



## Independent Accountants' Report

Board of Directors  
Milwaukee Public Schools

Board of Directors  
Milwaukee College Preparatory School

We have examined management's assertion that the Milwaukee College Preparatory School – 36<sup>th</sup> Street (“the Charter”) academic achievement and program results reported in the accompanying Report on Academic Performance for the year ended June 30, 2024 are accurate, valid and representative of all the Charter students and the Charter did attain at least 75 percent of the applicable criteria. The Charter’s management is responsible for the report on Academic Performance for the year ended June 30, 2024. Our responsibility is to express an opinion on management’s assertion about the Charter’s performance results based on our examination.

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. Those standards require that we plan and perform the examination to obtain reasonable assurance about whether management’s assertion is fairly stated, in all material respects. An examination involves performing procedures to obtain evidence about management’s assertion. The nature, timing and extent of the procedures selected depend on our judgment, including an assessment of the risks of material misstatement of management’s assertion, whether due to fraud or error. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

We are required to be independent and to meet our other ethical responsibilities in accordance with relevant ethical requirements relating to the engagement.

In our opinion, management's assertions that the Charter’s performance results reported in the Report on Academic Performance for the year ended June 30, 2024 are accurate, valid and representative of all students at the Charter and that the Charter did attain at least seventy-five percent of the applicable performance criteria are fairly presented in all material respects.

*Reilly, Penner & Benton LLP*

July 10, 2025  
Milwaukee, Wisconsin

**MILWAUKEE COLLEGE PREP**  
**Report on Academic Performance**  
**June 30, 2024**

**Criterion 1: Mandatory Requirement - Achieve a percentage of pupils in Charter School scoring proficient or advanced on the Wisconsin State Assessment System (WSAS) tests in English/language arts that is the same as, or higher than, the percentage of pupils scoring proficient or advanced in corresponding grades in all MPS schools.**

		Charter School Results			Attestation Results	MPS Schools	
<b>2023-2024</b>	Assessment	School Participation Rate	Number Scoring At/Above Proficient	Percent Enrolled At/Above Proficient	Percent Enrolled At/Above Proficient	Percent Enrolled At/Above Proficient	Achieved Criterion Yes or No
ELA	Forward	100.0%	110	41.7%	41.7%	24.0%	Yes

This criterion focuses on the Charter's and the district's achievement on the statewide assessment in the area of English/language arts administered for pupils in corresponding grades in all MPS schools. As indicated in the preceding table, the Charter did meet this criterion.

**Criterion 2: Mandatory Requirement - Achieve a percentage of pupils in Charter School scoring proficient or advanced on the Wisconsin State Assessment System (WSAS) tests in Mathematics that is the same as, or higher than, the percentage of pupils scoring proficient or advanced in corresponding grades in all MPS schools.**

		Charter School Results			Attestation Results	MPS Schools	
<b>2023-2024</b>	Assessment	School Participation Rate	Number Scoring At/Above Proficient	Percent Enrolled At/Above Proficient	Percent Enrolled At/Above Proficient	Percent Enrolled At/Above Proficient	Achieved Criterion Yes or No
Mathematics	Forward	100.0%	129	48.9%	48.8%	19.8%	Yes

This criterion focuses on the Charter's and the district's achievement on the statewide assessment in the area of Mathematics administered for pupils in corresponding grades in all MPS schools. As indicated in the preceding table, the Charter did meet this criterion.

**Criterion 3: Mandatory Requirement - Achieve a percentage of pupils in Charter School scoring proficient or advanced on the Wisconsin State Assessment System (WSAS) tests in Science that is the same as, or higher than, the percentage of pupils scoring proficient or advanced in corresponding grades in all MPS schools.**

		Charter School Results			Attestation Results	MPS Schools	
<b>2023-2024</b>	Assessment	School Participation Rate	Number Scoring At/Above Proficient	Percent Enrolled At/Above Proficient	Percent Enrolled At/Above Proficient	Percent Enrolled At/Above Proficient	Achieved Criterion Yes or No
Science	Forward	100.0%	24	26.4%	26.7%	21%	Yes

This criterion focuses on the Charter's and the district's achievement on the statewide assessment in the area of Science administered for pupils in corresponding grades in all MPS schools. As indicated in the preceding table, the Charter did meet this criterion.

