



Report to the General Counsel,
Executive Director Human
Resources, Area Superintendent
Area 1, and the Principal, iHigh
Virtual Academy

October, 2016

iHIGH VIRTUAL ACADEMY

Review of Time and Labor
Costs for School Year 2015

NOTICE

Statements that managerial practices need improvements, as well as other conclusions and recommendations in this report, represent the opinion of the Office of Internal Audit. Determinations of corrective action to be taken will be made by the appropriate San Diego Unified School District officials.

Highlights

Highlights of Report 17-02, a report to the General Counsel, Executive Director Human Resources, Area Superintendent, Area 1, and the Principal, iHigh Virtual Academy

iHigh Virtual Academy

Review of Time and Labor Costs for School Year 2015

Why OIA Did This Review

The General Counsel and the Executive Director, Human Resources requested a review of the additional compensation costs for iHigh Virtual Academy (iHigh) for school year 2016 (SY-16). During our preparation for this review we determined that the SY-15 payroll costs be reviewed.

What OIA Recommends

We provided five recommendations in the report. One recommendation is addressed to the Area Superintendent – Area 1 to evaluate whether administrative action for excessive compensation is warranted and c.

Four recommendations are provided to the Principal. These recommendations include: (1) requiring the timekeeper to update the payroll system for unrecorded absences and leaves, (2) requiring that all timecards and leave authorizations are complete and authorized before entry into the payroll system, (3) review the accuracy of the Audit Paid Time to Reported Time report through sampling the underlying documentation, and (4) establishing policies and procedures for the retention of payroll documentation and reports.

The Area Superintendent stated he referred the report to Legal Services to determine the collectability of the overpayment. The Acting Principal generally concurred with our findings and recommendations.

What Did OIA Find

iHigh's systems of internal control for additional compensation did not fully comply with the District's requirements. Our testing found that \$83,754 of the SY-15 compensation costs did not comply with the District's requirements or were not fully documented. The questioned costs represent 8.4 percent of the SY-15 compensation costs.

Additional compensation paid to a teacher did not comply with the District's requirements. OIA identified \$27,381 that was improperly paid to one staff member.

OIA questions \$58,640 in compensation and leave costs authorized by iHigh due to inadequate or missing documentation. We found that \$27,018 of the costs were not supported with timecards. Another \$31,622 of costs for various absences/leaves were not supported with written authorizations.

We were not provided with evidence that the Principal performed the required review of the *Audit Paid to Reported Time* report. This review would have enabled the Principal to identify the missing documentation and to take the necessary actions to secure it.

21 October 2016

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General Counsel
Office of Legal Services

Acacia Thede
Executive Director
Human Resources Department

Bruce R. Bivins
Area Superintendent, Area 1
San Diego Unified School District
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In March 2016, the General Counsel and the Executive Director, Human Resources Department requested that the Office of Internal Audit (OIA) review the time and labor (T&L) charges for additional compensation at iHigh Virtual Academy (iHigh). They were specifically interested in the compensation received by iHigh staff for teaching a 6/5 assignment during school year 2016 (SY-16).

In preparation to fulfill this request, we reviewed the additional compensation data for SY-16 and compared it to the school year 2015 (SY-15) data. During this analytical review, we noted several apparent anomalies in the SY-15 data. Based on our analysis and limited testing, we determined that a review of the SY-15 additional compensation data at iHigh was warranted. This report addresses the SY-15 additional compensation provided to iHigh staff and the documentation of time and labor charges to the San Diego Unified School District's (District or SDUSD) payroll system. A separate report, dated 21 October 2016, addressed our review of the SY-16 iHigh compensation through 29 February 2016.

Results in Brief

iHigh's system of internal controls for additional compensation and the recording of T&L charges did not fully comply with the District's requirements. Our testing identified \$86,559 in questioned costs, representing 8.7 percent of iHigh's total compensation costs of \$996,061 for fiscal year 2015.

We identified \$27,381 in compensation paid in excess of the District’s maximum number of additional compensable hours per week for teaching staff. Further, our testing identified \$58,640 in compensation that was not supported by documentation. Table 1 provides a summary of the questioned costs we identified.

