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**SPECIAL NEEDS SCHOLARSHIP PROGRAM**

**AUDIT GUIDE**

**ENROLLMENT AUDIT FOR**

**FEBRUARY AND MAY 2023**

**PAYMENT ELIGIBILITY FOR**

**January 13, 2023 Count Date**

**ISSUED BY THE**

**WISCONSIN DEPARTMENT OF PUBLIC INSTRUCTION**

**Foreword**

Wis. Admin. Code PI 49 requires that schools participating in the Special Needs Scholarship Program (SNSP) obtain a separate audit of the school’s September and January enrollments. This guide provides the reporting requirements and procedures for the January 13, 2023 enrollment audit. The enrollment audit report, with all required supporting documents, must be provided to the Department of Public Instruction (DPI) by May 1, 2023.

**Management/Auditor Responsibility:**

Auditors should make it clear to school management that the school is responsible for the proper reporting of enrollments and that the auditor’s responsibility is to determine that the pupil counts accompanying the agreed-upon procedures report are fairly presented, in all material respects, in conformity with the requirements of Wis. Admin. Code PI 49. School management must sign a management representation letter regarding certain management assertions described in Section 4.

**Procedures Completed:**

Wis. Admin. Code PI 49.07 (3) requires the use of agreed-upon procedures. This Guide contains procedures that constitute the procedures the auditor must complete to determine if the school’s 2nd Friday in January Pupil Count Report is correct.

If a pertinent procedure is not performed, the DPI is to be notified in a separate written communication regarding the reason for not performing the procedure. Under professional standards, when a practitioner undertakes an attestation engagement for the benefit of a government body or agency and agrees to follow specified government standards, guides, procedures, statutes, rules, and regulations, the practitioner must complete the required agreed-upon procedures, as well as applicable attestation standards.

The auditor should document the procedures performed or include a reference to the procedures performed and the related workpapers, if applicable, after each procedure. If the audit firm develops its own work program, the procedures should be “copied and pasted” as needed into the audit firm’s work program. The auditor must use the Independent Accountant’s Report and schedules available on the SNSP webpage at <https://dpi.wi.gov/parental-education-options/special-needs-scholarship/january-enrollment-audit>.

**Existence of Pupils/Evaluation of Omissions & Misstatements:**

The school’s management is acknowledging that the pupil exists by submitting a SNSP application or transfer request to the DPI and including the pupil in a submitted class list. A pupil for whom there is no externally produced documentation raises a potential issue as to the actual existence of that pupil.

Professional standards require that both qualitative and quantitative aspects of omissions and misstatements be considered in expressing a conclusion. Management practices at the school that resulted in the identified errors should be evaluated when assessing whether or not the school is in material compliance with the requirements of Wis. Admin. Code PI 49.

**Summary of Significant Report Changes Made**

*Changes made in the September 2022 Enrollment Audit Guide are not reflected below.*

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| **Section** | **Change(s)** |
| General | 1. None. |
| [Section 1](#_UNDERSTANDING_THE_SCHOOL’S) | 1. None. |
| [Section 2](#_ATTENDANCE_REQUIREMENTS) | 1. None. |
| [Section 3](#_SNSP_APPLICATION_&) | 1. Added that part of the IEP/services plan verification email review needs to verify the email to the LEA was sent **after** the application was received and determined eligible by the school, other than the school having the LEA verify the IEP/services plan requirement was met. 2. Clarified that “District” may be included or excluded at the end of the name of a district. 3. Clarified the procedures for determining if an application or transfer request is eligible to be added. |
| [Section 4](#_Obtain_a_representation) | 1. None. |
| [Appendix A](#_APPENDIX_A) | 1. Specified the disability determination should be identified in the submitted Enrollment Audit Excel schedule if there is a change related to the IEP reevaluation/scholarship type. |
| Excel Report | 1. None. |
| Agreed-Upon Procedure Report | 1. None. |

**Reporting Requirements**

**THE AUDITOR IS REQUIRED TO MAINTAIN A COPY OF THE FOLLOWING IN THE WORKPAPERS:**

* **Application and transfer request, including all supplemental documentation, received for any pupil tested in Section 3 who is included in Schedule 2, 3, or 4 of the Enrollment Audit Report.**
* **IEP reevaluation documentation for any continuing SNSP pupil included on Schedule 3 or 4 who was identified as needing a scholarship type change or IEP reevaluation date change.**

**Submitted Report:**

The report must be loaded to the SNSP January 2023 Enrollment Audit Kiteworks folder at <https://sft.dpi.wi.gov/w/f-62a2c281-a4a2-47d9-a8f2-efa8c062f2f3>. The submitted report should be named “{School Name on the Cover Page of the Enrollment Audit} Jan 2023 SNSP Enroll Rpt”. All auditors on the auditor listserve, SNSP administrators, and SNSP designees will be given access to the folder. **Please be aware you will not be able to see reports loaded by any other individual.** Faxed, emailed, or mailed copies or links to Google docs will not be accepted. The Kiteworks Instructions are available on the Enrollment Audit webpage.

