



PUPIL MEMBERSHIP AUDITING MANUAL

This manual is subject to changes based upon revisions to the State School Aid Act, Revised School Code, Pupil Accounting Administrative Rules, Attorney General Opinions, Pupil Accounting Manual, and additional clarifications of current Department guidance and policy.

Effective for School Year 2014-2015

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Pupil Membership Auditing Manual

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INTRODUCTION

This manual is provided as a resource to pupil membership auditors in performing desk and field audits of membership count procedures. Specific forms and programs have been developed to ensure that audits meet standards. These requirements apply to all pupils, including those in adult education programs operated by the Michigan Economic Development Corporation –Workforce Development Agency.

Pursuant to §18(4)(d) and §18(8) of the State School Aid Act, the Michigan Department of Education (Department) approves, publishes, annually reviews, and periodically updates this Pupil Membership Auditing Manual and the Pupil Accounting Manual. MCL 388.1618(4)(d) and MCL 388.1618(8). §81(5) of the State School Aid Act requires that each intermediate school district (ISD) employ at least one person who is trained in pupil accounting and auditing procedures, rules, and regulations. MCL 388.1681(5). ISDs must document this training. The auditor must be free of conflicts of interest and must document his/her independence. Auditors may not audit their own work. (See [Appendix A](#), Statement of Independence.)

§18(4) of the State School Aid Act mandates that each district, including each public school academy (PSA), and each ISD have a pupil membership audit either by the ISD auditor or a certified public accountant (CPA). MCL 388.1618(4). The Department has conditionally delegated that decision to districts and ISDs and provides the following guidance for pupil membership audits.

The district, PSA, or ISD (auditee) must:

- Submit the name of its pupil accounting contact person to the ISD auditor.
- Allow the ISD auditor to have access to its pupil accounting records.

The CPA must:

- Perform all steps in the Pupil Auditing Manual, including writing the audit narrative.
- Submit pencil changes to the DS4061 (or an indication of no changes) to the ISD auditor within 20 weeks of the count date.
- Submit a signed narrative to the ISD auditor.
- Allow the ISD auditor to have access to his or her work papers, if necessary.

The ISD must:

- Forward the Duplicate Unique Identification Code (UIC) Auditor View Report for the district being audited to the CPA four weeks after the Michigan Student Data System (MSDS) (DS4061) submission deadline.
- Enter the DS4120 and audit narrative into the MSDS system after reviewing the pencil changes to the DS4061 and audit narrative provided by the CPA.

NOTE: The CPA is responsible for the contents of the DS4120 and audit narrative although the ISD enters them into the system.

CHAPTER 1 –GENERAL REQUIREMENTS

INDEPENDENCE

Auditors must annually document their independence. (See [Appendix A](#), Statement of Independence.) The auditor shall not have a conflict of interest in regard to the school district, building, or program to be audited. With respect to an ISD's Special Education program, the auditor must be organizationally independent and objective. Examples of situations that may present conflicts of interest include the following.

- The auditor is currently employed by the school district, building, or program to be audited.
- The auditor was employed by the school district, building, or program to be audited within the preceding two years.
- The auditor has relatives currently employed by the school district, building, or program.
- The auditor has a personal or financial interest (e.g., service or employment contract) with the school district.

In instances when the auditor is found to have a conflict of interest, the ISD superintendent should be informed and measures should be taken to eliminate the conflict of interest by, for example, reassigning the audit to another auditor or acquiring the services of an outside independent auditor.

AUDIT CYCLE

The Department requires that each building/program be desk audited (see Chapter 2) for each pupil count. Department policy also requires that all high school buildings or programs be field audited (see Chapter 3) at least once every two school years and that all middle school and elementary school buildings be field audited at least once every four school years. Informed professional judgment allows the auditor to change the high school audit cycle to not less than once every three years based on previous field audit results. The rationale for this must be documented in the audit schedule and work papers and noted in the audit narrative.

At least one building or program must be field audited for each district or PSA each year. There is an exception in §18(4)(b) of the State School Aid Act (MCL 388.1618(4)(b)) which allows a district to conduct the pupil accounting field audit biennially if all of the following conditions are met:

- The district operates in a single building with fewer than 700 full-time equated pupils.
- The district has stable membership.
- The error rate of the immediately preceding two pupil accounting field audits of the district is less than 2%.

A Field Audit Planning Schedule must be documented in the work papers. The dates of the last field audit should be noted in the audit narrative. The Field Audit Planning Schedule must also be submitted annually to the Pupil Membership Auditor at the Department's Office of Financial Management - Audits by November 15.

Because of a higher potential for errors, certain individual buildings/programs (e.g., new schools and PSAs) may need to be audited more frequently. The auditor may use discretion in increasing the frequency of field audits. Any deviation in audit frequency must be documented

by the auditor. (See Chapter 3, Field Audits.) A “program” for the purpose of defining the audit scope should be mutually determined by the ISD and the district.

The audit risk, i.e., the risk that the building pupil membership counts may not be accurate, needs to be considered when determining audit frequency. The overall risk assessment for each building and population is based on the auditor’s judgment and must be documented. The risk assessment is used to determine the buildings to be audited and the sample size of pupils to be tested.

In determining the overall risk of a building or program, the auditor should consider the following.

- The results of the prior field and desk audits. Buildings or programs with error rates over 5% should be considered higher risk.
- The effectiveness of district count procedures and controls.
- The experience of district personnel assigned to process pupil count data. (See [Appendix C](#), Local District Planning Form.)
- The frequency of pupil absenteeism noted during the count period.
- The number of nonconventional pupils attending the building.
- The number of State School Aid Act §25e adjustments. MCL 388.1625e.

REQUIRED DOCUMENTATION

The district must submit the reports listed below to the pupil membership auditor.

1. District Level Requirements:
 - a. District or Building/Program Calendar
 - b. Attendance Policy
 - c. Graduation Requirements
 - d. List of Approved Courses
 - e. Record Retention Policy
 - f. Master Teacher Schedule
2. Building/Program Level Requirements:
 - a. Building/Program Schedules
 - b. Building/Program Alpha List - The building/program alpha list must be printed from MSDS and signed by the building principal or authorized representative. The auditor may require the alpha list printed from the district's student information system (SIS) for comparison purposes.
 - c. Nonconventional Pupil Lists - There must be a separate list indicating which nonconventional categories apply to each pupil.
 - d. Attendance Records - There must be a separate list indicating which pupils are absent in any class on the count day and their return date(s) within the 10/30-day period or 45-day period for suspended or expelled pupils.
 - e. Policy Defining Excused and Unexcused Absences
 - f. Excused Absence Documentation
3. Individual Pupil Level Requirements:
 - a. Enrollment Records (CA60)
 - b. Proof of Pupil Identity and Age
 - c. Pupil Class Schedules
4. MSDS Unaudited Full Time Equivalent (FTE) count DS4061 (listing FTEs by grade and totals for the district). This report is generated through the general application collection in MSDS. It is advisable to print the DS4061 from MSDS to ensure that it is the final certified collection.

CHAPTER 2 – DESK AUDITS

DEFINITION

A desk audit is a limited review of the district's documentation to verify that the counts reported for payment of state aid are accurate. A desk audit must be done for each building, in all districts, for every count period.

Desk audits include:

- Review of the Days and Clock Hours documentation
- Review of the 75% attendance documentation
- Review of pupil membership alpha lists
- Verification of the documentation that pupils who were absent on count day returned within the required 10/30 day period, or 45-day period for suspended or expelled pupils
- Identification of nonconventional categories which apply to each pupil
- Resolution of duplicate pupil counts
- Verification of residency-related information on the DS4061
- Review of Schools of Choice documentation
- Verification of teacher certification

The Desk Audit Program (See [Appendix B](#)) provides standardization and allows the auditor to perform the necessary procedures in an effective and efficient manner. It is a checklist and does not constitute complete audit documentation.

CONDUCTING THE DESK AUDIT

1. Review the Pupil Accounting Manual.
2. Review the correspondence file, prior audit work papers, the prior audit report, and any audit or relevant monitoring reports the district received from other sources.
3. Obtain and review the district's excused/unexcused absence policy.
4. Review the Scheduled Days and Clock Hours Report to ensure that the district will meet the required days and clock hours for the current school year. Unlike the other minimum desk audit procedures, the review of the Days and Clock Hours is required annually, not every count period.
5. Review the Attendance Report to verify compliance to date with the 75% attendance requirement in the current school year.
6. Review the alphabetical lists of membership to verify the following.
 - a. The MSDS-generated certified final version alpha list was submitted for audit.
 - b. The alphabetical lists of membership are signed by the building principal or authorized representative. For electronic audits, an affidavit signed by the building principal verifying accuracy of the alpha lists is acceptable.

Attendance is required to be taken on a daily basis. When taking attendance electronically, the district must either use the SIS used by the ISD or give the ISD auditor read-only access to the SIS used by the district.

- c. Pupils who were absent on the count day are identified on separate lists.
- d. Pupils in nonconventional categories are identified on separate lists.

It is the district's responsibility to determine the applicable category for each nonconventional pupil. The auditor should determine whether the documentation provided by the district supports the FTE claimed for the nonconventional category selected.

7. Perform the following procedures to resolve FTE conflicts and adjust FTE counts so that no pupil has an FTE that exceeds 1.0.
 - a. Obtain from the district a status report of unresolved FTE conflicts. Using the FTE Conflict Detection function in MSDS, districts should have identified and resolved as many of the FTE conflicts as possible before the close of the FTE Conflict Resolution process, which ends 6 weeks after count day.
 - b. At the end of the sixth week, obtain supporting documentation for unresolved FTE conflicts.
 - c. Work with districts to make FTE conflict adjustments within the ISD as needed and work with other ISD auditors for FTE conflict adjustments needed in other ISDs. Verify that the conflicts have been resolved before certifying the district's audit narrative.
 - d. If unable to resolve FTE conflicts, contact the Department's Pupil Membership Auditor. Do not leave conflicts unresolved.
8. Review the Drop/Add lists provided by the district to determine the accuracy of pupils dropped or added in close proximity to the count day. Review the Drop/Add lists between the Fall and Spring count days to determine the accuracy of differences in FTE counts. Auditors may also use the FTE Comparison Report in MSDS. For a district whose Fall count is much higher than the Spring count, perform and document the measures taken to determine possible reasons for the difference.
9. Review the Special Education Worksheets A and B to verify all of the following.
 - a. Teacher codes have been included.
 - b. Associated regular education FTE amounts, if any, have been reported in the proper column.
 - c. The resident districts have been identified for pupils being educated outside of their districts of residence.
 - d. FTE totals have been correctly calculated.
 - e. All pupils listed on the worksheets have been identified on the alphabetical lists of membership.
 - f. All pupils received the required number of hours of instruction to be counted for a full FTE. For pupils who received less than the required number of hours of instruction but are counted for a full FTE, review the pupil's Individualized Education Program (IEP) to verify that additional documentation has been recorded and attached to the IEP.
10. Verify the accuracy of FTEs reported in the Additional Information on K-12 Pupils.
 - a. Special Education and General Education FTE. MCL 388.1624. This field only appears on the DS4120 for PSAs and the value must be entered by the ISD.
 - b. New grade levels for the Fall count that have never been offered previously.

11. Verify that the information in the residency-related sections of the DS4061 report matches the residency information on the Pupil Alpha Lists.
12. Schools of Choice may be audited in the desk audit or field audit, depending on where the district's records are maintained. If conducting the Schools of Choice audit during the desk review, which is common when the district records are maintained centrally, verify that:
 - a. The district has signed cooperative agreements for a sample of §105c Special Education pupils accepted since the last field audit. MCL 388.1705c.
 - b. The district certified either that it complied with or that it did not comply with schools of choice provisions in the State School Aid Act.
 - c. If noncompliance exists, report the noncompliance to the Department's Schools of Choice consultant for implementation of the 5% penalty. MCL 388.1705(20) and MCL 388.1705c(20).
13. Evaluate the results of the desk audit and determine if changes need to be made to the district's risk assessment.
14. Verify that teachers hired by the district are properly certified.
 - a. Request the Master Teacher Schedule from the district. The schedule should include all buildings, as some teachers are scheduled for more than one building. If the Master Teacher Schedule is not in Excel format, it is suggested that it be converted to Excel to make for easier searches.
 - b. The Center for Educational Performance and Information (CEPI) will make a newly developed Registry for Educational Personnel (REP) report available in Excel within the MSDS application for each district in the ISD. Run the report in MSDS.
 - c. Compare the Master Teacher Schedule with the REP report. If a teacher is included on the Master Teacher Schedule but not on the REP report, check the Michigan Online Educator Certification System (MOECS) for certification. If a teacher is included on the REP report but not on the Master Teacher Schedule, verify with the district that the teacher is in fact not teaching and therefore, is correctly not included on the Master Teacher Schedule.
 - d. If a teacher is found to not be certified, the ISD auditor must make an FTE adjustment for each student for the class period taught by the non-certified teacher. The FTE adjustment should be made at the student level. Though this may be time consuming, it will simplify §25 adjustments and provide tracking of other audit procedures. The ISD auditor must also notify the Department's Office of Professional Preparation Services (OPPS) at (517) 373-3310 to report the non-certified teacher for the State Aid salary deduct.

Two sections of the State School Aid Act address the use of non-certified teachers by local school districts, intermediate school districts, and public school academies when engaged in instruction.

§6(4) of the State School Aid Act provides that membership is based on the number of full-time equated "pupils in grades K to 12 actually enrolled and in regular daily attendance" on the pupil membership count day and the supplemental count day. MCL 388.1606(4). §6(8) defines "pupils in grades K to 12 actually enrolled and in regular daily attendance" to mean "pupils in grades K to 12 in attendance and receiving instruction in all classes for

which they are enrolled on the pupil membership count day or the supplemental count day, as applicable." MCL 388.1606(8). It further provides that pupils who are absent from a class and do not meet the 10/30 day rule shall have their membership FTE prorated.

§6(8) defines a "class" to mean "a period of time in 1 day when pupils and a certified teacher or legally qualified substitute teacher are together and instruction is taking place." Thus, the period of time when pupil instruction is not being provided by a certified teacher or legally qualified substitute teacher is not a "class" and may not be counted for purposes of determining the number of full-time equated pupils.

In addition to the pupil membership provisions in §6, §163(2) provides that "a district or intermediate district employing teachers or counselors not legally certificated shall have deducted the sum equal to the amount paid the teachers or counselors for the period of noncertificated or illegal employment." MCL 388.1763(2).

These statutory provisions require that the use of non-certified teachers result in both the adjustment of the foundation allowance for any pupil membership FTE associated with the teacher and a school aid adjustment equal to the salary paid during the period of non-certified employment. Beginning in 2014-2015, the Department will increase monitoring of this issue.

EXIT CONFERENCE AND AUDIT ADJUSTMENTS

1. Before completion of the audit, the pupil membership auditor should contact appropriate local district personnel to discuss the following.
 - a. Opportunity for the local district to clarify issues or provide additional documentation for questions identified during the audit.
 - b. General findings – a general comment or an opportunity for the auditor to assist the local school district in identifying ways to improve its documentation or counting procedures to maximize or accurately report FTE memberships.
 - c. Specific findings, along with the associated FTE adjustments. A specific audit finding is a violation of the State School Aid Act, Revised School Code, Pupil Accounting Administrative Rules, or Pupil Accounting Manual that results in the loss of FTE.
 - d. District appeal procedures.
2. If a pupil is added as a result of the desk review, the district must enroll the pupil in MSDS and report the enrollment via the Student Record Maintenance (SRM) collection. The district should also provide a new alpha list to the ISD auditor as proof of the correction.
3. Record FTE adjustments on the FTE Adjustment Form (See [Appendix G](#)).
4. In MSDS, make all DS4061/4120 adjustments at the student level, not the aggregate level.

CHAPTER 3 –FIELD AUDITS

DEFINITION

The objective of the field audit is to verify that the counts reported for payment of state aid are accurate and that FTEs have been properly documented.

In addition to the requirements of the desk audit, the field audit requires the ISD auditor to visit the district building being audited to review pupil membership records.

A field audit also requires the auditor to interview school district pupil accounting personnel and a selection of teachers to determine the possibility that pupil accounting records may have been intentionally altered to secure unfair or unlawful gain.

The auditor determines the risk for each population of pupils:

| | |
|----------------|--|
| Population I | Conventional pupils in attendance on count day |
| Population II | Conventional pupils absent on count day |
| Population III | Pupils included in nonconventional categories |

The auditor selects a sample and examines a percentage of each population of pupils based on the determined risk. All pupils in nonconventional categories are examined separately, based on risk, to determine that all count requirements have been met. (See specific audit steps for each nonconventional category.)

The following is a comprehensive description of field audit procedures. The Field Audit Program ([Appendix E](#)) provides standardization and allows the auditor to perform the necessary procedures in an effective and efficient manner. It is a checklist and does not constitute complete audit documentation. The auditor has discretion in developing alternative audit programs but must:

- 1) Adequately document the work performed and
- 2) Meet minimum audit standards.

RISK ASSESSMENT AND SAMPLE SELECTION

Perform the following planning steps before doing the field audit:

1. Review the Local District Planning Form ([Appendix C](#)).
2. Select and document the buildings for audit based on the audit cycle and a Building Risk Assessment ([Appendix D](#)). Selection criteria should include types of pupils, prior audit findings, rotation schedule, and potential for error.

Obtain a list of the pupils in the following three categories for each building:

| | |
|----------------|--|
| Population I | Conventional pupils in attendance on count day |
| Population II | Conventional pupils absent on count day |
| Population III | Pupils included in nonconventional categories |

Note: It is the district's responsibility to determine the applicable category for each nonconventional pupil. The auditor should determine whether the documentation provided by the district supports the FTE claimed for the nonconventional category selected.

3. Discuss the buildings/programs to be audited and the timing of the audit with responsible local district personnel. Also, provide the local district with a list of items that will need to be available during the field audit. Discussions should also include availability of

workspace for the auditors, access to pupil membership records, and assistance to be furnished by the local district.

4. The Field Audit Planning Schedule should include all buildings for each district in the ISD. At a minimum, it should identify for each building the most recent count for which a field audit was conducted and the schedule for the next field audit. The Planning Schedule must be sent annually to the Pupil Membership Auditor in the Department's Office of Financial Management – Audits by November 15.
5. Determine sample size. A minimum sample must be selected from each population based on the risk assessment at each building in which a field audit is performed.

| | High Risk | Moderate Risk | Low Risk |
|----------------|-----------|---------------|----------|
| Population I | 15% | 10% | 2% |
| Population II | 20% | 15% | 10% |
| Population III | 20% | 15% | 10% |

If the result is not a whole number, the auditor must round up to the next whole number. Auditors may select samples larger than the minimum.

