



2855 W. Master Pieces Dr.
Tucson, AZ, 85741
(520) 352-JTED (5833)
Fax (520) 352-5842

March 31, 2026

Lindsey A. Perry, CPA, CFE
Arizona Auditor General
2910 N. 44th Street, Suite 410
Phoenix, AZ. 85018

Dear Ms. Perry,

Pima County Joint Technical Education District (Pima JTED) is the premier career and technical education district in Southern Arizona for grades 9-12, serving high school youth living within our 12,000 square mile boundary. Pima JTED's successful public-private partnerships have led to the District's phenomenal 77% growth rate over the last five years. The rapid growth rate has not been without its challenges, some of which are outlined in the recently released Auditor General's Performance Audit.

The almost two-year process related to the Performance Audit has presented multiple challenges for District staff, especially during this time of rapid growth. These audits are extremely stressful for staff, and the District is extremely proud of how staff handled the extra demand placed on them throughout this process.

Even though Pima JTED does not agree with all of the findings contained in the audit report, the District is committed to improving its processes and procedures to make District operations more effective and efficient.

Pima JTED prides itself on providing the best opportunities for all who take our career and technical courses. Improving upon an already successful model will only help us in achieving the goal of providing quality programs that benefit our youth as well as our community.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathy Prather".

Kathy Prather, Superintendent

*We deliver premier Career and Technical Education in partnership with
business, industry, and community stakeholders.*

Finding 1: District paid 2 employees more than \$104,000 for overtime work associated with performing their regular job duties without ensuring the hours charged were reasonable and allowable and staffing was appropriate

District Response: The Auditor General's finding is not agreed to.

Response explanation: The district has updated the staffing model for the business office and has aggressively attempted to bring in new staff to address deficiencies. In addition, the district is implementing a new overtime approval process as well as an electronic time keeping system.

Recommendation 1: Ensure it consistently follows its overtime policies by developing and implementing written procedures to ensure that all overtime hours are approved in advance and document any determinations to provide overtime pay rather than awarding compensatory time in accordance with District policy.

District Response: The audit recommendation will be implemented.

Response explanation: The district has written procedures and overtime was pre-approved. However, documented evidence of the pre-approvals was not retained for audit purposes. The district will established stronger controls to ensure prior approvals are well documented.

Recommendation 2: Develop a thorough supervisory payroll review process to ensure that requested overtime payments are in accordance with District policy and properly documented, including preapprovals.

District Response: The audit recommendation will be implemented.

Response explanation: The district is implementing an electronic time keeping system that will document all hours worked, including overtime, down to the minute. All timesheets will be approved electronically by supervisors.

Finding 2: District spent at least \$36,000 on food and beverages for District events without required Board approval, potentially wasting monies that could have been used for other District priorities, and did not ensure these purchases complied with the State's gift clause

District Response: The Auditor General's finding is not agreed to.

Response explanation: The District disagrees with this finding because clear and concise guidance has not been forthcoming from the Arizona Department of Education. However, the District has language in all employee contracts and notices of employment that states "To the extent

appropriate for the occasion, the District may provide incidental food and beverages at mandatory staff meetings, including in-services and staff development activities/trainings, as a de minimus fringe benefit in order to foster good working relations and encourage and reward staff participation” and felt this was sufficient to document prior board approval. The district has implemented a new process to include an item on each board agenda to approve all upcoming events that will include food purchased by the district. .

Recommendation 3: If the District determines that it is appropriate to purchase food and beverages using public monies, it must obtain advance Board approval for all food and beverage purchases associated with District events.

District Response: The audit recommendation will be implemented.

Response explanation: The district has implemented a new process to include an item on each board agenda to approve all upcoming events that will include food purchased by the district.

Recommendation 4: If the District determines that it is appropriate to purchase food and beverages using public monies, it must ensure compliance with State laws, the gift clause, and other requirements for any Board-approved food or beverage purchases, which includes determining and documenting that funding sources used are appropriate and how each purchase benefits the District and serves a public purpose.

District Response: The audit recommendation will be implemented.

Response explanation: The district has implemented a new process to include an item on each board agenda to approve all upcoming events that will include food purchased by the district.

Finding 3: District likely wasted public monies by unnecessarily leasing white fleet vehicles and purchasing an excessive number of car wash passes

District Response: The Auditor General’s finding is not agreed to.

Response explanation: District vehicles are wrapped for advertising which is a high impact form of out of home marketing turning them into mobile billboards. The Board and administration feel the greatest impact of this effort is achieved when the vehicles are clean and that it is a cost effective form of advertising while also providing vehicles for use when needed by staff to travel on district business or between the many campuses of the District throughout the 12,000 miles of the District.

Recommendation 5: Complete and document an analysis to determine how many vehicles the District needs for its operations that accounts for factors such as miles driven, staff and student transportation needs, and costs of leasing versus owning the vehicles.