The enrollment audit report package provided to the DPI must include the following in the order listed below. **A separate cover sheet should not be added to the front of the Enrollment Audit. The report must start with the cover page.**

* **Report Cover Page signed by the SNSP Administrator.** If the Enrollment Audit is signed using DocuSign, the DocuSign completion certification should be included at the end of the Enrollment Audit pdf.
* **Error Report**
* **Independent Accountant’s Report** 
  + The report must be dated as of the completion of field work.
  + The report must be addressed to the authorizing individual from the school who is the head of the school’s operating organization or governing board. This person **may not necessarily be the SNSP Administrator.** The title of the authorizing individual and the operating organization of the school must be used in the address.
  + The areas within the report that contain brackets must be updated.
* **Schedule 1-1** “*Pupil Enrollment Count Schedule*”
* **Schedule 1-2** *“SNSP Pupil Enrollment Count Schedule”*
* **Schedule 2** “*Ineligible Pupils*”
* **Schedule 3** *“Applications Requiring Corrections”*
* **Schedule 4** “*Pupil Additions”*
* **Schedule 5** *“Headcount and FTE Per Examination”*
* **A copy of the paper application or transfer request for any pupils tested in Section 3 who are included on Schedule 3 or 4 of the Enrollment Audit Excel document (if any pupils are included in Schedule 3 or 4). The supporting documentation for the application or transfer request does not need to be attached to the audit but must be maintained in the auditor workpapers.**
* **Disagreement Letter & Supporting Documentation** If a school checked the box on the cover page indicating they disagree with any findings in the audit, provide the disagreement letter from the school and the following from the auditor’s workpapers:
  + The application or transfer request and supporting documentation for students tested in Section 3;
  + The pupil’s attendance records for the 2nd Friday in January (or day before/day after if applicable); and
  + The IEP/services plan reevaluation if the auditor reported a scholarship change for a pupil from a full to partial scholarship pupil.
  + The IEP/services plan reevaluation if the auditor reported a scholarship change for a pupil from a full to partial scholarship pupil.

The documentation must be loaded to Kiteworks, either as a separate file or at the end of the Enrollment Audit pdf. If uploading a disagreement letter or documentation to the general Enrollment Audit folder in Kiteworks, please ensure the school name is included in the file name so the DPI can identify which school the documentation is for.

* **Email Approval for Adding Kindergarten** If the Enrollment Audit adds a kindergarten grade for the school, email approval from DPI to add the kindergarten grade as described in Step 2.12.

Wis. Admin. Code PI 49 requires the auditor to respond directly to inquiries from the DPI, permit the DPI review of workpapers, and provide the DPI with copies of workpapers as requested. The audit workpapers must be retained for at least five years from the due date of the current year financial audit, unless the auditor is requested to retain the records longer by the DPI or a law enforcement agency. The school should be advised of the requirement to retain pupil records used in the audit.

Please email [andrea.kratz@dpi.wi.gov](mailto:andrea.kratz@dpi.wi.gov) or call 608-267-1291 if you have any questions.

Andrea Kratz, School Finance Auditor

**Pupil Enrollment Payment Eligibility Procedures**

# UNDERSTANDING THE SCHOOL’S PUPIL COUNT REPORTING ENVIRONMENT

* 1. **Application & Transfer Request Requirements Guidance:** Review the bulletins on completing and accepting SNSP applications and transfer requests and the student application and transfer request checklists at <https://dpi.wi.gov/parental-education-options/special-needs-scholarship/student-applications-processing> under “**Explanation of Application Requirements and Process.”**

Additionally, the in depth training materials, which explained the SNSP application and transfer request requirements and the enrollment audit requirements, are available at <https://dpi.wi.gov/parental-education-options/special-needs-scholarship/january-enrollment-audit>.

Provide an indication of this being completed below or in a workpaper memo.

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| Workpaper Reference or Procedure(s) Performed |  | Performed By and Date |  |

* 1. **Understanding School Processes:** Auditors who completed the September 2022 Enrollment Audit should complete Section B and auditors who did not complete the September Enrollment Audit should complete Section A.

**Section A (Auditor Did Not Complete the September Enrollment Audit):**

The completion of these procedures may be partially completed by obtaining the prior auditor’s September Enrollment Audit workpapers. However, the new auditor should make inquiries of the school and review the school process to ensure all documented items in the prior auditor’s workpapers are appropriate and correct. If the auditor chooses to use the prior auditor’s workpapers, procedures should include the inquiries included in section B.

