



East Ramapo Central School District

105 South Madison Avenue, Spring Valley, NY 10977

A Unified Community Educating the Whole Child ...

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December 10, 2019

Lisa Reynolds, Chief Examiner
Local Government and School Accountability
Office of State Comptroller
Newburgh Regional Office
33 Airport Center Drive, Suite 103
New Windsor, NY 12533

Dear Ms. Reynolds:

The East Ramapo Central School District acknowledges receipt of the Non-Public School Transportation Report of November 2019. As stated in the report, the objective of the audit was to determine whether the District was providing transportation to eligible non-public school students for the fiscal years 2017-2018 and 2018-2019 through April 1, 2019.

- I. First, in response to your Non-Public School Transportation Audit key findings, we reiterate the fact that the District uses the State Education Department's (SED) Basic Educational Data System (BEDS) database as a guide for student enrollment. The database provides a snapshot of each school as of the first Wednesday of October.

A significant number of new students enroll in non-public schools shortly before, on, and after the above date, making school-based non-public enrollment data more updated than the SED records. The District pays for the transportation of non-public students reflecting higher costs than calculated based on the BEDS figure. The increased enrollment after BEDS day explains the difference in the expenses, as listed in your findings.

In sum, the issue of discrepancies in student numbers quoted in your report is an unavoidable consequence derived from the difference between what non-public schools submitted to SED in the first week of October and the growing current non-public school enrollment numbers after that date.

In more detail:

- 1) There were 488 general education and ten special education non-public students for the school year of 2017-18 who enrolled after BEDS day. The total additional cost that the District paid to provide transportation to these non-public students amounted to \$571,894.53.

- 2) There were 445 general education and six special education non-public students for the school year of 2018-19 who enrolled after BEDS day. The total additional cost that the District paid to provide transportation to these non-public students amounted to \$358,388.

Therefore, what the audit found as payments for more students beyond those registered in both 2017-18 and 2018-19 school years are, in fact, valid payments for non-public students who enrolled after BEDS day and are not reflected in the SED BEDS database.

- II. Second, as required, the East Ramapo Central School District's Corrective Action Plan (CAP) in response to your Non-Public School Transportation Audit is as follows:

Recommendation 1 – Ensure that New York State Laws and the District's policies for student eligibility are followed.

Implementation action(s): The School District is following all pertinent New York State Laws as outlined in section 58 of the NYS School Laws as well as adhering to all approved Board policies.

Implementation date: Completed as of June 30, 2019.

Person(s) responsible for implementation: Director of Transportation.

Recommendation 2 – Ensure that applications for transportation are filed with the Department by April 1st along with documents to prove residency and date of birth.

Implementation action(s): The Non-Public Transportation Request Forms along with all supporting documentation (utility bills, birth certificate, etc.) are turned in to the Transportation Department by the state-mandated deadline of April 1st. These documents are verified and filed in the Transportation Department's secure file room.

Implementation date: Completed as of April 1, 2019

Person(s) responsible for implementation: Director of Transportation and Assistant Directors of Transportation.

Recommendation 3 – Require that students transported by a Yeshiva Private Contractor (YPC) reapply annually for transportation.

Implementation action(s): Transportation for all students is requested through the submission of the Non-Public Transportation Request Form on an annual basis and must be received by the April 1st deadline, as outlined in section 58 of the NYS School Laws. In certain situations, transportation can be denied due to the lack of this form.

Implementation date: Completed as of April 1, 2019.

Person(s) responsible for implementation: Director of Transportation and Assistant Directors of Transportation.

Recommendation 4 – Develop procedures to ensure that policies regarding eligibility are followed.

Implementation action(s): The procedures that ensure strict adherence to all State Regulations and Board Policies have been developed and implemented to ensure compliance.

Implementation date: Completed as of June 30, 2019.

Person(s) responsible for implementation: Director of Transportation.

Recommendation 5 – Ensure that records establishing student eligibility are completed, filed, and retained.

Implementation actions(s): The Non-Public Transportation Request Forms, along with all supporting documentation (utility bills, birth certificate, etc.) are turned in to the Transportation Department by the State mandated deadline of April 1st. These documents are verified and filed in the Transportation Department’s secure file room. These records are retained for a period of time as established by the New York State Department of Education.

Implementation date: Completed as of April 1, 2019.

Person(s) responsible for implementation: Director of Transportation and Assistant Directors of Transportation.

Recommendation 6 – Use the actual number of students per department records, instead of estimates, to make payments for YPCs to transport students on a per-student basis.

Implementation actions(s): Each student is entered into the District Routing Platform (VersaTrans) as the individual Non-Public Transportation Form, and all accompanying documents are received, reviewed and verified. This “ACTUAL” number of students will be the maximum allowable for billing purposes.

Implementation date: Completed as of April 1, 2019.

Person(s) responsible for implementation: Director of Transportation and Assistant Directors of Transportation.

Recommendation 7 – Resolve any discrepancies between the number of students on payment claims (invoices) and the Department’s records before approving the payments.

Implementation action(s): All payment claims (invoices) are reviewed for accuracy as to the number of “approved” students in the Database as well as the actual number of transportation days and are initialed by the Assistant Director who performed the review. These documents are then forwarded to the Director for signature, which denotes the final approval for payment. Any discrepancies are reported to the YPC via written communication from the Director of Transportation.

Implementation date: Completed as of June 30, 2019.

Person(s) responsible for implementation: Director of Transportation and Assistant Directors of Transportation.

Recommendation 8 – Consult with District counsel to determine if there were any overpayments as a result of using estimated, rather than the actual, number of students. If there were overpayments, seek reimbursement.

Implementation action(s): Needs Attorney Gerhard's perspective as this is a moot point.

Implementation date:

Person(s) responsible for implementation:

Thank you for your consideration of our Proposed School Budget and your continued support.

Educationally,



Dr. Deborah L. Wortham
Superintendent of Schools