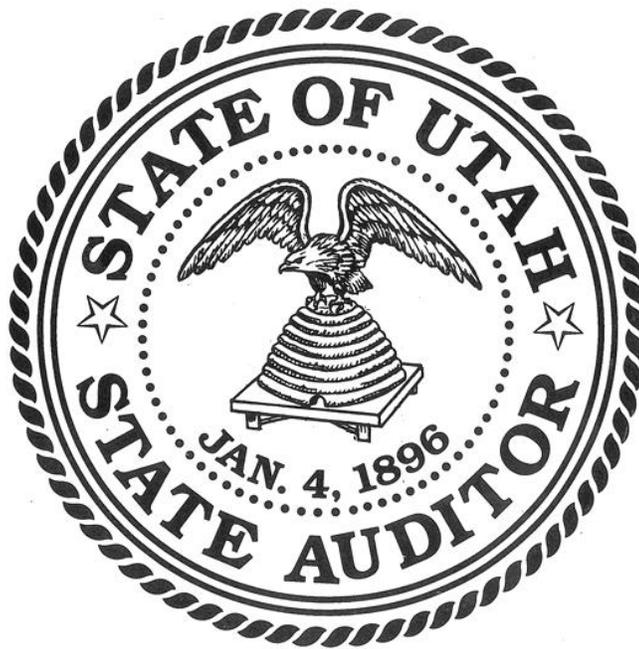


**Guide for
Agreed-Upon Procedures Engagements
For Local Education Agencies
and Community-Based Organizations**

(Revised May 2015)



**OFFICE OF THE
UTAH STATE AUDITOR**

REVISION HISTORY

As revisions are made to this *Guide for Agreed-Upon Procedures Engagements for Local Education Agencies and Community-Based Organizations*, they will be noted in the table below. Please refer back to the online version often to check for changes.

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Chapter 1. REQUIREMENTS OF AN AGREED-UPON PROCEDURES ENGAGEMENT

Requirements and Standards

The Utah State Office of Education requires all Local Education Agencies (LEAs) and Community-Based Organizations (CBOs) to contract with a competent, independent certified public accountant to perform an agreed-upon procedures engagement for the following areas:

- Aggregate Student Membership (due September 15th) (not applicable to CBOs)
- Fall Enrollment Count and Transfer Student Documentation (due November 1st) (not applicable to CBOs)
- Adult Education (due September 15th)

The procedures performed and the reports issued by the independent accountants should meet the standards for attestation engagements established by the American Institute of Certified Public Accountants (AICPA) (see AICPA AT Section 601, *Compliance Attestation*) and the standards applicable to attestation engagements contained in *Government Auditing Standards* (2011 Revision), issued by the Comptroller General of the United States. The relationship of these standards is described in paragraph 2.09 of *Government Auditing Standards*:

Attestation engagements can cover a broad range of financial or nonfinancial objectives about the subject matter or assertion depending on the users' needs. GAGAS [generally accepted government auditing standards] incorporates by reference the AICPA's Statements on Standards for Attestation Engagements (SSAE). Additional requirements for performing attestation engagements in accordance with GAGAS are contained in chapter 5.

Chapters 1 through 3 and 5 of *Government Auditing Standards* apply to attestation engagements.

Scope and Engagement Letter

The procedures to be performed, as determined by the Utah State Office of Education, are described in this *Guide for Agreed-Upon Procedures Engagements for Local Education Agencies and Community-Based Organizations* (Guide). **The contract between the LEA/CBO and the independent accountant should clearly identify the agreed-upon procedures to be performed, and those procedures should be consistent with the guidance in this Guide.** The CPA shall document the scope of the agreed-upon procedures requested by the governing body or their designee in an engagement letter signed in advance by the LEA's/CBO's chief administrative officer. (See Chapter 4 for an example engagement letter.)

Report on Agreed-Upon Procedures

The CPA's Agreed-Upon Procedures Reports should be in the form of procedures and findings and should include the entity's response. The reports are to be submitted to the Utah State Office of Education (not to the Office of the State Auditor). (See Chapters 2.C. and 3.B for examples of Agreed-Upon Procedures Reports.)

Management Representations

The CPA shall obtain written representation from the entity's management. These representations may be tailored to cover specific assertions and matters unique to the entity. (See Chapter 5 for an example written representation letter.)

Chapter 2: AGGREGATE MEMBERSHIP AND ENROLLMENT AGREED-UPON PROCEDURES ENGAGEMENT

INFORMATION CONTACT: Kirin McInnis, (801) 538-7674, kirin.mcinnis@schools.utah.gov

Engagement Objective: To identify sources of errors in recording and reporting non-fiscal data for the purpose of making continuous improvements to the quality of student accounting systems.

Background

The objective of the Minimum School Program (MSP) is to provide reasonably equal educational opportunities for all children in the State of Utah regardless of where they live or their economic status.

MSP funds are allocated to LEAs by the School Finance Section of the Utah State Office of Education (USOE) based on formulas provided by the Minimum School Finance Act and State Board of Education Administrative Rule R277-733. The largest share of funds use allocations based on average daily membership and fall enrollment. Some allocations are based on fixed or competitive grant applications. Compliance requirements related to the MSP funds allocated to LEAs are addressed in the Office of the Utah State Auditor's *State Compliance Audit Guide*.

Aggregate membership and enrollment records are submitted for each student annually by LEAs to the USOE as electronic text files via the Utah eTranscript and Record Exchange (UTREx) at year end (by July 7) for the prior school year and in the fall (by October 15) as of the first school day in October. From this information, the USOE generates school and LEA level summary reports out of the individual student detail data in the UTREx files. These summary reports — in particular, the aggregate membership section of the Year End Student Detail Report in UTREx and the enrollment section of the UTREx October School Summary Report — serve as statements of assertions by the LEA.

Statewide Online Education Program (SOEP)

The Statewide Online Education Program (SOEP) was created by the Utah State Legislature in the 2011 General Session. The program is one of several options a student has to enroll in online courses. A student participating in the SOEP enrolls in courses offered by providers outside of the student's primary LEA of enrollment. These online courses replace any traditional courses in which a student would otherwise be enrolled as part of his or her full course load at the primary school of enrollment.

Funding for the program is a unique process whereby Online Course Providers and Primary Schools of Enrollment enter into a financial agreement using a Course Credit Acknowledgment (CCA). A fee is withheld from the Primary School of Enrollment until a student's successful completion of the course, at which time the fee is transferred to the Online Course Provider as final payment.

Standards for Recording and Reporting Student Data

For purposes of this section of the *Guide*, "official documentation" includes records of daily student attendance which meet the standards of the State Board of Education's Utah Administrative Code Rule R277-419-4(B), "Pupil Accounting, Official Records" and regardless of format should be maintained in accordance with the standards and guidelines set forth by the Government Access and Management Act (GRAMA) and Public Records Management Act.

Standards for organizing and maintaining a student accounting system and for reporting pertinent to these agreed-upon procedures are found principally in two documents:

- State Board of Education Rule R277-419 on “Pupil Accounting” contains the legal standards and is found at:
<http://www.rules.utah.gov/publicat/code/r277/r277-419.htm>.
- The USOE 2014-2015 UTREx Data Clearinghouse File Specification contains the technical standards and is found at:
<http://www.schools.utah.gov/computerservices/Services/Data-Clearinghouse/2014-2015UTRExClearinghouseFileSpecification.aspx>

The following parts of the UTREx Clearinghouse document are the most relevant to the purposes of these agreed-upon procedures:

- Student Record (S1) Exit Code field — this is the reason why the student left school before the end of the school year
 - Student Record (S1) School Membership field — this is “regular” membership
 - SCRAM (S2) Membership field — this is special education membership
 - SCRAM (S2) Time field — note the distinction between “self-contained” and “resource” types of special education students
 - YIC (S3) Record – this is youth in custody membership
- State Board of Education Rule R277-726 on the Statewide Online Education Program provides a legal definition and standards for the Course Credit Acknowledgement (CCA) signatures and process and is found at
<http://www.rules.utah.gov/publicat/code/r277/r277-726.htm>.

Additional information that may be helpful can be found on the SOEP website at

<http://schools.utah.gov/edonline>.

- In addition to reading the above mentioned documentation, the independent accountant should also become familiar with the LEA’s data management policies and practices, especially as these impact the LEA’s production and submission of the Year End and October UTREx Reports to the USOE.

For example, it is important to understand that when a high volume of students change their course loads from full-time to part-time in the middle of a term, it is a common practice and more efficient for the LEAs to exit these students from full-time and re-enroll as part-time at the nearest term end and to adjust for membership at that time.

Request for Consideration of Adjustments

If, as a consequence of the agreed-upon procedures or further review of its student accounting system, an LEA would like to make an adjustment to statistics — that is, to aggregate data already in the possession of the USOE based on individual data previously reported by the LEA — that may have a material impact on the LEA’s allocation of funds, the LEA may submit a formal request for consideration to the USOE.