The building audit procedures allow for alternative sample sizes beginning with 60 if a building with a low-risk assessment has over 600 pupil records, or if a moderate or high risk assessment increases the minimum sample size to more than 60.

CONDUCTING THE FIELD AUDIT

1. Perform the steps identified for "All Populations," "Population I," "Population II," and "Population III."
2. Using the Sample Summary and Analysis (See [Appendix F](#)), determine and evaluate each population error rate according to the following:
 - a. Errors in each population are accumulated on a head count basis regardless of the FTE impact. For example, an error of an understatement of .5 FTE and an error of an overstatement of .5 FTE are summarized as two errors, although the cumulative FTE error is zero. The error rate is calculated by dividing the cumulative total number of pupil records in error by the cumulative total number of sample items reviewed.
 - b. If the initial sample was less than 60 and the error rate is 5% or greater, the auditor IS REQUIRED to expand the sample in increments to 25%, 40%, 55%, and 75% of the population. If the sample error rate is still 5% or greater at the 75% increment, the auditor IS REQUIRED to expand to a 100% review of the population.
 - c. If the initial sample selected was 60 or more, the auditor may stop if there is one error or no errors. If there are two or more errors, the auditor IS REQUIRED to expand the sample to 90 and then to 180 and 360 records as follows. If 90 pupil records are reviewed and there are 3 or more errors, the auditor IS REQUIRED to expand the sample to 180 items. If 180 pupil records are reviewed and there are 7 or more errors, the auditor IS REQUIRED to expand the sample to 360 items. If 360 pupil records are reviewed and there are 14 or more errors, the auditor IS REQUIRED to expand to a 100% review of the population.

- d. If errors are isolated, informed professional judgment allows the auditor to focus sample expansion on the subpopulations with the isolated errors. The auditor is encouraged to request that the district identify and correct the isolated errors before expanding the sample.
3. Determine and document the entire building/program error rate. This will be calculated by dividing the total number (on a head count basis) of errors noted in Populations I, II, and III by the total number (on a head count basis) of sample items reviewed in Populations I, II, and III.
 - a. If the building/program error rate is determined to equal or exceed 5% but is less than 10%, the auditor makes a judgment as to whether audit testing should be expanded to audit other like buildings in the district or to audit the same building again for the next pupil membership count.
 - b. If the building/program error rate is determined to equal or exceed 10%, the auditor IS REQUIRED to audit at least one other like building in the district or, if there is no other like building in the district, the auditor should audit the same building again for the next pupil membership count.
 - c. In all cases when an auditor has determined that the building/program error rate is equal to or exceeds 10%, the auditor IS REQUIRED to report the planned sample expansion to the Pupil Membership Auditor at the Department's Office of Financial Management – Audits.
4. Conduct face-to-face interviews with a sample of teachers and pupil accounting personnel to inquire whether they are aware of any inappropriate alterations of their attendance records or any other teacher's attendance records. Sample interview questions include:
 - a) If your district were to inappropriately inflate pupil counts, how could it be done?
 - b) Are you aware of any of your attendance records being inappropriately changed and, if so, what are the details?
 - c) Are you aware of anyone else's attendance records being inappropriately changed and, if so, what are the details?
 - d) Are you aware of the district claiming any inappropriate pupil counts or running inappropriate programs?
 - e) With what other persons should I talk about this?
 - f) Is there anything else that you would like to bring to my attention?

EXIT CONFERENCE AND AUDIT ADJUSTMENTS

1. Before completion of the audit, the pupil membership auditor should contact appropriate local district personnel to discuss the following.
 - a. Opportunity for the local district to clarify issues or provide additional documentation for questions identified during the audit.
 - b. General findings – a general comment or an opportunity for the auditor to assist the local school district in identifying ways to improve its documentation or counting procedures to maximize or accurately report FTE memberships.
 - c. Specific findings, along with the associated FTE adjustments. A specific audit finding is a violation of the State School Aid Act, Revised School Code, Pupil Accounting Administrative Rules, or Pupil Accounting Manual that results in the loss of FTE.
 - d. District appeal procedures.
2. If a pupil is added as a result of the audit, the district must enroll the pupil in MSDS and report the enrollment via the SRM collection. The district should also provide a new alpha list to the ISD auditor as proof of the correction.
3. Record FTE adjustments on the FTE Adjustment Form (See [Appendix G](#)).
4. In MSDS, make all DS4061/4120 adjustments at the student level, not the aggregate level.

SPECIFIC AUDIT PROCEDURES

ALL POPULATIONS

Complete the following audit steps for ALL populations:

1. Pupil Enrollment: Verify that the pupil was enrolled on or before the count date.
2. Pupil Age Requirement: Verify that the pupil met one of the following:
 - a. Pupil was at least five years of age on October 1, 2014 for the school year 2014-2015. Alternatively, if a child does not meet the minimum age requirement to be eligible to attend school for that school year under §1147 of the revised school code, MCL 380.1147, but will be five years of age not later than December 1 of that school year, the district may count the child in membership for that school year if the parent or legal guardian has notified the district in writing that he or she intends to enroll the child in kindergarten for that school year.
 - b. Pupil was less than 20 years of age on September 1 of the current school year or less than 26 years of age on September 1 if a Special Education pupil.
 - c. Pupil was less than 22 years of age as of September 1 of the current school year, had dropped out of school for more than one year and re-entered school, and is enrolled in a public school academy or an alternative education high school diploma program that is primarily focused on educating homeless pupils.
 - d. Pupil is in an alternative education program where adult education participants will be educated in the same program or classroom and was at least 16 years of age on September 1 of the school year.
3. Verify that the pupil does not hold a General Educational Development (GED) certificate or a high school diploma. Special Education pupils may have a GED certificate and continue until age 26.
4. Verify that the district determined the residency status of the pupils as prescribed in the Pupil Accounting Manual.

POPULATION I – CONVENTIONAL PUPILS PRESENT ON THE COUNT DAY

1. Complete the audit steps for “All Populations.”
2. Determine the total of building Population I pupils. (This should be on the building or program alpha list.)
3. Select a sample from the alpha list on a head count basis. The sample may target known risk areas.
4. Verify that the pupil was in attendance and received instruction in all classes on the count day. Attendance records must be taken on a class-by-class basis for buildings/programs in which the pupils change classrooms (such as high schools and middle schools).

EXCEPTION: Class-by-class attendance taking is not required for middle school pupils moving from class to class in a group as opposed to individually moving to various classes.

5. Determine and evaluate the audit error rate. See Chapter 3, Conducting the Field Audit and [Appendix F](#), Sample Summary and Analysis.

**POPULATION II – CONVENTIONAL PUPILS
ABSENT ON ALL OR PART OF COUNT DAY**

1. Complete the audit steps for “All Populations.”
2. Determine the total of building Population II pupils. (This should be on the building or program alpha list and on the count day absence list.)
3. Select a sample of these pupils on a head count basis. The sample may target known risk areas.
4. For pupils absent from one or more classes on the count day, verify that either:
 - a) The pupil had an authorized, documented, excused absence on the count day and attended all classes claimed for membership at least once within 30 calendar days after the count day, or was expelled or suspended and returned within 45 calendar days after the count day, or
 - b) The pupil had an unexcused absence on the count day, was enrolled and in attendance prior to the count day, and attended all classes claimed for membership at least once during one of the next 10 consecutive school days after the count day.

Practical Note: Some auditors find it more efficient to select and test all pupils in a sample of the teacher attendance records rather than to select individual pupils for testing. The sample size drawn should be based on risk (e.g., 10% for low-risk) and may target known risk areas. Auditors should attempt to draw a representative sample and should consider whether very small or large classes will bias the sample. The auditor should document the sample selection process. Auditors should compare all Population II pupils in the sample teacher records to the Population II documentation provided for audit. This is a test of the accuracy of the district’s Population II lists and a general finding should be written if a discrepancy is noted. The auditor should perform Steps 4(a) and 4(b) above for the Population II pupils and, in cases of noncompliance with the 10/30 day rule, expand that individual pupil record audit to class-by-class for return date verification. The auditor should count the Population II pupils in the teacher attendance books selected and document that a sufficient Population II sample was achieved (e.g., 10% for low-risk). Auditors using this optional method will find it efficient to test Population I pupils using the same teacher attendance records.

5. Determine and evaluate the audit error rate. See Chapter 3, Conducting the Field Audit.

POPULATION III – NONCONVENTIONAL PUPILS

1. Complete the audit steps for "All Populations."
2. Determine the total of building Population III pupils. Nonconventional pupils are described in Sections 5 and 6 of the Pupil Accounting Manual.

Note: It is the district's responsibility to determine the applicable category for each nonconventional pupil. The auditor should determine whether the documentation provided by the district supports the FTE claimed for the nonconventional category selected.

3. Select a sample of these pupils on a head count basis in such a manner that each Population III pupil has an equal chance of being selected. If, upon selection of the sample, there are nonconventional categories that have not been represented in the sample, supplement the sample by selecting at least one pupil from each of the unrepresented categories. The sample may target known risk areas.
4. From the sample population of pupils, verify each of the items listed for each Population III section below. Perform the following audit steps for the nonconventional pupils for the category designated by the district.
5. Determine and evaluate the audit error rate. See Chapter 3, Conducting the Field Audit and [Appendix F](#), Sample Summary and Analysis.

5-A: ALTERNATIVE EDUCATION PROGRAMS

Alternative Education – Defined

Alternative Education is a K-12 program that varies in its delivery from the traditional kindergarten through twelfth grade setting. An alternative classroom may vary from a small group of pupils from several grade levels receiving instruction for several subject areas from one certified teacher in a non-graded classroom setting to a program lab in which the certified teacher is present and the pupil works at his or her own pace on assigned subject matter. A pupil may attend on a part-time basis for several hours per day for specified subjects or may attend a one-on-one teacher/pupil session several times a week. The classes must be of subjects that are acceptable for a pupil to earn credit toward a high school diploma or grade level progression.

From the population of pupils designated as 5-A, Alternative Education, review each sampled membership as follows.

A. Learning Labs

From the population of pupils designated as 5-A in Learning Lab programs, review each sampled membership to verify that:

1. The pupil was enrolled in and attending courses that are earning credit toward a high school diploma or GED certificate.
2. The pupil was scheduled for a specified number of lab hours per week.
3. A certified teacher was designated as present in the learning lab at all times.
4. The sign-in and sign-out sheets, and the teacher's attendance records documented the actual hours per week the pupil attended the learning lab and that the pupil attended the minimum number of hours scheduled and claimed.
5. The pupil did not generate more FTE per course than would have been generated by a pupil in a traditional classroom setting.

B. Cooperative Agreement Programs

See 5-B, Cooperative Agreement Programs.

C. Pupil Expelled Under Mandatory Expulsion

See 5-C, Home-Based.

D. School of Choice

See 5-I, Schools of Choice.

E. Seat Time Waivers

See 5-O-B, Seat Time Waivers.

5-B: COOPERATIVE AGREEMENT PROGRAMS

Cooperative Agreement – Defined

A Cooperative Agreement Program involves a written voluntary agreement between and among districts to provide certain educational programs for pupils in certain groups of districts. The written agreement shall be approved by all affected districts at least annually and must specify the educational programs to be provided and the estimated number of pupils from each district who will participate in the educational programs. A pupil enrolled in a cooperative agreement program may be counted in membership in the pupil's district of residence with the written approval of all parties to the cooperative agreement.

A. Cooperative Agreement - Special Education

From the population of pupils designated as 5-B in Special Education Cooperative Agreement Programs, review each sampled membership to verify that:

1. A written, voluntary agreement between or among the educating districts exists.
2. The Special Education pupil is less than 26 years of age on September 1 of the current school year. (A Special Education pupil may have a GED certificate and continue until age 26.)

B. Cooperative Agreement - Career and Technical Education (CTE) Program/Vocational Education Program

From the population of pupils designated as 5-B in CTE/Vocational Education Programs, review each sampled membership to verify that:

1. Classes were taught or monitored by a certified teacher employed by the district or ISD.
2. The pupil is enrolled and evaluated on learned skills and performance.
3. The courses are part of the pupil's curriculum and count toward earning a high school diploma.
4. The pupil is less than 20 years of age for General Education pupils or less than 26 years of age for Special Education pupils on September 1 of the current school year.
5. The pupil has not earned a high school diploma or a GED certificate. A Special Education pupil with a GED certificate may continue until the age of 26.

C. Cooperative Agreement – Other (cooperative agreements may be required for the following.)

1. Alternative Education
See 5-A, Alternative Education Programs.
2. Nonessential Electives of Nonpublic and Home-Schooled Pupils
See 5-E, Nonpublic Part-Time Pupil and Home-Schooled Pupils.
3. Early/Middle College Programs
See 5-G-B, Early/Middle College Programs.

5-C: HOME BASED

1. Expelled Under Local District Policy

From the population of pupils designated as 5-C, expelled under local district policy, review each sampled membership to verify that:

1. The district provided at least two nonconsecutive hours of instruction per week to the pupil under the supervision of a certified teacher.
2. The district provided instructional materials, resources, and supplies that are comparable to those otherwise provided in the district's alternative education program.
3. Scheduled courses are offered for credit and placed on the pupil's transcript.
4. The membership claimed is prorated and limited to the actual hours of instruction.

2. Expelled Under Mandatory Expulsion Law

From the population of pupils designated as 5-C, expelled under the mandatory expulsion law, review each sampled membership to verify that:

1. The district provided at least two nonconsecutive hours of instruction per week to the pupil under the supervision of a certified teacher.
2. The district provided instructional materials, resources, and supplies that are comparable to those otherwise provided in the district's alternative education program.
3. Scheduled courses are offered for credit and placed on the pupil's transcript.
4. Each pupil has an individualized program, i.e., a certified teacher is with only one pupil during the instructional period. If a teacher is with more than one pupil at a time, it is not an individualized program and the FTE must be prorated.

5-D: HOMEBOUND and HOSPITALIZED

From the population of pupils designated as 5-D, Homebound and Hospitalized, review each sampled membership to verify that:

1. The membership was supported by written certification of an appropriate physician, hospital, or licensed treatment facility, evidenced by one of the following:
 - a. Written certification from the pupil's attending physician verifying that the pupil has a medical condition that requires the pupil to be hospitalized or confined to home during regular school hours for a period longer than five school days. The certification must be by a physician who is an MD or a DO.
 - b. Written certification from a hospital or a licensed treatment facility verifying that the pupil has a medical condition that requires the pupil to be hospitalized in the facility during regular school hours for a period of longer than five school days.
2. A certified teacher provided a minimum of two 45-minute periods of pupil instruction per week for General Education pupils and a minimum of two nonconsecutive one-hour periods of instruction per week for Special Education pupils. If required by the IEP, a certified Special Education teacher must provide the instruction.

Pupil instruction is required each week of the count period if the pupil is being counted for membership unless the pupil has a documented excused absence that prevents the pupil from receiving services during a week, or if instruction has been canceled district-wide for the district during the week for three or more days. Instruction must be provided each week once homebound or hospitalized services are requested. Failure to provide these services weekly results in the loss of the FTE or the reclassification of the pupil from Homebound and Hospitalized to Part-time with a prorated FTE based on the amount of instruction provided.

3. Appropriate attendance records show the dates and amount of time the pupil received Homebound or Hospitalized services. Attendance records must be signed by the certified teacher providing the service.

5-E: NONPUBLIC PART-TIME and HOME-SCHOOLED

From the population of pupils designated as 5-E, Nonpublic Part-Time and Home-Schooled, review each sampled membership to verify that:

1. The nonpublic school is registered with the Department as a nonpublic school and meets all state reporting requirements for nonpublic schools.
2. Instruction is scheduled to occur during the regular school day.
3. The instruction is provided by a certified teacher at the district or public school academy or the intermediate school district.
4. The curricular offering is also available to full-time pupils in the pupil's grade level or age group in the district or PSA during the regular school day at a public school site.
5. The curricular offering is restricted to nonessential elective courses for pupils in grades 1-12. Kindergarten pupils are ineligible for membership under a shared-time program.
6. The pupil is a part-time pupil for purposes of the State School Aid Act, MCL 388.1601, et seq.
7. The course length and grading system are similar to those of the course offered to public school pupils.
8. Daily attendance records are maintained and comply with district policies and procedures.

5-F: PART-TIME

From the population of pupils designated as 5-F, Part-Time, review each sampled membership to verify that:

1. The pupil is enrolled and attending one or more classes in the district.
2. The sum of the total FTE for a pupil enrolled in more than one district does not exceed 1.0 FTE.
3. The computation of the part-time FTE is accurate.

Note: For part-time pupils, consider the risk that this is a nonpublic school pupil. For example, consider why the pupil is less than full-time. If there is a risk that this is a nonpublic or home-schooled pupil, review the pupil's enrollment record, transcript, and other records to determine if the pupil is a bona fide public school pupil.

**5-G-A: POSTSECONDARY ENROLLMENT OPTIONS
and CAREER AND TECHNICAL PREPARATION DUAL ENROLLMENT PROGRAMS**

From the population of pupils designated as 5-G-A, Postsecondary Enrollment Options and Career and Technical Preparation Dual Enrollment Programs, review each sampled membership to verify that:

1. The pupil was enrolled in one of grades 9 through 12 during the year of the postsecondary dual enrollment.
2. The public school pupil was concurrently enrolled in and attending at least one high school course.
3. The eligible postsecondary institution has submitted to the district, on behalf of the eligible pupil, a notice indicating the course(s) in which the pupil is enrolled, the hours of enrollment, and a list of eligible charges.
4. The district paid the eligible charges related to the pupil's postsecondary enrollment up to a prorated part of the statewide pupil-weighted average foundation that is allocated to each course.
5. Fifty percent of the postsecondary education course or career and technical preparation course falls within the school district's academic year. A course that is in session more than 50% of the time during summer break is ineligible to be counted.
6. The postsecondary course(s) must be academic in nature or applicable to career preparation. The postsecondary course(s) must apply toward the satisfaction of certificate, degree, or program completion requirements, and may not be in the subject areas of physical education, theology, divinity, or religious education. Hobby craft and recreational courses are not eligible.
7. The pupil has been claimed for not more than 1.0 FTE during the count for a public school pupil, and not more than .99 FTE for a nonpublic pupil. The district shall not artificially lower the FTE claimed for a nonpublic pupil in order to meet this requirement. If the pupil's FTE calculation is 1.0 FTE, the pupil is considered a public school pupil and is subject to the membership criteria for such a pupil under §6 of the State School Aid Act (MCL 388.1606)
8. The pupil does not participate in intercollegiate athletics at the postsecondary institution.
9. The pupil has not enrolled in high school for more than four school years, including the school year in which the pupil seeks to enroll in an eligible course under the dual enrollment acts, unless the pupil was eligible under Administrative Rule 388.153.
10. The pupil was enrolled in no more than a total of 10 postsecondary courses as defined in MCL 388.513(1)(d).
11. The postsecondary course was not offered by the local public school or state-approved nonpublic school in which the eligible pupil was enrolled (unless the course was unavailable to the eligible pupil due to a scheduling conflict beyond the eligible pupil's control).
12. The career and technical preparation program was not offered through the school district, intermediate school district, area vocational-technical education program, or state-approved nonpublic school in which the pupil was enrolled or the course was unavailable to the eligible pupil due to a scheduling conflict beyond the eligible pupil's control.
13. For eligible nonpublic pupils who are receiving high school credit in addition to postsecondary credit, the course selection was limited to nonessential elective course.

