



Office of the Washington State Auditor
Pat McCarthy

Special Report
Alternative Learning Experience
Wellpinit School District No. 49
Stevens County

For the period September 1, 2014 through August 31, 2015

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**Office of the Washington State Auditor
Pat McCarthy**

February 13, 2017

Board of Directors
Wellpinit School District No. 49
Wellpinit, Washington

Report on Alternative Learning Experience

Thank you for the opportunity to work with you to promote accountability, integrity and openness in government. The State Auditor's Office takes seriously our role of providing state and local governments with assurance and accountability as the independent auditor of public accounts. In this way, we strive to help government work better, cost less, deliver higher value and earn greater public trust.

Independent audits provide essential accountability and transparency for District operations. This information is valuable to management, the governing body and public stakeholders when assessing the government's stewardship of public resources.

The attached comprises our report on the District's compliance with alternative learning experience enrollment reporting rules. Our independent audit report describes the overall results and conclusions for areas we examined. We appreciate the opportunity to work with your staff and we value your cooperation during the audit.

Sincerely,

Pat McCarthy
State Auditor
Olympia, WA

TABLE OF CONTENTS

Audit Summary	4
Schedule Of Audit Findings And Responses	7
Information About The District	16
About The State Auditor's Office	17

AUDIT SUMMARY

Results in brief

In most areas we audited, District operations complied with state laws and regulations and its own policies and procedures regarding alternative learning experience (ALE) enrollment. For the year ending, August 31, 2015 the District received approximately \$3.1 Million in combined enrollment and staff mix funding; approximately \$701,636 of this was related to its ALE programs.

However, we identified areas in which the District could make improvements in its Wellpinit Alliance – Columbia Basin J.C. and Wellpinit – Fort Semco High School Programs.

We recommend the District:

- Prepare written student learning plans for each student and include all courses taken, enrolled hours, and other required information within the learning plan.
- Report student FTE each month based on hours identified in learning plans.
- Complete progress evaluations on a monthly basis for all students reported.
- Prepare intervention plans when a student has unsatisfactory progress.
- Maintain documentation to support contact with the student at least every 20 school days.
- Maintain documentation of required records.
- Count only students who are actively enrolled.
- Report all students who meet funding requirements.
- Work with OSPI to determine repayment to the state.

These recommendations were included in our report as a finding.

- Wellpinit Alliance - Columbia Basin J.C. – The program reported 39.10 average annual full-time equivalent (AAFTE). Our audit tested a sample of seven students (4.30 AAFTE) and found 3.94 AAFTE over reported.
- Wellpinit - Fort Semco High School – The program reported 48.80 average annual full-time equivalent (AAFTE). Our audit tested a sample of seven students (4.30 AAFTE) and found 3.22 AAFTE over reported and 0.06 AAFTE underreported.
- Wellpinit Alliance High School– The program reported 14.80 average annual full-time equivalent (AAFTE). Procedures performed over this program were limited to considering internal controls the district has in place to assure compliance with reporting requirements.

Nothing came to our attention to cause us to believe the district did not comply with reporting requirements.

- Wellpinit Alliance-Yakama Nation– The program reported 19.20 average annual full-time equivalent (AAFTE). Procedures performed over this program were limited to considering internal controls the district has in place to assure compliance with reporting requirements. Nothing came to our attention to cause us to believe the district did not comply with reporting requirements.

About alternative learning experience programs

ALE programs are a form of basic K-12 public school education in Washington State. While students in traditional basic education attend classes on campus and have face-to-face contact with teachers and other staff, ALE students may spend most, or even all, of their time outside of a regular classroom setting.

Districts may build Internet-based educational programs that enroll students from anywhere in the state. Besides Internet programs, ALE can be accomplished through a contract between a student and district instructors, or through a parent-partner program in which parents participate in the design and teaching of the student's courses. These programs are different from homeschooling in that students remain part of the public school system and districts claiming funding are responsible for supervision, monitoring, assessing and evaluating the student's education.

Districts may count ALE students for funding when they report enrollment to the Office of Superintendent of Public Instruction (OSPI). In order to claim ALE students for funding, ALE programs must satisfy OSPI's requirement for courses of study leading to a high school diploma. Districts must prepare detailed plans for each student, maintain regular contact with students, and evaluate student progress on a monthly basis. Districts must also keep detailed records to show they have met all of these requirements.

