

# LIMITED PROCEDURES ENGAGEMENT

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## Hatboro-Horsham School District Montgomery County, Pennsylvania

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January 2019



Commonwealth of Pennsylvania  
Department of the Auditor General

Eugene A. DePasquale • Auditor General



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EUGENE A. DePASQUALE  
AUDITOR GENERAL

Dr. Curtis Griffin, Superintendent  
Hatboro-Horsham School District  
229 Meetinghouse Road  
Horsham, Pennsylvania 19044

Mr. James H. Greenhalgh, Board President  
Hatboro-Horsham School District  
229 Meetinghouse Road  
Horsham, Pennsylvania 19044

Dear Dr. Griffin and Mr. Greenhalgh:

We conducted a Limited Procedures Engagement (LPE) of the Hatboro-Horsham School District (District) to determine its compliance with certain relevant state laws, regulations, policies, and administrative procedures (relevant requirements). The LPE covers the period July 1, 2013 through June 30, 2017, except for any areas of compliance that may have required an alternative to this period. The engagement was conducted pursuant to authority derived from Article VIII, Section 10 of the Constitution of the Commonwealth of Pennsylvania and the Fiscal Code, 72 P.S. §§ 402 and 403, but was not conducted in accordance with *Government Auditing Standards* issued by the Comptroller General of the United States.

As we conducted our LPE procedures, we sought to determine answers to the following questions, which serve as our LPE objectives:

- Did the District have documented board policies and administrative procedures related to the following?
  - Internal Controls
  - The Right-to-Know Law
  - Transportation Operations
- Were the policies and procedures adequate and appropriate, and have they been properly implemented?
- Did the District comply with the relevant requirements in the Right-to-Know Law?

- Did the District correctly calculate and report transportation data to the Pennsylvania Department of Education (PDE), and did the District receive the correct amount of transportation reimbursement? (24 P.S. §§ 13-1301, -1302, -1305, -1306; PA Code Title 22, Chap. 11)

Our engagement found that the District properly implemented policies and procedures for the areas mentioned above and complied, in all significant respects, with relevant requirements except as detailed in the findings in this report.

We also evaluated the application of best practices in the area of school safety. Due to the sensitive nature of this issue and the need for the results of this review to be confidential, we did not include the complete results of our review of school safety in this report. However, we communicated the full results of our review of school safety to District officials, the PDE, and other appropriate officials as deemed necessary.

The findings and our related recommendations have been discussed with the District's management, and their responses are included in the finding section of this letter. We believe the implementation of our recommendations will improve the District's operations and facilitate compliance with legal, administrative requirements, and best practices. We appreciate the District's cooperation during the conduct of the engagement.

Sincerely,



Eugene A. DePasquale  
Auditor General

December 27, 2018

cc: **HATBORO-HORSHAM SCHOOL DISTRICT** Board of School Directors

## Table of Contents

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	Page
Background Information .....	1
Finding(s) .....	9
Finding No. 1 – The District Failed to Retain Required Documentation to Support the More Than \$1.5 Million in Regular Transportation Reimbursements in Noncompliance with the Public School Code ....	9
Finding No. 2 – The Hatboro-Horsham School District Failed to Conduct All Monthly Fire Drills as Required by the Public School Code and Inaccurately Reported Fire Drill Data to the PDE .....	15
Status of Prior Audit Findings and Observations .....	20
Distribution List .....	21

## Background Information

School Characteristics 2017-18 School Year <sup>A</sup>	
County	Montgomery
Total Square Miles	18.6
Number of School Buildings	7
Total Teachers	378
Total Full or Part-Time Support Staff	485
Total Administrators	33
Total Enrollment for Most Recent School Year	4,758
Intermediate Unit Number	23
District Vo-Tech School	Eastern Center for Arts and Technology

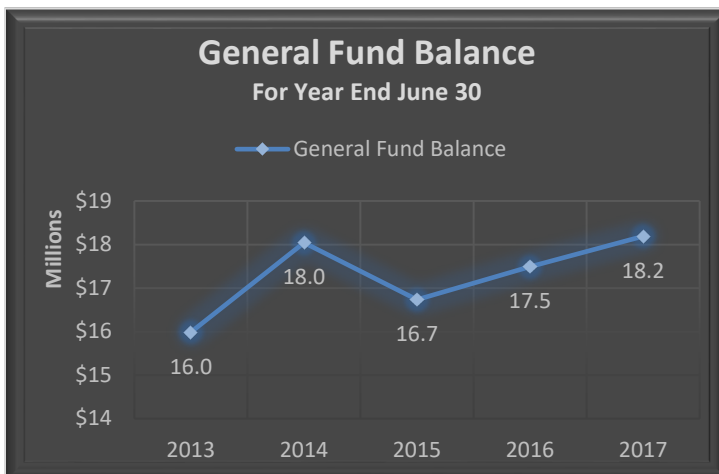
A - Source: Information provided by the District administration and is unaudited.

## Mission Statement<sup>A</sup>

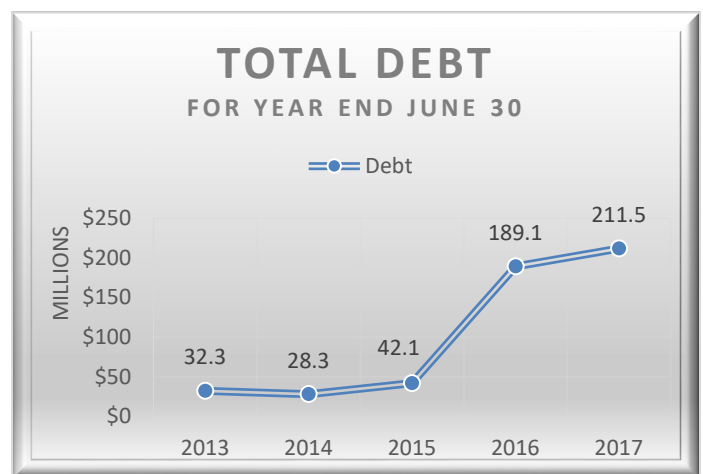
Prepare and challenge all students to excel academically and to develop social skills and creativity by providing exemplary and innovative educational programs through a supportive collaboration of educators, students, parents and community stakeholders.

## Financial Information

The following pages contain financial information about the Hatboro-Horsham School District (District) obtained from annual financial data reported to the Pennsylvania Department of Education (PDE) and available on the PDE's public website. This information was not audited and is presented for **informational purposes only**.