14. For fifth year high school pupils enrolled in an alternative education program, the pupil was enrolled in not more than two postsecondary dual enrollment courses taken at any given time and not more than four postsecondary enrollment courses taken during the school year.
15. For fifth year high school pupils enrolled in an alternative education program, the pupil had a plan on file at the district to complete district graduation requirements within the academic year, including postsecondary dual enrollment options. The plan was signed by the principal or designee, the parent or legal guardian, and the pupil. If the pupil was at least age 18 or an emancipated minor, the pupil may have acted on his or her own behalf.

5-G-B: EARLY/ MIDDLE COLLEGE

From the population of pupils designated as 5-G-B, Early/Middle College, review each sampled membership to verify that:

1. The pupil may be considered full-time if one of the following was satisfied:
 - a. The combined number of classes in which the pupil was enrolled and which the pupil was attending at the high school and at an eligible postsecondary institution equaled the number of scheduled classes per day at the high school necessary to reach the minimum required hours for a full-time pupil. Actual hours of instruction do not need to be calculated.
 - b. The combined number of classes in which the pupil was enrolled and which the pupil was attending at the high school and at an eligible postsecondary institution equaled the number of scheduled classes per day at the high school necessary to meet the minimum instructional time requirements of a reduced schedule. Actual hours of instruction do not need to be calculated.
 - c. The sum of the actual instructional hours in which the pupil was enrolled and which the pupil was attending the high school and an eligible postsecondary institution plus the actual travel time met the minimum number of hours required to meet a reduced schedule.
 - d. The pupil met the postsecondary institution's definition of a full-time college pupil.
2. The pupil was enrolled in a school district that had a separate designation in the Educational Entity Master (EEM) indicating that the district provides an early/middle college school or early/middle college program.
3. The pupil was enrolled in at least one high school class in a school district or state-approved nonpublic school in Michigan.
4. The pupil was not a foreign exchange pupil enrolled under a cultural exchange program.
5. The pupil had at least one parent or legal guardian who was a Michigan resident.

5-H: REDUCED SCHEDULE

From the population of pupils designated as 5-H, Reduced Schedule, review each sampled membership to verify that:

1. The pupil and/or pupil's parent/guardian submitted a written request for a reduced schedule that details the reason that a reduced schedule would be in the best educational interest of the pupil. The request must be signed by the pupil. If the pupil is less than 18 years of the age, the request must also be signed by the pupil's parent or legal guardian.
2. The local school district's counselor or other authorized representative evaluated the reason for the request and determined that a reduced schedule was in the best educational interest of the pupil.
3. The local school district scheduled the pupil for at least 80% of the required minimum hours of instruction for the school year or, for a district operating a four-block schedule, at least 75% of the minimum required hours for the school year.

5-I: SECTION 105 AND SECTION 105C SCHOOLS OF CHOICE

Schools of Choice may be audited in the desk review or field audit, depending on where the district's records are maintained. If conducting the Schools of Choice audit during the field audit, which most commonly occurs when the district records are maintained at individual buildings, review each sampled membership to verify that:

1. The district has signed cooperative agreements for a sample of §105c Special Education pupils accepted since the last field audit.
2. The district certified either that it complied with or that it did not comply with Schools of Choice provisions in the State School Aid Act.

If noncompliance exists, report the noncompliance to the Department's Schools of Choice consultant for implementation of the 5% penalty.

5-K: SPECIAL EDUCATION EARLY CHILDHOOD PROGRAMS AND SERVICES

From the population of pupils designated as 5-K, Special Education Early Childhood Programs and Services, review each sampled membership to verify that:

For pupils educated under Administrative Rule 340.1754 (Special Education programs):

1. An IEP was on file and effective as of the count day
2. The pupil was enrolled and receiving instruction on or before the count day.
3. The pupil was enrolled in a bona fide program as described in the Pupil Accounting Manual on or before the count day.
4. The FTE was accurately calculated by determining the number of instructional hours scheduled and provided and dividing that number by 450.
5. The membership was split equitably between Special Education and General Education for a pupil who was five years of age, attended kindergarten, and had an IEP.

For pupils educated under Administrative Rule 340.1755 (Special Education services):

1. An IEP or Individualized Family Service Plan (IFSP) for Michigan Special Education eligible pupils was on file and effective as of the count day.
2. The pupil was assigned to an approved or endorsed early childhood Special Education teacher or approved related service provider on or before the count day.
3. The pupil was scheduled for a minimum of 72 hours during the school year and documentation is available that such services were provided.
4. The pupil's IEP identified Rule 340.1755 services, including the frequency, duration, and location of the services.
5. For pupils receiving services from related staff, there is documentation that the related staff worked under the educational direction of an approved or endorsed early childhood Special Education teacher.
6. FTE was calculated by determining the number of instructional hours scheduled and provided and dividing that number by 180.

For pupils educated under Administrative Rule 340.1862 (Individualized Family Service Plan):

1. The pupil's Individualized Family Service Plan (IFSP) was on file and effective as of the count day.
2. The pupil was assigned to an approved or endorsed early childhood Special Education teacher or approved related service staff on or before the count day.
3. The pupil was scheduled for a minimum of 72 hours during the one calendar year and documentation is available that such services were provided.
4. The pupil's IFSP identified Rule 340.1862 services, including the frequency, duration, and location of the services and it must indicate the child was eligible for Michigan mandatory special education.
5. For pupils receiving services from related staff, there is documentation that the related staff worked under the educational direction of an approved or endorsed early childhood Special Education teacher.
6. FTE was calculated by determining the number of instructional hours scheduled and provided and dividing that number by 180.

5-L: SPECIAL EDUCATION PUPIL TRANSITION SERVICES

From the population of pupils designated as 5-L, Special Education Pupil Transition Services, review each sampled membership to verify that:

1. The pupil was enrolled and in attendance on the pupil membership count day.
2. The pupil was assigned to a Special Education teacher employed by the educating district.
3. The pupil met the 1,098 hours requirement to be counted full-time. Less than 1,098 hours results in a prorated FTE.
4. In addition to 1-3 above, see 5-P, Special Education Work-Based Learning Experiences (WBLE)
5. Work Activity Center Services: In addition to 1-3 above, membership for pupils receiving Work Activity Center Services must also be based on the following:
 - a. The activities for which the pupil was paid were incidental to the instructional program (i.e., less than 50% of the pupil's school time).
 - b. If the pupil was engaged in activities where a wage was paid for more than 50% of the time in a work activity center service, the time over 50% did not count toward pupil membership. A pupil who attended school less than 50% of his or her time may only be counted for the time instruction was received under the direct supervision of a teacher.
6. Transition Community Living Experience (TCLE): In addition to 1-3 above, membership for pupils receiving transition community living experiences must be based on the following:
 - a. By the pupil membership count day, the district must have had in place a training plan and training agreement with the community living experiences site which set forth expectations and standards of attainment.
 - b. The community living experience component must have been approved by the local school board and must contain learning objectives and standards for determining pupil progress.
 - c. The community living experiences must have been monitored by a designated school Special Education teacher.
 - d. The community living experiences must be documented on the pupil's schedule and a grade or credit must be given based upon the assessment of progress towards the achievement of the pupil's school goals.
 - e. The community living experiences site must have taken pupil attendance and maintained verified records of that attendance.

5-M: SPLIT SCHEDULE

From the population of pupils designated as 5-M, Split Schedule, review each sampled membership to verify that:

1. The district has accurately computed the number of instructional hours.
2. The FTE calculation was accurate. The sum total of the FTE for the pupil, in all buildings and programs, may not be more than 1.0.

5-N: SUSPENDED AND EXPELLED

From the population of pupils designated as 5-N, Suspended and Expelled, review each sampled membership to verify that:

For in-school short-term suspensions:

1. The attendance book of the teacher of record shows the pupil absent from class due to suspension.
2. The pupil was supervised by a certified staff member with attendance taken where the suspension was served.

For long-term suspensions or expulsions:

1. Attendance was taken where the suspension was served.
2. Pupil instruction was provided by a certified teacher.
3. Instruction was academic in nature and resulted in credit toward grade progression or a high school diploma.
4. Membership was prorated based upon the minimum required hours of pupil instruction for grades 1-12.
5. Nonresident pupils enrolled in and attending an alternative education program who have been suspended or expelled from the resident district may be counted for membership purposes without a release from the resident district.

For permanently expelled pupils:

1. The pupil was enrolled in the district for the purpose of receiving instruction.
2. The district worked with the pupil to develop an instruction plan for self-study.
3. The district provided the text books and other instructional materials.
4. A certified teacher provided a minimum of two nonconsecutive hours of direct pupil instruction per week. The district may supplement the pupil's instruction with virtual courses but the virtual course(s) cannot replace the required two one-hour sessions.

5-O-A: VIRTUAL LEARNING, DISTANCE LEARNING, AND INDEPENDENT STUDY

From the population of pupils designated as 5-O-A, Virtual Learning, Distance Learning, and Independent Study, review each sampled membership to verify that:

1. The pupil was enrolled and attending on the count day(s) if membership is being claimed pursuant to §6(8) and §6a of the State School Aid Act (MCL 388.1606(8) and MCL 388.1606a). Pupils enrolled in self-scheduled courses that take place off site satisfy the attendance requirement for the off-site self-scheduled course by attending an on-site course in which they are concurrently enrolled on the count day(s).
2. The pupil was enrolled in the course and the course is reflected on the pupil's class schedule on count day.
3. The course is academic in nature and approved by the board of education of the school district or board of directors of the public school academy.
4. The course generates credit toward a high school diploma or grade progression.
5. The course counts as one course on the pupil's class schedule.
6. The course generates an amount of FTE that is comparable to the FTE that the course would generate if offered through a traditional format.
7. The teacher of record was identified. A second teacher, who does not necessarily hold Michigan teacher certification, may be associated with the distance learning or virtual course.
8. An on-site mentor was assigned and available for assistance to the pupil. The on-site mentor must be a Michigan certified teacher employed by the school district.
9. If the course was offered using a blended learning format, the pupil must be physically in attendance on count day. For a pupil who is absent on count day, the attendance criteria are met if the pupil physically returns to school within the required 10/30 day period.
10. Grade Eligibility
 - a. Virtual learning:
 - i. On-site with an adult present other than a certified teacher: K-12
 - ii. Self-scheduled: K-12
 - iii. On-site with a certified teacher of record in the classroom: K-12
 - b. Distance learning: K-12
 - c. Independent study: 9-12
11. Number of courses allowed per count:
 - a. No more than a total of two of any combination of the following:
 - Virtual learning, on-site with an adult present other than a certified teacher
 - Virtual learning, self-scheduled
 - Independent study
 - b. No limit on the following:
 - Virtual learning, on-site with a certified teacher of record in the classroom
 - Distance learning

5-O-B: SEAT TIME WAIVER

From the population of pupils designated as 5-O-B, Seat Time Waiver, review each sampled membership to verify that:

1. The pupil was enrolled and attended on the count day(s) if membership is being claimed pursuant to §6(8) and §6a of the State School Aid Act (MCL 388.1606(8) and MCL 388.1606a). These requirements shall be satisfied as described in item 2.
2. The pupil met both attendance and participation requirements or no FTE was granted.
 - a. **Attendance** shall be measured using one of the following methods:
 - i. The pupil was physically present for scheduled on-site instruction at the school site on count day or the first day after the count day that the pupil was scheduled for on-site instruction. The pupil must attend one period for each course scheduled under the seat time waiver, and each period must represent the amount of time required for the course, if offered traditionally. For a pupil who is absent on count day, the attendance requirement may be satisfied if the pupil returns within 10 school days of an unexcused absence or within 30 calendar days of an excused absence.
 - ii. The pupil logged into at least one program-sponsored online course shown on his or her class schedule on count day, and then logged into at least one program-sponsored online course on his or her class schedule on nine separate days during the 30-day count period, for a total of 10 logins on separate days. When this method for meeting the attendance requirement is used, the pupil must have logged in on count day and nine additional calendar days during the count period. For a pupil who has an excused absence on count day, the pupil must complete a login on each of ten days within 30 calendar days of count day.
 - b. **Participation** shall be measured using two-way interaction between the teacher of record and the pupil which must occur at least one time per week for each week of the four-week count period. The first week in which participation will be measured begins on count day (Wednesday) and continues through the following Tuesday. Each consecutive week shall start on Wednesday and end on the following Tuesday, for a total of four weeks including the week that began on count day. The district shall document and retain an online activity log detailing two-way interactions for each seat time waiver pupil.
3. Each course counted as only one class on the pupil's class schedule and generated the same portion of FTE membership that a comparable on-site course offered by the district would generate unless the course was determined to provide less instructional time, in which case the FTE would be prorated according to the number of instructional hours provided. The pupil must have had a course-specific class schedule for the current count that included all enrolled courses counting toward membership for the pupil.
4. The teacher of record was a Michigan certified teacher employed by the district. The teacher of record also served as the on-site mentor, monitored the pupil's progress, and was available for assistance.
5. The pupil met the requirements defined for the specific program or course types in which the pupil was enrolled, including those defined in legislation, administrative rule, and the Pupil Accounting Manual.
6. The district must provide all documentation requested by the pupil membership auditor within five business days of the request.

5-O-C: CYBER SCHOOLS

From the population of pupils designated as 5-O-C, Cyber Schools, review each sampled membership to verify that:

1. The pupil met the membership eligibility requirements. A pupil's participation in the cyber school's educational program is considered regular daily attendance and membership.
2. The pupil was enrolled in the participating district and attending on the pupil membership count day(s). One or more of the following must be met to satisfy the attendance requirement:
 - a. The pupil attended a live lesson from the teacher.
 - b. The pupil logged into a lesson or lesson activity and the login was documented.
 - c. The pupil and teacher engaged in a subject-oriented telephone conversation.
 - d. There is documentation of an email dialogue between the pupil and teacher.
 - e. There is documentation of activity/work between the learning coach and pupil.
 - f. An alternate form of attendance as determined and agreed upon by the cyber school and intermediate school district auditor was met.
3. The pupil participated in all courses on count day to satisfy the participation requirement. If absent on count day, the pupil attended and participated in class as required by the 10/30 day rule.
4. The cyber school provided full-time instruction, and the pupil had a schedule based upon the school's criteria for a full-time pupil.

5-O-D: EXPANDED ONLINE LEARNING

From the population of pupils designated as 5-O-D, Expanded Online Learning, review each sampled membership to verify that:

1. The pupil was enrolled and in attendance on count day. For off-site and self-scheduled pupils, the pupil was in attendance on count day for a course in which the pupil was concurrently enrolled with the primary educating district.
2. The pupil was enrolled in any of grades 6-12.
3. Each course counted under this section was selected from the course syllabi published in the statewide online course catalog maintained by the Michigan Virtual University (MVU) or in the district's online course catalog.
4. Unless the pupil was newly enrolled in the district, the request for online course enrollment was made in the academic term, semester, trimester, or summer preceding the enrollment. The pupil was enrolled in the course on count day and the course was reflected on the class schedule of the primary district that claimed the pupil in membership.
5. The course did not generate more FTE than a comparable course offered in a traditional format by the district. Courses which offer less instruction than a comparable course must have their FTE prorated.
6. The district did not count the pupil for more than two online courses per count unless the pupil demonstrated previous success with online courses and the school leadership and the pupil's parent or legal guardian determined that it was in the best interests of the pupil to enroll him or her in more than two online courses in a specific academic term, semester, or trimester.
7. Each online course placed in a local catalog or in the statewide online course catalog by a local district was academic in nature and approved by the board of education of the school district or board of directors of the public school academy.
8. The course was capable of generating credit toward the pupil's high school diploma or grade progression.
9. A teacher who holds a valid Michigan teaching certificate was identified and assigned to the course. An on-site mentor employed by the district was also assigned to the pupil.
10. A pupil who was absent on count day must return within the 10/30 day rule period.
11. The pupil had a parent or legal guardian's consent for enrollment in the online course(s). Consent is not required if the pupil was at least age 18 or an emancipated minor.

5-P: WORK-BASED LEARNING EXPERIENCES (WBLE)

From the population of pupils designated as 5-P, Work-Based Learning Experiences, review each sampled membership to verify that:

1. The pupil was eligible to receive high school credit for his or her participation in the WBLE.
2. The district had a written **training agreement** in place on the count date which included:
 - a. The pupil's personal information, including name, home address, telephone number, date of birth, and emergency contact information.
 - b. The school's name, address, telephone number, and contact person.
 - c. The employer's name, address, telephone number, and contact person.
 - d. The responsibilities of the employer, school, and pupil.
 - e. Beginning and ending dates of the agreement.
 - f. Daily hours to be worked, including beginning and ending times.
 - g. The beginning rate of pay, if paid work-based learning experience.
 - h. Verification that appropriate safety instruction was provided.
 - i. Verification of the employer's worker's disability compensation insurance and general liability insurance.
 - j. Signatures of the principal or designee, certified teacher if non-CTE or a vocationally certified teacher/coordinator if CTE work-based learning, pupil, parent/guardian, and training station supervisor (employer).
 - k. A statement of assurance signed by the employer that a pupil will not be discriminated against on the basis of race, color, religion, national origin, sex, age, or disability.
 - l. A district statement of assurance of compliance with federal laws relating to nondiscrimination.
3. The district had a written **training plan** in place by the count date which included:
 - a. Verification by the certified teacher that the pupil's career or education goals as outlined in his or her education development plan relate to the placement.
 - b. A list of performance elements that contribute to the pupil's progress toward a career objective. For WBLE State-Approved CTE programs, performance elements as established by the Department's Office of Career and Technical Education must be used.
 - c. For WBLE Non-CTE programs, identification of the academic course(s) that generate credit toward a high school diploma and that relate to and prepare the pupil for job placement.
 - d. Signatures of the principal or designee, certified teacher if non-CTE or a vocationally certified teacher/coordinator if CTE work-based learning, pupil, parent/guardian, and training station supervisor (employer). If the training plan and training agreement are combined, one set of signatures is sufficient.
4. The employer or certified teacher/coordinator maintained and verified records of the pupil's attendance throughout the duration of the training agreement.