Prepare a memo/memos documenting the following:

Process for Preparing Attendance Records:

1. The names of classroom teachers, and their responsibilities for attendance and grade recording. Determine the process the teachers use to record attendance (“original classroom records”).
2. Determine if the school has a Student Information System (SIS) that the school uses for attendance and student data and, if so, what SIS is used.
3. The process and the names of staff involved in preparing the school’s official or central office records (“official attendance records”). If the school provided virtual instruction, obtain documentation from the school that explains the process that the school used to determine that a student should be recorded as in attendance. Information on how attendance should be taken in a virtual environment is available in the 2nd Fri Jan Pupil Count Report Training at <https://dpi.wi.gov/parental-education-options/special-needs-scholarship/school-training>.
4. How the school compiled the “All Pupils” and “SNSP Pupils” count date enrollment from official attendance records.
5. How the school determined if a pupil who was not in attendance for instruction on the count date should or should not be included in the count. This should include determining where the student was on the count date and that they were not enrolled in or attending another school or homeschooled during their period of absence.
6. How the school determined that a pupil should be listed on the submitted count report as a SNSP pupil.

Application & Transfer Request Review:

1. The process for accepting and reviewing applications and transfer requests, names of staff involved, and how the required documentation is filed and safeguarded. The documentation must be maintained electronically or in paper form for at least 5 years from the end of the school year in which the pupil applies or 5 years after the pupil no longer attends the school, whichever occurs later, unless requested to retain the records longer by the DPI or a law enforcement agency.
2. The process used to follow-up on inadequate documentation. Ensure that all documentation is provided within 21 days of the application or transfer request being received.

Other Considerations:

1. The process the school uses for responding to requests for pupil records and transcripts from other schools and the availability of those records for review. Ensure that the process to respond to requests for pupil records and transcripts includes sending a copy of the records and keeping the original pupil records at the school.
2. If the school is or is not a “Partnership” or “Contract” school of a public school district.
3. If the school operates a child care center in the same building as the school obtain:

* A schedule of the child care hours of operation and the location where child care activities occur during the hours the SNSP classes are being held (*Child care activities cannot be in classrooms at the same time that K4-12 instructional activities are occurring)*. Please note that if the school provides K3 that it considers to be educational programming, the K3 classroom may be combined with other grades at the school. If this is the case, the school will be required to use an allocation to determine the portion of the expenses for the combined classroom that relate to K4-12 educational programming in the year-end financial audit.
* A listing of child care participants (excluding the K3 educational programming pupils explained above) identifying those who are also SNSP pupils and:
  + the days, hours, classroom location, and teacher of the SNSP pupils during school hours; and
  + the days, hours, location, and individual responsible when the SNSP pupils are child care participants.

**Section B (Auditor Completed September Enrollment Audit):**

Obtain the information for the procedures below from the September 2022 Enrollment Audit Guide. Hold a meeting with individuals associated with count procedures, reviewing applications, and other procedures as relevant to the school asking the following questions. Recommended inquiries: the SNSP Administrator, 1 teacher, and 1 office staff person (not all questions will be relevant to all individuals).

1. Have there been any changes in the names of classroom teachers, and their responsibilities for attendance and grade recording?
2. Is the same process used by the teachers to record daily attendance or absences, grades, or other indications of instruction such as progress reports?
3. If the school has a SIS, have there been any changes in: 1) the way the SIS is used; 2) how data is entered by the teacher into the SIS; 3) the programming of the SIS; 4) the capability of administrators or anyone other than teachers to manipulate attendance data in the SIS; or 5) any other changes that would affect the recording of the attendance records in the SIS? (Additional recommended inquiry: IT individual, if applicable)
4. Have there been any changes in having instruction virtually or in person? If so, how has this impacted the records and reporting for the enrollment audit?
5. Have there been any changes in how the school compiles the “All Pupils” and “SNSP Pupils” count date enrollment from official attendance records?
6. Has there been a change in how the school determines that the pupil should or should not be included in the count if a pupil was not in attendance on the count date?
7. Has there been any change in how the school determined that a pupil should be listed on the submitted count report as a SNSP pupil?
8. Have there been any changes in the process and the names of staff involved in preparing the school’s official attendance records?
9. If there is a child care center operating in the same building, have there been any changes in the days, hours, and classroom locations that would result in child care activities occurring in the classrooms at the same time as instruction? (Additional recommended inquiry: Day care staff person)
10. Have there been any changes in the status of the school as a “Partnership” or “Contract” school of a public school district. Also, determine if any pupils have moved in or out of SNSP from these programs. If so, obtain a list of these pupils.
11. Have there been any changes in the school’s process for accepting and reviewing applications and transfer requests, names of staff involved, and how applications and transfer requests are filed and safeguarded?

If any changes are noted, determine their effect. If it is determined that any changes will have an effect, obtain additional information to understand the new process and test it as needed (see Section A for additional assistance). Document the results of the inquiries and the related assessment of any changes in a memo retained in the workpapers.