Evidence supporting the adjustment must be documented in the body of or as an attachment to the agreed-upon procedures report and be received by the USOE by the deadlines specified in this Guide. The actual request may be made by email over the “signature” of either the LEA superintendent or business administrator (or their charter school equivalents).

The USOE will review all such requests for consideration together with agreed-upon procedures reports during its regularly scheduled report review meetings in September (for the Year End UTREx Report) and November (for the October UTREx Report).

Submission of a request does not guarantee that an adjustment will be made. Moreover, adjustments to aggregate data may not be reflected in the underlying individual data stored in the USOE Data Warehouse. In either case, LEAs will be notified via email of the decision of the USOE. The USOE also retains the right to adjust statistics when warranted by the findings of an agreed-upon procedures engagement in the absence of a request from the LEA.

Legal Ref.	AGREED-UPON PROCEDURES	Performed by and Date	Workpaper Index
	<p>4. AGREED-UPON PROCEDURES REPORT –</p> <p>a. Use the appropriate illustrative report for Aggregate Student Membership in Part C. of this Chapter as a model for preparing an Independent Accountant’s Report on Applying Agreed-upon Procedures. NOTE: If local records are not in a condition to support application of the agreed-upon procedures, proceed to step 5.</p>		
	<p>b. Using the example in Part D. of this Chapter, complete the Aggregate Membership Agreed-Upon Procedures Schedule containing results on each case in the sample. For any student selected whose reported aggregate membership is based on any violation of R277-419, re-calculate the student’s aggregate membership to determine the correct figure.</p>		
	<p>c. Consider including additional written findings and recommendations related to improving weaknesses in LEA data management or noncompliance with reporting standards or with the procedures themselves. Also consider the communication requirements for agreed-upon procedures engagements found in <i>Government Auditing Standards</i> (see paragraph 5.59).</p>		
	<p>d. If the independent accountant’s report includes exceptions or recommendations, obtain a response from the LEA. The response can either be included within the independent accountant’s report or as a brief attachment to the report.</p>		
	<p>e. Submit the agreed-upon procedures report and schedule of results to USOE by September 15th at 5:00 p.m. MST (if the date falls on a weekend, the deadline shifts to the next workday). NOTE: If a report is not received by the specified time, the USOE will begin the process of withholding the LEA’s allotted monthly funds consistent with the authority granted to the State Board of Education under UCA 53A-1-403(B). Reports may be submitted via post, fax or email as follows:</p> <p><u>POST</u> Attn: Kirin McInnis School Finance Business Services Division Utah State Office of Education 250 East 500 South P O Box 144200 Salt Lake City, Utah 84114-4200</p> <p><u>FAX</u> To the attention of Kirin McInnis at 801-538-7729</p> <p><u>EMAIL</u> To Kirin McInnis at kirin.mcinnis@schools.utah.gov</p>		

Legal Ref.	AGREED-UPON PROCEDURES	Performed by and Date	Workpaper Index
	<p><u>PHONE</u> Kirin McInnis at 801-538-7674</p> <p><u>Conditions for Reporting:</u></p> <ul style="list-style-type: none"> • If a report does not conform to the procedures specified in this guide it may be rejected. • This report shall become part of the permanent records of both the LEA and the USOE. 		
	<p>5. If local records are not in a condition to support application of the agreed-upon procedures, in lieu of the aforementioned report, submit a statement on firm letterhead describing the reason(s) why the procedures could not be performed.</p>		

B. FALL ENROLLMENT COUNT AND TRANSFER STUDENT DOCUMENTATION PROCEDURES

Legal Ref.	AGREED-UPON PROCEDURES	Performed by and Date	Workpaper Index
	FALL ENROLLMENT COUNT:		
	1. Select schools in the LEA such that each secondary school is selected at least once every four years and each elementary school is selected at least once every nine years; if feasible, a shorter cycle, such as once every three years, would be preferable. Be sure to include online schools in the selection cycle.		
	2. Visit each school selected on the first school day of October. Although the visit may not take place on October 1, the UTREx October School Summary Report should still be as of October 1.		
	<p>3. On the day of your visit, select three to five classes in each school (include at least one online class for LEAs that offer online courses) and for each class selected on that day conduct a roll call by asking each student in the class to state his or her name and check to make sure that student is on the roll.</p> <p>NOTE: Count the students who actually are <i>in</i> the class. A student should be counted as “in the class” if: (a) the student is on the class roll and (b) is either physically present that day and states their name during roll call or (c) if absent, is legitimately enrolled in the class according to the Ten Day Rule.</p> <p>If the school is an online school, or the class is online, a student should be counted as “in the class” if (a) the student is on the class roll and has logged in that day, or (b) the student has logged in at least once during the ten school days before the agreed-upon procedures date.</p>		
	4. <u>For each school selected in 1. above:</u>		
	a. Verify the mathematical accuracy of the school’s enrollment total in its own records.		
	b. As soon as possible after the October 15 deadline for submitting Fall UTREx files, obtain a copy of the LEA’s final UTREx October School Summary Report, which includes a summary of enrollment on October 1 as reported to the USOE by the LEA for each school as well as for the LEA as a whole. (This report should be available from the LEA, if it is not, contact Kirin McInnis at kirin.mcinnis@schools.utah.gov or 801-538-7674 for a copy.) See Appendix 2-1, Sample 3, for an example of this report.		
	c. Compare the verified school enrollment total to the reported enrollment total in the UTREx October School Summary Report.		
	d. Give a brief explanation of any significant difference found between the verified school enrollment total and the reported enrollment total.		

Legal Ref.	AGREED-UPON PROCEDURES	Performed by and Date	Workpaper Index
	<p>e. Verify that the school calendar (the time school was in session) meets the minimum instructional standard of 990 hours and 180 days according to R277-419-4(A) and R277-419-8(C).</p> <p>NOTE: Do not estimate enrollment for any class or school or for the LEA as a whole. Any adjustments to enrollment in light of the compliance exceptions for the purpose of allocating funds will be made at the discretion of the USOE in response to a formal request for consideration by the LEA.</p>		
	TRANSFER STUDENT DOCUMENTATION:		
	<p>5. Select secondary schools that offer any Grades 9-12 such that each school is selected at least once every four years; if feasible, a shorter cycle, such as once every three years, would be preferable.</p>		
	<p>6. Obtain a copy of the Transfer Students List (from the prior Year End UTREx Report), which contains students, organized by school, who were:</p> <ul style="list-style-type: none"> a. enrolled in grades 9 through 12; but b. not enrolled on the last day of the school year; and c. classified by the LEA as: <ul style="list-style-type: none"> • TC – transferred out of the country • TH – transferred to home schooling • CH – transferred from charter to home school • TO – transferred out of the state • TP – transferred to a private school • UN – unknown • WD – withdrawn • WM – withdrawn medical • DE – death <p>Be sure to review the full list of exit codes on page 22 of the 2014-2015 UTREx Data Clearinghouse File Specification for additional information in determining correct exit codes. This document is available online at:</p> <p>http://www.schools.utah.gov/computerservices/Services/Data-Clearinghouse/2014-2015UTRExClearinghouseFileSpecification.aspx</p> <p>(If this report is not available from the LEA, contact Kirin McInnis at kirin.mcinnis@schools.utah.gov or 801-538-7674 for a copy. See Appendix 2-1, Sample 4 for an example of this report)</p>		
	<p>7. From the <i>Transfer Students List</i>, <u>select 20%</u> of transfer students meeting the criteria in Procedure 6. above across all secondary schools selected in Procedure 5. above.</p>		
	<p>8. For each transfer student selected, determine whether official written documentation exists to support the LEA's recorded exit code.</p> <p><u>Criteria for Official Written Documentation:</u> Official written documentation</p>		