5. Safety instruction appropriate to the placement was provided by the district and documented in either the training plan or the training agreement.
6. The WBLE did not generate more than one-half (.50) of the pupil's FTE.
7. The employment did not exceed the maximum hours set by the district.
8. Eligible Grades
 - a. Non-CTE: 9-12
 - b. State-Approved CTE: 11-12
9. Regular Visitation Plan
 - a. Non-CTE:
 - i. WBLE: Every nine weeks
 - ii. WBLE for Pupils with Disabilities: Every 30 days
 - iii. In-district Placement/Transition Services: Every 30 days
 - b. State-Approved CTE: Every nine weeks
10. Monitored by Certified Instructors
 - a. Non-CTE:
 - i. WBLE: Certified secondary teacher
 - ii. WBLE for Pupils with Disabilities: Visitations by certified district teacher; Special Education teacher assigned
 - iii. In-district Placement/Transition Services: Certified district teacher
 - b. State-Approved CTE: Vocationally certified teacher/coordinator
11. Additional Requirements
 - a. Non-CTE:
 - i. WBLE
 1. Compliance with federal and state regulations related to the employment of minors
 2. Current or prior enrollment in related course
 - ii. WBLE for Pupils with Disabilities: None
 - iii. In-district Placement/Transition Services: Placement relates to the pupil's transition services plan.
 - b. State-Approved CTE:
 - i. Paid or Unpaid Capstone WBLE
 1. Has successfully completed 50% of state-approved CTE program
 2. Must work minimum of 10 hours per week
 3. Must attend related CTE class or capstone class minimum of 40 minutes per week
 - ii. Unpaid WBLE/In-district WBLE (Rotations/Clinicals): 45 hours per specific training experience
 - iii. Unpaid In-District WBLE: 45 hours per specific training experience
 - iv. Less-Than-Class-Size
 1. A completed and signed notification received by the OCTE
 2. Time equivalent to state-approved CTE program
 3. No more than four pupils per instruction by LTCS annually authorized personnel

5-Q-A: SECTION 23a DROPOUT RECOVERY PROGRAM

From the population of pupils designated as 5-Q-A, Dropout Recovery Program, review each sampled membership to verify that:

1. The pupil was counted as 1/12th of an FTE for each month that the pupil was enrolled in the dropout recovery program and in full attendance.
2. The pupil was not counted for more than 1.0 FTE under this section.
3. The pupil was in full attendance for a month.
4. The dropout recovery program only enrolled eligible pupils.
5. The pupil met at least one of the following criteria:
 - a. The pupil had been expelled from school under the mandatory expulsion provisions in §1311 or §1311a of the Revised School Code.
 - b. The pupil was suspended or expelled from school under a local policy.
 - c. The pupil was referred by a court.
 - d. The pupil was pregnant or a parent.
 - e. The pupil was previously a dropout.
 - f. The pupil was determined by the district to be at risk of dropping out.
6. The dropout recovery program provided an advocate. All of the following apply:
 - a. An advocate may serve in that role for more than one pupil but no more than 50 pupils.
 - b. An advocate may be employed by the district or may be provided by an education management organization that is partnering with the district.
 - c. Before an individual was assigned to be an advocate, the district complied with §1230 and §1230a of the Revised School Code with respect to that individual.
7. The program developed a written personalized learning plan that was in place on or before the first school day of the month for the first month the pupil participated in the program.
8. The program monitored the pupil's progress against the written learning plan.
9. The program required each pupil to make satisfactory monthly progress as defined by the district.
10. The program reported the pupil's progress results to the partner district at least monthly.
11. The program was operated on or off a district school campus but was operated using distance learning online only if the program provided a computer and Internet access for each eligible pupil participating in the program.
12. The program was operated throughout the entire calendar year (12-month program).
13. If the district partnered with an education management organization, the organization had a dropout recovery program partnership relationship with at least one other district.

5-Q-B: SECTION 25e PUPIL MEMBERSHIP TRANSFERS

From the population of pupils designated as 5-Q-B, Pupil Membership Transfers, review each sampled membership to verify that:

1. The pupil was claimed by another district for all or part of an FTE on the pupil membership count day.
2. The pupil transfer occurred between the pupil membership count day and supplemental count day of the current school year.
3. The pupil satisfied the residency requirement of §6(4) of the State School Aid Act or met one of the exceptions provided in §6(6) of the State School Aid Act in the district making the claim under this section.
4. The portion of the FTE for which the pupil was enrolled in one or more online courses under §21f of the State School Aid Act was not counted or transferred under the pupil transfer process under this section.

The process for review of §25e requests is as follows.

1. A district or ISD requests a §25e transfer adjustment by submitting an SRM in MSDS. The request is made in the §25 component of the SRM. Auditors do not have editing capabilities in the §25e transfer request application.
2. The pupil membership auditor must review §25e transfer requests at least monthly. It is recommended that such review occur on a weekly basis.
3. Timing of approval or denial
 - a. Approval or denial of any §25e transfer request does not occur before the deadline for local district or ISD certification. This ensures that the pupil membership auditor has obtained a copy of the DS4061 before any FTE adjustments are made for §25e transfer requests.
 - b. Approval or denial of any §25e transfer request does not occur sooner than one week after the SRM submission. This ensures that the local district or ISD has the opportunity to dispute any adjustments.
4. During each review of §25e transfer requests, the pupil membership auditor selects a 10% random sample of requests from each district for audit.
5. Based on documentation submitted by the local district or ISD, the pupil membership auditor verifies membership, enrollment, and first day of attendance for each pupil in the 10% random sample.
6. If there is an error rate of greater than 10% in the 10% random sample, the pupil membership auditor must expand the sample size to 20%. If the error rate is still greater than 10%, the sample size must continue to be expanded by 10% increments until the error rate is not greater than 10%.
7. The pupil membership auditor reviews each SRM to verify that it was submitted by the local district or ISD within 30 days of the pupil's first day of attendance. An SRM submission that does not confirm to this requirement is denied. This does not apply, however, to a corrected SRM submitted to MSDS by a local district or ISD. Such submissions are not subject to the 30-day requirement.
8. The pupil membership auditor approves or denies each §25e transfer request.

6-A: EXPERIENTIAL LEARNING COURSES

From the population of pupils designated as 6-A, Experiential Learning Courses, review each sampled membership to verify that:

5. The pupil was enrolled in grades 9 to 12.
6. The course was supervised by a certified teacher.
7. The primary responsibility of the certified teacher of the course was teaching the pupil(s) during the course time frame, i.e., the teacher was not concurrently teaching another course.
8. A grade and credit were given based upon assessment.
9. Attendance was taken and documented.
10. The experience was the local school board approved curriculum/course.
11. The board-approved curriculum and course had identifiable content standards and expectations and were progressive in nature.
12. The learning objectives were not general employability skills.
13. The experiential learning course *was not* used as the sole course requirement for eligibility to participate in dual enrollment.
14. The pupil was limited to one experiential learning course per semester.
15. The pupil did not replace an employee.
16. The course was a combination of instruction and direct experience.

6-B: PEER-TO-PEER ELECTIVE COURSE CREDIT PROGRAM

From the population of pupils designated as 6-B, Peer-to-Peer Elective Course Credit Program, review each sampled membership to verify that:

1. The pupil was enrolled in grades 6-12.
2. The curriculum was approved by the local board of education.
3. Instructional objectives were established by the approved peer-to-peer support curricular content.
4. The peer-to-peer pupil was provided a course syllabus.
5. The peer-to-peer teacher provided lesson plans and the grading criteria for each peer-to-peer course or credit.
6. The teacher recorded daily attendance for the peer-to-peer pupil.
7. The teacher of record completed pupil assessment and grading.

CHAPTER 4 – AUDIT REPORTS and REPAYMENTS

AUDIT REPORT

1. The pupil membership audit narrative report must be built in MSDS. It is recommended that auditors build the narrative as they adjust the audited count (DS4120) so that the two are in balance. They must balance before the narrative can be certified. See the MSDS District User Training Manual for more information. According to §18 of the State School Aid Act (MCL 388.1618), the narratives are due to the Department on November 15 after the close of the school year. For example, the October 2013 and February 2014 narratives are due on November 15, 2014. The final audit narrative report is a public record and is available to any interested party.
2. Print the narrative and give it to the ISD Superintendent and District Superintendent. It is advisable to offer a time period to provide feedback.

REPAYMENT

ISD audit state aid adjustments will be made prior to any appeals. §15(2) of the State School Aid Act states that, "If the result of an audit conducted by or for the department affects the current fiscal year membership, affected payments shall be adjusted in the current fiscal year." MCL 388.1615(2).

CHAPTER 5 – APPEAL PROCESS

At the Department, there are two levels of review available to a district that challenges an ISD pupil membership audit. Prior to a Department level appeal, the ISD may offer the district an informal appeal process. The district may appeal the ISD audit to the Department’s Assistant Director of the Office of Financial Management (Assistant Director) and may appeal the Assistant Director’s decision to the State Superintendent. The appeal process is as follows.

1. Appeal to the Assistant Director of the Office of Financial Management

- a) A district shall file its appeal of an ISD’s audit findings with the Assistant Director within 30 days of receiving the ISD’s audit report or the ISD’s decision on the informal appeal. The appeal shall be in writing and shall include a description of the memberships appealed and the rationale and legal references supporting the district’s position. The district shall provide a copy of the appeal to the ISD auditor.
- b) The Assistant Director may direct further investigation and request additional information. Unless the Assistant Director requests additional information or finds good cause for consideration of additional information, only documents that were presented to the ISD auditor are considered.
- c) The Assistant Director may request to meet with school district officials and the ISD auditor to discuss the audit findings.
- d) The Assistant Director issues a written decision, affirming the audit findings or restoring all or part of the appealed memberships.
- e) The Assistant Director provides the district with the decision and informs the district of the 30-day period for appeal to the State Superintendent.

2. Appeal to the State Superintendent

- a) A district shall file its appeal of the Assistant Director’s decision to the State Superintendent within 30 days of receiving the decision of the Assistant Director. The appeal shall include a description of the memberships appealed and the rationale and legal references supporting the district’s position. It shall not include information or documents that were not presented to the Assistant Director.
- b) The file on appeal consists solely of the documents that were reviewed by the Assistant Director and the written appeal filed by the district.
- c) The State Superintendent issues a decision, affirming, reversing, or modifying the decision of the Assistant Director.
- d) A copy of the State Superintendent’s decision is provided to the district and the appropriate accounting adjustments, if any, are made.

CHAPTER 6 – DAYS/CLOCK HOURS and 75% ATTENDANCE – END-OF-YEAR REPORT

Each year, local district and ISD compliance with the required days/clock hours must be verified. Each year, local district compliance with the 75% attendance requirement must also be verified. ISDs do not have to comply with the 75% attendance requirement.

1. Days/Clock Hours

- a. Each local school district must enter its Days and Clock Hours Report (DS4168) into the Educational Entity Master (EEM) by July 15 for the immediately preceding school year. An ISD may either enter its DS4168 for the immediately preceding school year into the EEM by July 15 or submit a paper version of the DS4168 to the pupil membership auditor by July 15.
- b. No later than August 1, the pupil membership auditor must audit the DS4168 in the EEM or, for an ISD that submitted a paper version of the DS4168, submit an audited copy of the DS4168 to the Department's Office of State Aid and School Finance.
- c. The pupil membership auditor must make necessary adjustments and certify the data in the DS4168.
- d. The pupil membership auditor must notify the Department's Office of State Aid and School Finance of noncompliance with days/clock hours requirements.

NOTE: Days and hours requirements apply to all programs – districts and ISDs – that receive state aid. However, the deduction language in the State School Aid Act only applies to local districts and PSAs. If an ISD program falls below the required number of days/hours, no deductions in foundation allowances are made. Such issues should be reported to the Office of Special Education at the Department.

2. 75% Attendance

- a. Each local district must submit its 75% Attendance Report into the EEM by July 15 for the immediately preceding school year. The local district must also submit a paper version of the 75% Attendance Report to the pupil membership auditor by July 15.
- b. No later than August 1, the pupil membership auditor must review the local district's 75% Attendance Report for the immediately preceding school year to verify that no school day was counted if less than 75% of pupils were in attendance on that day.
- c. The pupil membership auditor must notify the Department's Office of State Aid and School Finance of noncompliance with the 75% requirement.
- d. By certifying the data in the DS4168, the pupil membership auditor certifies compliance with the 75% attendance requirement.

CHAPTER 7 - EXIT STATUS, DROP-OUT RATE, AND GRADUATION RATE AUDITS

INTRODUCTION

ISD audit responsibilities include audits of pupil exit statuses and other pupil data used in calculating annual graduation and pupil dropout rates.

MSDS is the source for data used in calculating graduation and dropout rates. Data from MSDS are populated into the Graduation and Dropout (GAD) Application for the purpose of auditing pupil exit statuses.

AUDITS OF ACTIVE COHORTS

Auditors review all submitted data on an annual basis. An annual audit ensures that auditors are not auditing multiple pupil exit code changes throughout the year and also ensures that there are not conflicts between auditor findings and submitted data.

The annual audit can be done as a desk or a field audit. A small sample of exit codes is selected from each high school building scheduled for a field audit of FTE in that school year.

If the audit is performed by a CPA rather than the ISD auditor, the ISD will provide the CPA with the necessary pupil reports. CPAs should request this data in a timely manner.

| Technical Summary | Example for the 2013-2014 school year audit cycle (dates approximate based on planned time line). |
|--|---|
| 1. The GAD Application is updated each October after the final disposition is reported on all pupils for the prior school year. Outlying buildings are identified and flagged as such. | 2013-2014 school year final dispositions are reported in MSDS via the End-of-Year General Collection by the end of June or the SRM Collection by mid-September. |
| 2. ISD auditors are given access to the GAD Application in late October after final dispositions are reported. | 2013-2014 school year final dispositions are available in the GAD Application late-October for pupils in the 2012, 2013, 2014, 2015, 2016, and 2017 cohorts. |
| 3. The GAD remains open for approximately six weeks for auditors to record findings on the six active cohorts for the audited school year. | ISDs audit 2013-2014 exit status codes reported for pupils in the 2012, 2013, 2014, 2015, 2016, and 2017 cohorts from late October through mid-December. |
| 4. Auditors may remove findings if districts provide them with the appropriate documentation during the six week audit period. | Late-October to mid-December |
| 5. CEPI calculates graduation and dropout rates based on pupils' dispositions after the audit is completed. | Mid-December through mid-January. |

AUDIT STEPS FOR GRADUATES AND COMPLETERS

Pupils who graduated or completed are reported by the district with the following exit statuses.

| Exit Status | Definition |
|--------------------|---|
| 01 | Graduated from General Education with a diploma |
| 02 | Graduated from General Education with a diploma and applied to a degree-granting college/university |
| 03 | Graduated from an alternative program with a diploma |
| 04 | Graduated from General Education and applied to a non-degree-granting institution |
| 05 | Completed General Education with an equivalency certificate, General Educational Development (GED) |
| 06 | Completed General Education with other certificate (e.g., certificate of attendance, district competency test) |
| 20 | Received Special Education certificate of completion and exited the kindergarten through 12 th grade (K-12) system |
| 21 | Special Education – reached maximum age and exited the K-12 system |
| 40 | Graduated from a Middle College with both a high school diploma and an associate degree or other advanced certificate |
| 41 | Graduated from a Middle College with only a high school diploma |

1. Randomly select a representative 2% sample of pupils for testing from the buildings scheduled for field audits in that school year (both fall and spring counts). The sample should be selected from final disposition for the school year as reflected in the pupil lists in the GAD Application. Provide the sample list to the district and request supporting documentation.
2. Review supporting documents for compliance with the Table of Acceptable Exit Status Documentation. Note: Auditors may find it more efficient to obtain the district's lists of graduates/completers before starting the audit so that they can simultaneously select pupils for sample and determine compliance.
3. Determine the error rate. If it is above 5%, pull an additional 10% sample and test. Continue this process until the cumulative error rate is 5% or lower or all graduate and completer records are reviewed.

Note: If the underlying errors are isolated, informed professional judgment allows the auditor to focus the sample expansion on the subpopulation(s) with isolated error(s).

4. Enter findings into the GAD Application. Change the exit code to "status unknown" if the district does not provide supporting documentation.

AUDIT STEPS FOR EXEMPT PUPILS

Pupils who are exempt from the graduation rate calculation are reported by the district with the following exit statuses.

| Exit Status | Definition |
|--------------------|------------------------------|
| 09 | Moved out of state |
| 12 | Deceased |
| 14 | Enrolled in home school |
| 15 | Enrolled in nonpublic school |

1. Randomly select a representative 5% sample of pupils for testing from the buildings scheduled for field audits in that school year (both fall and spring counts). The sample should be selected from final disposition for the school year as reflected in the pupil lists in the GAD. Provide the sample list to the district and request supporting documentation for pupils exited with an exempt status during the year.
2. Review supporting documents for compliance with the Table of Acceptable Exit Status Documentation.
3. Determine the error rate. If it is above 5%, pull an additional 10% sample and test. Continue this process until the cumulative error rate is 5% or lower or all exempt records are reviewed.

Note: If the underlying errors are isolated, informed professional judgment allows the auditor to focus the sample expansion on the subpopulation(s) with isolated error(s).

4. Enter findings into the GAD Application. Change the exit code to "status unknown" if the district does not provide supporting documentation.