**MILWAUKEE COLLEGE PREP**  
**Report on Academic Performance**  
**June 30, 2024**  
**(Continued)**

**Criterion 4: Mandatory Requirement - Achieve a percentage of pupils in Charter School scoring proficient or advanced on the Wisconsin State Assessment System (WSAS) tests in Social Studies that is the same as, or higher than, the percentage of pupils scoring proficient or advanced in corresponding grades in all MPS schools.**

		Charter School Results			Attestation Results	MPS Schools	
<b>2023-2024</b>	Assessment	School Participation Rate	Number Scoring At/Above Proficient	Percent Enrolled At/Above Proficient	Percent Enrolled At/Above Proficient	Percent Enrolled At/Above Proficient	Achieved Criterion Yes or No
Social Studies	Forward	100.0%	37	40.7%	39.9%	33.1%	Yes

This criterion focuses on the Charter's and the district's achievement on the statewide assessment in the area of Social Studies administered for pupils in corresponding grades in all MPS schools. As indicated in the preceding table, the Charter did meet this criterion.

**Criterion 5: Mandatory Requirement – Achieve a stability rate of pupils in Charter School (registered as of the September Third Friday Count) that is the same as, or higher than, the stability rate of pupils in corresponding grades in all MPS schools.**

<b>Stability Rate</b>	Charter Stability Rate	Attestation Results Charter Stability Rate	MPS Stability Rate	Achieved Criterion Yes or No
2023-2024	78.2%	87.2%	69.4%	Yes

The preceding table compares the Charter's stability rate with the stability rate for pupils in corresponding grades in all MPS schools. The Charter did meet the stability criterion since the stability rate was greater than the stability rate for all corresponding grades in all MPS schools.

**Criterion 6: Mandatory Requirement - Achieve an average daily attendance rate of pupils in Charter School that is the same as, or higher than, the average daily attendance rate of pupils in corresponding grades in all MPS schools.**

<b>Attendance Rate</b>	Charter Attendance Rate	Attestation Results Charter Attendance Rate	MPS Attendance Rate	Achieved Criterion Yes or No
2023-2024	91.8%	91.8%	86.8%	Yes

The preceding table compares the Charter's average daily attendance with the attendance for pupils in corresponding grades in all MPS schools. The Charter did meet the attendance criterion since the attendance rate was greater than the attendance rate for all corresponding grades in all MPS schools.

**MILWAUKEE COLLEGE PREP**  
**Report on Academic Performance**  
**June 30, 2024**  
**(Continued)**

**Criterion 7: Mandatory Requirement - Achieve a mobility rate of pupils in Charter School (registered as of the September Third Friday Count) that is the same as, or lower than, the mobility rate of pupils in corresponding grades in all MPS schools.**

<b>Mobility Rate</b>	<b>Charter Mobility Rate</b>	<b>Attestation Results Charter Mobility Rate</b>	<b>MPS Mobility Rate</b>	<b>Achieved Criterion Yes or No</b>
2023-2024	2.8%	2.8%	15.3%	Yes

The preceding table compares the Charter’s mobility rate with the mobility rate for pupils in corresponding grades in all MPS schools. The Charter did achieve the mobility criterion since the Charter’s mobility rate was less than the mobility rate for pupils in corresponding grades in all MPS schools.