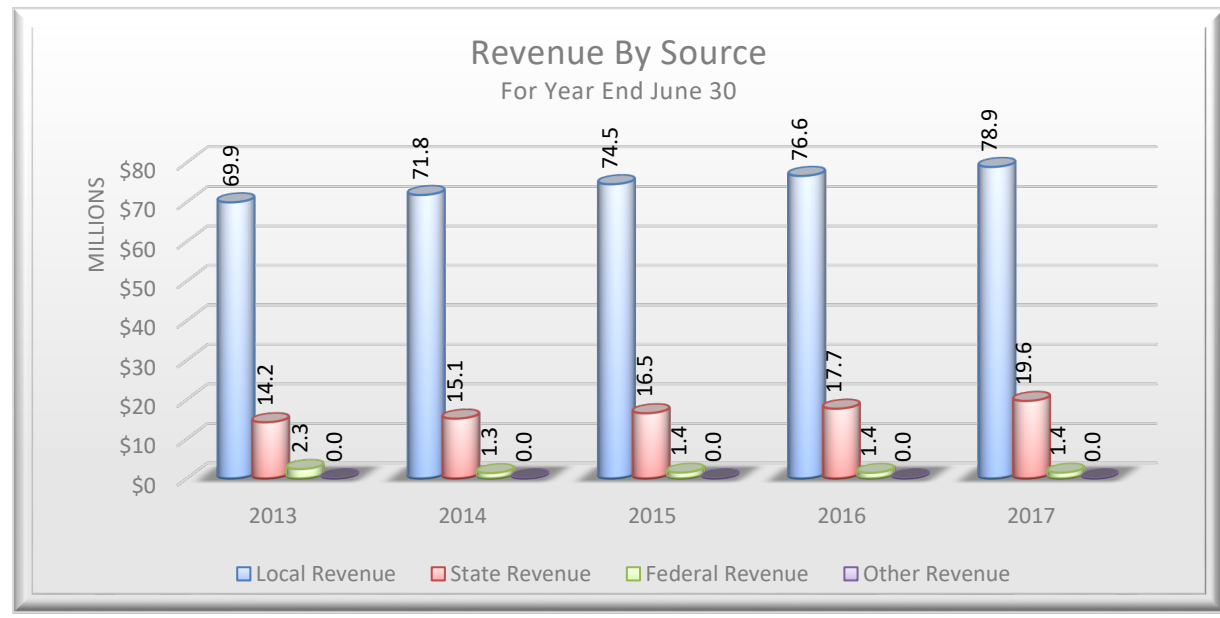
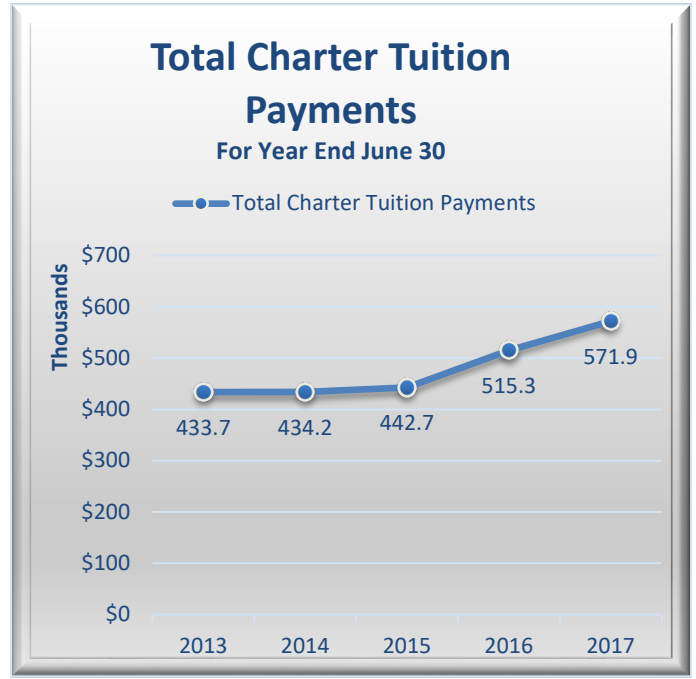
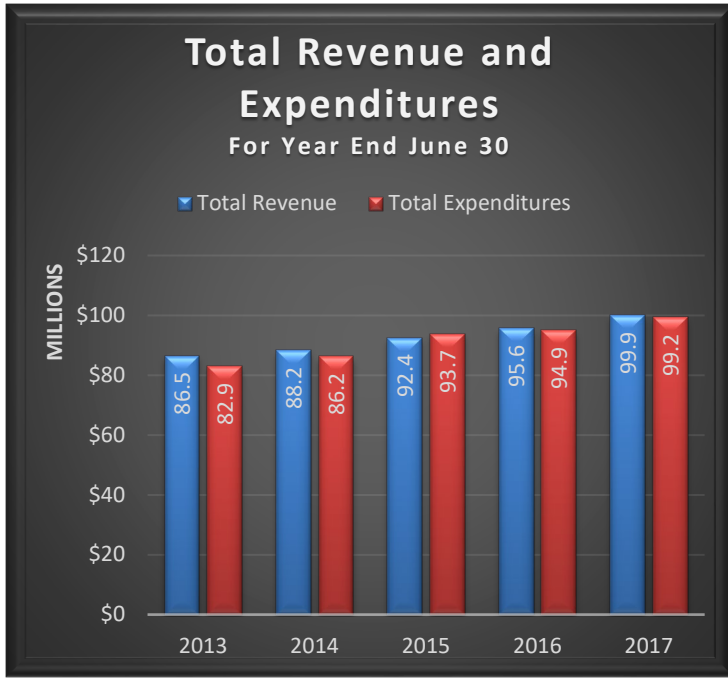


**Note:** General Fund Balance is comprised of the District's Committed, Assigned and Unassigned Fund Balances.



**Note:** Total Debt is comprised of Short-Term Borrowing, General Obligation Bonds, Authority Building Obligations, Other Long-Term Debt, Other Post-Employment Benefits, Compensated Absences and Net Pension Liability.

## Financial Information Continued



## **Academic Information**

The graphs on the following pages present School Performance Profile (SPP) scores, Pennsylvania System of School Assessment (PSSA) scores, Keystone Exam results, and 4-Year Cohort Graduation Rates for the District obtained from the PDE's data files for the 2014-15, 2015-16 and 2016-17 school years.<sup>1</sup> These scores are provided in the District's audit report for **informational purposes only**, and they were not audited by our Department. Please note that if one of the District's schools did not receive a score in a particular category and year presented below, the school will not be listed in the corresponding graph.<sup>2</sup> Finally, benchmarks noted in the following graphs represent the statewide average of all public school buildings in the Commonwealth that received a score in the category and year noted.<sup>3</sup>

### **What is a SPP score?**

A SPP score serves as a benchmark for schools to reflect on successes, achievements, and yearly growth. The PDE issues a SPP score using a 0-100 scale for all school buildings in the Commonwealth annually, which is calculated based on standardized testing (i.e., PSSA and Keystone exam scores), student improvement, advance course offerings, and attendance and graduation rates. Generally speaking, a SPP score of 70 or above is considered to be a passing rate.

The PDE started issuing a SPP score for all public school buildings beginning with the 2012-13 school year. For the 2014-15 school year, the PDE only issued SPP scores for high schools taking the Keystone Exams as scores for elementary and middle schools were put on hold due to changes with PSSA testing.<sup>4</sup> The PDE resumed issuing a SPP score for all schools for the 2015-16 school year.

### **What is the Keystone Exam?**

The Keystone Exam measures student proficiency at the end of specific courses, such as Algebra I, Literature, and Biology. The Keystone Exam was intended to be a graduation requirement starting with the class of 2017, but that requirement has been put on hold until the 2020-21 school year.<sup>5</sup> In the meantime, the exam is still given as a standardized assessment and results are included in the calculation of SPP scores. The Keystone Exam is scored using the same four performance levels as the PSSAs, and the goal is to score Proficient or Advanced for each course requiring the test.