ACCEPTABLE EXIT STATUS DOCUMENTATION

| Exit Status | Definition | Allowable Documentation |
|--|------------------------------|---|
| 01, 02, 03, 04, 05, 06, 20, 21, 40, 41 | Graduated or completed | <ul style="list-style-type: none"> • Official transcript or diploma • Official alpha list of graduates/completers from the pupil management software that includes pupil's name, UIC, date of birth, and MSDS completion status, sorted by building, then by completion status, and then by pupil's last name |
| 09 | Moved out of state | <ul style="list-style-type: none"> • Request for pupil records from a receiving public or private high school or an educational program that culminates in a regular high school diploma • Written record of a response from an official in the receiving school or program acknowledging the pupil's enrollment • For migrant pupils, documentation of pupil's out-of-state enrollment in the federal Migrant Student Information Exchange (MSIX) • Note: The United States Department of Education (USED) has ruled that a conversation with a parent or neighbor of a pupil is NOT considered official written documentation of a transfer. The one exception is that, if a parent informs a school administrator that the family is leaving the country, the school administrator may document this conversation in writing and include it in the pupil's file. |
| 12 | Deceased | <ul style="list-style-type: none"> • Confirmation from pupil management software that the pupil is listed as deceased in the software • Obituary, other newspaper article • Program from the funeral/memorial service • Written statement from the parent or guardian • Death certificate |
| 14 | Enrolled in home school | <ul style="list-style-type: none"> • Written parental statement • Pupil withdrawal form signed by the parent/guardian or qualified pupil indicating pupil is being home-schooled • Parental record request confirming pupil is home-schooled • Statement by attendance officer (truancy officer) verifying that compulsory attendance requirements are met • Note: The USED has ruled that a conversation with a parent or neighbor of a pupil is NOT considered official written documentation of a transfer. |
| 15 | Enrolled in nonpublic school | <ul style="list-style-type: none"> • Request for pupil records from a receiving public or private high school or an educational program that culminates in a regular high school diploma • Written record of a response from an official in the receiving school or program acknowledging the pupil's enrollment • Note: The USED has ruled that a conversation with a parent or neighbor of a pupil is NOT considered official written documentation of a transfer. |

For additional details about federal requirements, see:
<http://www2.ed.gov/policy/elsec/guid/hsgrguidance.pdf>

APPENDICES

DESK AUDIT PROGRAM

District: _____
 Count Date: _____
 Date Performed: _____

This audit program is intended to be used in reference to Chapter 2, Desk Audits.

| | Errors | Performed By |
|---|---------------|---------------------|
| 1. Review the Pupil Accounting Manual. | | |
| 2. Review correspondence file, prior audit work papers, prior audit report, and any audit or relevant monitoring reports the district received from other sources. | | |
| 3. Obtain and review the district’s excused/unexcused absence policy. | | |
| 4. Review the Scheduled Days and Clock Hours Report to ensure that the district will meet the required days and clock hours for the current school year. Unlike the other minimum desk audit procedures, the review of the Days and Clock Hours is required annually, not every count period. | | |
| 5. Review the Attendance Report to verify compliance to date with the 75% attendance requirement in the current school year. | | |
| 6. Review the alphabetical lists of membership to verify the following. | | |
| a. The MSDS certified final version alpha list was submitted for audit. | | |
| b. Pupils who were absent on the count day are identified on separate lists. | | |
| c. Pupils in nonconventional categories are identified on separate lists. | | |
| d. The alphabetical lists of membership are signed by the building principal/authorized representative. | | |
| 7. Perform the following procedures for duplicate FTEs disclosed in the FTE Conflict Detection report. | | |
| a. Obtain from the district a status report of unresolved FTE conflicts. | | |
| b. At the end of the sixth week, obtain supporting documentation for unresolved FTE conflicts. | | |
| c. Verify that the conflicts have been resolved before certifying the district’s audit narrative. | | |
| d. Notify the Pupil Membership Auditor at the Department’s Office of Financial Management – Audits | | |

| | Errors | Performed By |
|---|---------------|---------------------|
| of any unresolved conflicts. | | |
| 8. Review the Drop/Add lists provided by the district or the FTE Comparison Report in MSDS to determine the accuracy of pupils dropped or added between Fall and Spring count dates. | | |
| 9. Review the Special Education Worksheets A and B to verify that all required information is included. | | |
| a. Teacher codes are included. | | |
| b. Associated regular education FTE amounts, if any, are reported in the proper column. | | |
| c. The resident districts are identified for pupils educated outside of their district of residence. | | |
| d. FTE totals are correctly calculated. | | |
| e. All pupils listed on the worksheets are identified on the alphabetical lists of membership. | | |
| 10. Verify the accuracy of FTEs reported in the Additional Information on K-12 Pupils. | | |
| a. Special Education and General Education FTE (§24) line. | | |
| b. New grade levels for the Fall count that have never been offered previously. | | |
| 11. Verify that information in the residency-related sections of the DS4061 report match the residency information on the pupil alpha lists. | | |
| 12. For districts with centrally maintained Schools of Choice records, verify that: | | |
| a. The district has a signed cooperative agreement for a sample of §105c Special Education pupils accepted since the last field audit. | | |
| b. The district certified either that it complied with or that it did not comply with Schools of Choice provisions in the State School Aid Act. | | |
| c. If noncompliance exists, report the noncompliance to the Department's Schools of Choice consultant for implementation of the 5% penalty. | | |
| 13. Evaluate the results of the desk audit and determine if changes need to be made to the district's risk assessment. | | |
| 14. Verify that teachers have valid Michigan certification. | | |
| a. Request the Master Teacher Schedule from the district. The schedule should include all buildings, as some teachers are scheduled for more than one building. If the Master Teacher Schedule is not in Excel format, it is suggested that it be converted to Excel to make for easier searches. | | |

| | Errors | Performed By |
|---|---------------|---------------------|
| b. The Center for Educational Performance and Information (CEPI) will make a newly developed Registry for Educational Personnel (REP) report available in Excel within the MSDS application for each district in the ISD. Run the report in MSDS. | | |
| c. Compare the Master Teacher Schedule with the REP report. If a teacher is included on the Master Teacher Schedule but not on the REP report, check the Michigan Online Educator Certification System (MOECS) for certification. If a teacher is included on the REP report but not on the Master Teacher Schedule, verify with the district that the teacher is in fact not teaching and therefore, is correctly not included on the Master Teacher Schedule. | | |
| d. If a teacher is found to not be certified, the ISD auditor must make an FTE adjustment for each student for the class period taught by the non-certified teacher. The FTE adjustment should be made at the student level. | | |
| 15. Conduct an exit conference with appropriate local district personnel. The following should be discussed: <ul style="list-style-type: none"> a. Opportunity for the local district to clarify issues or provide additional documentation for questions identified during the audit. b. General findings c. Specific findings, along with the associated FTE adjustment d. District appeal procedures | | |
| 16. Verify that the district properly reported pupils added as a result of the desk review, enrolled pupils in MSDS and reported the enrollment via the SRM collection. The district should also provide a new alpha list to the ISD auditor as proof of the correction. | | |
| 17. Record adjustments noted in building audits on the FTE Adjustment Form. See Appendix G . | | |

I (We) have performed procedures sufficient to achieve the audit objectives identified on this program and have adequately documented the audit procedures performed.

Name: _____ Date _____

Name: _____ Date _____

LOCAL DISTRICT PLANNING FORM

District: _____

Count Date: _____

This form should be completed or updated for each membership count. It should be prepared by district program staff and forwarded to the auditor for use in planning the field audit.

1. Identify the key program personnel involved in the pupil membership count and indicate the individual whom the auditor should contact to make arrangements for the fieldwork.

| NAME | TITLE | LOCATION | PHONE | EMAIL ADDRESS | YEARS IN POSITION |
|-------------|--------------|-----------------|--------------|----------------------|--------------------------|
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |

2. For each building/program at which the district provides instruction, complete:

| BUILDING/PROGRAM | LOCATION | GRADE LEVELS/ CLASS OF PUPILS | APPROXIMATE NUMBER OF PUPILS |
|-------------------------|-----------------|--|---|
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

(Attach additional schedules if necessary)

3. One major purpose of the planning form is to provide the auditors with information about any significant changes that would affect completion of the audit. Please indicate if there have been any significant changes in the following and attach documentation as applicable.

- ___ Written procedures for ensuring a complete and accurate pupil count
- ___ Program locations or types of program categories
- ___ Systems (automated/manual) for maintaining enrollment and attendance records
- ___ Continuity in key pupil membership count positions
- ___ Participation in cooperative agreements with other local programs
- ___ Record retention procedures and practices (minimum of three-year retention)
- ___ Procedures to ensure that administrative personnel document in writing their review of the completed program alpha lists, including a representation that all program documentation is on file in accordance with state laws
- ___ Training of new staff without experience in membership accounting rules and procedures

Completed by:

Name: _____

Title: _____

Date Completed: _____

Updated by:

Name: _____

Title: _____

Date Completed: _____

Updated by:

Name: _____

Title: _____

Date Completed: _____

Updated by:

Name: _____

Title: _____

Date Completed: _____

BUILDING RISK ASSESSMENT FORM – FOR ISD AUDITOR USE

District: _____
 School Year: _____
 Completed by: _____

Building: _____
 Count: _____ Fall _____ Spring
 Audit Date: _____

Instructions: This form may be used to document the assessment of risk of the buildings/programs that will be field audited. Generally, the higher potential for errors, the higher the risks that the pupil membership counts are not accurate. Consider the risk factors listed below (High [H], Moderate [M], Low [L]), and place a check in the space beside the factors that significantly influence the risk for the audit area.

| | Risk Factor | | | Comments |
|---|-------------|---|---|----------|
| | H | M | L | |
| 1. The results of the prior field and desk audits. (Error rates over 5% are high risk.) | | | | |
| 2. The existence of district count procedures and controls. (Detailed procedures generally provide a lower risk.) | | | | |
| 3. The experience of district personnel assigned to process pupil count data per Local District Planning Form. (Experienced staff generally provides a lower risk.) | | | | |
| 4. The frequency of pupil absenteeism noted during the count period. (High absenteeism generally reflects a higher risk.) | | | | |
| 5. The number of nonconventional pupils attending the building. (Larger population of nonconventional pupils reflects a higher risk.) | | | | |
| 6. The number of State School Aid Act §25e adjustments. (Larger number of denied adjustments by the receiving district indicates higher risk.) | | | | |

| | | | |
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| Based on the foregoing considerations, the risk for this building is assessed as follows: | Overall Risk Assessment | | |
| Building Risk Assessment | High | Moderate | Low |
| Pop I – Conventional pupils present on count day | | | |
| Pop II – Conventional pupils absent on all or part of count day | | | |
| Pop III – Nonconventional pupils | | | |

| | | | |
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| Building Risk Assessment – Sample Size Percentages | High | Moderate | Low |
| Pop I – Conventional pupils present on count day | 15% | 10% | 2% |
| Pop II – Conventional pupils absent on all or part of count day | 20% | 15% | 10% |
| Pop III – Nonconventional pupils | 20% | 15% | 10% |

FIELD AUDIT PROGRAM

District: _____

Building: _____ Count Day: _____

This audit program is intended to be used in reference to Chapter 3, Field Audits.

| | Errors | Performed By |
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| BUILDING-WIDE PROCEDURES | | |
| 1. Review the Local District Planning Form. See Appendix C . | | |
| 2. Select and document the buildings for audit based on the audit cycle and risk assessment. See Appendix D . | | |
| 3. Discuss the buildings/programs to be audited and the timing of the audit with responsible local district personnel. Provide the district with a list of items that will be needed, including availability of workspace, access to pupil membership records, and assistance to be furnished by the local district. | | |
| 4. Prepare and send the Field Audit Planning Schedule annually to the Pupil Membership Auditor in the Department’s Office of Financial Management – Audits by November 15. | | |
| 5. Determine sample size. A minimum sample must be selected from each population based on the risk assessment at each building in which a field audit is performed. Perform audit steps for All Populations, Population I, Population II, and relevant Population III. | | |
| 6. Determine and document the entire building/program error rate. | | |
| 7. Conduct face-to-face interviews with a sample of teachers and pupil accounting personnel to inquire whether they are aware of any inappropriate alterations of their attendance records or any other teacher’s attendance records. | | |
| PUPIL SPECIFIC AUDIT PROCEDURES | | |
| ALL POPULATIONS | | |
| 1. Pupil was enrolled on or before the count date. | | |
| 2. Pupil met the age requirement. | | |
| 3. Pupil does not hold a high school diploma or GED certificate. Special Education pupils may have a GED certificate and continue until age 26. | | |
| 4. District determined the correct residency status. | | |

| | Errors | Performed By |
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| POPULATION I | | |
| 1. Determine the total building Population I pupils. | | |
| 2. Select a sample from the alpha list on a head count basis. | | |
| 3. Pupil was in attendance and received instruction in all classes on the count day. | | |
| 4. Determine and evaluate the audit error rate. | | |
| POPULATION II | | |
| 1. Determine the total building Population II pupils. | | |
| 2. Select a sample of these pupils on a head count basis. | | |
| 3. Either the pupil: <ul style="list-style-type: none"> a. Had authorized, documented, excused absence on the count day and attended all classes claimed for membership at least once within 30 calendar days after the count day, or was expelled and returned within 45 calendar days after the count day, or b. Had unexcused absence on the count day, was enrolled and in attendance prior to the count day, and attended all classes claimed for membership at least once during one of the next 10 consecutive school days. | | |
| 4. Determine and evaluate the audit error rate. | | |
| POPULATION III | | |
| 1. Determine the total building Population III pupils. | | |
| 2. Select a sample of these pupils on a head count basis in such a manner that each Population III pupil has an equal chance of being selected. If, upon selection of the sample, there are nonconventional categories that have not been represented in the sample, supplement the sample by selecting at least one pupil from each of the unrepresented categories. The sample may target known risk areas. | | |
| 3. Verify each of the items listed for each Population III section. | | |
| 4. Determine and evaluate the audit error rate by category. | | |
| 5-A: Alternative Education Program | | |
| 1. Learning Labs: | | |
| a. Enrolled in and attending courses that are earning credit toward a high school diploma or GED certificate. | | |
| b. Scheduled for specified number of lab hours per week. | | |
| c. A certified teacher was designated as present in the learning lab at all times. | | |

| | Errors | Performed By |
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| d. Sign-in and sign-out sheets and the teacher's attendance records document the actual hours per week the pupil attended the learning lab and the pupil attended the minimum number of hours scheduled and claimed. | | |
| e. Did not generate more FTE per course than would have been generated in a traditional classroom setting. | | |
| 2. Cooperative Agreements: See 5-B | | |
| 3. Expelled Under Mandatory Expulsion: See 5-C. | | |
| 4. Pupil's Choice: See 5-I | | |
| 5. Seat Time Waivers: See 5-O-B | | |
| 5-B: Cooperative Agreement Programs | | |
| 1. For Special Education, a written, voluntary agreement between or among educating districts exists. | | |
| 2. For Career and Technical/Vocational Education: | | |
| a. Classes were taught or monitored by a certified teacher employed by the district or ISD. | | |
| b. The pupil was enrolled and evaluated on learned skills and performance. | | |
| c. The courses were part of the pupil's curriculum and count toward earning a high school diploma. | | |
| 3. Alternative Education Programs: See 5-A | | |
| 4. Nonessential Electives of Nonpublic and Home-Schooled: See 5-E | | |
| 5. Early/Middle College Programs: See 5-G-B | | |
| 5-C: Home Based | | |
| 1. Expelled Under Local District Policy | | |
| a. The district provided at least two nonconsecutive hours of instruction per week under the supervision of a certified teacher. | | |
| b. The district provided instructional materials, resources, and supplies comparable to those otherwise provided in the district's alternative education program. | | |
| c. Scheduled courses were offered for credit and placed on the pupil's transcript. | | |
| d. FTE was prorated to actual hours of instruction. | | |
| 2. Expelled Under Mandatory Expulsion Law | | |
| a. The district provided at least two nonconsecutive hours of instruction per week under the supervision of a certified | | |

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| teacher. | | |
| b. The district provided instructional materials, resources, and supplies comparable to those otherwise provided in the district's alternative education program. | | |
| c. Scheduled courses were offered for credit and placed on the pupil's transcript. | | |
| d. Program is individualized, i.e., a certified teacher was with only one pupil during the instructional period. | | |
| 5-D: Homebound and Hospitalized | | |
| 1. The membership was supported by written certification of an appropriate physician, hospital, or licensed treatment facility, evidenced by one of the following: a. Written certification from the pupil's attending physician verifying that the pupil has a medical condition that requires the pupil to be hospitalized or confined to home during regular school hours for a period longer than five school days. The certification must be by a physician who is an MD or a DO. b. Written certification from a hospital or a licensed treatment facility verifying that the pupil has a medical condition that requires the pupil to be hospitalized in the facility during regular school hours for a period of longer than five school days | | |
| 2. A certified teacher provided a minimum of two 45-minute periods of instruction per week for General Education pupils and a minimum of two nonconsecutive one-hour periods of instruction per week for Special Education pupils. If required by the IEP, a certified Special Education teacher must provide the instruction. | | |
| 3. Attendance records show dates and amount of time the pupil received Homebound/Hospitalized services and are signed by the certified teacher providing the service. | | |
| 5-E: Nonpublic Part-Time and Home-Schooled | | |
| 1. Nonpublic school is registered with the Department and meets all state reporting requirements. | | |
| 2. Instruction was scheduled to occur during regular school day. | | |
| 3. Instruction was provided by a certified teacher at the district, PSA, or ISD. | | |
| 4. Curricular offering was available to full-time pupils in pupil's grade level or age group in the district or PSA during regular school day at a public school site. | | |
| 5. Curricular offering was restricted to nonessential elective | | |

| | Errors | Performed By |
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| courses for pupils in grades 1-12. Kindergarten pupils are ineligible. | | |
| 6. Pupil was part-time for purposes of the State School Aid Act. | | |
| 7. Course length and grading system were similar to course offered to public school pupils. | | |
| 8. Daily attendance records were maintained and comply with district policies and procedures. | | |
| 5-F: Part-Time | | |
| 1. The pupil was enrolled and attending one or more classes in the district. | | |
| 2. The sum total of FTE for pupil enrolled in more than one district does not exceed 1.0 FTE. | | |
| 3. The computation of the part-time FTE is accurate. | | |
| 5-G-A: Postsecondary Enrollment Options and Career and Technical Preparation Dual Enrollment | | |
| 1. The pupil was enrolled in one of grades 9 through 12 during the year of the postsecondary dual enrollment. | | |
| 2. The pupil is concurrently enrolled in and attending at least one high school course. | | |
| 3. The eligible postsecondary institution submitted to the district a notice indicating the course(s) in which the pupil was enrolled, the hours of enrollment, and a list of eligible charges. | | |
| 4. The district paid the eligible charges related to the pupil's postsecondary enrollment up to a prorated part of the statewide pupil-weighted average foundation allocated to each course. | | |
| 5. 50% of the postsecondary education course or career and technical preparation course fell within the school district's academic year. | | |
| 6. The postsecondary course is academic in nature or applicable to career preparation, applies toward the satisfaction of certificate, degree, or program completion requirements, and is not in subject areas of physical education, theology, divinity, or religious education. Hobby craft and recreational courses are not eligible. | | |
| 7. The pupil was not claimed for more than 1.0 FTE for a public school pupil and not more than .99 FTE for a nonpublic pupil. | | |
| 8. The pupil did not participate in intercollegiate athletics at the postsecondary institution. | | |