Table 1: Summary of Questioned Costs

Type of Deficiency	Hours	Cost
Missing/non-existent documentation – leave hours	956	\$31,622
Missing/non-existent documentation – additional hours	485	27,018
Payment of additional hours in excess of limitation	566	27,381
Discrepancies in hours recorded/paid	18	328
Extra time without management authorization	10	210
Total Questioned Hours and Costs	2,035	\$86,559

Source: OIA analysis of T&L data for SY-15

Recommendations

OIA made five recommendations to address the conditions and causes that we identified in this report. We addressed one recommendation to the Area Superintendent, Area 1, and four recommendations to the Principal, iHigh.

We recommend that the Area Superintendent determine whether administrative action is warranted regarding the violation of the District’s policies for additional compensation, and that action be taken to recover the overpayment of compensation.

Our recommendations to the Principal¹, iHigh include:

- Require that the timekeeper complete *Time Reporting Error Notice (TREN)* for all absences and leaves that were not recorded in the T&L system;
- Require that the timekeeper ensure that all timecards and leave applications are complete and authorized prior to entry into the T&L system.
- As part of the mandated review of the *Audit Paid Time to Reported Time Report*, verify the accuracy of the data by sampling a selection of timecards and leave applications used to support the T&L entries; and
- Establish school-based policies, procedures and practices to ensure that all payroll records, documentation, and reports are retained and safeguarded for the four year period required by Administrative Procedure (AP) 2600, *Payroll and Time Reporting*, § D.1.

¹ The recommendations in a draft version of this report were addressed to the Acting Principal whose response to the report is included as Appendix III. The references in final report have been changed to the Principal.

The Area Superintendent's response stated that he referred this matter to Legal Services to determine whether the District can or will take action to collect the overpayments (Appendix IV)

The Acting Principal responded that she generally concurred with our four recommendations. The response stated that she and the staff would take action to improve the system of documentation for time and labor costs incurred by the staff (Appendix III).

Background

iHigh describes itself as:²

iHigh Virtual Academy is a tuition-free public high school offering students the opportunity to earn a high school diploma primarily online. All core courses and many elective courses are University of CA a-g approved for UC/CSU Admissions. Credentialed teachers are on campus daily to provide student assistance and progress monitoring, either face-to-face or online. Students complete coursework in a much more flexible, self-directed manner than in a traditional classroom. For student athletes, all core courses are NCAA approved for Division I and Division II eligibility.

During fiscal year 2015 iHigh incurred compensation costs of \$996,061 for its teachers and staff.

The District employs an exception payroll system for the teachers and management staff. This system makes the assumption that an individual is at their assigned school and works the hours assigned.³ Exceptions are documented either on a timecard, used for additional compensation, or a leave application. Principals at each school are required to sign the timecard or leave application indicating they approved of the exception to the teacher or staff member's scheduled work hours.

The U.S. Government Accountability Office (GAO) in its publication *Maintaining Effective Control over Employee Time and Attendance Reporting* states in part that:⁴

² iHigh Virtual Academy; Overview; found at <https://www.sandiegounified.org/schools/ihigh-virtual-academy/overview-0> (last viewed 22 April 2016)

³ San Diego Unified School District; Payroll Department; *PeopleSoft Manual: Time and Labor*; Version 9.2; 8 September 2014; page 4.

⁴ U.S. Government Accountability Office, formerly the U.S. General Accounting Office; *Maintaining Effective Control over Employee Time and Attendance Reporting*; Report Number: GAO-03-352G; January 2003; Washington D.C.

All T&A⁵ and related supporting documents (e.g. overtime pay authorization) should be reviewed and approved by an authorized official. Review and approval should be made by the official, normally the immediate supervisor, most knowledgeable of the time worked by and the absence of the employee involved. Approval of T&A reports and related documents is based on personal observation, work output, timekeeper verification, information checks against independent sources, reliance on other controls, or a combination of these methods. The integrity of the information recorded in the T&A reporting system depends largely on the conscientious exercise of the supervisor (or other official) of his or her approval authority and appropriate basis for such approval. (Emphasis added)

Objectives and Scope

The purpose of this review is to answer the following did iHigh:

- Comply with the District's policies and APs for approving and reporting additional compensation, the use of compensable leave (see Appendix I for a summary of the additional compensation and leave costs); and
- Verify that all requests for additional compensation were supported and approved prior to entry into the District's T&L system.

Our review included the payroll charges incurred during the period 1 July 2014 through 30 June 2015. We expanded the scope of this review, when necessary to achieve the review's objectives. As we previously discussed we are providing this report as a supplement to our report, dated 21 October, on the compensation costs incurred by iHigh during the period 1 July 2015 through 29 February 2016.