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<sup>1</sup> The PDE is the sole source of academic data presented in this report. All academic data was obtained from the PDE's publically available website.

<sup>2</sup> The PDE's data does not provide any further information regarding the reason a score was not published for a specific school. However, readers can refer to the PDE's website for general information regarding the issuance of academic scores.

<sup>3</sup> Statewide averages were calculated by our Department based on individual school building scores for all public schools in the Commonwealth, including district schools, charters schools, and cyber charter schools.

<sup>4</sup> According to the PDE, SPP scores for elementary and middle schools were put on hold for the 2014-15 school year due to the state's major overhaul of the PSSA exams to align with PA Core standards and an unprecedented drop in public schools' PSSA scores that year. Since PSSA scores are an important factor in the SPP calculation, the state decided not to use PSSA scores to calculate a SPP score for elementary and middle schools for the 2014-15 school year. Only high schools using the Keystone Exam as the standardized testing component received a SPP score.

<sup>5</sup> Act 39 of 2018, effective July 1, 2018, amended the Public School Code to further delay the use of Keystone Exams as a graduation requirement for an additional year until the 2020-21 school year. *See* 24 P.S. § 1-121(b)(1).

### **What is the PSSA?**

The PSSA is an annual, standardized test given across the Commonwealth to students in grades 3 through 8 in core subject areas, including English and Math. The PSSAs help Pennsylvania meet federal and state requirements and inform instructional practices, as well as provide educators, stakeholders, and policymakers with important information about the state's students and schools.

The 2014-15 school year marked the first year that PSSA testing was aligned to the more rigorous PA Core Standards.<sup>6</sup> The state uses a grading system with scoring ranges that place an individual student's performance into one of four performance levels: Below Basic, Basic, Proficient, and Advanced. The state's goal is for students to score Proficient or Advanced on the exam in each subject area.

### **What is a 4-Year Cohort Graduation Rate?**

The PDE collects enrollment and graduate data for all Pennsylvania public schools, which is used to calculate graduation rates. Cohort graduation rates are a calculation of the percentage of students who have graduated with a regular high school diploma within a designated number of years since the student first entered high school. The rate is determined for a cohort of students who have all entered high school for the first time during the same school year. Data specific to the 4-year cohort graduation rate is presented in the graph.<sup>7</sup>

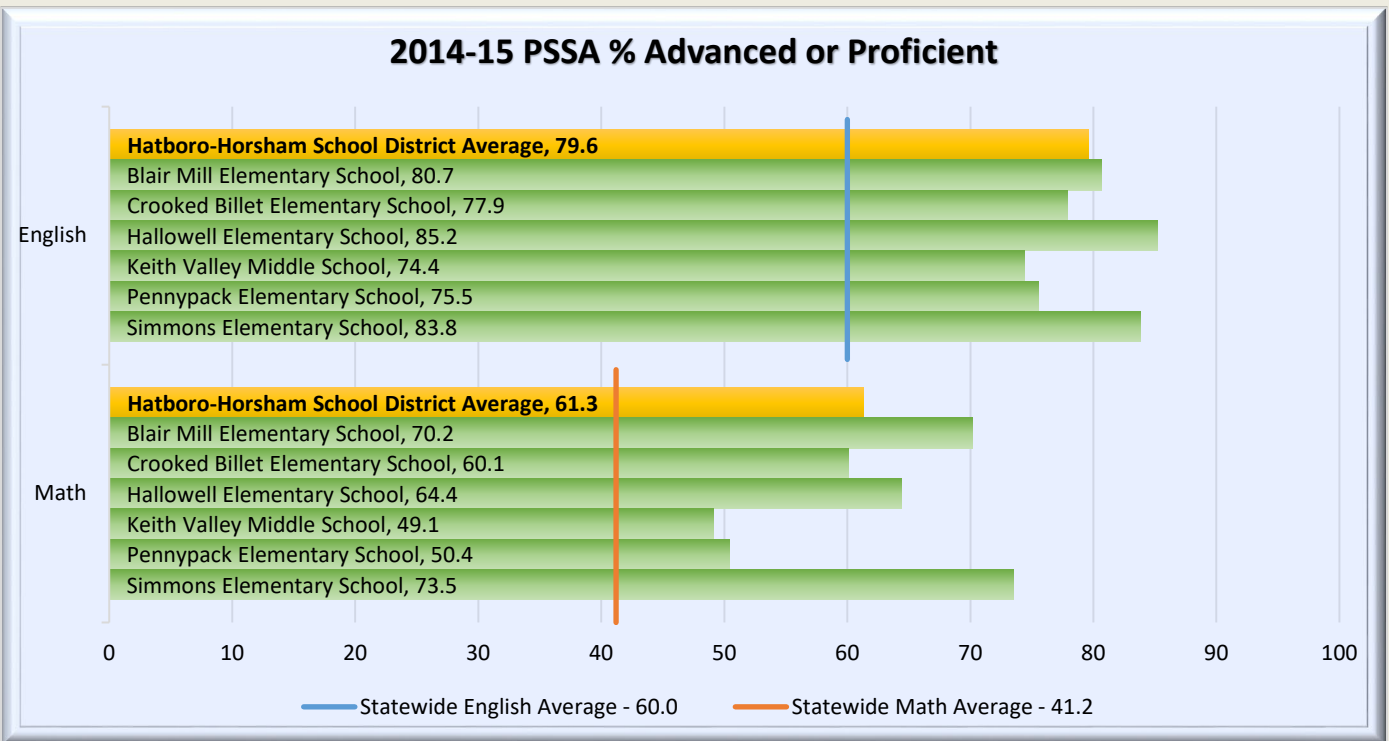
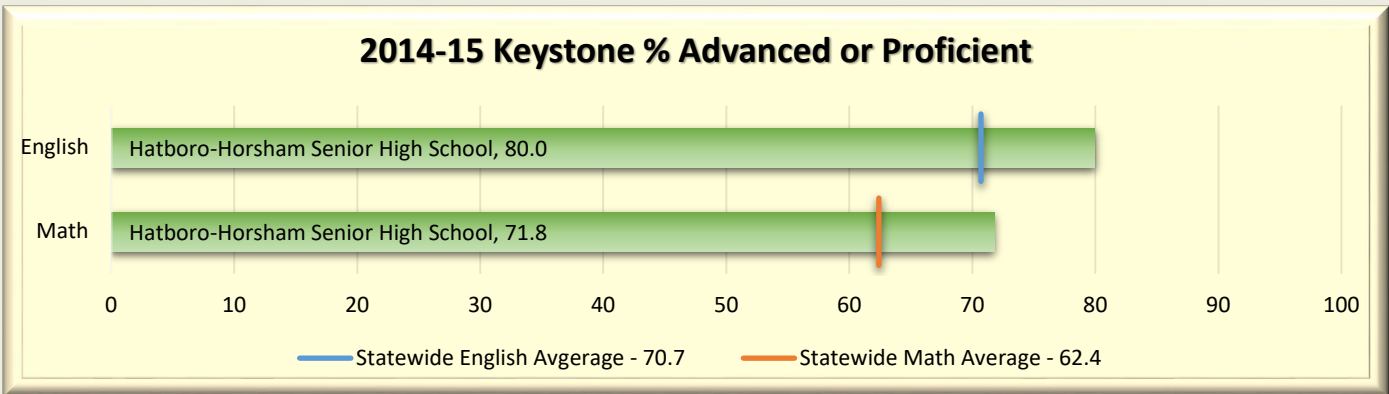
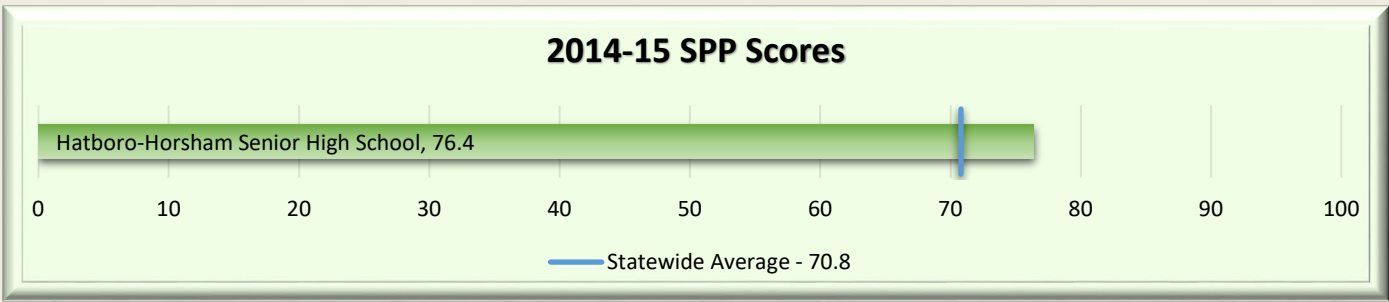
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<sup>6</sup> The PDE has determined that PSSA scores issued beginning with the 2014-15 school year and after are not comparable to prior years due to restructuring of the exam.