Legal Ref.	AGREED-UPON PROCEDURES	Performed by and Date	Workpaper Index
Federal Register, October 29, 2008, p. 64452	<p>that a student transferred out may include several different types of documentation, such as a request for records from the receiving high school; an approved application for home schooling or distance education; evidence of a transfer that is recorded in a State's data system; or a letter from an official in the receiving school acknowledging the student's enrollment. Documentation must be in writing rather than a telephone conversation or other verbal communication with a parent, relative, or neighbor so that the transfer can be verified through audits or monitoring.</p> <p>Unless a school or LEA can confirm in writing that a student has transferred out, emigrated to another country, or is deceased, the school or LEA must consider that student to be in the originating school's population.</p> <p><u>Compliance with GRAMA and Public Record Management Act:</u> Official documentation, regardless of format, should be maintained in accordance with the standards and guidelines set forth by the Government Access and Management Act (GRAMA) and Public Records Management Act.</p> <p><u>Students Out of Country:</u> "With respect to students who ... have emigrated to another country, the ... LEA also must confirm this fact in writing but need not obtain official documentation. For example, written confirmation of a student who has emigrated might include a school administrator's memo to the student's file, based on a phone conversation with a parent, stating that the student is leaving the country." Students who have moved to another country either temporarily (such as a foreign exchange student) or permanently must have written documentation.</p> <p><u>Deceased Students:</u> "A school or LEA must have written confirmation that a student is deceased before removing the student from the school. A letter from a parent or an obituary is sufficient documentation. Official written documentation of a student's death, such as a death certificate, is not necessary."</p> <p><u>Home Schooling:</u> Normally, a situation in which a student leaves a charter school for home schooling should be handled in this way: The charter school exits the student as a transfer to another LEA within the state (TS), notifies the other LEA in which the student resides of the student's change in enrollment status, provides the other LEA with the student's records and parental contact information, and urges the parent to submit to the other LEA the "signed affidavit" required by UCA 53A-11-102. In turn, the other LEA enrolls the student, follows up with the parent to obtain the affidavit, and, finally exits the student to home schooling (TH). In this case, the independent accountant engaged by the charter school should contact the other LEA to verify that a signed affidavit is on file.</p> <p>In cases where an affidavit is not on file, the charter school may have exited the student directly to home schooling, and may choose to use the transfer code 'CH' for transferred from Charter to Home School. Charters must verify the student has registered as a home school student with their district of residence and should be able to produce written evidence of a good faith effort to do its part in properly accounting for the student.</p>		

Legal Ref.	AGREED-UPON PROCEDURES	Performed by and Date	Workpaper Index
	<p><u>Reference to Other LEA.</u> As the independent accountant was not engaged by the other LEA in question, in no case should the agreed-upon procedures report include any statement regarding compliance by the other LEA.</p> <p><u>Note:</u> This procedure is designed to ensure that LEAs are properly exiting dropout students so as to ensure the accuracy of dropout rate reports. Beginning in school year 2015-2016, this data may also be used in determining LEA funding and compliance with the drop out recovery program established by 53A-17a-172 in the 2015 legislative session.</p>		
	<p>9. AGREED-UPON PROCEDURES REPORT –</p> <p>a. Use the appropriate illustrative report for Fall Enrollment Count in Section C. of this Chapter as a model for preparing an Independent Accountant’s Report on Applying Agreed-upon Procedures. NOTE: If local records are not in a condition to support application of the agreed-upon procedures, proceed to Procedure 10.</p>		
	<p>b. Using the example in Part D. of this Chapter, complete the Fall Enrollment Count Agreed-Up Procedures Schedule and the Transfer Student Documentation Agreed-Up Procedures Schedule containing results on each case in the sample.</p>		
	<p>c. Consider including additional written findings and recommendations related to improving weaknesses in LEA data management or noncompliance with reporting standards or with the procedures themselves. Also consider the communication requirements for agreed-upon procedures engagements found in <i>Government Auditing Standards</i> (see paragraph 5.59).</p>		
	<p>d. If the independent accountant’s report includes exceptions or recommendations, obtain a response from the LEA. The response can either be included within the independent accountant’s report or as a brief attachment to the report.</p>		
	<p>e. Submit the agreed-upon procedures report and schedule of results to USOE by November 1st at 5:00 p.m. MST (if the date falls on a weekend, the deadline shifts to the next workday). NOTE: If a report is not received by the specified time, the USOE will begin the process of withholding the LEA’s allotted monthly funds consistent with the authority granted to the State Board of Education under Utah Code 53A-1-403(B). Reports may be submitted via post, fax or email:</p> <p>POST Attn: Kirin McInnis School Finance Business Services Division Utah State Office of Education 250 East 500 South</p>		

Legal Ref.	AGREED-UPON PROCEDURES	Performed by and Date	Workpaper Index
	<p>P O Box 144200 Salt Lake City, Utah 84114-4200</p> <p><u>FAX</u> To the attention of Kirin McInnis at 801-538-7729</p> <p><u>EMAIL</u> To Kirin McInnis at kirin.mcinnis@schools.utah.gov</p> <p><u>PHONE</u> Kirin McInnis at 801-538-7674</p> <p><u>Conditions for Reporting:</u></p> <ul style="list-style-type: none"> • If a report does not conform to the procedures specified in this guide it may be rejected. • This report shall become part of the permanent records of both the LEA and the USOE. 		
	<p>10. If local records are not in a condition to support application of the agreed-upon procedures, in lieu of the aforementioned report, submit a statement on firm letterhead describing the reason(s) why the procedures could not be performed.</p>		

C. EXAMPLES OF AGREED-UPON PROCEDURES REPORTS

Illustrative Independent Accountant's Report on Applying Agreed-Upon Procedures Regarding Compliance with Pupil Accounting Rules for Aggregate Student Membership¹

[Insert name of body or individuals charged with governance]

[Insert name of LEA]

[Insert address]

In accordance with the *Guide for Agreed-Upon Procedures for Local Education Agencies and Community-Based Organizations*, issued by the Office of the Utah State Auditor, we have performed the procedures enumerated below, which were agreed to by [insert name of LEA] and the Utah State Office of Education, solely to assist them in evaluating [insert name of LEA]'s compliance with the Utah State Board of Education's Rule R277-419, *Pupil Accounting*, for aggregate student membership, for the year ended June 30, 20XX. Management is responsible for [insert name of LEA]'s compliance with those requirements.

This agreed-upon procedures engagement was conducted in accordance with the standards applicable to attestation engagements contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures that we performed and our findings are summarized as follows:

1. We familiarized ourselves with the standards established by the Utah State Board of Education and the Utah State Office of Education for recording and reporting student membership data and [insert name of LEA]'s data management policies and practices.
2. We selected [insert number selected] students from selected schools. Our selection is reported in the attached schedule.
3. For each student selected, we studied the official student records and supporting documentation, compared the local student records with the Year-End Student Detail Report in UTREx, identified the student's aggregate membership as recorded in the records, and determined whether the rules from R277-419 were properly applied in calculating the student's aggregate membership. See attached schedule for any exceptions.²
4. For any student selected whose reported aggregate membership is based on any violation of R277-419, we recalculated the student's aggregate membership to determine the correct figure. See attached schedule for any exceptions.²

We were not engaged to, and did not, conduct an examination or a review of [insert name of LEA]'s compliance with R277-419, the objectives of which would be the expression of an opinion or limited assurance on compliance. Accordingly, we do not express such an opinion or limited assurance on compliance. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

When any of the matters set forth in Paragraph 5.59 of Government Auditing Standards have been identified in conjunction with this agreed-upon procedures engagement, the following paragraph is required:

[In accordance with *Government Auditing Standards*, we are required to report significant deficiencies, material weaknesses, instances of fraud, noncompliance with provisions of laws, regulations, contracts, or grant agreements, or abuse that come to our attention during our agreed-upon procedures that warrant the attention of those charged with governance. Our agreed-upon procedures disclosed the following matters that warrant the attention of [insert name of LEA] officials: *Describe matters that were identified.*]

This report is intended solely for the information and use of the Utah State Office of Education, and the [insert name of those charged with governance] and management of [insert name of LEA], and is not intended to be and should not be used by anyone other than these specified parties.

[Firm's Signature]
[Firm's City, State]
[Report Date]

¹ See AICPA, AT Section 201, *Agreed-Upon Procedures Engagements* (paragraph .31), AT Section 601, *Compliance Attestation* (paragraph .24), and GAO *Government Auditing Standards* (chapter 5) for reporting requirements.

² If exceptions are noted, describe the exceptions here or refer to where the findings are reported. The LEA's response can be included here. See Chapter 2, Section A, Procedure 4, of this *Guide*.

**Illustrative Independent Accountant’s Report
on Applying Agreed-Upon Procedures
Regarding Compliance with Pupil Accounting Rules
for Fall Enrollment Count and Transfer Student Documentation¹**

[Insert name of body or individuals charged with governance]

[Insert name of LEA]

[Insert address]

In accordance with the *Guide for Agreed-Upon Procedures for Local Education Agencies and Community-Based Organizations*, issued by the Office of the Utah State Auditor, we have performed the procedures enumerated below, which were agreed to by [insert name of LEA] and the Utah State Office of Education, solely to assist them in evaluating [insert name of LEA]’s compliance with the Utah State Board of Education’s Rule R277-419, *Pupil Accounting*, for pupil accounting for fall enrollment count as of October 1, 20XX and transfer student documentation for the year ended June 30, 20XX. Management is responsible for [insert name of LEA]’s compliance with those requirements.