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| Workpaper Reference or Procedure(s) Performed |  | Performed By and Date |  |

* 1. **Fraud Risk Assessment:** Complete/update the required fraud risk assessment audit guide available at <https://dpi.wi.gov/parental-education-options/special-needs-scholarship/january-enrollment-audit>. This audit guide incorporates fraud due to payment eligibility issues and overall financial statement fraud for the year-end financial audit. The auditor must identify potential fraud related to the enrollment audit and mitigate the risk related to the enrollment audit. Reference the location of the fraud risk assessment completed below.

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| Workpaper Reference or Procedure(s) Performed |  | Performed By and Date |  |

* 1. **K4 Parental Outreach:**

Required K4 Parental Outreach Testing: If the school is reporting pupils enrolled in a K4 program in the “4 Year-Old K/437 Hours + 87.5 Hours Outreach” category or has notified the auditor that it would like to change its pupils to the “4 Year-Old K/437 Hours + 87.5 Hours Outreach” category, obtain a listing of scheduled outreach activities and dates and times of the activities. Also obtain a copy of the teacher’s log for any activities that were already scheduled to occur. Review the listing of outreach activities ensuring they are all acceptable activities. The review should include determining the items below. See the K4 Parental Outreach Activities Bulletin at <https://dpi.wi.gov/parental-education-options/special-needs-scholarship/bulletins> and the K4 Parental Outreach Activities Training at <https://dpi.wi.gov/parental-education-options/special-needs-scholarship/school-training> for a list of example activities that are allowed, the requirements for activities to be included, and a list of some activities that are not allowed.

* **Activities Available to All K4 Parents/Legal Guardians (hereafter “parent”):** The activities must be available to all K4 parents and not be disciplinary or specific assistance for a particular pupil or pupils.
* **Educational Component Related to K4 Parental Role:** The activities must have an educational component for the parent and the focus must be on assisting the parent in their role as a K4 parent.
* **K4 Activities Above and Beyond Activities Provided to the School as a Whole:** The activities must be above and beyond the activities provided to the school as a whole. If the activity is offered to the school as a whole, it could not be counted as K4 parental outreach. For example, any parent-teacher conferencing must be above and beyond the days provided for other grade levels. If parents of pupils in other grades attend a K4 parental outreach event but the primary focus is the K4 parents and all of the other requirements are met, the activity may still be included as K4 parental outreach.
* **Separate from Direct Instruction:** The activities must be provided separate from direct instructional hours and in addition to the required minimum 437 hours of direct pupil instruction.
* **Attendance:** At least one K4 parent must attend the event and/or complete the activity in order for the school to include the outreach activity in its total hours.
* **Allowed Time:** The amount of time included for the activity is the time that it takes one parent only to complete the activity. The time it takes the parent to complete the activity is not multiplied by the number of parents that participated. Additionally, the time does not include teacher preparation or travel time.
* Fundraising and volunteering are not allowed activities.

If the total of **allowed** outreach activities that have already occurred is not at least 87.5 hours, determine if K4 parental outreach activities are scheduled for the remainder of the year. If so, review the planned activities to ensure they comply with the above requirements (except the attendance requirements). Determine that the total actual activities that occurred plus the activities scheduled for the remainder of the year that meet the requirements are at least 87.5 hours.

* Move K4 pupils to the K4 without outreach category: If the school is unable to provide a listing of K4 parental outreach activities or if the auditor determines the school will not provide at least 87.5 hours of K4 parental outreach hours, all K4 pupils must be reported in the 437 hours (0.5 FTE) category. On Schedule 1-1 of the Enrollment Audit Report, the auditor should answer no to the question of whether the school will provide K4 parental outreach. K4 SNSP pupils will automatically change to the 0.5 FTE category.
* Move K4 pupils to the K4 with outreach category: If the school has indicated it would like to provide the K4 parental outreach activities but did not include the pupils in the “4 Year-Old K/437 Hours + 87.5 Hours Outreach” category in the count report, ensure the school has met the K4 parental outreach activities requirements above. If the school meets the requirements, the auditor should indicate “Yes” to the question of whether the school will provide K4 parental outreach on Schedule 1-1 of the Enrollment Audit Report. K4 SNSP pupils will automatically change to the 0.6 FTE category.

Please note the K4 category must be the same for the SNSP and the Choice programs if the school is participating in both programs.

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| Workpaper Reference or Procedure(s) Performed |  | Performed By and Date |  |

* 1. **Contested Application/Transfer Request/Pupil Eligibility Issues:** Ask the school if there are any contested applications, transfer requests, or pupil eligibility issues with parents or the DPI. Prepare a workpaper memo identifying pupils, the related issues, and status. Determine if the dispute has an effect on pupil eligibility and/or SNSP payments. If any pupils are ineligible that were included in the count per the DPI Pupil Information Report, ensure these pupils are determined ineligible in the Enrollment Report as described in Appendix A.