<sup>7</sup> The PDE also calculates 5-year and 6-year cohort graduation rates. Please visit the PDE's website for additional information: <http://www.education.pa.gov/Data-and-Statistics/Pages/Cohort-Graduation-Rate-.aspx>.

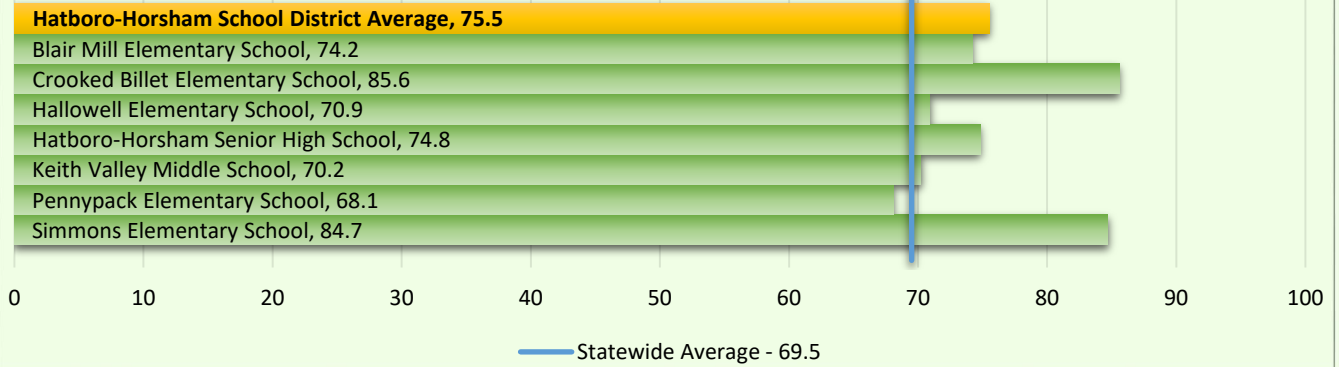


**2014-15 Academic Data**  
**School Scores Compared to Statewide Averages**

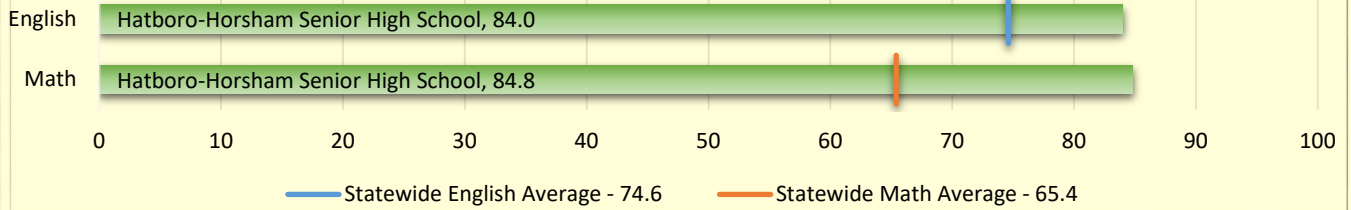


**2015-16 Academic Data**  
**School Scores Compared to Statewide Averages**

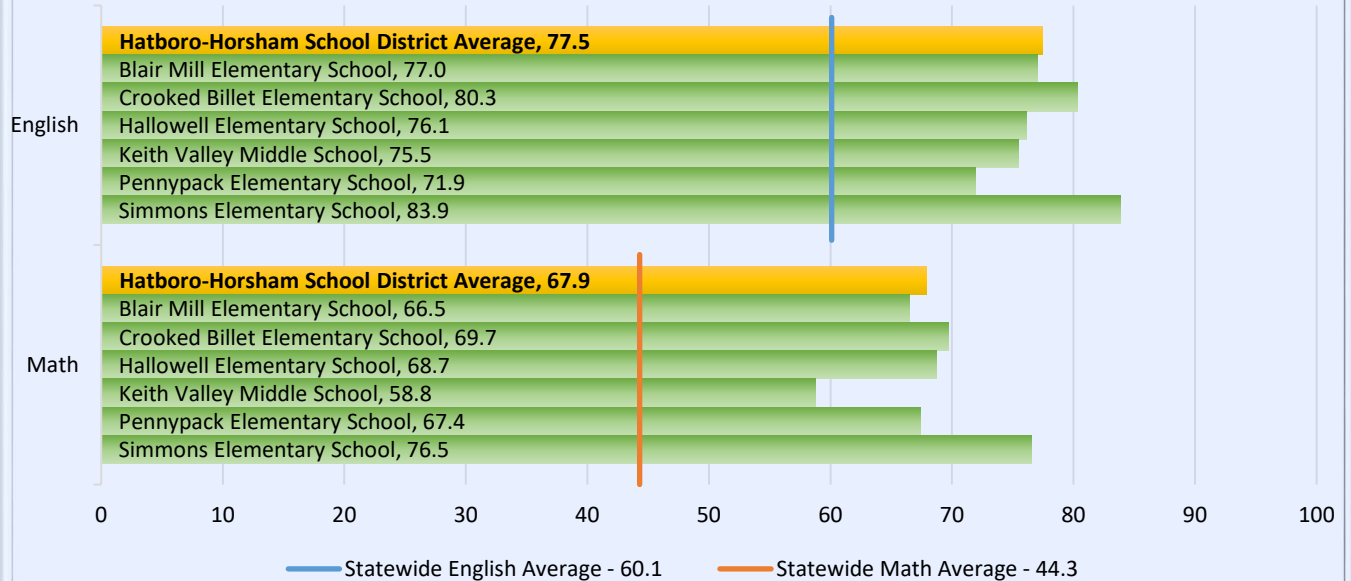
**2015-16 SPP Scores**



**2015-16 Keystone % Advanced or Proficient**

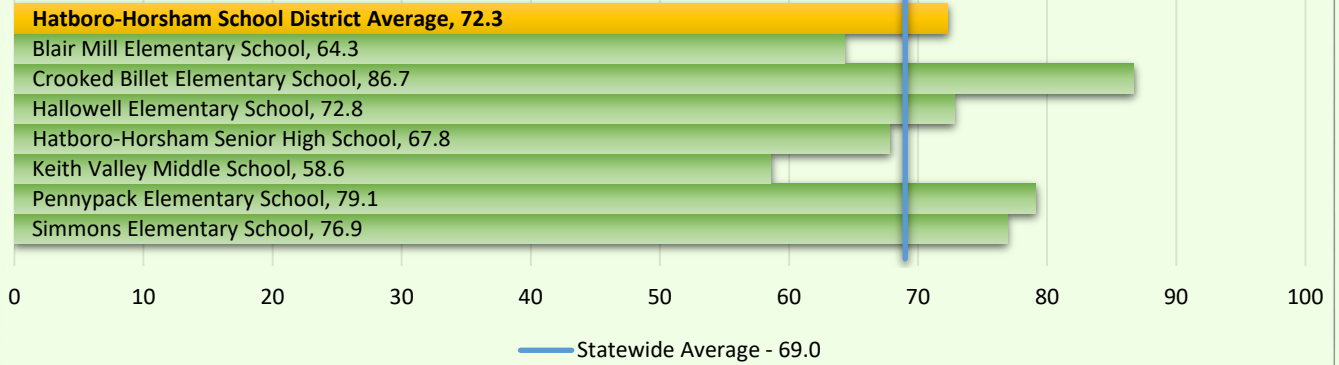


**2015-16 PSSA % Advanced or Proficient**

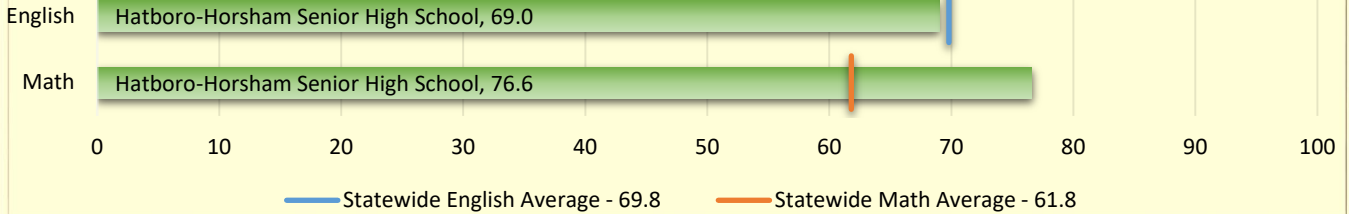


**2016-17 Academic Data**  
**School Scores Compared to Statewide Averages**

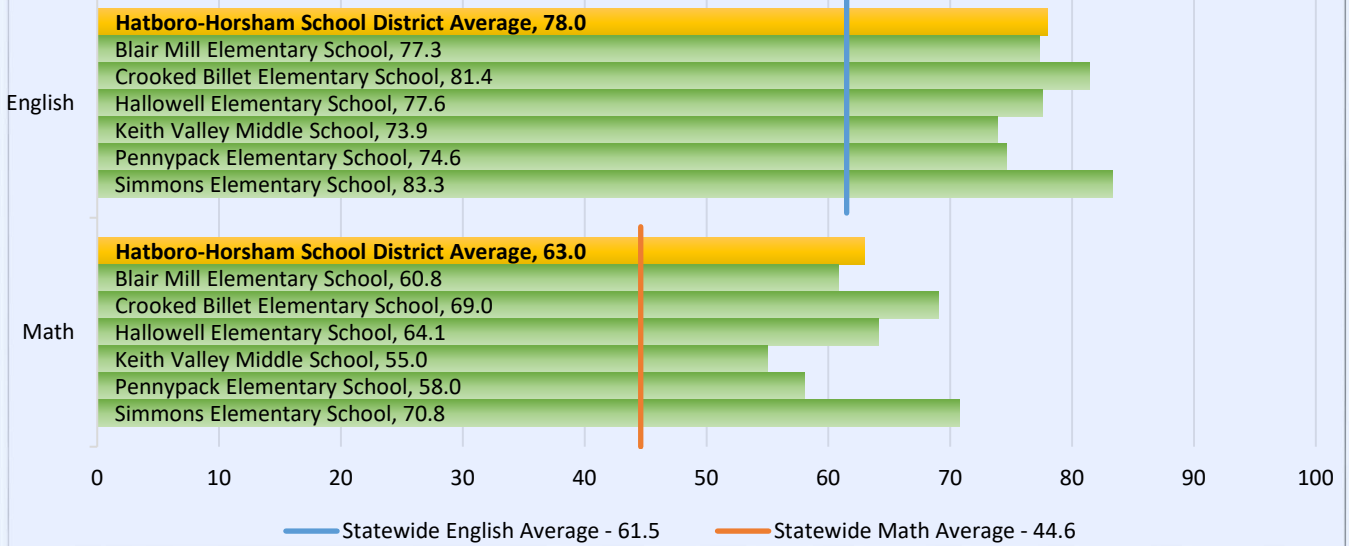
**2016-17 SPP Scores**



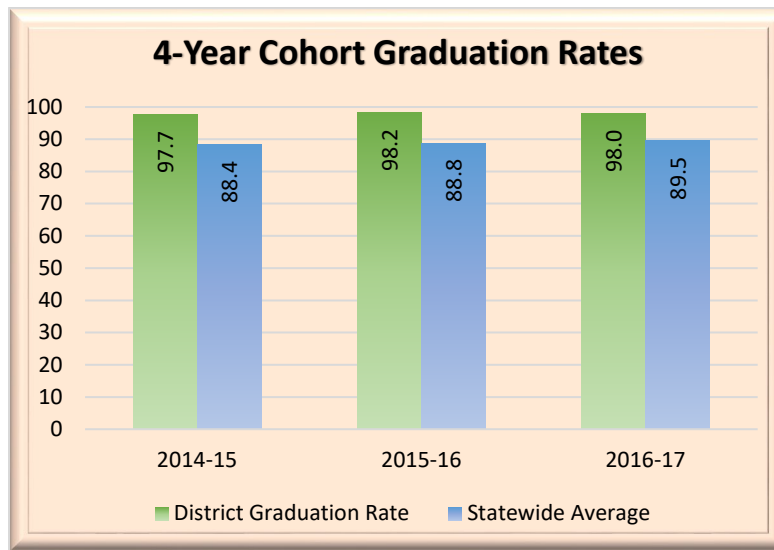
**2016-17 Keystone % Advanced or Proficient**



**2016-17 PSSA % Advanced or Proficient**



**Graduation Data**  
**District Graduation Rates Compared to Statewide Averages**



## Findings

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### Finding No. 1

### The District Failed to Retain Required Documentation to Support the More Than \$1.5 Million in Regular Transportation Reimbursements in Noncompliance with the Public School Code

#### *Criteria relevant to the finding:*

#### **Student Transportation Subsidy**

The Public School Code (PSC) provides that school districts receive a transportation subsidy for most students who are provided transportation. Section 2541 (relating to Payments on account of pupil transportation) of the PSC specifies the transportation formula and criteria. *See* 24 P.S. § 25-2541.