**Criterion 8: Mandatory Requirement - Achieve a percentage of pupils promoted from Grades 4 and 8 in Charter School that is the same as, or higher than, the percentage of pupils being promoted from the corresponding grades in all MPS schools.**

<b>2023-2024 Promotion</b>	<b>Charter School Results</b>			<b>Attestation Results</b>	<b>MPS Schools</b>	<b>Achieved Criterion Yes or No</b>
	<b>Number Enrolled</b>	<b>Number Promoted</b>	<b>School Rate</b>	<b>School Rate</b>	<b>District Rate</b>	
Grade 4	41	41	100.0%	100.0%	99.9%	Yes
Grade 8	17	17	100.0%	100.0%	99.9%	

The preceding table compares the Charter’s 4<sup>th</sup> and 8<sup>th</sup> grade graduation rate with the 4<sup>th</sup> and 8<sup>th</sup> grade graduation rate for all MPS 4<sup>th</sup> and 8<sup>th</sup> graders. The Charter did achieve the graduation criterion since the Charter’s graduation rate for Grade 4 and Grade 8 was greater than the graduation rate for pupils in corresponding grades in all MPS schools.



## Independent Accountants' Report

Board of Directors  
Milwaukee Public Schools

Board of Directors  
Milwaukee College Preparatory School

We have examined management's assertion that the Milwaukee College Preparatory School ("Charter") complied with all contractual requirements as listed in the accompanying representation letter dated June 25, 2025, during the school year ended June 30, 2024. Charter management is responsible for its assertion. Our responsibility is to express an opinion on management's assertion about the Charter's compliance based on our examination.

Our examination was made in accordance with the attestation standards established by the American Institute of Certified Public Accountants. Those standards require that we plan and perform the examination to obtain reasonable assurance about whether management's assertion is fairly stated, in all material respects. An examination involves performing procedures to obtain evidence about management's assertion. The nature, timing and extent of the procedures selected depend on our judgment, including an assessment of the risks of material misstatement of management's assertion, whether due to fraud or error. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

We are required to be independent and to meet our other ethical responsibilities in accordance with relevant ethical requirements relating to the engagement.

As required by MPS Minimum Audit Requirements, a representation letter is attached representing that management of the Charter is responsible for compliance with contractual requirements.

In our opinion, management's assertions that the Charter complied with the aforementioned requirements for the school year ended June 30, 2024, is fairly stated in all material respects except for requirements in relation to PAAR submission, board listing, Title I funding requirements, staff licenses, immunizations, addressing prior year findings, insurance coverage and background checks.

*Reilly, Pennu & Benton LLP*

July 10, 2025  
Milwaukee, Wisconsin

**Summary Schedule of Contract Compliance Requirements**

Contract Section	Contract Provision	Level of Compliance			
		Full	Partial	None	Not Applicable
I.B.	Ensure person in charge of school is the same as in contract	X			
I.C.	Adhere to the educational program described in the petition	X			
I.D.	Adhere to the methods of instruction described in the petition	X			
I.E.	Submit Pupil Academic Achievement Report ("PAAR") within 30 days of receipt of data Ensure the PAAR is in the appropriate format		1		
I.F.	Comply with 501(c)(3) tax status requirement	X			
	Comply with Articles of Incorporation and Bylaws	X			
	Ensure that MPS has an updated listing of all members serving on the governing board Comply with Title I funding requirements		2 3		
I.G.	Adhere to MPS Administrative Policy 3.09(7)(a) regarding livable wage	X			
	Ensure all instructional staff hold a license or permit to teach issued by DPI		4		
I.H.	Comply with Board policies and local, state, and federal laws, regulations, and codes that pertain to health and safety, regarding immunization requirements		5		
I.I.	Establish policies to achieve a diverse pupil profile	X			
I.J.	Comply with Board policies and guidelines for pupil admission	X			
	Comply with the contract requirement to maintain a pupil database containing specific demographic data	X			
	Comply with contract regarding the Special Education Plan	X			
	Comply with the contract regarding Individuals with Disabilities in Education Act	X			
I.K.	Submit a budget by April 30	X			6
	Submit budget in the approved MPS format	X			
	Determine submitted budget is within 10% of final budget.	X			
	Adhere to long-term debt requirements				
	Submit mid-year unaudited financial statement by January 31 (for July 1 - December 31)	X			
	Charter school shall provide for an annual financial audit report in accordance with generally accepted auditing standards and government auditing standards. The audit should include:				
	> Statement of financial position	X			
	> Statement of activities and changes in net assets	X			
	> Statement of cash flows	X			
	> Schedule of MPS contract revenues and expenditures	X			
	> An attestation opinion was included on the MPS contract of revenues and expenditures	X			
> Uniform Guidance reports and schedules, if applicable	X				
Verify that the audit report and management letter were submitted to MPS within 15 days of receipt from the auditor	X				
Has management addressed or corrected for findings or material weaknesses addressed in the single audit report or management letter		7			
Charter school shall comply with pupil eligibility audit requirement in school years ending in an odd number				6	
Charter school shall immediately report any pending or threatened litigation				6	
I.L.	Changes or amendments to the disciplinary guidelines were submitted to MPS Comply with MPS disciplinary and expulsion guidelines or comply with disciplinary guidelines approved by the Board	X			6
I.N.	Complied with MPS's school facilities policy	X			
	Adhere to insurance and bond coverage requirements		8		
I.P.	Adhere to nonsectarian requirements	X			
I.Q.	Adhere to no tuition charge requirement	X			
I.R.	Adhere to non-discrimination policy	X			
	Complied with all local, state and federal laws, codes, rules and regulations	X			
I.S.	Adhere to Board's policy concerning background checks performed on all employees and volunteers through MPS Human Resources		9		
I.T.	Comply with notifying MPS if they receive correspondence from: U.S. Department of Education, U.S. Department of Justice and DPI				6
I.U.	Adhere to school calendar described in the petition.	X			
I.X.	Comply with MPS's transportation policy or comply with the transportation policy that was approved by the Board				10
	Comply with MPS's nutrition services policy or comply with the nutrition services policy that was approved by the Board	X			
I.Z.	Adhere to staff development opportunities requirements	X			