This agreed-upon procedures engagement was conducted in accordance with the standards applicable to attestation engagements contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures that we performed and our findings are summarized as follows:

Fall Enrollment Count

1. We visited [insert number of classes visited] classes in [insert name of entity] on the first school day of October 20XX. Our sample is reported in the attached schedule.
2. We conducted a roll call in each class visited and compared our counts to the class rolls for that day and verified that students who were not present for the count were appropriately enrolled in the class. For virtual schools and online classes selected, we obtained class rolls and verified each student logged in on the first day of October 20XX or logged in as least once during the ten school days before that date. [See attached schedule for any exceptions.²]
3. For each school selected on that day—
 - a. We verified the mathematical accuracy of each school’s enrollment total in its own records.
 - b. We obtained a copy of [insert name of LEA]’s final *UTREx October School Summary Report*.
 - c. We compared the verified school enrollment total to the reported enrollment total in the *UTREx October School Summary Report*.
 - d. We verified that the school calendar meets the minimum instructional standard of 990 hours and 180 days according to R277-419-4(A) and R277-419-8(C).

[See attached schedule for any exceptions.²]

Transfer Student Documentation

1. From the *Transfer Student List*, we selected [insert number of transfer students selected] students who

were enrolled in grades 9 through 12, but not enrolled on the last day of the school year, and classified by [insert name of LEA] as TC, TH, CH, TO, TP, WM, or DE.

2. For each student selected, we determined whether official documentation exists to support [insert name of LEA]'s recorded exit code. [See attached schedule for any exceptions.²]

[The transfer student documentation agreed-upon procedures do not apply because the LEA does not serve students in grades 9 through 12.]

–or–

[The transfer student documentation agreed-upon procedures do not apply because no transfer students with an exit code meeting the criteria were reported in the school year.]

We were not engaged to, and did not, conduct an examination or a review of [insert name of LEA]'s compliance with R277-419, the objectives of which would be the expression of an opinion or limited assurance on compliance. Accordingly, we do not express such an opinion or limited insurance on compliance. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

When any of the matters set forth in Paragraph 5.59 of Government Auditing Standards have been identified in conjunction with this agreed-upon procedures engagement, the following paragraph is required:

[In accordance with Government Auditing Standards, we are required to report significant deficiencies, material weaknesses, instances of fraud, noncompliance with provisions of laws, regulations, contracts, or grant agreements, or abuse that come to our attention during our agreed-upon procedures that warrant the attention of those charged with governance. Our agreed-upon procedures disclosed the following matters that warrant the attention of [insert name of LEA] officials: *Describe matters that were identified.*]

This report is intended solely for the information and use of the Utah State Office of Education and the [insert name of those charged with governance] and management of [insert name of LEA], and is not intended to be and should not be used by anyone other than these specified parties.

[Firm's Signature]
[Firm's City, State]
[Report Date]

¹ See AICPA, AT Section 201, *Agreed-Upon Procedures for Engagements* (paragraph .31), AT Section 601, *Compliance Attestation* (paragraph .24), and GAO *Government Auditing Standards* (chapter 5) for reporting requirements.

² If exceptions are noted, describe the exceptions here or refer to where the findings are reported. The LEA's response can be included here. See Chapter 2, Section B, Procedure 9 of this Guide.

D. EXAMPLE SCHEDULES TO BE INCLUDED WITH REPORTS

AGGREGATE MEMBERSHIP Agreed-Upon Procedures Schedule

FISCAL YEAR END: June 30, 2015
AGENCY: Enter the name of the local education agency
ENROLLMENT: Enter the agency's enrollment on October 1, 2014
FIRM: Enter the name of the firm which conducted the agreed-upon procedures
CPA: Enter the name and phone number of the accountant principally responsible for the engagement
DATE: Enter the date this schedule was completed

SELECTED MEMBER				REPORTED AGGREGATE MEMBERSHIP			ARE ENTRY & EXIT DATES CORRECT?		IS REPORTED AGGREGATE MEMBERSHIP IN COMPLIANCE WITH THESE RULES?			RECALCULATED AGGREGATE MEMBERSHIP		
3-Digit School Number assigned by USOE	School Name	Statewide Student ID (SSID)	Local Student ID	Regular	Special Education		3 Part Year		3(a) Ten Day Rule and/or Continuing Enrollment Measurement	3(b) School Days Standards Rule	3(c) Part Day Proration Rule	Regular	Special Education	
					Self-Contained	Resource	Entry Date Correct	Exit Date Correct					Self-Contained	Resource
<i>Enter one row for each student selected. Please identify online / virtual schools.</i>				<i>Record membership in whole days as found in local records.</i>					<i>For each rule, record one of the values noted in the key at the bottom of this schedule regarding local data documentation or practice.</i>			<i>Record recalculated membership only if there is an "N" indicating an incorrect entry or exit date or noncompliance with at least one of the rules.</i>		

Y = Yes
 N = No
 X = Not applicable to this student

FALL ENROLLMENT COUNT
 Agreed-Upon Procedures Schedule

DATE: October 1, 2015
AGENCY: Enter the name of the local education agency
FIRM: Enter the name of the firm which conducted the agreed-upon procedures
CPA: Enter the name and phone number of the accountant principally responsible for the engagement
DATE: Enter the date this report was completed

Class Description (Grade / Teacher)	INDIVIDUAL CLASS ENROLLMENT	
	3 Count of Students on Class Roll (Expected)	3 Count of Students in the Class (Actual)
<i>Enter one row for each class selected.</i>		
<i>Please identify which classes are virtual / online.</i>		

SCHOOL	TOTAL ENROLLMENT				SCHOOL CALENDAR	
	4a Enrollment as Recorded by School in Own Records (Actual)	4b School's Enrollment as reported by LEA via UTREx (Expected)	4c Difference Between School's Actual Enrollment and Expected Enrollment	4d Explanation of the Difference Noted in 4c	4e Does the school calendar meet the minimum instructional standard of 990 hours? Y/N	4e Does the school calendar meet the minimum instructional standard of 180 days? Y/N
School Name						
<i>Enter one row for each school selected.</i>						

TRANSFER STUDENT DOCUMENTATION
 Agreed-Upon Procedures Schedule

FISCAL YEAR END: June 30, 2015
AGENCY: Enter the name of the local education agency
POPULATION: Enter the total number of students on the "Transfer Students List" that meet the criteria in 6
FIRM: Enter the name of the firm which conducted the agreed-upon procedures
CPA: Enter the name and phone number of the accountant principally responsible for the engagement
DATE: Enter the date this schedule was completed

[1]	[2]	[3] 6	[4] 8	[5]	[6]	[7]
School Name	Statewide Student ID (SSID)	Reported Year End Exit Code	Is there adequate documentation to support the reported exit code? Y = yes, N = no	Is the exit code correct according to the available documentation? Y = yes, N = no	If [5] is "no" enter the correct exit code	...and write a brief supporting explanation:
<i>Enter one row for each student selected.</i>		<i>Enter the exit code from the "Transfer Students List"</i>				

Chapter 3. ADULT EDUCATION AGREED-UPON PROCEDURES ENGAGEMENT

INFORMATION CONTACT: Marty Kelly, 801-538-7824, marty.kelly@schools.utah.gov

Objective

To ensure that information found in the student files maintained by the Adult Education program agrees/supports student data maintained in UTopia (described below) and that the records from Local Education Agencies (LEAs) and Community-Based Organizations (CBOs) for Adult Education meet the requirements of [Rule R277-733](#), *Adult Education Programs*, and the *Utah Adult Education Policies and Procedures Guide* issued by the Utah State Office of Education (USOE).

Scope

The procedures to be performed, as determined by the USOE, are described in this Chapter of the *Guide for AUP Engagements for Local Education Agencies and Community-Based Organizations (Guide)*, and basically require the accountant to agree the hard copy of information in the student files with the UTopia reports created by the USOE from the data entered by the LEAs/CBOs.

Agreed-upon procedures should be performed after the close of the school year ending June 30. The independent accountant's agreed-upon procedures report is due to the USOE – Adult Education Services Coordinator no later than September 15. This report will be used in the determination of funding for the second following fiscal year. (For example, the agreed-upon procedures engagement of school year 2013-2014 data determines school year 2015-2016 funding.)

Background

Minimum School Program (MSP) funds are allocated to LEAs/CBOs by the School Finance and Statistics Section of the USOE. Compliance requirements related to the MSP funds allocated to LEAs are addressed in Chapter 3 of the *State Compliance Audit Guide*, issued by the Office of the Utah State Auditor. The Minimum School Program allocations are based on formulas provided by the Minimum School Program Finance Act and Utah State Board of Education Rule R277-733. Several LEAs and CBOs also compete for and are awarded federal Office of Vocational and Adult Education–Workforce Investment Act, Title II Adult Education and Family Literacy Act (AEFLA) funds. Funding is based on intensity and duration, as well as program annual outcomes of intensity.