| | Errors | Performed By |
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| 9. The pupil was not enrolled in high school for more than four school years, unless eligible under Administrative Rule 388.153. | | |
| 10. The pupil was enrolled in no more than a total of 10 postsecondary courses as defined in MCL 388.513(1)(d). | | |
| 11. The postsecondary course was not offered by the local public school or state-approved nonpublic school in which the pupil is enrolled, unless the course was unavailable to the eligible pupil due to a scheduling conflict beyond the pupil's control. | | |
| 12. The career and technical preparation program was not offered through the school district, ISD, area vocational-technical education program, or state-approved nonpublic school in which the pupil was enrolled or the course was unavailable to the eligible pupil due to a scheduling conflict beyond the eligible pupil's control. | | |
| 13. For eligible nonpublic pupils who are receiving high school credit in addition to postsecondary credit, the courses were nonessential electives. | | |
| 14. For fifth year high school pupils enrolled in an alternative education program, the pupil was enrolled in not more than two postsecondary dual enrollment courses taken at any given time and not more than four postsecondary enrollment courses taken during the school year. | | |
| 15. For fifth year high school pupils enrolled in an alternative education program, the pupil had a plan on file at the district to complete district graduation requirements within the academic year, including postsecondary dual enrollment options. The plan is signed by the principal or designee, the parent or legal guardian, and, if the pupil is less than 18 years of the age, by the parent or legal guardian. | | |
| 5-G-B: Early/Middle College | | |
| 1. The pupil may be considered full-time if: <ul style="list-style-type: none"> a. The combined number of classes in which the pupil was enrolled and which the pupil was attending at the high school and at an eligible postsecondary institution equaled the number of scheduled classes per day at the high school necessary to reach the minimum required hours for a full-time pupil; or b. The combined number of classes in which the pupil was enrolled and which the pupil was attending at the high school and at an eligible postsecondary institution equaled the number of scheduled classes per day at the high school necessary to meet the minimum instructional time requirements of a reduced schedule (See 5-H); or c. The sum of the actual instructional hours in which a pupil | | |

| | Errors | Performed By |
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| <p>was enrolled and attending at the high school and at an eligible postsecondary institution plus the actual travel time met the minimum number of hours required to meet a reduced schedule (See 5-H); or</p> <p>d. The pupil met the postsecondary institution's definition of a full-time college pupil.</p> | | |
| 2. The pupil was enrolled in a school district that had a separate designation in the EEM indicating that the district provides an early/middle college school or early/middle college program. | | |
| 3. The pupil was enrolled in at least one high school class in a school district or state-approved nonpublic school in Michigan. | | |
| 4. The pupil was not a foreign exchange pupil enrolled under a cultural exchange program. | | |
| 5. The pupil had at least one parent or legal guardian who was a Michigan resident. | | |
| 5-H: Reduced Schedule | | |
| 1. The pupil and/or parent/guardian submitted a written request for a reduced schedule that details the reason that a reduced schedule is in the best educational interest of the pupil. The request is signed by the pupil and, if the pupil is less than 18 years of the age, by the parent or legal guardian. | | |
| 2. The local school district's counselor or other authorized representative evaluated the reason for the request and determined that a reduced schedule was in the best educational interest of the pupil. | | |
| 3. The local school district scheduled the pupil for at least 80% of the required minimum hours of instruction for the school year or, for a district operating a four-block schedule, at least 75% of the minimum required hours for the school year. | | |
| 5-I: Section 105 and 105C Schools of Choice | | |
| 1. The district has signed cooperative agreements for a sample of §105c Special Education pupils accepted since the last field audit. | | |
| 2. The district certified either that it complied with or that it did not comply with Schools of Choice provisions in the State School Aid Act. | | |
| 5-K: Special Education Early Childhood | | |
| 1. Under Administrative Rule 340.1754 | | |
| a. IEP was on file and effective as of the count day. | | |
| b. The pupil was enrolled and receiving instruction on or before count day. | | |

| | Errors | Performed By |
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| c. The pupil was enrolled in a bona fide program as described in the Pupil Accounting Manual on or before the count day. | | |
| d. The FTE was accurately calculated by determining the number of instructional hours scheduled and provided and dividing that number by 450. | | |
| e. The FTE was split equitably between Special Education and General Education for a pupil who was five years of age, attends kindergarten, and had an IEP. | | |
| 2. Under Administrative Rule 340.1755 | | |
| a. IEP or IFSP was on file and effective as of the count day. | | |
| b. The pupil was assigned to an approved or endorsed early childhood Special Education teacher or approved related service provider on or before the count day. | | |
| c. The pupil was scheduled a minimum of 72 hours during the school year and documentation is available that such services were provided. | | |
| d. IEP identifies Rule 340.1755 services, including the frequency, duration, and location of the services. | | |
| e. For pupils receiving services from related staff, there is documentation that the related staff worked under the educational direction of an approved or endorsed early childhood Special Education teacher. | | |
| f. FTE was calculated by determining the number of instructional hours scheduled and provided and dividing that number by 180. | | |
| 3. Under Administrative Rule 340.1862 | | |
| a. IFSP was on file and effective as of the count day. | | |
| b. The pupil was assigned to an approved or endorsed early childhood Special Education teacher or approved related service provider on or before the count day. | | |
| c. The pupil was scheduled a minimum of 72 hours during the school year and documentation is available that such services were provided. | | |
| d. IFSP identifies Rule 340.1862 services, including the frequency, duration, and location of the services and it indicates that the child was eligible for Michigan mandatory special education. | | |
| e. For pupils receiving services from related staff, there is documentation that the related staff worked under the educational direction of an approved or endorsed early | | |

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| childhood Special Education teacher. | | |
| f. FTE was calculated by determining the number of instructional hours scheduled and provided and dividing that number by 180. | | |
| 5-L: Special Education Pupil Transition Services | | |
| 1. The pupil was enrolled and in attendance on count day. | | |
| 2. The pupil was assigned to a Special Education teacher employed by the educating district. | | |
| 3. The pupil met the 1,098 hours requirement to be counted full-time. Less than 1,098 hours results in a prorated FTE. | | |
| 4. Special Education Work Based Learning Experiences: See 5-P | | |
| 5. Work Activity Center Services: | | |
| a. The activities for which the pupil was paid were incidental to the instructional program (less than 50% of the pupil's school time). | | |
| b. If more than 50% of the time was in a work activity center service, the time over 50% did not count toward pupil membership. | | |
| 6. Transition Community Living Experience (TCLE): | | |
| a. Training plan and training agreement were in place. | | |
| b. The TCLE was approved by the local school board and contains learning objectives and standards for determining pupil progress. | | |
| c. The TCLE was monitored by a designated school Special Education teacher. | | |
| d. The TCLE was documented on the pupil's schedule and grade or credit is given based upon the assessment of progress towards the achievement of the pupil's school goals. | | |
| e. Attendance was taken and records were maintained. | | |
| 5-M: Split Schedule | | |
| 1. Number of instructional hours is calculated correctly. | | |
| 2. The FTE calculation is accurate. | | |
| 5-N: Suspended and Expelled | | |
| 1. For in-school short-term suspensions: | | |
| a. Attendance book of the teacher of record shows the pupil absent from class due to suspension. | | |

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| b. The pupil was supervised by a certified staff member with attendance taken. | | |
| 2. For long-term suspensions or expulsions: | | |
| a. Attendance was taken where the suspension was served. | | |
| b. Instruction was provided by a certified teacher. | | |
| c. Instruction was academic in nature and leading to credit toward grade progression or a high school diploma. | | |
| d. FTE was prorated based upon the minimum required hours of pupil instruction for grades 1-12. | | |
| 3. For permanently expelled pupils: | | |
| a. The pupil was enrolled in the district for the purpose of receiving instruction. | | |
| b. The district worked with the pupil to develop an instruction plan for self-study. | | |
| c. The district provided the text books and other instructional materials. | | |
| d. A certified teacher provided the minimum of two nonconsecutive hours of direct pupil instruction per week. | | |
| 5-O-A: Virtual Learning, Distance Learning, and Independent Study | | |
| 1. The pupil was enrolled and attending on count day if claimed pursuant to §6(8) and §6a of the State School Aid Act. Pupils enrolled in self-scheduled courses that take place off site satisfy the attendance requirement for the off-site self-scheduled course by attending an on-site course in which they are concurrently enrolled on the count day. | | |
| 2. The pupil was enrolled in the course and the course is reflected on the pupil's class schedule. | | |
| 3. Course is academic in nature and approved by the board of education of the school district or board of directors of the public school academy. | | |
| 4. Course generates credit toward a high school diploma or grade progression. | | |
| 5. Course counts as one course on the pupil's class schedule. | | |
| 6. Course would generate a comparable amount of FTE if offered through a traditional format. | | |
| 7. The teacher of record was identified. | | |

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| 8. An on-site mentor was assigned and is a Michigan certified teacher employed by the school district. | | |
| 9. If the course was offered using a blended learning format, the pupil must be physically in attendance on the count day or return to school within the 10/30 day or 45-day period. | | |
| 10. Grade eligibility requirements are met. | | |
| 11. The number of courses is allowable without a seat time waiver. | | |
| 5-O-B: Seat Time Waiver | | |
| 1. The pupil was enrolled and attending on count day if claimed pursuant to §6(8) and §6a of the State School Aid Act. | | |
| 2. The pupil met attendance requirements through either physical presence or through log-ins. a. Physical presence: i. The pupil was physically present for scheduled on-site instruction on count day or first day after count day that the pupil was scheduled for instruction. ii. Attended one period for each course scheduled. iii. Each period represented the same amount of time as if delivered traditionally. iv. If absent on count day, returned within 10/30 day rule period. b. Log-ins: i. The pupil logged into at least one program-sponsored course on count day, and then logged into at least one program-sponsored online course on his or her class schedule on nine separate days during the 30-day count period, for a total of 10 logins on separate days. ii. If excused absence on count day, the pupil completed a login on each of ten days within 30 calendar days of count day. | | |
| 3. The pupil met participation requirements through four weekly two-way educational interactions between the teacher of record and pupil. There must be one two-way interaction during each of the four weeks (Wednesday through Tuesday) in the 28-day period that begins on count day Wednesday. The interactions were relevant to the pupil's course content. | | |
| 4. Each course counted as only one class and generated the same portion of FTE that a comparable on-site course would generate or was prorated according to the number of instructional hours provided. The pupil must have had a course-specific class schedule for the current count that included all enrolled courses being counted toward membership for the pupil. | | |
| 5. The teacher of record was a Michigan certified teacher | | |

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| employed by the district. | | |
| 6. The pupil met the requirements for the specific program or course in which enrolled, including those defined in legislation, administrative rule, and the Pupil Accounting Manual. | | |
| 5-O-C: Cyber Schools | | |
| 1. The pupil met the membership eligibility requirements. A pupil's participation in the cyber school's educational program is considered regular daily attendance and membership. | | |
| 2. The pupil was enrolled and attending on count day, with proof of one or more of the following to satisfy the attendance requirement: <ul style="list-style-type: none"> a. Attendance at a live lesson from the teacher, b. Documentation of login of lesson or lesson activity, c. Subject-oriented telephone conversation between pupil and teacher, d. Documentation of email dialogue between the pupil and teacher, e. Documentation of activity/work between the learning coach and pupil, or f. An alternate form of attendance agreed upon by cyber school and ISD auditor. | | |
| 3. The pupil participated in all courses on count day or attended and participated in class as required by the 10/30 day rule. | | |
| 4. The cyber school provided full-time instruction and the pupil had a schedule based upon the school's criteria for a full-time pupil. | | |
| 5-O-D: Expanded Online Learning | | |
| 1. The pupil was enrolled and in attendance on count day. For off-site and self-scheduled pupils, the pupil was in attendance on count day for a course in which concurrently enrolled with the primary educating district. | | |
| 2. The pupil was enrolled in any of grades 6-12. | | |
| 3. Each course was selected from the syllabi published in the statewide online course catalog maintained by MVU or in the district's online course catalog. | | |
| 4. Unless the pupil was newly enrolled in the district, the request for online course enrollment was made in the academic term, semester, trimester, or summer preceding the enrollment. The pupil was enrolled in the course on count day and the course was reflected on the class schedule of the primary educating district that claimed the pupil in membership. | | |
| 5. The course did not generate more FTE than a comparable | | |

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| course offered in a traditional format by the district. If the course offered less instruction than a comparable course, the FTE was prorated. | | |
| 6. The district did not count the pupil for more than two online courses per count unless the pupil demonstrated previous success with online courses and the school leadership and pupil's parent or legal guardian determined that it was in the best interests of the pupil to enroll in more than two online courses in the specific academic term, semester, or trimester. | | |
| 7. Each online course was academic in nature and approved by the board of education of the school district or board of directors of the public school academy. | | |
| 8. The course was capable of generating credit toward the pupil's high school diploma or grade progression. | | |
| 9. A teacher who holds a valid Michigan teaching certificate was identified and assigned to the course. An on-site mentor employed by the district was also assigned to the pupil. | | |
| 10. If absent on count day, returned within 10/30 day rule period. | | |
| 11. The pupil had parent or legal guardian's consent for enrollment in the online course (not required if at least age 18 or an emancipated minor). | | |
| 5-P: Work-Based Learning Experience (WBLE) | | |
| 1. The pupil was eligible to receive high school credit for participation in the WBLE. | | |
| 2. Written training agreement in place on count day included: | | |
| a. Pupil's personal information, including name, home address, telephone number, date of birth, and emergency contact information. | | |
| b. School's name, address, telephone number, and contact person. | | |
| c. Employer's name, address, telephone number, and contact person. | | |
| d. The responsibilities of employer, school, and pupil. | | |
| e. Beginning and ending dates of agreement. | | |
| f. Daily hours to be worked, including beginning and ending times. | | |
| g. Beginning rate of pay, if paid work-based learning experience. | | |
| h. Appropriate safety instruction was provided. | | |

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| i. Employer has worker's disability compensation and general liability insurance. | | |
| j. Required signatures. | | |
| k. Nondiscrimination statements of assurance. | | |
| 3. Written training plan in place on count day included: | | |
| a. Verification by the certified teacher that the pupil's career or education goals as outlined in his or her education development plan relate to the placement. | | |
| b. A list of performance elements that contribute to the pupil's progress toward a career objective. | | |
| c. For WBLE Non-CTE programs, identification of the academic courses that generate credit toward a high school diploma in which the pupil is currently enrolled or was previously enrolled that relates to and prepares the pupil for job placement. | | |
| d. Required signatures. | | |
| 4. Employer or certified teacher/coordinator maintained and verified records of the pupil's attendance throughout the duration of the training agreement. | | |
| 5. Safety instruction appropriate to the placement was provided by the district and documented in either the training plan or training agreement. | | |
| 6. WBLE did not generate more than one-half (.50) of the pupil's FTE. | | |
| 7. Employment did not exceed the maximum hours set by the district. | | |
| 8. The pupil met grade eligibility. | | |
| 9. Regular visitation plan is documented. | | |
| 10. Monitored by certified instructors. | | |
| 11. Additional requirements in Pupil Accounting Manual are met. | | |
| 5-Q-A: Section 23a Dropout Recovery Program | | |
| 1. The pupil was counted as 1/12 th of an FTE for each month that the pupil was enrolled in the dropout recovery program and in full attendance. | | |
| 2. The pupil was not counted for more than 1.0 FTE under this section. | | |
| 3. The pupil was in full attendance for a month. | | |

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| 4. The dropout recovery program only enrolled eligible pupils. | | |
| 5. The pupil met at least one of the following criteria: a. The pupil had been expelled from school under the mandatory expulsion provisions in §1311 or §1311a of the Revised School Code. b. The pupil was suspended or expelled from school under a local policy. c. The pupil was referred by a court. d. The pupil was pregnant or a parent. e. The pupil was previously a dropout. f. The pupil was determined by the district to be at risk of dropping out. | | |
| 6. The dropout recovery program provided an advocate. All of the following apply: a. An advocate may serve in that role for more than one pupil but no more than 50 pupils. b. An advocate may be employed by the district or may be provided by an education management organization that is partnering with the district. c. Before an individual was assigned to be an advocate, the district complied with §1230 and §1230a of the Revised School Code with respect to that individual. | | |
| 7. The program developed a written personalized learning plan that was in place on or before the first school day of the month for the first month the pupil participated in the program. | | |
| 8. The program monitored the pupil's progress against the written learning plan. | | |
| 9. The program required each pupil to make satisfactory monthly progress as defined by the district. | | |
| 10. The program reported the pupil's progress results to the partner district at least monthly. | | |
| 11. The program was operated on or off a district school campus but was operated using distance learning online only if the program provided a computer and Internet access for each eligible pupil participating in the program. | | |

| | Errors | Performed By |
|---|---------------|---------------------|
| 12. The program was operated throughout the entire calendar year (12-month program). | | |
| 13. If the district partnered with an education management organization, the organization had a dropout recovery program partnership relationship with at least one other district. | | |
| 5-Q-B: Section 25e Pupil Membership Transfers | | |
| 1. The pupil was claimed by another district for all or part of an FTE on the pupil membership count day. | | |
| 2. The pupil transfer occurred between the pupil membership count day and supplemental count day of the current school year. | | |
| 3. The pupil satisfied the residency requirement of §6(4) of the State School Aid Act or met one of the exceptions provided in §6(6) of the State School Aid Act in the district making the claim under this section. | | |
| 4. The portion of the FTE for which the pupil was enrolled in one or more online courses under §21f of the State School Aid Act was not counted or transferred under the pupil transfer process under this section. | | |
| 6-A: Experiential Learning Courses | | |
| 1. The pupil was enrolled in grades 9-12. | | |
| 2. The course was supervised by certified teacher. | | |
| 3. The teacher's primary responsibility was teaching the pupil during the course time frame; the teacher was not concurrently teaching another course. | | |
| 4. A grade and credit are given based on assessment. | | |
| 5. Attendance was taken and documented. | | |
| 6. The local school board approved the curriculum/course. | | |
| 7. The course had identifiable content standards and expectations and was progressive in nature. | | |
| 8. The learning objectives were not general employability skills. | | |
| 9. The course was not used as the sole course requirement for eligibility to participate in dual enrollment. | | |
| 10. The pupil was limited to one experiential course per semester. | | |
| 11. The pupil did not replace an employee. | | |

| | Errors | Performed By |
|---|---------------|---------------------|
| 12. The course was a combination of instruction and direct experience. | | |
| 6-B: Peer-to-Peer Elective Course Credit Program | | |
| 1. The pupil was enrolled in grades 6-12. | | |
| 2. The curriculum was approved by the local school board. | | |
| 3. Instructional objectives were established by the approved peer-to-peer curricular content. | | |
| 4. The pupil was provided a course syllabus. | | |
| 5. The peer-to-peer teacher provided lesson plans and grading criteria for each peer-to-peer course. | | |
| 6. The teacher recorded daily attendance. | | |
| 7. The teacher of record completed the pupil assessment and grading. | | |
| Exit Conference and Audit Adjustments | | |
| 1. Conduct an exit conference with appropriate local district personnel. The following should be discussed: <ul style="list-style-type: none"> a. Opportunity for the local district to clarify issues or provide additional documentation for questions identified during the audit. b. General findings c. Specific findings and associated FTE adjustments d. District appeal procedures | | |
| 2. If a pupil is added as a result of the audit, the district must enroll the pupil in MSDS and report the enrollment via the SRM collection. The district should also provide a new alpha list to the ISD auditor as proof of the correction. | | |
| 3. Record FTE audit adjustments on the FTE Adjustment Form. See Appendix G . | | |
| 4. In MSDS, make all DS4061/4120 adjustments at the student level, not the aggregate level. | | |

I (We) have performed procedures sufficient to achieve the audit objectives identified on this program and have adequately documented the audit procedures performed.