**Notes on compliance:**

- 1 Section I.E. of the contract states that the charter school shall develop and submit an annual pupil academic achievement report to MPS within 30 days of receipt of data (due date of January 27, 2025). Procedures revealed that the Charter did not submit the data until February 3, 2025.
- 2 Section I.F. of the contract states that the charter school shall have a list of individuals on the governing board that matches the list provided to the contracted services department list. Procedures revealed that the Charter did not submit an updated list to MPS for the 2023-2024 school year resulting in MPS having an additional board member on their list.
- 3 Section I.F. of the contract states that the charter school shall comply with all of the rules and regulations applicable to Title I funding sources. Procedures revealed that the Charter did not have Human Resources verify an I-9.
- 4 Section I.G. of the contract states that the charter school shall ensure that all instructional staff hold a current and appropriate license or permit to teach by the Wisconsin Department of Public Instruction. Procedures revealed that four teachers did not hold a valid license.
- 5 Section I.H. of the contract states that the charter school shall ensure that all of its pupils comply with Wisconsin immunization requirements. According to the Health Immunization Report, the Charter was 96.5% compliant.
- 6 Not applicable - Requirements or notifications to MPS do not apply in the current year.
- 7 Section I.K. of the contract states that the Charter shall address and correct findings and material weaknesses from the prior financial audit and management letter. Procedures revealed that the June 30, 2023 material weakness single audit finding was not fully resolved as lack of review process continues.
- 8 Section I.N. of the contract states that the Charter shall, at a minimum, maintain 50% of the per pupil contract value in fidelity bond/crime insurance. Per examination of the charters original approved budget for per pupil revenue (\$21,575,000); the Charter should've had \$10,787,500 in insurance; however the liability insurance was only \$1,900,000.

Section I.N. of the contract states that the Charter shall, at a minimum, maintain an aggregate limit of \$2,000,000 for School Leaders Errors & Omissions insurance; however the liability insurance was only \$1,000,000.

- 9 Section I.S. of the contract states that the Charter shall perform background screening through the MPS Department of Human Resources on all Charter School full and part-time employees and volunteers. Procedures revealed four individuals did not have a background check completed. Procedures also revealed that four individuals selected had charges for battery, carrying a concealed weapon, theft and failure to report a crime.  
  