The *Utah Adult Education Policies and Procedures Guide* is updated annually and provides definitions and guidance for Adult Education programs. This guide can be found at the following website:

<http://www.schools.utah.gov/adulted/DOCS/Directors/Policy/PolicyProcedures.aspx>

UTopia

Each LEA/CBO is required to maintain hard-copy documentation on each adult education student. In addition, the LEAs/CBOs must enter the information into The Utah Online Performance Information for Adult Education (UTopia), a database which stores all students' demographic, SEOP, assessment and outcome information in a standardized format on a statewide basis. The USOE creates many UTopia reports from this data. These reports detail student activity in Adult Education programs for each fiscal year which are used for determining state and federal funding. **The necessary data for each school year is to be finalized by the LEAs/CBOs and entered into UTopia by July 15.**

NOTE: Access to UTopia will require the Adult Education Program Director and the UTopia Administrator to be present during the performance of the agreed-upon procedures, as the system is password protected.

DEFINITIONS

Definitions for terms used in this Chapter can be found in Section C. of this Chapter and in [Rule R277-733](#).

A. ADULT EDUCATION PROCEDURES

Legal Ref.	AGREED-UPON PROCEDURES	Performed by and Date	Workpaper Index
	<p>1. Using the Program Outcome Measure (POM) report, select a sample of “Enrollee Status” students from the UTopia database to test in each of the categories noted in procedure No. 2 below.</p> <p>Each selection should be at least 5% (but need not exceed 20 students) of the program’s total “Enrollee Status” enrollment reflective of students from all of the program’s sites (including both physical locations and on-line sites of the LEA/CBO). One selection may be used for multiple categories. For example, the students selected in performing procedures related to “contact hours” might also be the same students selected in performing procedures related to “credits earned.”</p> <p>NOTES: The student files selected should be representative of the students enrolled in the LEA's Adult Education program during the year.</p> <p>The POM (Program Outcome Measure) report is ONLY used to select the test sample of enrollees. The POM is not to be used for any tests.</p>		
	<p>2. For each student file selected in 1 above, verify through a review of student files that the student information entered into UTopia is valid and complete as indicated below for each of the following areas:</p> <p>a. Contact hours: For each “Enrollee Status” student selected:</p> <p>1) Obtain the student’s attendance record i.e. the original documentation maintained by teachers, counselors, registrars, etc., for both instructional and non-instructional contact hours. (Note: class roll documentation should include student signature or initials and an arrival and departure time for each class session attended. For attendance hours generated from an online computer course, the computer-generated attendance report will suffice.)</p> <ul style="list-style-type: none"> • For instructional contact hours, this includes classroom “roll books”, teacher maintained attendance sheets, etc., • For non-instructional contact hours, this includes documentation (student logs) noting content/purposes of contact. 		
	<p>2) Validate that the original documentation record of <i>non-instructional</i> contact was a) maintained by teachers, counselors, registrars, etc., for assessments, Student Education Occupation Plan (SEOP) development,</p>		

Legal Ref.	AGREED-UPON PROCEDURES	Performed by and Date	Workpaper Index
	<p>and counseling activities, b) reflects the date the contact was made, the type of activity, the amount of time spent, and by whom the contact was made, and c) agrees to the UTopia Student Total Contact Hour Detail Report.</p>		
	<p>3) Recalculate the number of instructional and non-instructional contact hours for the student and verify that the contact hours agree with the hours as reported in the UTopia Student Total Contact Hour Detail Report.</p> <p>Note: Contact hour data entered in UTopia is automatically rounded up to the nearest quarter hour).</p>		
	<p>b. Diplomas (Carnegie units): For each “Enrollee Status” student file selected:</p> <p>1) Verify that the student’s file has the required original documentation record of course credit earned while enrolled in the program (including Official GED® Report if the GED® was used for credit) and that the information agrees to the credit entered into the UTopia Student Official Transcript Report and Student Transcript Workup Report.</p>		
	<p>2) Verify that documentation from outside entities (school districts, employer verification, military, etc.) used by the program to award credit towards diplomas agrees to the information entered in the UTopia Student Official Transcript Report and Student Transcript Workup Report.</p>		
	<p>3) Verify that the above stated credit information (both earned from within the program and awarded from other sources) meets the LEA’s/CBO’s (Adult Education Program) required number of units of credit for graduation and that the total number of units of credit agree to those recorded in the UTopia Student Official Transcript Report and the Student Transcript Workup Report</p>		
	<p>4) Utilize the separation feature on UTopia’s home page to verify that the student was separated (if student’s name does not appear, then he/she has been separated).</p> <p>– or –</p> <p>If the student continued to receive instruction, verify that the last funding code reported on the student’s Demographic Screen was changed to 7 and the student was enrolled in non-credit bearing ABE or ESOL courses only.</p>		
	<p>c. General Education Development (GED®) diploma – For each “Enrollee Status” student file selected:</p> <p>1) Verify that the GED® cited on the Student’s “SEOP Student Goals and Statuses” screen reflected GED® obtainment.</p>		

Legal Ref.	AGREED-UPON PROCEDURES	Performed by and Date	Workpaper Index
	<p>2) Utilize the separation feature on UTopia’s home page to verify that after attainment of the GED® the student was separated (if student’s name does not appear, then he/she has been separated).</p> <p>– or –</p> <p>If the student continued to receive instruction, verify that the last funding code reported on the student’s Demographic Screen was changed to 7 and the student was enrolled in non-credit bearing ABE or ESOL courses only.</p>		
	<p><u>General Note:</u> When reviewing the UTopia Student Transcript Workup for the selected student, successful passing of the GED® may be used as a replacement for credit up to 5.0 units if the GED® Tests were successfully passed and transcribed (in UTopia or as a “hard copy” prior to July 1, 2009). Distribution of credit may only be used as follows: Language Arts = 1.0 if test was taken in English, (if taken in Spanish no credit may be awarded; if the test was taken in English and Spanish then 0.5 credit may be awarded); Math = 1.0; Science = 1.0; Social Studies = 1.0 (geography and world civilization instructional areas only); and elective 1.0 to 5.0 units of credit depending on whether or not the previously mentioned subject areas were already filled by other credit entries. NOTE: if the test was taken in Spanish, the maximum amount of credit that may be awarded is 4.0. If the test was taken in both English and Spanish, then the maximum amount of credit that can be awarded is 4.5.</p>		
	<p>d. Level Gains – For each “Enrollee Status” student file selected:</p> <p>1) Verify that the enrollee had a pre- and post-test(s), as noted in the UTopia Complete Test History report.</p>		
	<p>2) Verify that each test protocol “face sheet” includes the student’s name, date of birth, date of test, name of assessor, and the scores obtained, and that this information matches what was entered in the Utopia on the Complete Test History report).</p>		
	<p>e. Credits earned – For each “Enrollee Status” student file selected:</p> <p>1) Verify that the original record of total course credits <u>earned</u> while enrolled in the Adult Education program agrees with the credit <u>entered</u> on the UTopia Student’s Credit Screen.</p>		
	<p>2) Verify that the student’s file contains transcripts from other institutions, GED, and other sources of credit validating both earned and awarded credits as listed on the UTopia Student Official Transcript and Student Transcript Workup reports.</p>		
	<p>f. Proof of Residency – For each “Enrollee Status” student file selected:</p> <p>1) Verify that the required documentation for proof of Utah residency is contained in the student’s file and that it agrees to what is stated on the</p>		

Legal Ref.	AGREED-UPON PROCEDURES	Performed by and Date	Workpaper Index
	<p>student's UTopia Demographic Screen. Note: this procedure is utilized only when the program is the initial program the student was enrolled in as noted on the student's Demographic Screen – "Student Program History".</p>		
	<p>3. Fees and Tuition Collected in Support of Adult Education Program –</p> <p>a. Obtain an understanding of procedures and controls over receipts.</p>		
	<p>b. Obtain a copy of the most recent (defined as current year completed) "Fees and Tuition Collected in Support of Adult Education Program" report prepared by the LEA/CBO. An example of this form can be found at:</p> <p>http://www.schools.utah.gov/adulted/DOCS/Directors/Policy/TabN.aspx</p>		
	<p>c. Determine whether the report accounts for all collections from the LEA/CBO and whether the report agrees with information recorded in the accounting system.</p>		
	<p>d. Determine whether fees and tuition collected were used only in the Adult Education program.</p>		
	<p>e. Compare actual amounts collected to budgeted and prior-year amounts. Investigate any unexpected results (that is, ratios or variations different from what would be expected considering known changes in program activities, number of participants, and tuition and fee rates).</p>		
	<p>4. Agreed-Upon Procedures Report –</p> <p>a. Complete an agreed-upon procedures report, including written findings describing exceptions, errors, or discrepancies, if any. A sample agreed-upon procedures report has been included in Section B. of this Chapter.</p> <p>You are encouraged to include in the report other findings related to improving weaknesses in LEA/CBO data management or noncompliance with reporting standards or with the procedures themselves. Also consider the communication requirements for agreed-upon procedures engagements found in <i>Government Auditing Standards</i> (see paragraph 5.59).</p>		
	<p>b. If the independent accountant's report includes findings that require corrective action, obtain a response from the LEA/CBO addressed to the USOE in a separate letter. The response can describe what the LEA/CBO has already done or what it will do to correct the situation.</p>		