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| Workpaper Reference or Procedure(s) Performed |  | Performed By and Date |  |

* 1. **School Identified Corrections:** Ask the school if they are aware of any corrections that must be made to SNSP pupil data other than to the pupil’s grade (which will be identified in Section 2).

This inquiry should include asking if it has been determined that a full scholarship pupil was determined to no longer have a disability in a prior school year, but the determination was not properly reported to DPI in the 2022 Preliminary Enrollment Report or September 2022 Enrollment Audit.

* If a reevaluation occurred after June 30, 2022 or the reevaluation determined the pupil still had a disability, advise the school they must report the reevaluation in the 2023 Preliminary Enrollment Report.
* If a reevaluation occurred prior to July 1, 2022 that determined the pupil no longer had a disability and the pupil is identified as a full scholarship pupil in the January 2023 DPI Pupil Information Report, the auditor must complete the reevaluation review procedures in Step 4.1 of the September Enrollment Audit Guide available at <https://dpi.wi.gov/parental-education-options/special-needs-scholarship/auditor/september-enrollment-audit>. The auditor must then report the scholarship type change (from full to partial) for the pupil in the January 2023 Enrollment Audit.

If the school informs the auditor of required corrections, confirm that the correction should be made and that the pupil is eligible. If the pupil is eligible, include the pupil in the enrollment audit as described in Appendix A with the required change identified. Identify any ineligible pupils as described in Appendix A.

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| Workpaper Reference or Procedure(s) Performed |  | Performed By and Date |  |

* 1. **Background Check Completed:**

1. Overview of the Background Check Requirements: Private schools participating in the SNSP cannot employ either of the following:
2. Any individual who is not eligible for a teaching license as the result of an offense. An individual is ineligible for a teaching license if the individual has been convicted of any Class A, B, C, D, E, F, G, or H felony under Wis. Stat. chs. [940](https://docs.legis.wisconsin.gov/statutes/statutes/940) or [948](http://docs.legis.wisconsin.gov/statutes/statutes/948), except §§ 940.08 and 940.205, within six (6) years of the individual applying for a license to teach. Wis. Stat. § 118.19(4). For a list and complete definitions of the prohibited offenses, please see Wis. Stat. chs. [940](https://docs.legis.wisconsin.gov/statutes/statutes/940) or [948](http://docs.legis.wisconsin.gov/statutes/statutes/948).
3. Any individual who might reasonably be believed to pose a threat to the safety of others, which includes individuals who have engaged in immoral conduct, as defined under Wis. Stat. § 115.31(1)(c).

Background checks must be conducted for all individuals defined as employees under Wis. Stat. § 108.02 (12) who are directly or indirectly related to the school’s educational programming. Individuals who perform services for a school may be considered employees regardless of whether the individuals are paid directly by the school. In order to determine which individuals require a background check, the school should begin by generating a list of all individuals who perform services for their legal entity. The school must conduct a background check for any individual on the list who meets both of the following:

* + - * 1. The individual is an employee based on the definition under Wis. Stat. § 108.02 (12).
        2. The individual’s employment is directly or indirectly related to the school’s educational programming. An individual’s employment is considered directly or indirectly related to the school’s educational programming if any of the following criteria apply to the individual:
  1. Any compensation for the individual is included as an eligible education expense in a financial audit submitted under Wis. Stat. §§ 115.7915, 118.60, or 119.23,
  2. The individual interacts with students, or
  3. The individual has a job that relates to the financial, administrative, or academic sectors of the school.

Schools have two options for the background checks:

* + - * 1. Separate background checks must be completed when an employee is hired and every 5 years thereafter.
        2. The school can complete the background check annually by confirming the individual has a current DPI issued license. If this option is used, the school must complete the following:

Obtain and retain a copy of the DPI issued license.

Annually determine that the individual has a current license in advance of the employee working for the school term. If the individual’s license is no longer current, the background check option in 1 must be completed prior to the individual working for that school year.

See the Criminal Background Checks Bulletin at <https://dpi.wi.gov/parental-education-options/special-needs-scholarship/bulletins> and the Criminal Background Check Training at <https://dpi.wi.gov/parental-education-options/special-needs-scholarship/school-training> for additional information on the background check requirements.

1. Identify Individuals Requiring Background Checks. Obtain the following from the school:
   * + - 1. One of the January 2023 payroll records for the school. For any new employees since the September Enrollment Audit testing, the listing should identify if the school determined each individual was an employee directly or indirectly related to educational programming.
         2. A listing of additional individuals not included in the payroll records who were paid by the school between the September Enrollment Audit review date and the January Enrollment Audit review date except for expense reimbursements. The listing should identify if the school determined each individual was an employee directly or indirectly related to educational programming.

Background checks are required for employees of the school who are directly or indirectly related to educational programming. If the school identified an individual did not require a background check, determine that a background check was not required because of one of the following:

* + - * 1. The individual was not an employee of the school based on the definition under Wis. Stat. § 108.02 (12).
        2. The individual was not directly or indirectly related to educational programming.