The examination and testing we applied to the transactions and supporting documentation is not sufficient to constitute an examination conducted in accordance with generally accepted government auditing standards. The objective of which is the expression of an opinion on the compensation costs incurred by iHigh. Had we performed an examination in accordance with generally accepted government auditing standards, other items may have come to our attention that we would have reported to you.

Use of Computerized Data

OIA did not rely on computerized data in conducting this review.

⁵ The terms T&A (time and attendance) and T&L are considered to be synonymous and used interchangeably. For the purposes of this report, OIA will use the term T&L.

Additional Compensation Costs Exceed Permitted Level

iHigh permitted one of its staff to be compensated \$27,381 in excess of the amount permitted by the District for similar work. Neither the former iHigh Principal nor timekeeper complied with the requirements of AP 7236, *Additional Hourly Assignments for Contract Teachers*, § C.3.b. This subsection limits the amount of additional hourly compensation that a teacher may earn up to 10 hours per week. During the period 27 August 2014 through 14 June 2015, one teacher providing services for a Department of Defense Education Agency grant reported an average of 23.47 additional hours per week (see Appendix II). This average includes approximately four weeks when iHigh and other District schools were not in session. Appendix II provides a detailed listing of the hours for which the teacher received compensation and cost of the additional compensation. The following table provides a summary of the additional compensation received and in question.

Table 2: Excessive Additional Compensation

TRC	Total Additional Hours Reported	Additional Hours per AP	Excessive Hours	Excessive Compensation
PRO	986	420	566	\$27,381

Source: Analysis iHigh T&L Records and PeopleSoft payroll disbursements

Note: TRC is time reporting code

Recommendation

1. OIA recommends that the Area Superintendent, Area 1, (a) determine whether administrative action is warranted regarding the violation of the District's policies, and (b) take action to recover the amount of the overpayment.

The Area Superintendent responded that this matter had been referred to Legal Services to determine the collectability of the overpayments (Appendix IV provides the response).

Documentation Controls Are Not Reliable

We identified several issues regarding the documentation of additional compensation and leaves taken by the iHigh teachers and staff. This resulted in OIA questioning 1,469 hours of compensation and leaves totaling \$58,998. In our opinion, the absence of documentation controls is a significant weakness⁶ in the school's system of internal controls.

⁶A significant weakness is a weakness, or a combination of weakness, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance. A material weakness is a deficiency, or combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected, on a timely basis. A control deficiency exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis.

In discussing the need for evidence of supervisory review and approval for T&L transactions, the GAO in *Maintaining Effective Controls over Employee Time and Attendance Reporting* states that:⁷

The supervisor has the primary responsibility for authorizing and approving T&L transactions. Supervisors and timekeepers should be aware of the work time and absence of employees for whom they are responsible. To help ensure the proper recording of T&L information, completed T&L records should be reviewed and approved on an appropriate basis by the supervisor (or equivalent official). To the extent practical, changes to an employee's work schedule should be approved prior to the change actually occurring. Unanticipated changes should be reviewed for approval as soon as reasonably possible.

Documentation Does Not Meet the Standards

The District's AP 2600, *Payroll and Time Reporting*, § C.3.b includes base documentation requirements for all T&L charges inputted into the T&L system. These base level requirements require that each school have procedures to ensure:

- prompt, accurate reporting of assignments, time worked, signing- in/out by the staff;
- employee absence information is reported and authorized on designated forms; and
- certification of accuracy of each payroll and the data reported including:
 - reviewing and approving all payroll transactions,
 - validating and signing official payroll audit documents, and
 - assuring that all payroll deadlines are met.

Also, AP 2600 § D.1.b requires that each school maintain, all original timecards, leave forms, and signed audit reports for the current year and three prior years at least four years in total.

Supporting documentation is required by AP 7236, *Additional Hourly Assignments for Contract Teachers*, §§ C.2.a and C.3.c which state that “Only teachers specifically approved for compensation shall be paid;” and “Approval in writing from appropriate division head/instructional leader must be obtained (D.1) before teachers are employed to perform services covered by the procedures.”

⁷ U.S. Government Accountability Office, formerly the U.S. General Accounting Office; *Maintaining Effective Control over Employee Time and Attendance Reporting*; Report Number: GAO-03-352G; January 2003; Washington D.C.

Complete and verifiable documentation was not available to support the T&L transactions processed and the compensation costs incurred by the school. Table 3 provides a summary of our testing for timecards supporting additional compensation incurred by iHigh in SY-15.