Legal Ref.	AGREED-UPON PROCEDURES	Performed by and Date	Workpaper Index
	<p>c. A copy of the agreed-upon procedures report and the LEA's/CBO's written response, as applicable, must be received by the USOE Adult Education coordinator no later than 5:00 p.m. MST on September 15th (if the date falls on a weekend, the deadline shifts to the next workday).</p> <p>NOTE: If a report is not received by the specified time, the USOE will begin the process of withholding the LEA's/CBO's allotted monthly funds consistent with the authority granted to the State Board of Education under Utah Code 53A-1-403(2)(b). Reports may be submitted via post, fax or email:</p> <p><u>POST</u> Attn: Marty Kelly Adult Education and GED Services Utah State Office of Education 250 East 500 South P O Box 144200 Salt Lake City, Utah 84114-4200</p> <p><u>FAX</u> 801-538-7882</p> <p><u>EMAIL</u> To Marty Kelley at marty.kelly@schools.utah.gov</p> <p><u>PHONE</u> 801-538-7824</p> <p><u>Conditions for Reporting:</u></p> <ul style="list-style-type: none"> • If a report does not conform to the procedures specified in this Guide it may be rejected. • This report shall become part of the permanent records of both the LEA and the USOE. 		

B. EXAMPLE AGREED-UPON PROCEDURES REPORT

Illustrative Independent Accountant's Report on Applying Agreed-upon Procedures for Adult Education¹

[Insert name of body or individuals charged with governance]

[Insert name of LEA/CBO]

[Insert address]

In accordance with the *Guide for Agreed-Upon Procedures for Local Education Agencies and Community-Based Organizations*, issued by the Office of the Utah State Auditor, we have performed the procedures enumerated below, which were agreed to by [insert name of LEA/CBO] and the Utah State Office of Education, solely to assist them in evaluating [insert name of LEA/CBO]'s (Acronym for LEA/CBO) compliance with the Utah State Board of Education's Rule R277-733, *Adult Education Programs* and the *Utah Adult Education Policies and Procedures Guide* for the school year ended June 30, 20XX. Management is responsible for [insert name of LEA/CBO]'s compliance with those requirements.

This agreed-upon procedures engagement was conducted in accordance with the standards applicable to attestation engagements contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures that we performed and our findings are summarized as follows:

1. Contact hours: **Number of student files selected:** _____

For each "Enrollee Student" student file selected, we obtained the student's original attendance record, validated that original non-instructional contact documentation is maintained in the student's file, recalculated the number of instructional and non-instructional contact hours for the student, and verified that the instructional and non-instructional information and contact hours agree with the data reported in UTopia.

No exceptions were found as a result of applying these procedures.²

2. Diplomas (Carnegie units): **Number of student files selected:** _____

For each "Enrollee Status" student file selected, we verified that diploma outcomes were properly reported by the number of credits, as required by the diploma issuing program, that earned and awarded (from sources outside of the adult education program) credits were properly supported, and that those credits match the credits entered into UTopia.

No exceptions were found as a result of applying these procedures.²

of an opinion or limited assurance on compliance. Accordingly, we do not express such an opinion or limited assurance on compliance. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

When any of the matters set forth in Paragraph 5.59 of Government Auditing Standards have been identified in conjunction with this agreed-upon procedures engagement, the following paragraph is required:

[In accordance with *Government Auditing Standards*, we are required to report significant deficiencies, material weaknesses, instances of fraud, noncompliance with provisions of laws, regulations, contracts, or grant agreements, or abuse that come to our attention during our agreed-upon procedures that warrant the attention of those charged with governance. Our agreed-upon procedures disclosed the following matters that warrant the attention of [insert name of LEA/CBO] officials: *Describe matters that were identified.*]

This report is intended solely for the information and use of the Utah State Office of Education, and the [insert name of LEA's/CBO'S governing board] and management of the [insert name of LEA/CBO], and is not intended to be and should not be used by anyone other than these specified parties.

[Firm's Signature]
[Firm's City, State]
[Report Date]

¹ See AICPA, AT Section 201, *Agreed-Upon Procedures for Engagements* (paragraph .31), AT Section 601, *Compliance Attestation* (paragraph .24), and GAO *Government Auditing Standards* (chapter 5) for reporting requirements.

² If exceptions are noted, replace this sentence and describe the exceptions here or refer to where the findings are reported. The LEA's/CBO's response can be included here. See Chapter 3, Section A. Procedure 4 of this *Guide*.

C. DEFINITIONS FOR ADULT EDUCATION PROGRAM

Adult Basic Education (ABE): instruction designed specifically for an native English speaking adult who 1) has minimal competence and basic skills in reading, writing, speaking, problem solving, or computation 2) is not sufficiently competent to meet the educational requirements of adult life in the United States; or 3) is not sufficiently competent to speak, read or write the English language to allow employment commensurate with the adult's real ability. Includes grade levels 0 – 8.9.

ABE includes the following:

- **ABE 1 (Beginning ABE Literacy):** Grade level 0-1.9. Student has no or minimal reading and writing skills, may have little or no comprehension or how print corresponds to spoken language and may have difficulty using a writing instrument, may have little or no recognition of numbers or simple counting skills, may have little or no ability to read basic signs or maps and can provide limited personal information on simple forms, can write a limited number of basic sight words and familiar words and phrases. Student can handle simple routine entry level jobs that require little or no basic written communication or computational skills. No knowledge of computers or technology.
- **ABE 2 (Beginning Basic Education):** Grade level 2.0-3.9. Student can read simple **material** on familiar subjects; can write simple notes and messages on familiar situations. Student can count, add and subtract three digit numbers, can perform multiplication through 12, can identify simple fractions, and perform other simple mathematical operations; is able to read simple directions, signs and maps, fill out simple forms requiring basic personal information, write phone messages and make simple changes. The student can handle basic entry level jobs that require minimal literacy skills, can read want ads and complete simple job applications.
- **ABE 3 (Low Intermediate Basic Education):** Grade level 4.0-5.9. Student can read text on familiar subjects that have a simple and clear underlying structure, can use context to determine meaning; can write simple paragraphs with a main idea and supporting details on familiar topics. Student can perform with high accuracy all four basic math operations using whole numbers up to three digits and can identify and use all basic mathematical symbols. Student is able to handle basic reading, writing and computational tasks related to life roles such as completing medical forms, order forms, employment applications. Student can qualify for entry level jobs that require following basic written instructions and diagrams with assistance. Can use simple computer programs and perform a sequence of routine tasks given directions in using technology.
- **ABE 4 (High Intermediate Basic Education):** Grade level 6.0-8.9. Student is able to read simple descriptions and narratives on familiar subjects or from which new vocabulary can be determined by context and can make minimal inferences. The student is able to write simple narrative descriptions and short essays on familiar topics and can use punctuation consistently. The student can perform all four basic math operations with whole numbers and fractions; can determine correct math operations for solving story problems. Student is able to handle basic life skills tasks such as graphs and charts. The student can read materials on familiar topics such as simple employee handbooks and payroll stubs, can complete simple forms and reconcile a bank statement. Can learn and work with most basic computer software such as using a word processor and can follow simple instructions for using technology.

Adult Secondary Education (ASE or AHSC or HSC): instruction designed for the adult who 1) has basic skills and competence levels in reading, writing, speaking, problem solving and computation; 2) may or may not have a certificate of graduation (or its equivalent) from a school providing secondary education. Includes grades 9.0 through 12.9.

High School completion includes the following:

- **AHSC 1 (Low Adult Secondary Education):** Grade level 9.0-10.9. This student can be considered as a “high school diploma seeking student”. The student can comprehend expository writing and identify spelling, punctuation and grammatical errors. Writing is organized and cohesive, can write and reflect thoughts. The student can perform all four basic math functions with whole numbers, decimals and fractions; can interpret and solve simple algebraic equations, tables, graphs; can use math in business transactions. The student is able or can learn to follow simple multi-step directions and read common legal forms and manuals. Student is proficient in using computers and can use most common computer applications.

AHSC 2 (High Adult Secondary Education): Grade level 11.0-12.0. Student can comprehend, explain and analyze information from a variety of literacy works, can use higher order processes to interpret meaning of written material. Writing is cohesive and clearly expressed. Student can make mathematical estimates of time and space and can apply principles of geometry to measure angles, lines and surfaces. Student is able to read technical information and complex manuals, can comprehend some college level books and apprenticeship manuals; can function in most job situations involving higher order thinking. Student can work productively in groups. Can use and adapt common software and select appropriate technology to new situations.