During the period under review, the District operated 4 ALE programs, which accounted for 22 percent of its total basic student enrollment:

- Wellpinit Alliance Columbia Basin J.C. is a program that serves students in grades 10-12. Students work onsite utilizing online instruction. The program has operated for 15 years and non-resident students represent 100 percent of students reported for funding.
- Wellpinit- Fort Semco High School is a program that serves students in grades 10-12. Students work onsite utilizing online instruction. The program has operated for 15 years and non-resident students represent 100 percent of students reported for funding.

- Wellpinit Alliance- Yakima Nation is an onsite program serving students in grades 9-12. The program has operated for 15 years and non-resident students represent 100 percent of students reported for funding.
- Wellpinit Alliance High School is an onsite program serving students in grades 9-12. The program has operated for 15 years and non-resident students represent 42 percent of students reported for funding.

About the audit

Per RCW 28A.232.010, school districts must receive biennial audits of their ALE program. This report contains the results of our independent audit of ALE enrollment at Wellpinit School District No. 49 from September 1, 2014 through August 31, 2015.

Management is responsible for ensuring compliance with applicable ALE requirements. This includes the design, implementation and maintenance of internal controls relevant to these objectives.

Our audit involved performing procedures to obtain evidence about the District's compliance with state laws and regulations and its own policies and procedures, and internal controls over such matters, with regard to its ALE program.

In keeping with general auditing practices, we do not examine every transaction, activity or area. Instead, the areas examined were those representing the highest risk of noncompliance.

SCHEDULE OF AUDIT FINDINGS AND RESPONSES

Wellpinit School District No. 49 Stevens County September 1, 2014 through August 31, 2015

2015-001 Wellpinit School District was over funded \$412,923 in alternative learning experience enrollment in its Wellpinit Alliance – Columbia Basin J.C. and Wellpinit - Fort Semco High School ALE programs due to lack of internal controls.

Background

Alternative learning experience (ALE) is an individualized course of study that school districts may claim for basic education funding provided the district complies with state regulations.

The Office of Superintendent of Public Instruction (OSPI) establishes the rules and provides instructions on ALE enrollment reporting for state funding.

OSPI rules require the District to identify the number of hours each student will be engaged in learning activities within each written student learning plan. The hours identified in the plans are used as the basis to report students for funding. Plans must identify beginning and ending dates and students may not be claimed for funding outside of these dates. Student progress toward planned goals must be assessed on a monthly basis and students may not be reported in the following month when an evaluation is not conducted. If the evaluation determines progress is not satisfactory, an intervention plan to improve student progress must be implemented. In addition, documentation must exist to substantiate student-teacher contact at least every 20 school days.

Description of Condition

Wellpinit School District operates two ALE programs at job corps sites in Moses Lake (Wellpinit Alliance – Columbia Basin J.C.) and White Swan (Wellpinit – Fort Semco High School). The programs provide basic education to students in grades 10-12 and students may attend onsite courses and enroll in APEX online courses. Wellpinit Alliance – Columbia Basin J.C. and Wellpinit – Fort Semco High School reported 39.10 and 48.80 annual average full-time equivalent (AAFTE), respectively. Nonresident students represent 100 percent of students reported for funding in both ALE programs.

We tested 14 students for a total of 86 reported monthly enrollments and found:

- Student learning plans were missing in 48 instances.
- The District claimed more hours than student learning plan stated in 32 instances.
- Monthly evaluations were missing in 41 instances.
- Intervention plans were missing in 8 instances.
- Documentation of contact within 20 school days was missing in 31 instances.
- One Student had no documentation supporting their enrollment or participation in ALE program for 5 months.
- One student was counted for funding for one month after leaving the program.
- One student who met all requirements for funding was not counted for one month.

Cause of Condition

The District did not have internal controls in place to ensure all ALE compliance requirements were met at these remote locations prior to claiming the students for funding.

Effect of Condition

We determined the District over reported 71.74 AAFTE from the Wellpinit Alliance - Columbia Basin J.C. and Wellpinit Fort Semco High School ALE programs, resulting in overfunding of \$412,923.

Recommendation

We recommend the District:

- Prepare written student learning plans for each student and include all courses taken, enrolled hours, and other required information within the learning plan.
- Report student FTE each month based on hours identified in learning plans.
- Complete progress evaluations on a monthly basis for all students reported.