Table 3: Missing Timecards and Unsupported T&L Charges

Additional Compensation Type	TRC	Instances	Hours	Cost
Contract Rate	PRO	43	235.00	\$15,799.30
Classroom Hourly	CRH	46	204.00	9,865.44
Curriculum Writing	CRW	4	21.00	687.54
Overtime	OTH	9	12.50	356.25
Extra Time	EXTRA	4	8.00	167.61
Holiday Worked Overtime (1.5x)	HWOT	1	4.50	141.42
Total Unsupported Hours and Costs		107	485.00	\$27,017.56

Source: OIA analysis of payroll supporting documentation

Additionally, we identified instances where the teachers and staff submitted leave authorizations; however they were not entered into the payroll system. By not recording sick leave and vacation this potentially increases the District’s liabilities for these leaves. Unused sick leave can be credited to the individuals’ service longevity potentially increasing their retirement payout and the District’s cost. Unused vacation is paid out to the individual when they resign or retire; errors could increase the amount of the payout. Table 4 provides a summary of the unrecorded leaves that we identified.

Table 4: Unrecorded Leave

Leave Description	TRC	Instances	Hours
District Business Personal Development	DBSPD	6	84.00
Sick Leave – Full	SLF	9	64.50
Vacation	VAC	1	6.00
Total Instances and Hours		16	154.50

Source: OIA analysis of payroll supporting documentation

Our review of the documentation found that the former Principal during the period 2 through 6 February 2015 failed to authorize five timecards (10 hours of EXTRA time) resulting in the unauthorized payment of \$210.

Payroll Costs Not Effectively Validated

We were unable to obtain evidence that the former Principal had reviewed the *Audit Paid to Reported Time Report* this caused in part the ineffective validation of iHigh’s T&L coding and charges. This report allows the Principal to view the details of the amount(s) charged as exceptions or as additional compensation. Further, it allows the Principal to determine that all of the charges reviewed are supported by the appropriate documentation.

Our testing identified that discrepancies in the data entry of hours were not identified resulting in the iHigh staff being overcharged. We identified \$328 in overcharges to the teachers and staff. Table 5 provides additional detail on the overpayments to the employees.

Table 5: Discrepancies in Recorded Hours

Employee	Source of the Error	Recorded Hours	Corrected Hours	Difference	Amount of Overcharged
A	Hours Calculated Incorrectly	3.50	2.50	1.00	\$ 29.92
A	No hours indicated on the timecard	5.00	0.00	5.00	149.60
A	Paid overtime instead of extra time	1.00	1.00	0.00	9.97
A	No hours indicated on the timecard	2.00	0.00	2.00	41.90
B	Hours were posted incorrectly	6.00	4.00	2.00	98.71
C	Posted SLF on a Saturday	8.00	0.00	8.00	0.00
Total Erroneously Posted Hours				18.00	\$328.10

Source: OIA analysis of payroll supporting documentation

OIA identified \$31,622 of T&L charges that were not supported by timecards or leave applications. However, they were charged within the T&L system. As a result, iHigh was unable to provide a reasonable assurance that its T&L charges were accurately recorded. The following table summarizes the T&L entries for which charges were missing.

Table 6: Documentation Not Provided

Leave Type	TRC	Instances	Hours	Cost
Sick Leave – Full	SLF	66	521.50	\$22,330.63
Sick Leave – Half	SLH	53	422.50	9,045.81
Vacation	VAC	1	6.00	125.70
Floating Holiday	FLH	1	6.00	119.70
Total Instances, Hours, Costs		121	956.00	\$31,621.84

Source: OIA analysis of payroll supporting documentation

Recommendations

OIA recommends that the iHigh Principal take the following corrective actions:

2. Require the timekeeper complete *Time Reporting Error Notices* for all absences and leaves that were incorrectly recorded or not recorded in the T&L system;
3. Require the timekeeper to ensure all timecards, and leave applications are complete and authorized prior to entry into the payroll system;
4. Conduct the required review of the *Audit Paid to Reported Time* report, verify the accuracy of the data entry by sampling a selection of the timecards and leave applications used to support the data entered into the system; and
5. Establish school based policies, procedures, and practices to ensure that all payroll related records, documentation, and reports are retained and safeguarded for the four years required by AP 2600 § D.2.

The Acting Principal's response generally concurred with our recommendations (Appendix III provides a copy of the response). The actions outlined in the response met the intent of the recommendations.