Name: _____

Date _____

Name: _____

Date _____

SAMPLE SUMMARY AND ANALYSIS

| | Total Pop. | INITIAL SAMPLE | | | | 1 st EXPANSION | | | | | 2 nd EXPANSION | | | | |
|------------|------------|----------------|-------------|-------------|-------------|---------------------------|----------------------|-------------|------------|-----------|---------------------------|---------------------|-------------|------------|---------|
| | | Risk % | Sample Size | # of Errors | % Errors | Risk 25% | 1 st Exp. | # of Errors | Cum Errors | % Error | Risk 40% | 2 nd Exp | # of Errors | Cum Errors | % Error |
| Example | 400 | 10% | 40 | 3 | 7.5% | 25% | 60 | 2 | 5 | 5% | 40% | 60 | 0 | 5 | 3.1% |
| Pop. I | | | | | | | | | | | | | | | |
| Pop. II | | | | | | | | | | | | | | | |
| Pop. III | | | | | | | | | | | | | | | |
| TOT | | | | | | | | | | | | | | | |

| | Total Pop. | 3 rd EXPANSION | | | | | 4 th EXPANSION | | | | | 100% | | |
|------------|------------|---------------------------|----------------------|-------------|------------|----------|---------------------------|----------------------|-------------|------------|---------|-------------|------------|---------|
| | | Risk 55% | 3 rd Exp. | # of Errors | Cum Errors | % Errors | Risk 75% | 4 th Exp. | # of Errors | Cum Errors | % Error | # of Errors | Cum Errors | % Error |
| Example | | N/A | N/A | | | | N/A | | | | | N/A | | |
| Pop. I | | | | | | | | | | | | | | |
| Pop. II | | | | | | | | | | | | | | |
| Pop. III | | | | | | | | | | | | | | |
| TOT | | | | | | | | | | | | | | |

Explanation of example:

- 10% x 400 population = 40 pupils
- 3 errors divided by 40 sample = 7.5% error rate
- 25% x 400 = 100 minus 40 = 60 pupils
- 2 errors in expansion and 3 errors = 5 cumulative errors
- 5 divided by 100 total sample = 5% error rate
- Because the error rate is 5%, a second expansion is needed.
- 40% x 400 = 160 minus 100 = 60 pupils
- 0 errors in expansion + 5 errors = 5 cumulative errors
- 5 divided by 160 total sample = 3.1% error rate
- Because the error rate is less than 5%, a third expansion is not needed.

Each sample was selected in the following manner:

Population I:

Population II:

Population III:

| | POP. III CATEGORIES IN BUILDING/PROGRAM | COUNT | SAMPLE SIZE | # ERRORS | % ERRORS |
|-------|---|--------------|--------------------|-----------------|-----------------|
| 5-A | Alternative Education | | | | |
| 5-B | Cooperative Agreement Programs | | | | |
| 5-C | Home Based | | | | |
| 5-D | Homebound/Hospitalized | | | | |
| 5-E | Nonpublic Part-Time and Home-Schooled | | | | |
| 5-F | Part-Time | | | | |
| 5-G-A | Postsecondary Enrollment Options and Career and Technical Preparation Dual Enrollment | | | | |
| 5-G-B | Early/Middle College | | | | |
| 5-H | Reduced Schedule | | | | |
| 5-I | ISD School of Choice or Former §91 or 91A | | | | |
| 5-K | Special Education Early Childhood | | | | |
| 5-L | Special Education Pupil Transition Services | | | | |
| 5-M | Split-Schedule | | | | |
| 5-N | Suspended and Expelled | | | | |
| 5-O-A | Virtual Learning, Distance Learning, and Independent Study | | | | |
| 5-O-B | Seat Time Waiver | | | | |
| 5-O-C | Cyber School | | | | |
| 5-O-D | Expanded Online Learning | | | | |
| 5-P | Work-Based Learning Experiences (WBLE) | | | | |
| 6-A | Experiential Learning | | | | |
| 6-B | Peer-to-Peer Elective Course Credit | | | | |

FTE ADJUSTMENT FORM

| Building/ Grade/ Program | Pupil's Name | Class | Description | Legal Reference | General Education | | | Special Education | | |
|--------------------------------|-----------------|-------|-------------|--------------------|--------------------------|-----------------|--------------|--------------------------|-----------------|--------------|
| | | | | | Beginning FTE Balance: | | | Beginning FTE Balance: | | |
| | | | | | Claimed FTE | Adjusted FTE | Total FTE | Claimed FTE | Adjusted FTE | Total FTE |
| | | | | | | | | | | |
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| | | | | | | | | | | |
| | | | | | Final Adjusted FTE Count | | | Final Adjusted FTE Count | | |

Note:
 The district should be given a reasonable opportunity to resolve the above potential variances before the exit conference.
 Auditors should consider attaching supporting documentation.

AUDIT FINDINGS – GENERAL

A general audit finding is a general comment or an opportunity for the auditor to assist the local school district in identifying ways to improve its documentation or counting procedures to maximize or accurately report FTE.

| NBR | ABBREV | DESCRIPTION |
|------------|---|---|
| G1 | Good Job | Overall, the district did a good job on reporting for pupil accounting. |
| G2 | Alpha List – Population II and III Pupils | Populations II and III pupils must be identified on the alpha list with the appropriate alpha code or on a separate list. |
| G3 | Reports – Summary Validation Reports | District must submit all computer-generated summary reports needed to validate FTEs as reported on the DS4061. |
| G4 | Alpha Roster - Last Name First by Grade | The alpha list must list all eligible pupils in alphabetical order, last name first, by grade level. |
| G5 | Alpha List - FTE by Pupil and Grade Total | The alpha list must indicate an FTE for each pupil, as well as the FTE total for each grade level. The grade level total on the alpha list should match the grade level total shown on the DS-4061. |
| G6 | Attendance Records - Markings | A mark/symbol must be used to indicate on the attendance record the first day a pupil appears in class for instruction. |
| G7 | Attendance Records - Teacher Marks | All teachers must use the attendance marks stipulated in the district's/PSA's policy. |
| G8 | Attendance Records - Available | Teacher attendance records must be available at the time of the field audit and should be organized weekly beginning with the week prior to count and including count week and the four weeks following count. |
| G9 | Attendance Records – Inaccurate | The pupil's attendance was inaccurately reported, e.g., pupil dropped but marked as present in attendance records, pupil absent on count day and incorrect return date reported, pupil marked as present by teacher but absent by office. This raises questions about the accuracy of attendance records. |

| NBR | ABBREV | DESCRIPTION |
|------------|---|--|
| G10 | Attendance Records - Add/Drop Marks | The date a pupil drops/adds a class should be clearly indicated on the attendance record, e.g., "transferred to Eng. 101, date" on the attendance record for the dropped class and "transferred from Eng. 100, date" on the attendance record for the added class. |
| G11 | Attendance – Teacher, Class, Hour, Dates | Each attendance record must clearly identify teacher, class, hour, and dates of instruction. |
| G12 | Attendance – Markings in Teacher Records | Attendance markings should be easily readable and entered on a separate line or separate page so that they will be distinguishable from grades, scores, and other markings. |
| G13 | Attendance – Do Not Obliterate Names | Do not obliterate pupil names from the official attendance record. In the event that a pupil transfers or drops a class, draw a single line through the name and make a notation at the end of the line, e.g., "transferred to Eng. 101" or "dropped 9/27." |
| G14 | Attendance – Teacher Signature | If computer-generated attendance records are used, they must be verified, signed, and dated weekly by the classroom teacher. |
| G15 | Attendance – Absent on the Count Day | Only those pupils absent on any portion of the count day should be included on the ten-day worksheet. |
| G16 | Attendance – Official Record | We strongly recommend that teachers maintain only one official attendance record. Maintaining more than one creates a situation where records may not match, leading to questions about their validity. |
| G17 | Attendance – 10/30 day period Middle School/High School | For middle and high schools: A ten-day worksheet must be compiled for every building for every hour claimed for state aid and list each pupil who is absent on the count day from that specific building. |
| G18 | Attendance – 10/30 day period Elementary | For elementary schools: A ten-day worksheet must be prepared for every building, indicating the appropriate grade level and listing each pupil who is absent on the count day. |
| G19 | Attendance – Excused Absence Documentation | Excused absences on the count day must be documented in writing, indicating date of absence, reason for absence, name of school official who compiled the documentation, and the date documented. |
| G20 | Attendance - Indicated on the Alpha List | Please use a highlighter color other than pink or yellow to indicate on the alpha rosters the pupils who were absent on the count day. |

| NBR | ABBREV | DESCRIPTION |
|------------|---|--|
| G21 | Alpha Lists and Summary Reports on the Same Day | Alpha lists and summary reports should be generated on the same day to preserve integrity and accuracy of the reports. |
| G22 | Attendance – Take Every Class | Attendance MUST be taken in every class/program/block claimed for state aid. |
| G23 | Attendance Records – Retention | Pupil attendance records must be maintained for three entire school years. |
| G24 | Enrollment – Records Retention and 75% Log | A daily record of total enrollment, # of pupils present/absent, and % of pupils present/absent must be on file for 3 years. The record is required to validate the requirement that 75% of the pupils be present for a day of instruction to be counted. |
| G25 | Alpha List – Name of School | Please indicate the school/academy name and count day (e.g., Fall 2001-02 or Supplemental 2001-02) at the top of each page of the grade level alpha list. |
| G26 | Alpha List – Only Pupils Eligible | Only those pupils who meet attendance and other state aid eligibility requirements should be listed on the alpha list and claimed for state aid. |
| G27 | Pupil Schedules | Pupil schedules, accurately reflecting the classes on the count day, must be furnished to the auditor. |
| G28 | Residence - Codes | All nonresidents must be identified with the appropriate nontraditional (Population III) codes AND district of residence codes or its own separate list. |
| G29 | District of Residence | Incorrect in MSDS. The pupil's resident district was incorrectly identified in MSDS. |
| G30 | Alpha List – Absence Marks | Each pupil who is absent in any class on the count day must be identified on the alpha list. |
| G31 | Alpha List – Review for Accuracy | Alpha Rosters should be reviewed for completeness and accuracy prior to submission in the reporting packet to the ISD/RESA auditor(s). |
| G32 | Alpha List – Must Have 3 FTE Columns | The alpha list must include three FTE columns: General Education FTE, Special Education FTE, and Total FTE. The Total FTE must be less than or equal to 1.00 FTE. |
| G33 | Alpha List – Signature | The last page of the alpha list must be signed and dated by a school official. |

| NBR | ABBREV | DESCRIPTION |
|------------|--|--|
| G34 | Alpha and Attendance Lists in Same Order | Pupils must be listed in the attendance records in the same manner, (i.e., last name, first name) they are listed on the building alpha list. Do not use nicknames or only first names. |
| G35 | Special Ed – Supporting Documentation | District must submit Special Education computer-generated summary sheets to support the FTEs (both General and Special Education) for Special Education pupils as reported on the DS-4061. |
| G36 | Special Ed - MSDS/Worksheets | The Special Education worksheets A/B do not match what was reported in MSDS. |
| G37 | Alpha List and MSDS | The FTEs on the Alpha list do not match the MSDS submission. |
| G38 | Alpha List and MSDS Special Education | The FTEs on the Alpha list and the Special Education worksheets do not match the MSDS submission. |
| G39 | Calendars - Signed | Calendars must be signed. |
| G40 | Calendars - Inaccurate | Calendars must accurately reflect the actual days and hours of pupil instruction. |
| G41 | Residency Code | The Pupil's Residency Code was incorrectly reported in MSDS. |
| G42 | Other | |
| G43 | Attendance - No Classes Held | Teachers must mark cancelled and scheduled “no-school” days/classes in the attendance records. |

AUDIT FINDINGS – SPECIFIC

A specific audit finding is a violation of the State School Aid Act, Revised School Code, Pupil Accounting Administrative Rules, or Pupil Accounting Manual that results in the loss of FTE.

| NBR | ABBREV | DESCRIPTION | LEGAL REFERENCES |
|------------|--|---|--|
| S1 | Absence - 30 Day | Pupil had an excused absence on the count day, did not return to school within 30 calendar days after the count day, and was listed on the building alpha list and claimed for state aid. | Administrative Rules 340.3(c) and 340.7(6); §6(8) of the State School Aid Act |
| S2 | Absence - 10 Day | Pupil had an unexcused absence on the count day, did not return to school within ten school days, and was listed on the alpha list and claimed for state aid. | Administrative Rules 340.3 (c) and 340.7(6); §6(8) of the State School Aid Act |
| S3 | Absent | Pupil left the district before the count date and did not return. | Administrative Rule 340.3(a); §6(8) of the State School Aid Act |
| S4 | Attendance - FTE Adjusted for Classes Attended | The FTE for pupil was adjusted to reflect the number of classes attended during the count period. | §6(8) of the State Aid Act; Administrative Rule 340.7 |
| S5 | Enrollment - After the Count Day | Pupil who enrolled after the count day was listed on the alpha list and claimed for state aid. | Administrative Rule 340.2; §6(8) of the State School Aid Act |
| S6 | Enrollment - Attendance Before the Count Day | District was unable to document the reason why pupil did not attend any classes on or before the count day. | Administrative Rule 340.2; §6(8) of the State School Aid Act |
| S7 | Alpha Roster - Duplicate Pupil | Pupil was listed twice on the alpha list, resulting in a claim of more than 1.0 FTE. | Administrative Rules 340.2 and 340.7; §6(4)(a) of the State School Aid Act |
| S8 | Duplicate Pupil Count | Pupil counted in more than one district for an FTE total greater than 1.0. | Administrative Rules 340.2 and 340.7; §6(4)(a) of the State School Aid Act |
| S9 | Alpha Roster - Pupils | The auditor verified the eligibility of pupil, who was not | §6(8) of the State School Aid Act |

| NBR | ABBREV | DESCRIPTION | LEGAL REFERENCES |
|------------|---|---|--|
| | Not on List but Eligible | included on the original alpha list and not claimed for state aid. ___ FTEs were added. | |
| S10 | Hour Requirement Not Met | The building calendar did not provide the minimum hours of instruction with a certified teacher. | Section 2 of the Pupil Accounting Manual |
| S11 | Pupil Schedule | Pupil was claimed for a full membership but pupil is not scheduled for a full day and there is no detail regarding dual enrollment, reduced schedule, etc. | Administrative Rule 340.7; §6(8) of the State School Aid Act; Section 5-F of the Pupil Accounting Manual |
| S12 | Minimum Age | Pupil was listed on the alpha list and claimed for state aid but was not age five as of December 1 and parental notice was not timely received for pupil age five by October 1. | §6(4)(l) of the State School Aid Act; §1147 of the Revised School Code |
| S13 | Age - Under 20 by September 1 | Pupil who was not under the age of 20 (age 26 if Special Education or age 22 if criteria for homeless pupil satisfied) as of September 1 of the current school year was listed on the alpha list and claimed for state aid. | §6(4)(l) of the State School Aid Act; Administrative Rule 340.1702 |
| S14 | General Education/Special Education Split | The FTE split between General Education and Special Education was inaccurate. | §51a of the State School Aid Act; Administrative Rules 340.1701b and 340.1702 |
| S15 | General Education/Special Education Split | Cooperative Education pupil was counted in both General Education in one district and Special Education in another, resulting in FTE greater than 1.0. | §6(4) of the State School Aid Act |
| S16 | General Education/Special Education Split | Special Education pupils over age 20 attended General Education classes and not counted on MSDS. | §6(4)(l) of the State School Aid Act |
| S17 | Special Education - §53a to 52 | Pupil reported as §53a was not approved by the Department so changed to §52. | §52 and 53a of the State School Aid Act |
| S18 | Special Education - §52 to 53a | Pupil reported as §52 was approved by the Department so changed to §53a. | §52 and 53a of the State School Aid Act |

| NBR | ABBREV | DESCRIPTION | LEGAL REFERENCES |
|------------|---|--|--|
| S19 | Special Education - Ancillary Services Only | Pupil was receiving ancillary services only and not eligible to be counted in membership. | |
| S20 | Special Education - Wrong Category | Pupil was reported in the wrong Special Education category. | |
| S21 | Juvenile Home | Pupil was in attendance at and claimed by a juvenile facility. | §6(4)(d) and §24 of the State School Aid Act |
| S22 | Residency Requirements | Pupils did not meet the residency requirements. | §6(4)(b) of the State School Aid Act; Administrative Rules 340.2 and 340.3; Section 4 of the Pupil Accounting Manual |
| S23 | Nonresident Pupil - Waiver/Release | The educating district did not receive a waiver/release from the nonresident pupil's district of residence that allowed the pupil to be counted in membership. | §6(4)(b) and §6(6) of the State School Aid Act; Section 4 of the Pupil Accounting Manual |
| S24 | Pupil - High School Diploma | A pupil previously received a high school diploma and therefore, is not eligible to be counted in membership. | §6(4)(m) of the State School Aid Act |
| S25 | Learning Lab | FTE claimed for the learning lab classes exceeded the FTE for the same class in a traditional setting. | Section 5-A of the Pupil Accounting Manual; Administrative Rule 340.13 |
| S26 | Alternative Education - Other | | |
| S27 | Cooperative Agreement Programs | | |
| S28 | Home-Based - Record of Service | Record of service was not maintained for pupil who was identified on the alpha list as receiving instruction under the home-based provision. | Section 5-C of the Pupil Accounting Manual; §6(4)(u) of the State School Aid Act; §1311 and §1311a of the Revised School Code; Administrative Rule 340.2 |
| S29 | Home-Based - Hours of | Pupil identified on the alpha list as receiving home-based | Section 5-C of the Pupil |