Completing a Level. Progressing from one educational functioning level to the next higher educational functioning level. Evidence of completing a level is determined as student’s post-test score exceeds their Entering Functioning Level (EFL). The National Reporting System (NRS) Functioning Level descriptors are used to determine a student’s Functioning Level. If a student’s post-test score exceeds the NRS descriptors range of scores for his/her EFL the student may have met their goal. The student may exit the program or they may remain enrolled and move towards advancing additional levels as their future assessments indicate. Advancement or completing a level can only be determined by the student’s post-test scores.

Completing a Level and Advancing One or More Levels. Includes completing a level (see Entering Functioning Level for the baseline to gauge advancement). After a level is completed, a continuing student may advance multiple levels. It is necessary to remember that Completing a Level is based on the student’s lowest level for reporting purposes. If a student’s post-test score (using a different form of the same standardized test used for the pre-test to establish the EFL *and* after an additional 60 - 100 hours of instruction) exceed the NRS descriptors range of scores the student has then completed another level.

Concurrent Program: this occurs when a student is enrolled in more than one program at any point in time. The concurrent program can only manage credits and contact hours earned in that program.

Contact Hour. Hours of non-instruction include: counseling SEOP development hours and assessment time. Instructional contact hours include tutoring/teaching under the supervision of a school district employee or community-based organization employee designed to promote student learning in the program curriculum. Contact hours are reported in the learners entering functioning level regardless of area of instruction.

Hours that CAN be counted:	Hours that CANNOT be counted:
Instructional hours in all ABE.	Homework completed outside of class.
AHSC and ESOL classes designed to advance a student’s functioning level.	Community education classes such as parenting and computer literacy.
Program-sponsored tutoring or participation in a learning lab.	Time spent in GED® examinations.
Distance Learning courses-contact hours reported	Distance learning including: electronic high school

based upon program's grant (distance learning) narrative.	courses or other courses not taken under the direct supervision of an adult education instructor.
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English for Speakers of Other Languages (ESOL): non-English speakers who lack competence and language acquisition in any one of the following: reading, writing, speaking, problem solving or listening.

ESOL includes the following:

- **ESOL 1 (Beginning ESOL Literacy):** student who cannot speak or understand English, has no or **minimal** reading or writing skills in any language. Student functions minimally or not at all in English and communicates only through gestures or a few isolated words. Student may have no knowledge or use of computers.
- **ESOL 2 (Low Beginning ESOL):** student can understand basic greetings, simple phrases and commands. Student can understand simple questions related to personal information, read numbers, letters and some common sight words, can read and write some familiar words and phrases, can write basic personal information. Student can function with difficulty in social situations and situations related to immediate needs. Student may have limited knowledge and experience with computers.
- **ESOL 3 (High Beginning ESOL):** student can understand common words, simple phrases and sentences containing familiar vocabulary, can read most sight words and many other common words, can read familiar phrases and simple sentences. Student can function in some situations related to immediate needs and in familiar social situations. Student may have limited knowledge and experience with computers.
- **ESOL 4 (Low Intermediate ESOL):** student expresses basic survival needs and with some difficulty participates in some routine social conversations, reads simple material on familiar subjects, can write simple notes and messages on familiar situations, can interpret **simple** directions, schedules, signs, maps etc, and can complete simple forms. Student may be able to use computer programs and can perform a sequence of routine tasks given directions.
- **ESOL 5 (High Intermediate ESOL):** student can participate in conversations in familiar social **situations** but may need some assistance in clarifying, can read text on familiar subjects that have a simple and clear underlying structure, can write simple paragraphs, can meet basic survival and social demands and can follow simple oral and written instructions, has some ability to communicate on the telephone on familiar subjects. Student can work with or learn basic computer software.

ESOL 6 (Advanced ESOL): student can understand and communicate in a variety of contexts related to daily life and work, can understand and participate in conversations on a variety of everyday subjects including some unfamiliar vocabulary, can read moderately complex text related to life roles and descriptions and narratives from authentic materials on familiar subjects, can function independently to meet most survival needs and to use English in routine social and work situations. Student can use common software, learn new basic applications and select correct basic technology in familiar situations.

Enrollee Status: an adult education student who completes twelve or more contact hours (inclusive of instructional and non-instructional), has a pre-test that establishes an Entering Functioning Level and a Student Education Occupation Plan (SEOP) that includes a defined core goal and a defined funding code for the fiscal year.

Entering Functioning Levels (or Functioning Level) – per NRS guidelines (EFL). Student is assigned an EFL for reporting purposes during a fiscal year. An EFL is determined by scale scores obtained from a standardized test. A student's scale score in their lowest area of instruction i.e. math, writing, reading determines a student's EFL for Utah reporting purposes and is the baseline upon which advancement to higher NRS levels is used. (See NRS functioning levels for ESOL, ABE, and AHSC).

Exiting the Program/Exit Date/Separation Date. Date when the student last attends a program through 'drop out' and/or completion of goal(s) and has not received instruction for 90 days.

Federal Funding: Adult Education and Family Literacy Act and/or Department of Workforce Services Refugee funds awarded to a school district, governmental entity, or non-profit community-based organization as a result of a competitive application.

Funding Formula: Adult education funds are distributed to school districts according to the state approved funding formula based on student outcomes.

Level Gain. When a student enters the program for the first time in a fiscal year he is assessed and receives a pre-test score. The student's lowest "academic" level is his entering functioning level for the fiscal year. The student must be post-tested to determine a level gain. Post-testing may occur after 60 hours of instructional contact hours or after a minimum of 40 instructional contact hours if the student is known to be exiting the program.

Managing Program. Program in control of all of the student's data and outcomes associated with the student.

Participant. A student who has less than twelve total contact hours in a fiscal/program year, does not have a pre-test, or does not have a completed SEOP that includes the establishment of at least one core goal in the managing program.

Proof of Utah Residency. (Note: documentation must be maintained by the program that is/was the original manager of the student's data. See R277-733-6.) Adult Education Program Student Eligibility.

- A. An individual is eligible to be a Utah adult education student if:
- (1) the prospective adult education student is at least 16 years of age and the student's class has not graduated; or
 - (2) a prospective adult education student who is otherwise eligible provides one of the following to establish Utah residency:
 - (a) valid state of Utah driver license;
 - (b) valid state of Utah driver privilege card;
 - (c) valid state of Utah identification card; or
 - (d) valid state of Utah resident fishing or hunting license.
 - (3) a prospective adult education student provides one of the following in the prospective student's name with the home mailing address (no post office boxes); documentation shall have been received no more than 12 months prior to the individual's registration request:
 - (a) mail from an in-state or out-of-state business;
 - (b) utility bill or work order;
 - (c) cell phone or telephone bill;
 - (d) employee pay stub;
 - (e) written statement on an employer's letterhead defining a job commitment;
 - (f) current year automobile registration;
 - (g) Utah state government agency form letter;
 - (h) Utah public library card;
 - (i) rent or mortgage payment statement;
 - (j) Utah voter registration card;
 - (k) Utah high school/college transcript or report card;

- (l) tribal correspondence;
 - (m) approved or denied free or reduced lunch application from the individual's children's school that includes the individual's name on the application;
 - (n) daycare or nursery school record of the individual's children that includes the individual's name on the record;
 - (o) K-12 registration demographic card of children enrolled in a Utah school that includes the individual's name on the card.
 - (p) Consular ID card – issued by the SLC Mexican Consulate.
- B. The following does not establish residency for purposes of adult education programs:
- (1) mail addressed to occupant or resident;
 - (2) letters from friends or relatives;
 - (3) power of attorney documents;
 - (4) personal correspondence addressed to a post office box.
- C. To be eligible for participation in an adult education program, a Utah resident shall be:
- (1) an individual 17 years of age or older whose high school class/cohort has graduated; or
 - (2) an individual emancipated under Section 78-3a-1005; or
 - (3) an individual emancipated by marriage; or
 - (4) an individual who is at least 16 years of age who has not graduated from high school and who is no longer enrolled in a K-12 program of instruction; or
 - (5) a student 16 to 19 years of age whose class has not graduated and who is attending adult education classes as an alternative to a traditional public education program.
- D. Non-Utah residents from states bordering Utah seeking enrollment into an Adult Education program in Utah shall be considered resident Utah students consistent with individual agreements between the Utah Adult Education Program and the individual states bordering Utah.

SEOP. Student Education Occupation Plan. A student focused personal plan generated by programs for each student inclusive of student demographics and the establishment of at least one core goal, objective(s), records of prior educational achievements, in addition to other statuses and a signed waiver release.

State Funding: Minimum School Program (MSP) funds awarded to school districts. Percentage awarded is based on annual legislative allocation and program performance outcomes.

Transfer Student: Student who has exited one program and is now enrolled in another program.

UTopia: Utah Online Performance Information for Adult Education. A database containing all students' demographic, SEOP, assessment and outcome information is stored statewide ensuring accurate student information sharing and reporting between programs, the state and/or the federal government.