1. Identify Companies Requiring Background Checks: Obtain a listing from the school of additional companies who were paid by the school between the September Enrollment Audit review date and the January Enrollment Audit review date. The school must identify on the listing whether the individuals working at each company were a school employee that was directly or indirectly related to educational programming.

For any companies that were not identified as having school employees that require background checks, determine if the companies were either:

1. Related parties of the school as defined under Generally Accepted Accounting Principles; or
2. Providing administrative personnel, teachers, teacher aides, or substitute teachers for the school. This includes companies that provided virtual instruction for the school.

If so, ensure that a background check was not required because of one of the following:

1. The individual was not an employee of the school based on the definition under Wis. Stat. § 108.02 (12). If the school is subcontracting employees, such as teachers, the administrative personnel at the subcontractor generally are not employees unless they are completing specific administrative functions for the school.
2. The individual was not directly or indirectly related to educational programming.

Any employees of the legal entity of the school that are directly or indirectly related to educational programming must have a background check completed.

1. Identify Employees Requiring a New Background Check: Review the list of individuals that previously used the separate background check option and determine if the last background check was more than 5 years ago from January 13, 2023. If so, the school was required to complete a new background check for the employee.
2. Immoral Conduct: Obtain a policy or other written document from the school identifying what the school considered to be immoral conduct. Immoral conduct is defined under Wis. Stat. § 115.31(1)(c) as “conduct or behavior that is contrary to commonly accepted moral or ethical standards and that endangers the health, safety, welfare or education of any pupil.” The school’s policy must identify that immoral conduct includes the employee intentionally using an educational agency's equipment to download, view, solicit, seek, display, or distribute pornographic material as one of the types of immoral conduct.
3. Determine Required Background Checks Completed: Determine whether all of the employees who are directly or indirectly related to educational programming (“educational employees”) identified in B, C or D met one of the following.
4. *DPI Issued License Option:* Obtain a copy of the DPI issued license from the school. Verify that the educational employee met the requirement by:
   1. Obtaining a copy of the educational employee’s license certificate.
   2. Verifying the license was currently active at <https://elo.wieducatorlicensing.org/datamart/publicSearchMenu.do>. Lifetime licenses are current if the “Expires On” is blank and the “License Status” is “Valid for Dates Shown”. Other licenses are current if they have a future “expires on” date.

Please note any current DPI issued license is sufficient for this requirement, it does not need to be a specific type of license for background check purposes.

1. *Separate Background Check Option:* Obtain a copy of the background check completed. If the school was required to complete a new background check for the employee because the most recent background check was more than 5 years ago as identified in D, determine that a new background check was completed within 5 years of the last background check.

Determine the following for each employee:

1. Whether the background check identified any offenses that wouldn’t allow the individual to work at the school. An individual cannot work at the school if the individual has been convicted of any Class A, B, C, D, E, F, G, or H felony under Wis. Stat. chs. [940](https://docs.legis.wisconsin.gov/statutes/statutes/940) or [948](http://docs.legis.wisconsin.gov/statutes/statutes/948), except §§ 940.08 and 940.205, within six (6) years. Wis. Stat. § 118.19(4). For a list and complete definitions of the prohibited offenses, please see Wis. Stat. chs. [940](https://docs.legis.wisconsin.gov/statutes/statutes/940) or [948](http://docs.legis.wisconsin.gov/statutes/statutes/948).
2. Whether the background check identified the employee engaged in immoral conduct, as defined in the written policy or document obtained in E. If any items are identified through the background check, review the documentation from the School assessing whether the item identified is immoral conduct based on the School’s policy or document obtained in D and the conclusion reached by the School.

If the required background check was not completed, determine if it was completed by the report date.

Maintain the records/listings provided by the school above and a list of the individuals who were tested for background checks in the supporting workpapers.

1. Prior Enrollment Audit Missing Background Checks:Review the September 2022 Enrollment Audit to determine if the school had any missing background checks as of the report date. If the individual is still employed by the school, determine if the school completed one of the background check options in F. If the required background check was not completed, determine if it was completed by the report date.

Maintain the listings provided by the school in B and C, a list of the individuals reviewed in D, and a list of the individuals who were tested for background checks in the supporting working papers.