Contributor

Ines G. Abitria was the principal auditor and contributor to this report.

Copies of the final report will be provided to the Board of Education, Audit and Finance Committee, the Superintendent of Public Education, Chief of Staff and the Director, Payroll/Benefits. A copy will be placed on the District's web page at <https://www.sandiegounified.org/audit-reports>.

Should you have any questions on this report or our work, please contact either Ms. Abitria at iabitria@sandi.net or at 619.725.5695 or myself at jcashmon@sandi.net or at 619.725.5696.



John M. Cashmon
Director, Internal Audit

Appendix I: Requests for Additional Compensation and Leave and Cost by Time Reporting Codes

FY-15 Additional Compensation and Leaves

TRCs Resulting in Additional Compensation	TRC	Instances	Amount
Classroom Hourly	CHR	53	\$11,267.88
Curriculum Writing	CRW	18	1,743.41
Extra Time	EXTRA	193	7,959.30
Holiday Work – Overtime	HWOOTH	3	267.13
Non-classroom Hourly	NCT	5	261.92
Overtime (Double Rate)	OTD	1	104.76
Overtime	OTH	42	1,694.47
Pro Rata	PRO	315	71,165.55
Workshop – Certificated	WKC	5	218.30
Workshop – Presenter	WKP	2	679.14
Teacher Working Prep	WPS	1	90.21
Total Additional Compensation Payments		638	95,452.07

TRCs for Leave – With and Without Pay	TRC	Instances	Amount
District Business	DBS	13	\$ 3,767.12
District Business Personal Development	DBSSPD	30	10,487.05
Floating Holiday	FLH	1	125.70
Jury Duty	JUR	2	819.85
Professional and Personal Improvement	PPI	3	1,626.63
Religious Holiday	RH	1	359.58
Sick Leave – Full	SLF	94	35,791.27
Sick Leave – Half	SLH	53	9,045.81
Unpaid Time – Certificated	UNC	5	856.41
Unpaid Time – Classified	UNP	3	359.09
Vacation	VAC	11	1,289.99
Total Leave Payment and Forgone Payments		216	\$64,528.50

Appendix II: Detail of Excessive Additional Compensation

Reporting Period		Additional Hours Charged per Week	AP 7236 Maximum Chargeable Time – per week	Excessive Hours Charged – per week	Excessive Compensation
Start Date (Sunday)	End Date (Saturday)				
24 Aug 14	30 Aug 14	28.00	10.00	18.00	\$ 870.48
31 Aug 14	6 Sep 14	24.00	10.00	14.00	677.04
7 Sep 14	13 Sep 14	28.00	10.00	18.00	870.48
14 Sep 14	20 Sep 14	28.00	10.00	18.00	870.48
21 Sep 14	27 Sep 14	12.00	10.00	2.00	96.72
28 Sep 14	4 Oct 14	24.00	10.00	14.00	677.04
5 Oct 14	11 Oct 14	28.00	10.00	18.00	870.48
12 Oct 14	18 Oct 14	28.00	10.00	18.00	870.48
19 Oct 14	25 Oct 14	28.00	10.00	18.00	870.48
26 Oct 14	1 Nov 14	28.00	10.00	18.00	870.48
2 Nov 14	8 Nov 14	16.00	10.00	6.00	290.16
9 Nov 14	15 Nov 14	24.00	10.00	14.00	677.04
16 Nov 14	22 Nov 14	28.00	10.00	18.00	870.48
23 Nov 14	29 Nov 14	28.00	10.00	18.00	870.48
30 Nov 14	6 Dec 14	28.00	10.00	18.00	870.48
7 Dec 14	13 Dec 14	28.00	10.00	18.00	870.48
14 Dec 14	20 Dec 14	28.00	10.00	18.00	870.48
21 Dec 14	27 Dec 14	28.00	10.00	18.00	870.48
28 Dec 14	3 Jan 15	28.00	10.00	18.00	870.48
4 Jan 15	10 Jan 15	28.00	10.00	18.00	870.48
11 Jan 15	17 Jan 15	28.00	10.00	18.00	870.48
18 Jan 15	24 Jan 15	26.00	10.00	16.00	773.76
25 Jan 15	31 Jan 15	28.00	10.00	18.00	870.48
1 Feb 15	7 Feb 15	28.00	10.00	18.00	870.48
8 Feb 15	14 Feb 15	28.00	10.00	18.00	870.48
15 Feb 15	21 Feb 15	24.00	10.00	14.00	677.04
22 Feb 15	28 Feb 15	16.00	10.00	6.00	290.16
1 Mar 15	7 Mar 15	16.00	10.00	6.00	290.16
8 Mar 15	14 Mar 15	20.00	10.00	10.00	483.60
15 Mar 15	21 Mar 15	20.00	10.00	10.00	483.60
22 Mar 15	28 Mar 15	20.00	10.00	10.00	483.60
29 Mar 15	4 Apr 15	20.00	10.00	10.00	483.60
5 Apr 15	11 Apr 15	20.00	10.00	10.00	483.60
12 Apr 15	18 Apr 15	20.00	10.00	10.00	483.60
19 Apr 15	25 Apr 15	20.00	10.00	10.00	483.60
26 Apr 15	2 May 15	20.00	10.00	10.00	483.60
3 May 15	9 May 15	20.00	10.00	10.00	483.60
10 May 15	16 May 16	20.00	10.00	10.00	483.60
17 May 15	23 May 16	20.00	10.00	10.00	483.60
24 May 15	30 May 15	12.00	10.00	2.00	96.72
31 May 15	6 Jun 15	20.00	10.00	10.00	488.40
7 Jun 15	13 Jun 15	20.00	10.00	10.00	488.40
Total Excess Payments		986.00	420.00	566.00	\$27,381.36