#### **Total Students Transported**

Section 2541(a) of the PSC states, in part: “School Districts shall be paid by the commonwealth for every school year on account of pupil transportation which, and the means and contracts providing for which, have been approved by the Department of Education, in the cases hereinafter enumerated, an amount to be determined by multiplying the cost of approved reimbursable pupils transportation incurred by the district by the district’s aid ratio. In determining the formula for the cost of approved reimbursable transportation, the Secretary of Education may prescribe the methods of determining approved mileages and utilized passenger capacity of vehicles for reimbursement purposes...” *See* 24 P.S. § 25-2541(a).

We found that the Hatboro-Horsham School District (District) did not comply with the record retention provisions of the Public School Code (PSC) when it failed to retain adequate source documents to verify over \$1.5 million in regular transportation reimbursements from the Pennsylvania Department of Education (PDE) for the 2013-14 through 2016-17 school years.

Without proper documentation, we were unable to determine the appropriateness of the regular transportation reimbursement received by the District. It is absolutely essential that records related to the District’s transportation expenses and transportation reimbursements be retained in accordance with the record retention provision, as cited in more detail in the criteria box, of the PSC and be readily available for audit.

Districts receive two separate transportation reimbursement payments from the PDE. Regular transportation reimbursement is broadly based on the number of students transported, the number of days each vehicle was used for transporting students, and the number of miles that vehicles are in service, both with and without students. Supplemental transportation reimbursement is based on the number of charter school and nonpublic school students transported. The District failed to retain all source documents for us to verify the accuracy of the regular transportation reimbursements received.

As evidenced by the components listed above, the number of students transported, number of days transported, and miles driven are the basis for calculating the regular transportation reimbursement. Therefore, it is essential for districts to document, verify, and retain student rosters,

Criteria relevant to the finding  
(continued):

**Annual Filing Requirement**

Section 2543 of the PSC sets forth the requirement for school districts to annually file a *sworn statement* of student transportation data for the prior and current school year with the PDE in order to be eligible for the transportation subsidies. See 24 P.S. § 25-2543.

Section 2543 of the PSC, which is entitled, “*Sworn statement* of amount expended for reimbursable transportation; payment; withholding” states, in part: “[A]nnually, each school district entitled to reimbursement on account of pupil transportation shall provide in a format prescribed by the Secretary of Education may, for cause specified by it, withhold such reimbursement, in any given case, permanently, or until the school district has complied **with the law or regulations** of the State Board of Education.” (Emphasis added.) *Id.*

**Record Retention Requirement**

Section 518 of the PSC requires that financial records of a district be retained by the district for a period of not less than *six years*. See 24 P.S. § 5-518.

**PDE instructions for Local Education Agencies (LEA) on how to complete the PDE-1049. The PDE-1049 is the electronic form used by LEAs to submit transportation data annually to the PDE.**

<http://www.education.pa.gov/Documents/Teachers-Administrators/Pupil%20Transportation/eTran%20Application%20Instructions/PupilTransp%20Instructions%20PDE%201049.pdf> (accessed 10/24/18)

odometer readings, and changes that occur during the year for each vehicle transporting students.

In this case, the District did not maintain sufficient documentation of this information for the four years reviewed. The table below shows the student and vehicle data reported to the PDE and the regular transportation reimbursement received each school year.

Hatboro-Horsham School District Transportation Data Reported to PDE			
School Year	Reported Number of Students Transported	Reported Number of Vehicles	Total Reimbursement Received
2013-14	4,912	81	\$370,739
2014-15	4,799	90	\$389,733
2015-16	4,934	83	\$416,135
2016-17	4,550	95	\$395,085
<b>Totals</b>	<b>19,195</b>	<b>349</b>	<b>\$1,571,692</b>

The District retained odometer readings for all four years reviewed to support mileage traveled to transport students; however, the District failed to retain adequate supporting documentation for the number of students and days transported. District and nonpublic schools often have different school calendars and, in turn, are not open on the same days. Therefore, the District must determine the total days each vehicle was used to transport students to both District and nonpublic schools. District officials acknowledged that total days for each vehicle was based only on the District’s school calendar without considering the days students were transported to other schools.

The District failed to retain bus rosters to document the number of students assigned to each vehicle. The number of students assigned to each vehicle could not be retrieved from the District’s transportation software for any of the years reviewed. Without this information, we were unable to determine the accuracy of the reported data. As shown in the table above, the reported number of students transported decreased by 362 from the 2013-14 to 2016-17 school year. Based on past accumulative experience, fluctuations like this necessitate a review of the reported information. In this case, we were unable to substantiate the

*Criteria relevant to the finding  
(continued):*

**Pupils Assigned**

Report the greatest number of pupils assigned to ride this vehicle at any one time during the day. Report the number of pupils assigned to the nearest tenth. The number cannot exceed the capacity. If the number of pupils assigned changed during the year, calculate a weighted or sample average.

**Daily Miles With**

Report the number of miles per day, to the nearest tenth, that the vehicle traveled with pupils. If this figure changed during the year, calculate a weighted average or sample average.

**Daily Miles Without**

Report the number of miles per day, to the nearest tenth, that the vehicle traveled without pupils. If this figure changed during the year, calculate a weighted average or sample average.

**Number of Days**

Report the number of days (whole number) a vehicle provided transportation to and from school. Include nonpublic and other school calendars for Days in Service.

**Spare Vehicle**

A vehicle used as a spare is not assigned any particular run. This vehicle is used solely as a substitute for a vehicle assigned a regular school run that is temporarily out of service.

fluctuations due to the District’s lack of supporting documentation.

Additionally, the reported number of vehicles fluctuated and we found errors in the reported number of vehicles used to transport students for the 2015-16 and 2016-17 school years. The District reported some vehicles incorrectly as spare vehicles. Spare vehicles are not reimbursable, so incorrectly reporting these vehicles can be a costly mistake. However, the District did not have supporting documentation to verify the number of students assigned to these vehicles or the amount of days these vehicles were used to transport students, so we were unable to calculate the monetary effects of this reporting error.

As noted earlier, the PSC mandates that all financial records be retained for a period of not less than *six years*. We found that the District did not comply with the PSC’s record retention requirement in maintaining supporting documentation for its transportation reimbursement.