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| Workpaper Reference or Procedure(s) Performed |  | Performed By and Date |  |

# ATTENDANCE REQUIREMENTS

* 1. **Required Information from School:** Obtain the following information from the school for completion of the attendance procedures and retain the documents in the workpaper file:

1. Official Attendance Records: The school’s official attendance records for the count date. If pupils were included due to attending any day before and any day after the count date, the school must also provide the official attendance records for the applicable day before and the day after the count date. The official attendance records must come from the school’s SIS if the school has a SIS. All schools participating in the Choice program must have a SIS. The listing must be by grade level. The SNSP pupils must be identified one of three ways:
   1. Through an indicator in the SIS that is identified on the official attendance records.
   2. Through an indicator in the SIS that is identified on the Alternative SNSP Identifier Report from the SIS identified below.
   3. The school may manually add an identifier of who is a SNSP pupil to the official attendance records. The SNSP identifier does not need to be maintained in the SIS if this option is used.
2. Alternative SNSP Identifier Report from SIS: If the school uses a report from the SIS other than the official attendance records to identify SNSP pupils, the school must provide the Alternative SNSP Identifier Report showing all pupils and the SNSP identifier.
3. School Calendar for the School Year: The calendar for the 2022-23 school year.
4. Additional SNSP Pupils: A listing of any additional SNSP pupils that should be added to the January count that were not included by the school in the 2nd Friday in January Pupil Count Report.

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* 1. **SIS Testing:** If the auditor completed the September Enrollment Audit, complete additional testing of the SIS if any changes to the SIS are identified in Section 1.2, Section B, question 3.

If the auditor did not complete the September Enrollment Audit, the auditor must test the SIS if the school has a SIS. The auditor may either submit their plan for testing the SIS for approval to a DPI Auditor annually or use the DPI sample test plan. A sample test plan is available online at <https://dpi.wi.gov/parental-education-options/special-needs-scholarship/january-enrollment-audit>. If the school uses the Alternative SNSP Identifier Report from the SIS option explained in 2.1, the auditor must complete testing of this report as indicated in the required report testing section at the bottom of the SIS Testing procedures.

The auditor does not need to notify DPI if the sample test plan will be used. If the auditor will use their own test plan or will only use part of the DPI sample test plan, the auditor prepared test plan or proposed modification to DPI’s sample test plan must be emailed to [dpichoiceauditreports@dpi.wi.gov](mailto:dpichoiceauditreports@dpi.wi.gov) and approved by a DPI Auditor before the auditor begins testing using the test plan.

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* 1. **School on Count Date:** Review the school’s calendar and ensure it shows that instruction was scheduled for the count date for all classes and pupils. Confirm with school staff that school was held on the count date.

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* 1. **Total SNSP Pupil Count:** Verify that the total number of SNSP pupils by grade per the official attendance records equal the total number of pupils by grade on the DPI Pupil Information Report.

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* 1. **DPI Pupil Information Report vs Official Attendance Records:** Verify enrollments for all SNSP pupils reported on the DPI Pupil Information Report and any pupils that are included in the Additional SNSP Pupils list (obtained in Step 2.1) against the school’s official attendance records. The DPI Pupil Information Report will be provided to the auditor on the auditor authorization form via Kiteworks, which is a secure file transfer website.

Grade Matches: Ensure the student’s grade on the DPI Pupil Information Report matches the official attendance records for the January count for each SNSP pupil. The grade for the count is included in the DPI Pupil Information Report in the “Grade Counted 2nd Fri” column. If the grade is different, complete the following:

* If it is determined that the DPI Pupil Information Report reflects the wrong grade and the student is in K4, K5, or 1st grade, determine if the pupil is age eligible for the grade attended per the official attendance records by reviewing the date of birth on the DPI Pupil Information Report. The age eligibility requirements are as follows:

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| **Grade** | **Student must have been born on or before:** |
| K4 | September 1, 2018 |
| K5 | September 1, 2017 |
| 1st Grade | September 1, 2016 |

* If age eligible for the grade attended, the grade change must be identified in the Enrollment Audit as described in Appendix A.
* If not age eligible, the pupil must be identified as ineligible. Please note that there is no early admission option for the SNSP so if the pupil was in a grade they were not age eligible for, they must be determined ineligible. Complete the procedures described in Appendix A for the pupil.

Name Matches: Ensure the student’s first and last name on the DPI Pupil Information Report match the official attendance records for the January count for each SNSP pupil. The student’s first and last name must be the legal name of the student. The student’s middle initial and suffix do not need to be reviewed and any differences should not be identified on the enrollment audit. Additionally, if the difference is due to spacing, capitalization or the use of a hyphen, no change is required. If the student’s first and last name does not exactly match, other than due to spacing, capitalization, or the use of a hyphen, complete the following:

* Determine the correct, legal name by obtaining a copy of the annotated birth certificate, immunization record, or court order identifying a legal name change. Retain a copy of the annotated birth certificate, immunization record, or court order in the workpapers.
* If it is determined that the DPI Pupil Information Report reflects the wrong first or last name, the name change must be identified in the Enrollment Audit as described in Appendix A.
* If the DPI Pupil Information Report has the correct legal name, ensure the school corrects the spelling of the pupil’s name on its reports. In this case, no change needs to be identified in the enrollment audit.

