 58.9 percent of its available operating dollars in the classroom.² By fiscal year 2009, the District's overall classroom dollar percentage was only 55.7 percent, 3.2 percentage points lower than in fiscal year 2001. The District's percentage was lower despite



In November 2000, voters passed Proposition 301, which increased the state-wide sales tax to provide additional resources for education programs. Under statute, these monies, also known as Classroom Site Fund (CSF) monies, may be spent only for specific purposes, primarily to increase teacher pay.

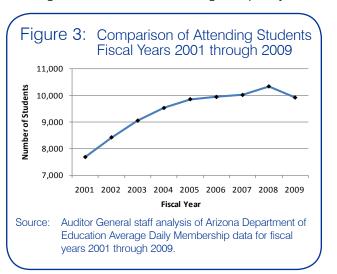
Available operating dollars are those used for the District's day-to-day operations. They exclude costs associated with repaying debt, capital outlay, and non-K-12 programs. Classroom spending includes salaries and benefits of teachers and instructional aides, textbooks, and other classroom supplies.

having received about \$3 million of CSF monies in fiscal year 2009 alone. As shown in Figure 2, if the District had continued to direct its other monies into the classroom at the same rate it did in fiscal year 2001, the year prior to receiving CSF monies (i.e., maintained the same level of effort), the addition of CSF monies would have increased the District's 2009 classroom dollar percentage 4.1 percentage points to 59.8 percent. This means an additional \$3 million would have been spent in the classroom in fiscal year 2009.

Drop in fiscal year 2007 classroom dollar percentage reflects developments over which the District had little control

The large spending shift away from the classroom that occurred between fiscal years 2006 and 2007 appears to have resulted from the combination of opening a new school and a sudden drop in student enrollment growth. As shown in Figure 3, district enrollment grew quickly each

year during fiscal years 2001 through 2005, rising from 7,683 to 9,860 students. However, that growth came to a standstill in fiscal year 2006, after plans to build a new school were already well underway. Therefore, when the District opened the new school in fiscal year 2007, it did not have the anticipated student enrollment necessary to efficiently operate the school. As a result, auditors' analysis showed that while the District's percentage of operational dollars spent on instruction decreased, the percentage spent in other areas, such as administration and plant operations, increased significantly.



Continued low percentage in fiscal year 2008 reflects more deliberate budget decisions

As shown in Figure 3, district growth returned in fiscal year 2008, rising from 10,020 to 10,343 students. This growth should have resulted in a higher classroom dollar percentage because more classroom teachers would be needed for the more than 300 new students. However, the percentage of dollars spent in the classroom remained basically stagnant for fiscal year 2008. The reason appears to be a decision by district officials to spend money elsewhere—specifically on instructional support. Instructional support activities are associated with assisting teachers with the content and process of providing learning experiences for students such as librarians, teacher training, and curriculum development. According to district officials, in recent years, they

made the decision to place an emphasis on teacher training in order to improve student achievement. As a result, the District went from spending less than 6 percent of its current expenditures on instructional support activities in fiscal year 2007 to spending over 8 percent of its current expenditures on instructional support in fiscal year 2009. Although these activities are necessary and closely tied to the classroom, increased instructional support spending should not come from monies that would otherwise have been spent in the classroom.

Recommendation

The District should ensure that CSF monies are used to supplement rather than supplant other monies spent on classroom instruction.

APPENDIX

Objectives, Scope, and Methodology

The Office of the Auditor General has conducted a performance audit of the Pendergast Elementary School District was conducted pursuant to A.R.S. §41-1279.03(A)(9). Based in part on their effect on classroom dollars, as previously reported in the Auditor General's annual report, *Arizona Public School Districts' Dollars Spent in the Classroom (Classroom Dollars* report), this audit focused on the District's efficiency and effectiveness in four operational areas: administration, plant operation and maintenance, food service, and student transportation. To evaluate costs in each of these areas, only current expenditures, primarily for fiscal year 2009, were considered.¹ Further, because of the underlying law initiating these performance audits, auditors also reviewed the District's use of Proposition 301 sales tax monies and how it accounted for dollars spent in the classroom.

In conducting this audit, auditors used a variety of methods, including examining various records, such as available fiscal year 2009 summary accounting data for all districts and Pendergast ESD's fiscal year 2009 detailed accounting data, contracts, and other district documents; reviewing district policies, procedures, and related internal controls; reviewing applicable statutes; and interviewing district administrators and staff.

To analyze Pendergast ESD's operational efficiency, auditors selected a group of peer districts based on their similarities in district size, type, and location. This operational peer group includes Pendergast ESD and eight other large or very large elementary school districts located in city/suburb areas.² To compare districts' academic indicators, auditors developed a separate student achievement peer group using the same size and location categories as in the operational peer group, but with the additional consideration of each district's poverty rate because poverty rate has been shown to be strongly related to student achievement. Additionally:

To assess whether the District's administration effectively and efficiently managed district operations, auditors evaluated administrative procedures and controls at the district and school level, including reviewing personnel files and other pertinent documents, and interviewing district and school administrators about their duties. Auditors also reviewed and evaluated fiscal year 2009 administration costs and compared these to peer districts'.