| NBR | ABBREV | DESCRIPTION | LEGAL REFERENCES |
|------------|---|---|---|
| | Instruction by Certified Teacher | instruction did not receive the required hours of instruction per week by a certified teacher during the count period. | Accounting Manual; §6(4)(u) of the State School Aid Act; §1311 and §1311a of the Revised School Code; Administrative Rule 340.2 |
| S30 | Home-Based – Prorated FTE | Pupil was not subject to a mandatory expulsion, so FTE for home-based services must be prorated. | Sections 5-C and 5-N of the Pupil Accounting Manual; §6(4)(u) of the State School Aid Act; §1311 and §1311a of the Revised School Code; Administrative Rule 340.2 |
| S31 | Home-Based - Other | | |
| S32 | Homebound/ Hospitalized - Service | Record of service was not maintained for pupil who was identified on the alpha list as receiving instruction under the homebound/hospitalized provision. | §109 of the State School Aid Act; Section 5-D of the Pupil Accounting Manual |
| S33 | Homebound/ Hospitalized - Hours of Instruction | Pupil identified on the alpha list as receiving homebound/hospitalized instruction did not receive the required hours of instruction per week by a certified teacher during the count period. | Administrative Rule 340.2; §109 of the State School Aid Act; Section 5-D of the Pupil Accounting Manual |
| S34 | Homebound/ Hospitalized - Physician's Certification | The pupil's attending physician's certification was not on file. | §109 of the State School Aid Act; Section 5-D of the Pupil Accounting Manual |
| S35 | Homebound/ Hospitalized - Other | | |
| S36 | Non-Public Part-Time Pupils – Core Classes | Non-public part-time pupils received instruction in core classes. | Section 5-E of the Pupil Accounting Manual; §6(6) and §166b of the State School Aid Act; Administrative Rule 340.2(20). |
| S37 | Non-Public Part-Time Pupils - Other | | |
| S38 | Part-Time Pupils - FTE | Pupil was claimed for FTE greater than hours of | Administrative Rules 304.2 and |

| NBR | ABBREV | DESCRIPTION | LEGAL REFERENCES |
|------------|---|--|--|
| | | instruction scheduled/provided. | 340.7; §6(8) of the State School Aid Act; Section 5-F of the Pupil Accounting Manual |
| S39 | Part-Time Pupils - Other | | |
| S40 | Postsecondary Enrollment – Payment of Charges | District did not pay the eligible charges for the postsecondary courses. | Section 5-G of the Pupil Accounting Manual; §21b of the State School Aid Act |
| S41 | Postsecondary Enrollment - Other | | §21b of the State School Aid Act; Administrative Rule 340.17; Career and Technical Preparation Act; Postsecondary Enrollment Options Act; Section 5-G of the Pupil Accounting Manual |
| S42 | Reduced Schedule – Educational Interest | Pupil did not meet the best educational interest criterion for a reduced schedule. The membership was adjusted to reflect the appropriate FTE for the number of scheduled hours. | §101(7)(c) of the State School Aid Act; Section 5-H of the Pupil Accounting Manual |
| S43 | Reduced Schedule - Documentation | The school did not fill out the appropriate reduced schedule forms. The membership was adjusted to reflect the appropriate FTE for the number of scheduled hours. | §101(7)(c) of the State School Aid Act; Section 5-H of the Pupil Accounting Manual |
| S44 | Reduced Schedule - Other | | |
| S45 | Schools of Choice – Special Education - Cooperative Agreement | District does not have a signed cooperative agreement with resident district covering Special Education pupils. | Section 5-I of the Pupil Accounting Manual; §105c of the State School Aid Act; Administrative Rule 340.4 |
| S46 | Schools of Choice - Other | | §105 and 105c of the State School Aid Act; Administrative Rule 340.4 |
| S47 | Special Education Early | The reported FTE for preprimary-aged Special Education | §6(4) of the State School Aid Act; |

| NBR | ABBREV | DESCRIPTION | LEGAL REFERENCES |
|------------|--|---|---|
| | Childhood- Service | pupil did not reflect the service provided during the count period. | Administrative Rules 340.1754 and 340.1755; Section 5-K of the Pupil Accounting Manual |
| S48 | Special Education Early Childhood - Other | | |
| S49 | Special Education Pupil Transition | | |
| S50 | Mandatory Expulsion | Mandatory expulsion pupils were being educated with the general population. | Section 5-N of the Pupil Accounting Manual; §1311 and §1311a of the Revised School Code |
| S51 | Suspended and Expelled - Other | | |
| S52 | Michigan Virtual High School and Distance Learning - Mentor | Virtual and distance learning pupils were not mentored by an on-site certified teacher. | Sections 5-O-A and 5-O-D of the Pupil Accounting Manual; §98 of the State School Aid Act; Administrative Rule 340.11 |
| S53 | Michigan Virtual High School and Distance Learning - Number of Courses | Courses are at the pupil's self-scheduled time and place and pupil's schedule exceeded the two course limit for virtual or distance learning classes. | Sections 5-O-A and 5-O-D of the Pupil Accounting Manual; §98 of the State School Aid Act; Administrative Rule 340.11 |
| S54 | Michigan Virtual High School and Distance Learning - Charges | District did not pay applicable charges for virtual or distance learning classes. | Sections 5-O-A and 5-O-D of the Pupil Accounting Manual; §98 of the State School Aid Act; Administrative Rule 340.11 |
| S55 | Michigan Virtual High School and Distance Learning - Attendance | Pupil was not in attendance during the count period. | Sections 5-O-A and 5-O-D of the Pupil Accounting Manual; §98 of the State School Aid Act; Administrative Rules 340.2 and 340.11 |

| NBR | ABBREV | DESCRIPTION | LEGAL REFERENCES |
|------------|--|--|--|
| S56 | Michigan Virtual High School and Distance Learning - Other | | |
| S57 | Work-Based - Attendance | Attendance record was not maintained. | Administrative Rules 340.2, 340.15, and 340.16; Section 5-P of the Pupil Accounting Manual |
| S58 | Work-Based - Training Plan | Training plan and training agreement were not completed. | Administrative Rules 340.15 and 340.16; Section 5-P of the Pupil Accounting Manual |
| S59 | Work-Based - Site Visits | Certified teacher/coordinator employed by the district failed to monitor pupil's work with site visits as required or a staff member failed to visit the worksite of a Special Education pupil as required to check pupil's attendance and progress and to assess placement in terms of health, safety, and welfare. | Administrative Rules 340.15, 340.16, and 340.1733(i); Section 5-P of the Pupil Accounting Manual |
| S60 | Work-Based - Special Education | Pupil's Special Education work site based files were missing one or more of the requirements to count in membership, i.e., training plan or training agreement incomplete, not aligned with IEP/EDP, no safety training, no visitation log, no worker's compensation/general liability insurance, etc. | Administrative Rules 340.15 and 340.16; Section 5-P of the Pupil Accounting Manual |
| S61 | Work-Based - General Education | The pupil's work-based files were missing one or more of the requirements to count in membership, i.e., training plan or training agreement incomplete, not aligned with EDP, no safety training, no visitation log, no worker's compensation/general liability insurance, etc. | Administrative Rules 340.15 and 340.16; Section 5-P of the Pupil Accounting Manual |
| S62 | Work-Based - Other | | |
| S63 | Experiential Learning Courses - Other | | Section 6-A of the Pupil Accounting Manual; Administrative Rule 340.14 |

| NBR | ABBREV | DESCRIPTION | LEGAL REFERENCES |
|------------|---|--|---|
| S64 | Other | | |
| S65 | Adult Ed | | |
| S66 | Attendance - Other | | |
| S67 | Residency - Other | | |
| S68 | Seat Time Waiver - Other | | |
| S69 | Seat Time Waiver – Logins | Pupil did not log into at least one program-sponsored online course for ten calendar days during the 30-calendar day count period. | Section 5-O-B of the Pupil Accounting Manual; §101(9) of the State School Aid Act; Administrative Rule 340.18 |
| S70 | Seat Time Waiver – Two-way Weekly Interaction | No documentation of weekly two-way interaction that is relevant to the pupil’s course content between the teacher of record and pupil for each week of the count period. | Section 5-O-B of the Pupil Accounting Manual; §101(9) of the State School Aid Act; Administrative Rule 340.18 |
| S71 | Seat Time Waiver – Course-Specific Schedule | Pupil does not have a course-specific schedule. | Section 5-O-B of the Pupil Accounting Manual; §101(9) of the State School Aid Act; Administrative Rule 340.18 |
| S72 | Seat Time Waiver –On-Site Mentor | Teacher of record is not assigned to pupil or teacher of record is not a certified Michigan teacher employed by the district. | Section 5-O-B of the Pupil Accounting Manual; §101(9) of the State School Aid Act; Administrative Rule 340.18 |
| S73 | Approved §25e Adjustments (November) | System-generated audit finding for auditor-approved §25e requests in the month of November | §25e of the State School Aid Act |
| S74 | Approved §25e Adjustments (December) | System-generated audit finding for auditor-approved §25e requests in the month of December | §25e of the State School Aid Act |

| NBR | ABBREV | DESCRIPTION | LEGAL REFERENCES |
|------------|--------------------------------------|--|--|
| S75 | Approved §25e Adjustments (January) | System-generated audit finding for auditor-approved §25e requests in the month of January | §25e of the State School Aid Act |
| S76 | Approved §25e Adjustments (February) | System-generated audit finding for auditor-approved §25e requests in the month of February | §25e of the State School Aid Act |
| S77 | Approved §25e Adjustments (March) | System-generated audit finding for auditor-approved §25e requests in the month of March | §25e of the State School Aid Act |
| S78 | Approved §25e Adjustments (April) | System-generated audit finding for auditor-approved §25e requests in the month of April | §25e of the State School Aid Act |
| S79 | Approved §25e Adjustments (May) | System-generated audit finding for auditor-approved §25e requests in the month of May | §25e of the State School Aid Act |
| S80 | Approved §25e Adjustments (June) | System-generated audit finding for auditor-approved §25e requests in the month of June | §25e of the State School Aid Act |
| S81 | Manual §25e Adjustments | §25e requests manually entered by the Pupil Auditor | §25e of the State School Aid Act |
| S82 | Certified Teacher | Pupil is not taught by a certified teacher. | §6(8) and §163 of the State School Aid Act; Administrative Rule 340.10(2)(a) |

CONFIRMATION REQUEST

_____ School District

Auditing Procedures Completed by _____ ISD

Count Dates _____

Purpose – This form provides standard information for the public accountant who is auditing the financial records of the district. The work done by ISD auditors and the results of the audit are considered by the public accountant when designing his/her audit procedures. This optional form is provided by the Michigan Department of Education at the request of several ISD representatives who wanted a standard reporting form.

1. Identify the individual(s) who audited the pupil membership counts and graduation and drop out (GAD) data. Include their years of experience, education, and any recent pupil membership and GAD training they have attended.

| <u>Auditor</u> | <u>Years of Experience</u> | <u>Education</u> | <u>Training (Date, Title)</u> |
|----------------|----------------------------|------------------|-------------------------------|
| _____ | _____ | _____ | _____ |
| _____ | _____ | _____ | _____ |
| _____ | _____ | _____ | _____ |

2. Indicate any relationships the pupil membership auditors may have with the local school district or its employees that may impair the pupil membership auditor’s independence.

3. Desk audits were performed for the following buildings/programs for the:

October Count: _____

February Count: _____

4. Field audits were performed for the following buildings/programs for the:

October Count: _____

February Count: _____

5. Report the number of state aid memberships:

| | <u>General Ed K-12</u> | <u>Special Ed K-12 Sec. 52</u> | <u>Special Ed K-12 Sec. 53a</u> | <u>Total</u> |
|----------|------------------------|--------------------------------|---------------------------------|--------------|
| October | _____ | _____ | _____ | _____ |
| February | _____ | _____ | _____ | _____ |

6. Did the ISD use the Michigan Department of Education (the Department) audit process?
 Yes No

If not, did the ISD use a standardized approach to the audit process? Yes No
Please describe the audit process used and include a copy of the audit program (not the work papers) if the Department audit program was not used.

7. As part of your audit procedures, was the district's entry of the individual building pupil counts into the district-wide total for MSDS (Form DS-4061) reviewed for reasonableness?
 Yes No If no, please explain.

8. Did the local district provide required supporting records for verification of the count?
 Yes No If no, please discuss which significant records were missing.

9. Did the ISD auditor perform a building risk assessment and perform sampling based on the risk assessment? Yes No.
Please describe the risk factors considered and the sampling method used.

10. Were higher risk programs and issues (Population III categories) considered in the scope of the audit? Yes No If no, please explain.

11. For pupils absent on the count day, did the audit scope include procedures to verify that pupils included in the count properly returned to school within the 10- or 30-day periods?
 Yes No If no, please explain.

12. Were any building error rates greater than 5%? Yes No
If yes, describe the results of the expanded audit procedures.

13. Were any building error rates greater than 10%? Yes No
If yes, describe the actions taken.

14. Was the most recent DS-4168 reviewed? Yes No
Please indicate any exceptions or shortages of days or hours.

15. Although the current year's DS-4168 is not due until August, did you review (as a matter of assistance to the local district) the current school year calendar for compliance with the current year minimum days and hours? Yes No
If yes, please explain any potential shortages noted.

Results

1. Were all pupil accounting adjustments included in the pupil auditor's narrative report?
 Yes No If no, please explain.

2. Based on the result of the ISD pupil count audit, in the ISD auditor's opinion, does the local school district have an adequate process for computing a substantially accurate membership count in accordance with the Pupil Accounting Manual? Yes No
If no, please explain.

3. Does the ISD auditor have any reason to believe that significant errors might exist that were not detected in the audit? Yes No
If yes, please explain (including the amount of the potential adjustment).

Exit Status, Drop Out Rates, and Graduation Rate Audits

1. Desk or field audits were performed for the:

February Count _____ October Count _____

2. Did the ISD use the Department audit process? Yes No
If not, did the ISD use a standardized approach to the audit process? Yes No
Please describe the audit process used and include a copy of the audit program (not the work papers) if the Department audit program was not used.

3. Were any building error rates greater than 5%? Yes No
If yes, describe the results of the expanded audit procedures.

Completed by: _____ Date: _____

Title: _____

Appendix K

| Acronym | Meaning |
|----------------|--|
| CEPI | Center for Educational Performance and Information |
| CPA | Certified Public Accountant |
| CTE | Career and Technical Education |
| DS4061 | Unaudited FTE Report |
| DS4120 | Audited FTE Report |
| DS4168 | Days and Clock Hours Report |
| EDP | Educational Development Plan |
| EEM | Educational Entity Master |
| FTE | Full Time Equated |
| GAD | Graduation and Dropout |
| GED | General Educational Development |
| IEP | Individualized Education Program |
| IFSP | Individualized Family Service Plan |
| ISD | Intermediate School District |
| MCL | Michigan Compiled Laws |
| MOECS | Michigan Online Educator Certification System |
| MSDS | Michigan Student Data System |
| MSIX | Migrant Student Information Exchange |
| OPPS | Office of Professional Preparation Services |
| PSA | Public School Academy |
| REP | Registry for Educational Personnel |
| RESA | Regional Educational Service Agency |
| SIS | Student Information System |
| TCLE | Transition Community Living Experience |
| UIC | Unique Identification Code |
| USED | United States Department of Education |
| WBLE | Work-Based Learning Experience |

| Due Date | Activity |
|---------------------------------|---|
| September 17, 2014 | GAD – End-of-summer graduates, cohort year changes, PEPE changes, exit status updates, and UIC linking requests due in MSDS |
| October 1, 2014 | Pupil membership count date (fall collection) |
| October 20, 2014 (tentative) | Auditable GAD rates in GAD application |
| November 5, 2014 | Pupil membership submission deadline |
| November 12, 2014 | Pupil membership certification deadline |
| November 15, 2014 | Audit Narrative due in MSDS |
| November 15, 2014 | Field Audit Planning Schedule due to Department’s Office of Financial Management - Audits |
| February 11, 2015 | Supplemental membership count date (spring collection) |
| March 18, 2015 | Pupil membership submission deadline |
| March 25, 2015 | Pupil membership certification deadline |
| June 30, 2015 | End-of-year Collection certification deadline |
| July 15, 2015 | Enter Days and Clock Hours Report DS4168 into EEM |
| August 1, 2015 | Audit Days and Clock Hours Report DS4168 |
| October 15, 2015 | Audit Narrative due in MSDS |

Disclaimer: The following is provided as a service of the Michigan Department of Education (Department) and is included in this manual with the understanding that the Department is not hereby rendering legal advice or representing that all relevant authority is included. No judicial decisions or Michigan attorney general opinions are included and neither the lists of statutory, regulatory, and other relevant authority nor the topical index is intended to be comprehensive. Individuals should consult all relevant statutes, administrative rules, judicial decisions, Attorney General opinions, and other authority, and those desiring or requiring legal advice should seek the services of an attorney.

MICHIGAN AND FEDERAL STATUTES

- Career and Technical Preparation Act, MCL 388.1901 – MCL 388.1913
- Fair Labor Standards Act, 29 USC 201 *et seq.*
- Individuals with Disabilities Education Act, 20 USC 1400 *et seq.*
- Interstate Compact on Educational Opportunity for Military Children, MCL 3.1041 – MCL 3.1042
- Nonpublic School Act, MCL 388.551- MCL 388.558
- Postsecondary Enrollment Options Act, MCL 388.511 – MCL 388.524
- Revised School Code, MCL 380.1 – MCL 380.1852
- State School Aid Act, MCL 388.1601 – MCL 388.1896
- Youth Employment Standards Act, MCL 409.101 – MCL 409.124

MICHIGAN ADMINISTRATIVE RULES (MICHIGAN ADMINISTRATIVE CODE)

- Career and Technical Education Reimbursed Programs, Rule 395.231 to Rule 395.376
- Education of Pregnant Students, Rule 340.1121 and Rule 340.1122
- Postsecondary Dual Enrollment Criteria for Fifth-Year High School Pupils, Rule 388.151 to Rule 388.155
- School District Pupil Accounting for Distribution of State Aid, Rule 340.1 to Rule 340.18
- Special Education Programs and Services, Rule 340.1701 to Rule 340.1862

MICHIGAN DEPARTMENT OF EDUCATION PUPIL ACCOUNTING MANUAL

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| Junior ROTC, instructional time | | 388.1701(7)(e) | 340.10(3)(a) | | |
| Juvenile detention facility, child caring institution, or mental health institution | | 388.1606(4)(d) 388.1624 | | | |
| Kindergarten, alternate schedule | | 388.1701(5) | | 2 | |
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| Membership, foster care | 380.1148(2) | | | | |
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| Membership, placement in institution | | 388.1606(4)(d) | | | |
| Membership, postsecondary institution | | | 340.7(7) 340.10a(4) | 5-G-A | |
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| Membership, pupil counted by more than 1 district | | 388.1606(4) | 340.2 340.7 | | |
| Membership, public school academy | | 388.1606(4) | | 3 | |
| Membership, sparsely populated district | | 388.1606(4)(y) | | | |
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