The District failed in its fiduciary duties to taxpayers and was not in compliance with the PSC by not retaining this information, and without the documentation, we could not determine whether the amount of regular transportation reimbursement received was appropriate. Transportation expenses and the subsequent transportation reimbursements are significant factors that can impact the District’s overall financial position. Therefore, it is in the best interest of the District to ensure that it regularly and consistently meets its fiduciary duties and complies with the PSC’s record retention requirements.

**Recommendations**

The *Hatboro-Horsham School District* should:

1. Immediately take the appropriate administrative measures to ensure that it retains all documentation supporting the transportation data reported to the PDE including student bus rosters and days traveled, in accordance with the PSC’s record retention requirements.
2. Establish District procedures that specifically address how transportation data is collected, reviewed, and reported to the PDE.

3. Establish training to be provided on a periodic basis for all new and current District personnel responsible for calculating and submitting transportation subsidy data to the PDE.

### **Management Reply**

District management provided the following response:

#### Issue (1) noted in the Finding

The District did not comply with the record retention provisions of PSC 518.

#### Management Response

The District utilized a transportation software to obtain the student maximum load reports and student ridership reports data, which was then transferred into the spreadsheet used to calculate the data for entry into the PDE Forms for subsidy calculation. The source documents used to prepare the data entry were not being retained as part of the audit file. The records will be maintained in accordance with the PSC records retention to insure the District's ability to obtain allowable, maximum subsidy and/or insure that the records will be accessible for audit review to enable an audit team to confirm the subsidy awards.

#### Corrective Action

The District upon notice that monthly source documents for student maximum load reports and student ridership are required to be maintained in the District Transportation Records of no less than 6 years, began to print and save the monthly source documents as part of the monthly record for Transportation Subsidy Data Entry records.

The District will maintain the Request for transportation Documents submitted by other schools (nonpublic and charter) in a spreadsheet format for reconciliation purposes and any additional requests or changes received during the school year will be confirmed in writing, entered into the original spreadsheet for each school and maintained as part of the annual documentation for Transportation Data Entry and retained for no less than 6 years. The District will document any changes in such a manner to insure reporting of any student who participated in transportation to another



school for at least one day during the school year, even if the student has later declined transportation or is no longer a resident of the district.

The District is updating the procedures for review of the data to be submitted to PDE to include a reconciliation process of totals reported for each vehicle, total vehicles reported and any data entry fields that do not include data. An additional review will be implemented in the reconciliation process.

#### Issue (2) noted in the Finding

The District reported total days for all vehicles based on the HHS Calendar, without considering the days students were transported to other schools.

#### Management Response

The District interpreted the District School Calendar as the maximum number of days allowed to be reported for student transportation regardless of number of days of transport to other schools.

#### Corrective Action

The District will retain copies of all schools that the District transports to, to document number of days students were transported to enable District to submit for days in excess of District calendar.

#### Issue (3) noted in the Finding

The District reported some vehicles incorrectly as spare vehicles.

#### Management Response

The District understands that the use of a vehicle the District has classified as a spare vehicle, if used consistently to replace another vehicle for an extended period of time, can and should be reported as a complimentary vehicle for the months the first vehicle is not in service or is put into service for additional transportation requirements (i.e. new route).

The District has recently participated in additional training for Transportation Subsidy and Record Retention coordinated by PASBO, which will be recorded for audit corrective action. Any additional training will be maintained in Training Documentation, which will be shared with staff that are active in obtaining, maintaining and reporting Transportation Data to PDE.

#### Corrective Action

The District will monitor vehicle replacement needs that require an extended coverage, including but not limited to a major repair to determine if the vehicle replaced into service has performed as a replacement for an extended period of time, thus qualifying that vehicles mileage and student count for reimbursement. Use of a spreadsheet that can be sorted by multiple categories, including VIN and months, will be used to monitor missing data fields that may indicate the use of a spare vehicle and the need to update the reporting of the monthly data as part of the original vehicle.

The addition of routes during a fiscal year will be monitored and records of the additional need will be documented to be able to report the use of a vehicle that was previously considered a spare vehicle, allowing for reimbursement eligibility.

#### **Auditor Conclusion**

We are pleased that the District intends to improve its controls regarding the reporting of transportation data and the retention of transportation records in accordance with the PSC. We will evaluate the effectiveness of any corrective actions implemented by the District during our next engagement.

## Finding No. 2

## The Hatboro-Horsham School District Failed to Conduct All Monthly Fire Drills as Required by the Public School Code and Inaccurately Reported Fire Drill Data to the PDE

### *Criteria relevant to the finding:*

The following PSC provisions, as implemented by the PDE in its guidance for the 2016-17 school year, are relevant to the finding:

Section 1517(a) of the PSC requires:

“(a) In all public schools where fire-escapes, appliances for the extinguishment of fires, or proper and sufficient exits in case of fire or panic, either or all, are required by law to be maintained, fire drills shall be periodically conducted, **not less than one a month**, by the teacher or teachers in charge, under rules and regulations to be promulgated by the district superintendent under whose supervision such schools are. In such fire drills, the pupils and teachers shall be instructed in, and made thoroughly familiar with, the use of the fire-escapes, appliances and exits. **The drill shall include** the actual use thereof, and **the complete removal of the pupils and teachers**, in an expeditious and orderly manner, by means of fire-escapes and exits, from the building to a place of safety on the ground outside.” [Emphases added.] See 24 P.S. § 15-1517(a) (effective **through** November 5, 2017).

Our review of the District’s fire drill reports for the 2016-17 school year disclosed that the District failed to conduct fire drills each month, as required by Section 1517(a) of the Public School Code (PSC).<sup>8</sup> We also found that the District incorrectly reported its fire drill data to the Pennsylvania Department of Education (PDE) and, consequently, the Superintendent inappropriately attested to the accuracy of the fire drill data.<sup>9</sup>

As part of our review, we requested the 2016-17 Fire Drill Accuracy Certification Statement (ACS) report filed with the PDE for the District’s seven school buildings. We also reviewed supporting documentation to determine if fire drills were conducted each month from September through May. We found that the District incorrectly reported to the PDE that fire drills were completed every month for every building, when other emergency drills were conducted in place of fire drills for some months. These facts were not noted on the ACS report filed with the PDE for the 2016-17 school year.

More specifically, our review of the supporting documentation revealed that the District only conducted 34 fire drills in its seven school buildings, instead of the 63 fire drills required for the nine school months reviewed.<sup>10</sup> Our review of the information reported in the District’s ACS report represented that 63 fire drills took place during the months of September through May for the 2016-17 school year. However, we determined that information was inaccurate. The District believed it was

<sup>8</sup> 24 P.S. § 15-1517(a).

<sup>9</sup> 24 P.S. § 15-1517(b). With regard to the fire drill mandate, the PSC explicitly requires district superintendents to ensure that the requirement be “faithfully carried out in the schools over which they have charge.” Please note that Act 55 of 2017 expanded subsection (b) of Section 1517 to apply to all “chief school administrators” and states that “the provisions of this section are [to be] faithfully carried out in the **school entities** over which they have charge.” [Emphasis added.].

<sup>10</sup> The District has seven school buildings and fire drills are required each month for each building. Therefore, we determined that a total of 63 fire drills should have been conducted (7 buildings x 9 months = 63 fire drills).