¹ Current expenditures are those incurred for the District's day-to-day operation. They exclude costs associated with repaying debt, capital outlay (such as purchasing land, buildings, and equipment), and programs such as adult education and community service that are outside the scope of preschool through grade 12 education.

² Large districts serve between 8,000 and 19,999 students; very large districts serve more than 20,000 students. The peer group contained seven large elementary districts in addition to Pendergast and one very large elementary district. Auditors excluded an eighth large elementary district that received such a high level of additional funding that it skewed the peer-spending averages.

- To assess whether the District's plant operation and maintenance function was managed appropriately and functioned efficiently, auditors reviewed and evaluated fiscal year 2009 plant operation and maintenance costs and district building space, and compared these costs to peer districts'.
- To assess whether the District's food service program was managed appropriately and functioned efficiently, auditors reviewed fiscal year 2009 food service revenues and expenditures, including labor and food costs, and compared costs to peer districts'.
- To assess whether the District's transportation program was managed appropriately and functioned efficiently, auditors reviewed and evaluated required transportation reports, driver files, bus maintenance and safety records, and bus capacity usage. Auditors also reviewed fiscal year 2009 transportation costs and compared them to peer districts'.
- To assess whether the District was in compliance with Proposition 301's Classroom Site Fund requirements, auditors reviewed fiscal year 2009 expenditures to determine whether they were appropriate, properly accounted for, and remained within statutory limits.
- To assess the District's financial accounting data, auditors evaluated the District's internal controls related to expenditure processing and reviewed transactions for proper account classification and reasonableness. Auditors also evaluated other internal controls that were considered significant to the audit objectives.

We conducted this performance audit in accordance with generally accepted government auditing standards. 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.

The Auditor General and her staff express their appreciation to the Pendergast Elementary School District's board members, superintendent, and staff for their cooperation and assistance throughout the audit.

DISTRICT RESPONSE



Administrative Office Human Resources Superintendent Fax District Fax

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October 15, 2010

Debra Davenport, CPA Auditor General 2910 North 44th Street, Suite 410 Phoenix AZ 85018

RE: Response to Pendergast Elementary School District FY10 Performance Audit.

Dear Ms. Davenport:

Pendergast ESD respectfully submits our written response to the performance audit conducted by the Auditor General for FY2009. The audit indicated one recommendation and you will find the response to the recommendation attached.

Having no recommendations in the district operations categories verifies our commitment to operating our district efficiently and our dedication to be effective stewards of the taxpayer dollars. We also would like to thank you for acknowledging in Finding 1 the efficiency of our transportation operations.

The District would like to extend our appreciation of the professionalism and courtesy extended by your staff during the audit process and their willingness to engage in worthwhile dialogue throughout the audit to ensure a complete understanding of our operations.

Respectfully,

Ron Richards, Ed. D Superintendent

Attachment:

Finding 1: District's transportation program operates efficiently.

We appreciate your acknowledgment of our efforts to operate our Transportation Services efficiently. Since FY2009 we have continued our efforts to develop and implement ways to operate our transportation services at an even lower cost. This is reflected on our FY2010 Annual Financial report as it shows we reduced our spending over FY2009 by an additional \$54,000 and look to save more in FY2011 while maintaining the high standards we have established for the department.

Finding 2: Shift in classroom spending indicates possible supplanting

Recommendation: The district should ensure that CSF monies are used to supplement rather than supplant other monies spent on classroom instruction.

We agree with the recommendation that a district should always ensure that CSF monies are used to supplement and not supplant other monies spent on classroom instruction. We also agree that a shift in spending could possibly indicate supplanting although we disagree with any inference that the district supplanted CSF funds with other monies. The district has not and never will supplant CSF monies given to us by the taxpayers of the state. Since the district started receiving CSF in FY2002, we have always used the proceeds as allowed by and required by statute. Each year the district continued to increase the number of classroom sections as needed for student growth and have maintained our average class size below 27. Also, over the same time period, with the help of CSF monies, we were able to increase the average salary of our teachers by 48 percent.

The district also agrees that we did increase our spending in Instruction Support. Nevertheless this was not at the expense of classroom instruction rather it was a strategic plan to assist the classroom with enhanced teacher training specific to the needs of the classroom teacher and the use of master teachers, coaching the classroom teachers in the use of proven classroom teaching techniques. This plan has proven itself as reflected in the FY2010 academic achievement results that show we made substantial gains in our reading, writing and math scores.

In addition to our increased spending in Instruction Support, Pendergast also implemented the research based model called "Response to Intervention" (RtI) as a systems model to improve student achievement. The implementation was launched at the beginning of the FY2009 with the content of Reading being the first focus. Since that time, compared to

previous five years, Pendergast obtained its highest percentage at grade level targets on the Dynamic Indicator of Early Literacy Skills, (DIBELS) assessment. At the end of the FY2010, the District celebrated a 5% increase of students meeting their grade level target in Reading. In addition, significant reductions have taken place in both Intensive (significantly below level) and Strategic (below grade level) categories. Additionally, the district realized double digit growth on students passing AIMS Reading in grades 6th-7th. As a District, it is the first time since the federal government started tracking subgroups, that our ELL Sub-Group has made Annual Yearly Progress (AYP) in Reading. Overall, Pendergast celebrated a 6% increase of students passing or exceeding on the state AIMS test. However, during the same instructional period, the state realized a growth in Reading of just 2%