Source: OIA analysis of payroll charges and supporting documentation

Reporting Period includes a Mandated Holiday

Reporting Period – iHigh and District Schools Closed

Appendix III: Comments from Acting Principal, iHigh Virtual Academy



iHigh Virtual Academy

3939 Conde St • San Diego, CA 92110
Tel: (619) 764-5440

To: John M. Cashmon, Director Internal Audit

From: Maureen Cottrell, Acting Principal, iHigh Virtual Academy

Date: 23 May 2016

Subject: Written response to iHigh Virtual Academy: Review of Time on Labor Costs for School Year 2015

This memorandum provides a response to the findings of the audit of the review of time and labor costs for SY 2015 at iHigh Virtual Academy. The report identified that approximately 6% of the total compensation paid to iHigh employees during SY 2015 was not properly supported and documented.

The corrective action that will be taken moving forward.

- Mandated timekeeper completion of Time Reporting Error Notices for any absences and leaves that were not recorded properly in the Time and Labor System.
 - Timekeeper will identify when an employee for whom we are responsible has any of the indicated error scenarios and complete the form for the time. ECD Immediately
 - If there is a recommendation to complete Time Reporting Error Notices for the specific hours noted in this report further information is required to complete this action. This information was requested via email on 5/18.
- Mandated timekeeper ensure all timecards, and leave applications are complete and authorized prior to entry into the system. ECD Immediately
 - Met with timekeeper to review current methods and procedures to ensure they are consistent with approved methods.
 - Approved time and labor training for timekeeper at the start of SY 16-17.
- Conduct timely reviews of the Audit Paid to Reported Time to verify the accuracy of payroll and time reported. ECD Immediately
 - Printed reports will be maintained in a binder.
- Initial staff meeting was held on 5/20/16 to discuss improvements to current methods for time and labor related items. Continued discussion will be generated in order to formulate and enforce school based policies, procedures, and practices to ensure payroll records, documentation, and reports are accurate.
 - Records will be maintained in binders for the four years required by AP 2600.

Additional action items to be implemented:

- Prompt, accurate reporting of assignments, time worked, signing-in/out by the staff. ECD Immediately

- Employee absence information are reported and authorized on designated forms. ECD Immediately
- Require timekeeper to ensure all timecards and leave applications are complete and authorized prior to entry into the payroll system. ECD Immediately
- Certification of accuracy of each payroll and the data reported to include:
 - Reviewing and approving all payroll transaction
 - Validating and signing official payroll audit documents
 - Assuring that all payroll deadlines are met.

Appendix IV: Comments from the Area Superintendent, Area 1

From: Bivins Bruce

Sent: Monday, September 26, 2016 2:29 PM

To: Cashmon John

Subject: Re: Follow-up on Outstanding Response to the Draft Reports on Review of iHigh Compensation for School Years 2015 and 2016

Good Afternoon Mr. Cashmon,

This matter has been referred to Legal Services for a determination of whether the district can or will take legal action to recoup any overpayments.

Bruce R. Bivins

Area 1 Superintendent

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One Team. One Dream.