- Prepare intervention plans when a student has unsatisfactory progress.
- Maintain documentation to support contact with the student at least every 20 school days.
- Maintain documentation of required records.
- Count only students who are actively enrolled.
- Report all students who meet funding requirements.
- Work with OSPI to determine repayment to the state.

District's Response

Wellpinit School District would like to thank the Washington State Auditor's Office (the "SAO") for working with the District throughout the audit process. The SAO answered the District's questions and provided helpful recommendations.

Based on these recommendations, the District has set up internal controls to ensure its remote ALE sites comply with all the ALE record-keeping requirements. These controls include performing monthly audits, requiring all sites to use the same forms (the District has adopted the recommended forms from the SAO), providing staff training, and holding staff members accountable through job descriptions.

Our district plans to work closely with OSPI to address and correct the auditor's findings. Having a clean audit for our ALE program is important to the District—as reflected in prior desk audits where our program was found to be compliant.

Auditor's Remarks

We thank the District for its cooperation and assistance during the audit and acknowledge its commitment to improvements. We will review the status of the recommendations during our next audit.

Applicable Laws and Regulations

WAC 392-121-182 Alternative learning experience requirements, states in part:

(3)(f) "Intervention plan" means a plan designed to improve the progress of students determined to be not making satisfactory progress. An intervention plan must be developed, documented, and implemented by a certificated teacher in conjunction with the student and, for students in grades K-8, the student's parent(s). For students whose written student learning plan includes only online courses, the intervention plan may be developed by the school-based

support staff in conjunction with the student and certificated teacher and must be approved by the student's online certificated teacher. At minimum, the intervention plan must include at least one of the following interventions:

(i) Increasing the frequency or duration of contact with a certificated teacher for the purposes of enhancing the ability of the certificated teacher to improve student learning;

(ii) Modifying the manner in which contact with a certificated teacher is accomplished;

(iii) Modifying the student's learning goals or performance objectives;

(iv) Modifying the number of or scope of courses or the content included in the learning plan.

(n) "Written student learning plan" means a written plan for learning that includes at least the following elements:

(i) A beginning and ending date for the student's alternative learning experience courses;

(ii) An estimate by a certificated teacher of the average number of hours per school week the student will engage in learning activities to meet the requirements of the written student learning plan. This estimate must consider only the time the student will engage in learning activities necessary to accomplish the learning goals and performance objectives specified in the written student learning plan;

(iii) For online courses and remote courses, a description of how weekly contact requirements will be fulfilled;

(iv) A description of each alternative learning experience course or course work included as part of the learning plan, including specific

learning goals, performance objectives, and learning activities for each course, written in a manner that facilitates monthly evaluation of student progress. This requirement may be met through the use of individual course syllabi or other similarly detailed descriptions of learning requirements. The description must clearly identify the requirements a student must meet to successfully complete the course or course work. Courses or course work must be identified using course names, codes, and designators specified in the most recent Comprehensive Education Data and Research System data manual published by the office of superintendent of public instruction;

(v) Identification of the certificated teacher responsible for each course or course work included as part of the plan;

vi) Identification of all instructional materials that will be used to complete the learning plan; and

(vii) A description of the timelines and methods for evaluating student progress toward the learning goals and performance objectives specified in the learning plan;

(viii) Identification of whether each alternative learning experience course or course work meets one or more of the state essential academic learning requirements or grade-level expectations and any other academic goals, objectives, and learning requirements defined by the school district.

(4) Alternative learning experience program requirements:

(a) Each student participating in an alternative learning experience must have a written student learning plan

developed and approved by a certificated teacher that is designed to meet the student's individual educational needs. A certificated teacher must have responsibility and accountability for each course specified in the plan, including supervision and monitoring, and evaluation and documentation of the student's progress. The written student learning plan may be developed with assistance from the student, the student's parents, or other interested parties. For students whose written student learning plan includes only online courses, the written student learning plan may be developed and approved by a certificated teacher or a school-based support staff.

(b) Each student enrolled in an alternative learning experience must have one of the following methods of contact with a certificated teacher at least once a school week until the student completes all course objectives or otherwise meets the requirements of the learning plan:

- (i) Direct personal contact; or
- (ii) In-person instructional contact; or
- (iii) Synchronous digital instructional contact.