District Response: The audit recommendation will be implemented.

Response explanation: The district performs an analysis to determine how many vehicles the district needs for its operations on a regular basis, usually when the lease terms are completed. However, the district will improve this process to make it clearer to the reader which factors are utilized for the analysis and how the number of vehicles required is determined.

Recommendation 6: After determining the number of vehicles needed for its operations, adjust the number of vehicles in its white fleet, as necessary, to maintain a white fleet supported by its analysis.

District Response: The audit recommendation will be implemented.

Response explanation: The district adjusts the number in its white fleet each time the lease terms are completed but will develop a process to better document that determination and the factors that were involved in that decision.

Recommendation 7: Complete and document an analysis of the District's car wash needs and limit car wash purchases based on its analysis.

District Response: The audit recommendation will be implemented.

Response explanation: The district will develop a process to better document the analysis done when determining the car wash needs of the district.

Finding 4: District wasted public monies on credit card late fees and finance charges, and did not publicly accept donations and document the reason for fee waivers, decreasing public transparency and increasing the risk of theft

District Response: The Auditor General's finding is agreed to.

Response explanation: The district paid credit card late fees while waiting for receipts from staff that documented all purchases on district credit cards were appropriate district purchases. The district notified the Governing Board of donations but the notifications were not always on the study action portion of the agenda. The fee waivers followed district policy but needed better documentation as to the reason for the waiver.

Recommendation 8: Develop and implement a process to ensure that credit card payments are made in a timely manner to avoid unnecessary late fees and finance charges.

District Response: The audit recommendation will be implemented.

Response explanation: All staff have been notified that their credit card purchase rights will be terminated if receipts are not turned into the business office in a timely manner so the credit cards can be paid on time each month.

Recommendation 9: Implement additional procedures to help ensure employees follow required credit card purchasing procedures, including additional training or penalties for repeat offenses, among other options.

District Response: The audit recommendation will be implemented.

Response explanation: The district will include credit card training in the annual all staff in service and will revoke credit card purchase authorization from repeat offenders.

Recommendation 10: Ensure it acknowledges the receipt, purpose, and value of donations and that the Governing Board accepts all donations during meetings open to the public.

District Response: The audit recommendation will be implemented.

Response explanation: The district has added an agenda item to each board meeting to approve all known donations including the receipt, purpose, and value of the donations.

Recommendation 11: In consultation with legal counsel, as necessary, strengthen existing policies and develop and implement written procedures governing open meetings. These policies and procedures should specifically require the Governing Board to accept all donations in public meetings and require the District to acknowledge the contribution's receipt, purpose, and value during public meetings.

District Response: The audit recommendation will be implemented.

Response explanation: The district uses ASBA for policy services and will implement any policies involving donations that are appropriate for the district.

Recommendation 12: Consult with legal counsel, as necessary, to ensure that any District actions taken contrary to open meeting laws are appropriately addressed to be made valid.

District Response: The audit recommendation will be implemented

Response explanation: The district will take a list of donations that do not appear to be approved to the Governing Board for approval

Recommendation 13: Develop and implement a fee waiver policy that includes requirements for documenting all fee waivers and a secondary review of all waived fees for appropriateness, and update existing procedures for fee waivers to ensure compliance with the policy.

District Response: The audit recommendation will be implemented.

Response explanation: The district will develop and implement procedures that document the reason for the waiver and for the appropriateness of the waiver.

Finding 5: District did not comply with some conflict-of-interest requirements, increasing the risk that employees and Board members did not disclose substantial interests that might influence or could affect their official conduct

District Response: The Auditor General's finding is agreed to.

Response explanation: The district has a system in place to document all conflict of interest responses for employees but it did not collect them from all employees and Governing Board members. The district has improved the process to ensure conflict of interest forms are obtained for all employees and Governing Board members.

Recommendation 14: Update and enforce its existing conflict-of-interest policies for Board members and employees by requiring Board members and employees to annually submit conflict-of-interest disclosure forms describing any substantial interests they or their relatives may have in any contract, sale, purchase, or service to the District or District decisions, or attesting that no conflicts exist, if applicable.

District Response: The audit recommendation will be implemented.

Response explanation: The district will enforce its existing policy and will ensure that all employees and Governing Board members submit annual disclosure forms

Recommendation 15: Maintain all substantial interest disclosures in a special file available for public inspection, including disclosure forms and Board meeting minutes where a disclosure is documented.

District Response: The audit recommendation will be implemented.

Response explanation: The district will implement the recommendation

Recommendation 16: Establish and implement written procedures to ensure disclosure forms are reviewed for accuracy and completeness and any potential conflicts are fully described, and to identify and remediate any disclosed substantial interests.

District Response: The audit recommendation will be implemented.