Section I.S. of the contract states that the Charter shall not allow any employee or volunteer to have contact with pupils if the background reveals instances of convictions of a criminal offense or pending charges which substantially relate to the duties and responsibilities assigned to the employee or volunteer. Procedures revealed that four individuals selected had charges including battery, carrying a concealed weapon, theft and failure to report a crime. Whether these charges qualify for an employee to be unfit would be determined by MPS Department of Human Resources.

- 10 Not applicable - The Charter does not provide transportation.



## Corrective Action Plan – Contract Compliance

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**Reference Number: Partial #1**

**Description:** PAAR Submission

**Corrective Action Plan:** The Charter will implement a multi-step internal PAAR submission timeline that includes a pre-submission review window and early data compilation to ensure the PAAR is submitted within the 30-day deadline. A calendar reminder and checklist will be established to support timely submission.

**Anticipated Completion Date:** Ongoing

**Contact:** Rali Dotson, Chief Operation and Information Officer, 414-264-6000

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**Reference Number: Partial #2**

**Description:** Board of Directors Listing

**Corrective Action Plan:** The Charter will establish a quarterly governance update process to MPS, ensuring that all changes to the Board of Directors are submitted in real-time. A cross-check with MPS listings will occur annually prior to audit submission.

**Anticipated Completion Date:** Ongoing

**Contact:** Rali Dotson, Chief Operation and Information Officer, 414-264-6000

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**Reference Number: Partial #3**

**Description:** Title I

**Corrective Action Plan:** The Charter will update its HR onboarding checklist to require I-9 verification for all staff funded through Title I sources, with oversight and monthly audits conducted by the Director of HR to ensure ongoing compliance.

**Anticipated Completion Date:** Ongoing

**Contact:** Rali Dotson, Chief Operation and Information Officer, 414-264-6000

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**Reference Number: Partial #4**

**Description:** Valid Licenses

**Corrective Action Plan:** The Charter will implement a **quarterly** licensure verification review with HR and school leaders, using DPI credentialing reports. All instructional staff will be tracked in a centralized credential database.

**Anticipated Completion Date:** Ongoing

**Contact:** Rali Dotson, Chief Operation and Information Officer, 414-264-6000

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**Reference Number: Partial #5**

**Description:** Immunization Requirements

**Corrective Action Plan:** The Charter will enhance immunization compliance through bi-monthly nurse reviews and proactive parent engagement strategies to reach full compliance, targeting the remaining 3.5%.

**Anticipated Completion Date:** Ongoing

**Contact:** Rali Dotson, Chief Operation and Information Officer, 414-264-6000

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**Reference Number: Partial #7**

**Description:** Prior Year Audit Findings Continued

**Corrective Action Plan:** The Charter will update its internal audit procedures to address prior year findings by implementing documented review processes for all financial submissions. A corrective action review team will meet quarterly to verify progress.

**Anticipated Completion Date:** Ongoing

**Contact:** Rali Dotson, Chief Operation and Information Officer, 414-264-6000

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**Reference Number: Partial #8**

**Description:** Fidelity Bond/Crime Insurance



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**Corrective Action Plan:** The Charter is in the process of increasing its insurance coverage to meet the minimum fidelity bond and E&O insurance requirements. Finalized coverage documentation will be submitted to MPS by the start of the 2025–26 school year.

**Anticipated Completion Date:** Ongoing

**Contact:** Rali Dotson, Chief Operation and Information Officer, 414-264-6000

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**Reference Number:** Partial #9

**Description:** Background Screenings

**Corrective Action Plan:** The Charter will require all background checks to be completed through MPS HR prior to any employee or volunteer beginning service. A compliance officer will review results, and any charges found will be reviewed for eligibility per MPS HR guidelines.