(c) The educational progress of each student enrolled in an alternative learning experience must be evaluated at least once each calendar month of enrollment by a certificated teacher or, for students whose written student learning plans include only online classes, school-based support staff in accordance with this section. The results of each evaluation must be communicated to the student or, if the student is in grades K-8, both the student and the student's parent. For students whose written student learning plan includes only online courses, a school-based support staff may communicate the progress evaluation to the student. Educational progress must be evaluated according to the following requirements:

- (i) Each student's educational progress evaluation must be based on the learning goals and performance objectives defined in the written student learning plan.

(ii) The evaluation of satisfactory progress must be conducted in a manner consistent with school district student evaluation or grading procedures, and be based on the professional judgment of a certificated teacher.

(iii) In the event that the monthly evaluation is not completed within the calendar month being evaluated, the evaluation must be completed within five school days of the end of the month. Districts must not claim funding for the subsequent month for a student who was not evaluated within that time frame.

(7) Enrollment reporting procedures: Effective the 2011-12 school year, the full-time equivalency of students enrolled in an alternative learning experience must be determined as follows:

(a) The school district must use the definition of full-time equivalent student in WAC 392-121-122 and the number of hours the student is expected to engage in learning activities as follows:

(i) On the first enrollment count date on or after the start date specified in the written student learning plan, subject to documented evidence of student participation as required by WAC 392-121-106(4), the student's full-time equivalent must be based on the estimated average weekly hours of learning activity described in the student's written student learning plan.

(ii) On any subsequent monthly count date, the student's full-time equivalent must be based on the estimated average weekly hours of learning activity described in the written student learning plan if:

(A) The student's progress evaluation conducted in the prior calendar month pursuant to subsection (4)(c) of this section indicates satisfactory progress; or

(B) The student's progress evaluation conducted in the prior calendar month pursuant to subsection (4)(c) of this section indicates a lack of satisfactory progress, and an intervention plan designed to improve student progress has been developed, documented, and implemented within five school days of the date of the prior month's progress evaluation.

(iii) On any subsequent monthly count date if an intervention plan has not been developed, documented, and implemented within five days of the prior month's progress evaluation, the student's full-time equivalent must not be included by the school district in the subsequent month's enrollment count.

(b) The enrollment count must exclude students meeting the definition of enrollment exclusions in WAC 392-121-108 or students who have not had contact with a certificated teacher for twenty consecutive school days. Any such student must not be counted as an enrolled student until the student has met with a certificated teacher and resumed participation in their alternative learning experience or is participating in another course of study as defined in WAC 392-121-107;

(10) Documentation and record retention requirements: School districts claiming state funding for alternative learning experiences must retain all documentation required in this section in accordance with established records retention schedules and must make such documentation available upon request for purposes of state monitoring and audit. School districts must maintain the following written documentation:

(d) The written student learning plans required by subsection (4) of this section;

(e) Evidence of weekly contact required by subsection (4) of this section.

(f) Student progress evaluations and intervention plans required by subsection (4) of this section;

INFORMATION ABOUT THE DISTRICT

Wellpinit School District No. 49 is located on the Spokane Indian Reservation in Stevens County. The District provides educational services to approximately 552 students in kindergarten through 12th grade.

An elected, five-member Board of Directors governs the District. The Board appoints a Superintendent to oversee the District's daily operation as well as its approximately 81 employees. For fiscal year 2015, the District operated on a \$7.6 million annual budget.

Contact information related to this report	
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Audit history

You can find current and past audit reports for the District at <http://portal.sao.wa.gov/ReportSearch>.

ABOUT THE STATE AUDITOR'S OFFICE

The State Auditor's Office is established in the state's Constitution and is part of the executive branch of state government. The State Auditor is elected by the citizens of Washington and serves four-year terms.

We work with our audit clients and citizens to achieve our vision of government that works for citizens, by helping governments work better, cost less, deliver higher value, and earn greater public trust.

In fulfilling our mission to hold state and local governments accountable for the use of public resources, we also hold ourselves accountable by continually improving our audit quality and operational efficiency and developing highly engaged and committed employees.

As an elected agency, the State Auditor's Office has the independence necessary to objectively perform audits and investigations. Our audits are designed to comply with professional standards as well as to satisfy the requirements of federal, state, and local laws.

Our audits look at financial information and compliance with state, federal and local laws on the part of all local governments, including schools, and all state agencies, including institutions of higher education. In addition, we conduct performance audits of state agencies and local governments as well as [fraud](#), state [whistleblower](#) and [citizen hotline](#) investigations.

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We take our role as partners in accountability seriously, and provide training and technical assistance to governments, and have an extensive quality assurance program.

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