Response explanation: The district will implement the recommendation

Recommendation 17: Develop and provide periodic training to Board members and employees on the requirements for complying with conflict-of-interest laws, including the need to describe their substantial interests on disclosure forms and to refrain from participating in any decision, contract, sale, purchase, or service for which they or a relative have a substantial interest; and document the training provided.

District Response: The audit recommendation will be implemented.

Response explanation: The district includes these trainings in the annual all staff inservice but will better document the training, the staff who participated and how the training occurred for those not in attendance.

Finding 6: District lacked processes to consistently collect and validate key outcome data used to assess CTE program effectiveness, resulting in reporting

errors and potentially inaccurate information about programs' success in preparing students for high-need occupations

District Response: The Auditor General's finding is not agreed to.

Response explanation: The district collects and validates key outcome data used to assess CTE program effectiveness but uses a different, more inclusive, definition of outcome data than the definition used in this finding. Other items collected include ADE Technical Skills Assessment scores, certifications earned, annual program evaluation results, and student and parent climate surveys. However, data collection was not always consistently collected, validated, and documented. The district will improve the process to consistently collect, validate, and document data used to assess program outcomes.

Click or tap here to enter text.

Recommendation 18: Develop and implement consistent data-collection protocols for all CTE programs to demonstrate compliance with statutory and ADE requirements and recommended practices. This includes collecting and validating complete data, such as data related to student certifications earned and post-graduate jobs obtained, as well as developing a process to track all outcome data.

District Response: The audit recommendation will be implemented in a different manner.

Response explanation: The district is constantly working to improve data collection for all CTE programs

Recommendation 19: Analyze all CTE program outcome data to evaluate its CTE programs' effectiveness in preparing students for high-need occupations and to support the investment of any public monies and use the results of its evaluations to make changes to its programs to ensure they are meeting their statutory purpose of preparing students for high-need occupations.

District Response: The audit recommendation will be implemented in a different manner.

Response explanation: The district will analyze all CTE program outcome data using the definition and quality metrics that is more inclusive in measuring student success

Finding 7: District's excessive access to its sensitive computerized data and other IT deficiencies increased the risk of unauthorized access to sensitive information, data loss, errors, and fraud

District Response: The Auditor General's finding is agreed to.

Response explanation: The district had turnover in key Information Technology positions during the period of the audit and has since removed the accounts and will continue to improve deficiencies and vulnerabilities.

Recommendation 20: Limit users' access in the accounting system to only those functions needed to perform their job duties.

District Response: The audit recommendation will be implemented.

Response explanation: The district will continuously monitor access to the accounting system and modify as necessary

Recommendation 21: Review and reduce the number of users with administrator-level access to its accounting system to only those individuals with a business need for administrator-level access.

District Response: The audit recommendation will be implemented in a different manner.

Response explanation: The district is relatively small and has limited staff available making it necessary for administrators to perform multiple functions but the district will work to minimize access to the extent possible while maintaining the ability to perform the duties necessary on behalf of the district

Recommendation 22: Immediately disable or remove all accounting system and network accounts that are no longer needed, including those associated with terminated employees.

District Response: The audit recommendation will be implemented.

Response explanation: The district will improve the process for account termination when an employee leaves the district

Recommendation 23: Develop and implement written procedures to address IT system access relative to job duties; promptly remove access when no longer needed; and establish a formal process to periodically review accounting system and network access, including making necessary updates if the reviews identify accounts with more access than necessary.

District Response: The audit recommendation will be implemented.

Response explanation: The district will implement the recommendation

Recommendation 24: Implement and enforce strong authentication controls that align with USFR requirements and credible industry standards to decrease the risk of unauthorized persons gaining access to sensitive District information and disrupting operations.

District Response: The audit recommendation will be implemented.

Response explanation: The district will implement the recommendation

Recommendation 25: Develop and implement a formal process to review the District's authentication controls against credible industry standards at least annually.

District Response: The audit recommendation will be implemented.

Response explanation: The district will implement the recommendation

Recommendation 26: Develop and implement policies and procedures to conduct mandatory security awareness training that meets USFR and credible industry standards for District employees upon hire and at least annually thereafter, and document employee participation and the training provided.

District Response: The audit recommendation will be implemented.

Response explanation: The district will implement the recommendation

Recommendation 27: Develop and implement a Board-approved IT contingency plan that meets USFR requirements and credible industry standards; perform documented tests against the plan, at least annually, to identify and remedy any deficiencies; and update the plan based on the test results.

District Response: The audit recommendation will be implemented.

Response explanation: The district will implement the recommendation

Recommendation 28: Develop and implement policies and procedures to ensure computer and network infrastructure are properly maintained and up to date, including upgrading to vendor-supported software and applications.

District Response: The audit recommendation will be implemented.

Response explanation: The district will implement the recommendation

Recommendation 29: Comply with CIPA requirements by implementing its policies and procedures for student web filtering settings to ensure students are protected.

District Response: The audit recommendation will be implemented.

Response explanation: The district will implement the recommendation