*Criteria relevant to the finding  
(continued):*

Further, Section 1517(b) of the PSC also requires:

“(b) District superintendents are hereby required to see that the provisions of this section are faithfully carried out in the schools over which they have charge.” See 24 P.S. § 15-1517(b) (except minor wording changes, the language currently effective).

According to the PDE guidance emailed to all public schools on October 7, 2016, and its Basic Education Circular entitled, *Fire Drills and School Bus Evacuations*, annual certification of the completion of fire drills must be provided to PDE. Beginning with the 2016-17 school year, annual reporting was required through the PIMS and fire drill certifications require each school entity to report the date on which each monthly fire drill was held. Fire Drill Accuracy Certification Statements must be electronically submitted to the PDE by July 31 following the end of a school year. Within two weeks of the electronic PIMS submission, a printed, signed original must be sent to the PDE’s Office for Safe Schools.

**Important Note:** The following summary is provided as a courtesy for informational purposes only to highlight recent amendments to the PSC, but does **not** apply to the audit period (i.e., 2016-17 school year) for this finding.

acceptable to replace fire drills with other types of emergency drills, such as lockdown and severe weather drills.

Under Section 1517(b) of the PSC, district superintendents are required to ensure that all requirements of Section 1517 are “faithfully carried out in the schools over which they have charge.”<sup>11</sup> While the District did conduct some type of drill each month, it did not satisfy the requirement to conduct fire drills each month that school is in session. Therefore, the information the Superintendent attested to on the Fire Drill ACS report was not valid and accurate.

In conclusion, while we acknowledge the vital importance of the District’s students and staff regularly participating in emergency drills throughout the school year, the PSC specifically mandates that monthly fire drills be conducted each and every month while school is in session.<sup>12</sup> In fact, as further explained in the criteria to the left, recent amendments to the PSC reinforce the importance of conducting both monthly fire drills and school security drills.

### **Recommendations**

The *Hatboro-Horsham School District* should:

1. Conduct monthly fire drills with staff and students at each school building while school is in session, as required by the PSC.
2. Consult with its solicitor to ensure it is fully aware of all amendments (discussed in the Criteria box) to the PSC regarding fire and school security drill requirements and permissible, substitute drills for the 2018-19 school year.
3. Ensure that the District is reporting factually accurate data to the PDE in its annual fire drill reports that can be evidenced by supporting documentation.

<sup>11</sup> 24 P.S. § 15-1517(b). As noted above, pursuant to Act 55, the section now applies to all chief school administrators and all school entities.

<sup>12</sup> Section 1922 (relating to Presumptions in ascertaining legislative intent) of the Statutory Construction Act provides as follows, in part: “In ascertaining the intention of the General Assembly in the enactment of a statute the following presumptions, among others, may be used:...(2) That the General Assembly intends the entire statute to be effective and certain.” See 1 Pa.C.S. § 1922(2).

*Criteria relevant to the finding  
(continued):*

In **2018**, the General Assembly amended Section 1517 of the PSC through Act 39 which ***mandates*** that each school entity conduct one school security drill per school year in each school building in place of a required fire drill within 90 days of the commencement of the school year after the subsection's effective date (July 1, 2018) and in each school year thereafter. The school security drill ***must*** be conducted while the school entity is in session and students are present. Further, Act 39 provides that each school entity may conduct two school security drills per school year in each school building in place of two fire drills after 90 days from the commencement of each school year. *See 24 P.S. § 15-1517 (as most recently amended by Act 39 of 2018).* **By way of further clarification, this mandatory provision supersedes the discretionary provision of Act 55 of 2017.**

## **Management Response**

District management provided the following response:

The Hatboro-Horsham School District accepts the auditor's finding that it did not strictly adhere to the letter of the law concerning monthly fire drills in the audit year. In response, HHSD would like to strongly note that in an effort to go above and beyond the PDE's monthly fire drill requirement during the audit year, the district substituted to conduct several other equally important emergency action drills in addition to fire drills. These other types of drills were done in order to ensure a safer environment in our schools and not in any way circumvent the monthly fire drill state requirement. HHSD believes that the spirit of the monthly drill law during the audit year was to ensure that all school students and staff were as safe as possible. The district concluded that being as safe as possible involved preparing students and staff not only for fire but also for a wide variety of equally dangerous emergency situations. These other important emergency situations include but were not limited to; active shooters; severe weather; and general quick emergency evacuations. The recent 2018-2019 school year change in the state's monthly fire drill mandate seems to validate HHSD's inclusion of other types of emergency drills during the audit year. The state now mandates that all schools conduct monthly fire drills and that in the first 90 calendar days of school, one of those monthly mandated fire drills must be substituted with an "emergency drill." Two more emergency drills are allowed to be substituted for fire drills during the remainder of the school year. In HHSD's case, the emergency drill was a "lockdown drill." In the audit year, HHSD was ahead of the state's requirements when it conducted emergency/lockdown drills at all of its schools. Again, with the safety of the students and staff in mind, HHSD went even further during the audit year when it included severe weather drills and evacuation drills as a part of its monthly emergency drills. The reasoning for including severe weather drills, active shooter drills, and evacuation drills, in addition to fire drills, is as follows:

-It has been decades since a K-12 student has been killed in a school building fire.

-In this region of the country, and in this part of the state severe weather incidents (i.e. severe thunder storms involving high straight-line winds and funnel clouds, flash flooding, and hurricanes/tropical storms) are very real possibilities.

-Active shooter incidents, although still rare, must be adequately prepared for. It is vital that HHSD staff and students know how to react if a shooting were to occur in one of our schools.

For the above reasons, the HHSD substituted some monthly fire drills with other equally important emergency drills. The end of the year PDE Safe Schools ACS sign off was signed in good faith by the Superintendent because of the belief that the school district had in fact gone above and beyond the state's mandated monthly fire drill law. Although HHSD accepts that it did not correctly interpret the law, we wish to state unequivocally that we did not intend to bypass or evade the law with this action. Further, with the safety of its students and staff in mind, HHSD believes that it surpassed established safety practices and the state law by including other types of important emergency drills during the audit year. HHSD does not believe that it should be penalized for doing so.

#### Planned Corrective Action

In order to comply with the state's current mandatory monthly fire drill requirement, the HHSD Director of Safety, both verbally and in writing, reviewed, with all of the district's building principals, the PDE Monthly Fire Drill Law. The safety director stressed that the state's current monthly drill requirements must be strictly adhered to. This includes the mandate that a safety drill must be substituted for a fire drill in the first 90 calendar days that school is in session and that up to two additional safety drills may be substituted for two fire drills for the remainder of the school year. HHSD Director of Safety will review all of the school principals' submitted monthly emergency drill logs so that compliance can be assured.

### **Auditor Conclusion**

We are pleased that the District intends to comply with current monthly fire and emergency drill requirements. We encourage the District to conduct additional emergency drills beyond what is required by the PSC. We will evaluate the effectiveness of any corrective actions implemented by the District during our next engagement.

## **Status of Prior Audit Findings and Observations**

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**O**ur prior audit of the Hatboro-Horsham School District resulted in no findings or observations.



## **Distribution List**

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This letter was initially distributed to the Superintendent of the District, the Board of School Directors, and the following stakeholders:

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