Chapter 4. EXAMPLE ENGAGEMENT LETTER FOR PUPIL ACCOUNTING and ADULT EDUCATION AGREED-UPON PROCEDURES

NOTE: A single engagement letter may be used to cover the procedures related to all programs noted in this Guide. Before devising the engagement letter, the practitioner should determine which of the agreed-upon procedures in Chapters 2 and 3 of this Guide are applicable to the LEA/CBO being examined based on grade level, program funds received, etc. All procedures to be performed should be noted in a list to be attached as an integral part of the engagement letter.

[Prepared on CPA's Letterhead]

[Insert date]

To the [Governing Body]
and
_____, [Chief Administrative Officer]
[XYZ Entity]

Purpose of Letter

We are pleased to confirm our understanding of the nature and limitations of the services we are to provide for [Entity's full name].

Requested Procedures and Responsibilities

We will apply the agreed-upon procedures, as documented in the *Guide for AUP Engagements for Local Education Agencies and Community-Based Organizations*, issued by the Office of the State Auditor, and as listed in the attached schedule, solely to assist [the Entity] in complying with the Utah State Board of Education Administrative Rules [and Utah State Office of Education policies] for local education agencies and community-based organizations receiving Minimum School Program funds as follows:

- Aggregate Membership for the year ended June 30, 2015 (R277-419, *Pupil Accounting*);
- Fall Enrollment Count as of October 1, 2015 and Transfer Student Documentation for the year ended June 30, 2015 (R277-419, *Pupil Accounting*);
- Adult Education for the year ended June 30, 2015 (R277-733, *Adult Education Programs*, and the *Utah Adult Education Policies and Procedures Guide*). [Note: Modify this letter accordingly if LEA/CBO has not received Adult Education funds.]

The procedures we will perform have been agreed to by the specified parties to these engagements, which are [the Entity] and the Utah State Office of Education.

Applicable Standards

Our engagement to apply agreed-upon procedures will be conducted in accordance with the standards applicable to attestation engagements contained in *Government Auditing Standards* issued by the Comptroller General of the United States. The sufficiency of the procedures is solely the responsibility of the specified parties listed above. Consequently, we make no representation regarding the sufficiency of

the procedures described in the attached schedule either for the purpose for which this report has been requested or for any other purpose. If, for any reason, we are unable to complete the procedures, we will describe any restrictions on the performance of the procedures in our report, or will not issue a report as a result of this engagement.

Reporting on Agreed-upon Procedures

Because the agreed-upon procedures listed in the attached schedule do not constitute an examination or a review, we will not express reasonable or limited assurance on your compliance with Utah State Board of Education rules for pupil accounting [and adult education and the *Utah Adult Education Policies and Procedures Guide*]. In addition, we have no obligation to perform any procedures beyond those listed in the attached schedule.

Report Distribution

We will present a written report listing the procedures performed and our related findings. This report is intended solely for the use of the specified parties as identified above and should not be used by anyone other than these specified parties. In accordance with *Government Auditing Standards*, we are required to report significant deficiencies, material weaknesses, instances of fraud, noncompliance with provisions of laws, regulations, contracts, or grant agreements, or abuse that come to our attention during our agreed-upon procedures that warrant your attention.

Our report will contain a paragraph indicating that had we performed additional procedures, other matters might have come to our attention that would have been reported to you. You will be given the opportunity to review a draft of the report and write a response to any exceptions to be included in the final report.

Documentation Ownership and Retention

The attest documentation for this engagement is the property of [*the CPA Firm*] and constitutes confidential information. However, we may be requested to make certain attest documentation available to the Office of the Utah State Auditor pursuant to authority given to it by law or regulation. If requested, access to such attest documentation will be provided under the supervision of [*the CPA Firm*] personnel. Furthermore, upon request, we may provide copies of selected attest documentation to the Office of the Utah State Auditor who may intend, or decide, to distribute copies of information contained therein to others, including other governmental agencies.

We agree to retain our attest documentation for a period of at least five years from the date of our report.

Peer Review Report

In accordance with the requirements of *Government Auditing Standards*, we have attached a copy of the latest external peer review report of our firm for your consideration and files.

Management

• Responsibilities

Our engagement will be conducted on the basis that [*the Entity*]'s management acknowledge and understand that they have responsibility for:

- a. Designing, implementing, and maintaining internal control relevant to the [the Entity]'s financial and student accounting records, and compliance with applicable state laws;
- b. Selecting and determining the suitability and appropriateness of the criteria upon which the student accounting records will be evaluated;
- c. Compliance with applicable state laws and regulations applicable to its activities, including relevant rules [and policies] applicable to pupil accounting [and adult education];
- d. Providing us with:
 - 1) Access to all information of which management is aware that is relevant to the [the Entity]'s pupil accounting [and adult education] records (management is responsible for the accuracy and completeness of such information);
 - 2) Additional information that we may request from management for the purpose of performing the agreed-upon procedures; and
 - 3) Unrestricted access to persons within the entity from whom we determine it necessary to obtain attest evidence.
- e. Submitting our report to the Utah State Office of Education and the Office of the Utah State Auditor.

• **Representations**

At the conclusion of our engagement, we will require from management and, when appropriate, those charged with governance, written confirmation concerning representations made to us in connection with the agreed-upon procedures.

Engagement Administration and Fees

Our engagement is scheduled for performance during [Insert time frame] and, unless unforeseeable problems are encountered, the engagement should be completed by [Insert anticipated completion date].

[Insert name of firm representative], CPA, is the engagement partner for the services specified in this letter and is responsible for supervising the engagement and signing the report.

Our fee for this engagement will be \$[insert amount] (which includes travel and other out-of-pocket expenses) and is payable when invoiced at the completion of this engagement. Finance charges of [1½ percent per month] will be assessed on unpaid balances over 30 days old.

If any difference arises between the [the Entity] and our firm related to services performed by us that cannot be resolved, you and we agree first to try in good faith to settle the difference by mediation. Costs of any mediation proceeding shall be shared equally by all parties.

We appreciate the opportunity to assist you and believe this letter accurately summarizes the significant terms of our engagement. If you have any questions, please let us know. If you agree with the terms of our engagement as described in this letter, please sign and return a copy to us. If the need for additional procedures arises, our agreement with you will need to be revised. It is customary for us to enumerate these revisions in an addendum to this letter. If additional specified parties of the report are added, we will require that they acknowledge in writing their responsibility for the sufficiency of procedures.

Very truly yours,

[CPA Firm's Name]

RESPONSE:

This letter correctly sets forth our understanding. Acknowledged and agreed on behalf of [the Entity] by:

Signature: _____
Printed Name: _____
Title: _____
Date: _____

Note – Adjustments should be made as necessary to comply with changes in attestation and government auditing standards issued after the preparation of this Guide.

Chapter 5. EXAMPLE WRITTEN REPRESENTATION LETTER FOR PUPIL ACCOUNTING AND ADULT EDUCATION AGREED-UPON PROCEDURES

[Prepared on Entity's Letterhead]

[Insert date]

[CPA Firm's Name and Address]

In connection with your engagement to apply agreed-upon procedures to the Aggregate Student Membership data[, **Transfer Student Documentation**] [**and Adult Education data**] for the year ended June 30, 2015, and the Fall Enrollment Count as of October 1, 2015 of [Full name of Entity], as required by Utah State Board of Education Rule R277-419 [and R277-733 and the *Utah Adult Education Policies and Procedures Guide*], we confirm, to the best of our knowledge and belief as of [date], the following representations made to you during your engagement.

1. We are responsible for compliance with the requirements of the rules for pupil accounting [and adult education] and for establishing and maintaining effective internal control over compliance with those rules.
2. We have performed an evaluation of our compliance with rules for pupil accounting [and adult education] and determined that we have complied with those rules.
3. Our interpretation of any compliance requirements that have varying interpretations has been provided to you.
4. There have been no communications from regulatory agencies, internal auditors, or other independent practitioners or consultants relating to noncompliance with the rules for pupil accounting [and adult education], including communications received between [Date of Subject Matter] and [Date of Representation Letter] .
5. We have made available to you all information and documentation that we believe is relevant to our compliance with the rules for pupil accounting [and adult education].
6. We have responded fully to all inquiries made to us by you during the engagements.
7. To the best of our knowledge and belief, no noncompliance with the rules for pupil accounting [and adult education] has occurred subsequent to [Date of Subject Matter] and through the date of this letter that would require adjustment to or modification of pupil accounting information.
8. We represent that your reports are intended solely for the use of the Utah State Office of Education and the [those charged with governance] and management of [name of Entity] and is not intended to be and should not be used by anyone other than those specified parties.

Name, Title, [Entity]

Name, Title, [Entity]

Note – Adjustments should be made as necessary to comply with changes in attestation and *Government Auditing Standards* issued after the preparation of this Guide. This example combines three compliance attestation engagements. Due to the timing and those involved, three separate written representations may be necessary.