**Anticipated Completion Date:** Ongoing

**Contact:** Rali Dotson, Chief Operation and Information Officer, 414-264-6000

**Signature:**

Alfred Keith (Jul 9, 2025 21:18 CDT)

**Email:** alfred.keith@milwcollegeprep.com

Jul 9, 2025



June 25, 2025

**Milwaukee Board of School Directors**

In regard to the charter school contract between the Milwaukee Board of School Directors and Milwaukee College Preparatory School (“Charter”), I certify the following:

- That the educational program from Appendix A of the contract is being followed
- That the method of instruction from Appendix A of the contract is being followed
- That the Charter’s tax-exempt status has not changed
- That the Articles of Incorporation and bylaws from Appendices D and E of the contract are being followed
- That the Charter’s governance council requirements as outlined in Appendices A, D, and E of the contract are being followed
- That the methods to involve parents as noted in Appendix A of the contract are being followed
- That all full-time staff and vendors were paid the Livable Wage
- Except as noted, that the Charter has complied with all Board policies and all local, state, and federal laws, codes, rules, and regulations that apply to public schools and pertain to health and safety, including, but not limited to, the Wisconsin immunization requirements
- That the Charter is attempting to follow the plan submitted to MPS Contracted School Services regarding achieving a racial and ethnic balance among its pupils that is reflective of the school district population
- That the Charter has abided by all MPS policies and guidelines for pupil admission and did not impose admission requirements that are inconsistent with MPS policies and guidelines
- That the Charter has maintained pupil database information in an MPS-approved format in accordance with MPS administrative policies and procedures pertaining to each charter school pupil, including but not limited to the pupil’s name, address, home phone number, place and date of birth, parent(s) or guardian, immunization records, ethnic background, school of last attendance, number of siblings, and emergency contact
- That the Charter has fully complied with the law regarding the confidentiality of pupil records as provided for in 20 U.S.C. §1232g (Family Educational Rights and Privacy Act - FERPA) and its



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implementation regulations and Wis. Stat. §118.125

- That the Charter is following the plan submitted to MPS Contracted School Services and provides a Free Appropriate Public Education (FAPE) to children with disabilities, including but not limited to identifying, evaluating, planning educational programs, and implementing placements in accordance with the Individuals with Disabilities Education Act (IDEA), 20 U.S.C. §1400 et seq., and Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. §794
- That the Charter submitted to MPS Contracted School Services within 15 days of receipt all audits, reviews, compilations, management letters, or reports of reportable conditions prepared by an independent certified public accountant
- That all pending or threatened litigation as of June 30, 2024, has been disclosed to the Charter's independent public accountants and MPS
- That the Charter followed the disciplinary guidelines, including any changes or amendments submitted to MPS Contracted School Services, that are attached to the contract as either Appendix I or J
- That the Charter did not expel any pupil
- That the Charter did not discipline any pupil protected under Section 504 of the Rehabilitation Act of 1973, IDEA, or the Americans with Disabilities Act (ADA), 42 U.S.C. §12101 et seq.
- That the Charter did not use corporal punishment, including strip searches, on any pupil
- That the Charter is compliant with the section of the contract regarding ensuring that the facility utilized to conduct its educational program is adequate to serve the pupil population identified in the contract
- That the Charter is compliant with the section of the contract regarding obtaining adequate insurance and bond coverage as listed in the contract and that all policies are currently paid and in effect, except as noted in the report
- That the Charter is nonsectarian in its programs, admissions policies, employment practices, and all other operations
- That the Charter has not charged tuition or assessed any student fees in areas disallowed by the contract
- That the Charter has not discriminated against any student or qualified employee or applicant



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- That the Charter has complied with all local, state, and federal laws, codes, rules, and regulations applicable to public charter schools, including but not limited to those noted in the contract, and has not received notification of any non-compliance concerns
- That the Charter has had background checks performed on all employees and volunteers and that no one—paid or unpaid—is working in the school whose background check indicated ineligibility, except as noted in the report
- That the Charter did not receive correspondence from the U.S. Department of Education, U.S. Department of Justice, or DPI that required a formal response
- That the Charter did not develop its own transportation policy
- That the Charter did not provide transportation
- That the Charter did develop its own nutritional services policy
- That the Charter follows the MPS free breakfast and lunch program

[Alfred Keith \(Jul 9, 2025 12:51 CDT\)](#)

**Al Keith IV**

**Chief Executive Officer**