Ineligible Pupil due to Attendance: If a pupil identified as counted on the DPI Pupil Information Report or a pupil that is on the Additional SNSP Pupils list did not meet the attendance requirements, the pupil is ineligible. If the ineligible pupil was counted based on the DPI Pupil Information Report, complete the procedures described in #5 in Appendix A for the pupil. Pupils who were counted on the 2nd Friday in January Pupil Count Report and not subsequently determined ineligible by DPI will have a 1 in the “FINAL HC Jan” column.

Additional Pupil: If a pupil was not identified as counted on the DPI Pupil Information Report and was found to be eligible for payment, the pupil should be: (a) tested based on the procedures in this section, and (b) if the application or transfer request was not previously audited, it must be tested to determine if it is eligible as described in section 3. If determined eligible, the pupil should be included as an additional pupil on Schedule 4 of the Enrollment Audit Excel document. The DPI Pupil Information Report includes all SNSP pupils that meet one of the following criteria:

* The school submitted the application or transfer request for the pupil in the SNSP Portal by the 2nd Friday in January and the application or transfer request had not been determined ineligible; and
* The pupil was included in the 3rd Friday in September pupil count based on the September Enrollment Audit, even if they were determined ineligible after the 3rd Friday in September.

Note that in order to be a SNSP pupil as of January 13, 2023, the school must have had an agreement with the parent or guardian for the services to be provided by the count date. See Step 2.13 for additional information.

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* 1. **Count Requirements:** Verify that all pupils with a 1 in the “FINAL HC Jan” column on the DPI Pupil Information Report and any pupils that need to be added based on the procedures in Step 2.5 meet the count requirements. In order to meet the count requirements, the pupil must either be:

* + 1. In attendance for instruction on the count date, or
    2. If not in attendance on the count date, the pupil must be in attendance for instruction any day prior to the count date and any day after the count date within the same school year. The student does not have to be in attendance on the day before and the day after the count date to meet this requirement. Instead, the pupil must be in attendance any day prior to the count date and any day after the count date. The pupil cannot also be enrolled in another private school, a home-based private educational program, a charter school, or a public school district in or out of Wisconsin during the period of absence.

If a pupil needs to be added as a SNSP pupil, complete the “Additional Pupil” procedures in Step 2.5. If a pupil does not meet the count requirement, the pupil is ineligible. Additionally, if the auditor identifies that the same pupil is counted twice at the school, one of the names/id numbers must be identified as ineligible. Complete the procedures described in Appendix A for any ineligible pupils. If the auditor becomes aware of the same pupil being counted at two different schools, contact DPI for proper reporting. No specific procedures are required by the auditor to identify a pupil being counted at two different schools.

Include in a workpaper memo a statement that nothing came to the auditors’ attention that would indicate that pupils included in the SNSP count were enrolled, in or out of Wisconsin, in another private school, a home-based private educational program, a charter school, or a public school district.

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* 1. **Choice Pupils:**

1. If the school is participating in the Choice programs, compare the pupils included on the DPI Pupil Information Report for any Choice programs the school is participating in to the pupils with a 1 in the “FINAL HC Jan” column in the SNSP DPI Pupil Information Report. Also include any pupils that were added as a Choice or SNSP pupil through the attendance procedures.
2. If a pupil is included as both a Choice and SNSP pupil, determine which program the student was eligible for. If the student applied to multiple programs, the school should have a letter from the parent indicating which program the parent selected for the student.
3. The student should be included as ineligible in the Enrollment Audit, as described in Appendix A, in the program(s) that the student was not eligible for and/or that was not selected by the parent.

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* 1. **School Operates a Child Care Center:** If the school operates a child care center in the same building as the school, compare a listing of child care participants to the listing of students that received SNSP payments. Ensure that the school did not receive a child care payment for all-day care of SNSP students. If the school did, the pupils are considered to be enrolled in daycare and must be identified as ineligible for the SNSP. Complete the procedures described in Appendix A for the pupil.

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* 1. **Partnership or Contract School:** If the school has pupils enrolled in a “Partnership” or “Contract” school of a public school district, obtain a listing of pupils attending the school. The most common example of this is when the private school has K4 for the public school district. Compare the pupil names against SNSP pupils on the official attendance records and determine that a SNSP payment was not received for partnership or contract pupils. If the school included any partnership or contract pupils as SNSP pupils, they must be determined ineligible as the public school district would count the pupils and not the private school. Complete the procedures described in Appendix A for the pupils.

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* 1. **Tuition Revenues or Waivers:** Obtain a list of pupils paying tuition revenue or who have tuition waivers. Determine that all tuition and tuition waiver pupils are included in the official attendance records.

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* 1. **Total All Pupil Count:** Verify that the all pupil count by grade category per the official attendance records equals the all pupil count by grade category in the “Per DPI” column of the January Enrollment Audit when the school is selected on the cover page.

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* 1. **All Pupil Count:**

1. Explanation of All Pupil Count: The All Pupil count represents the total number of pupils at the school in grades K4-12, regardless of whether or not they are Choice, SNSP, tuition paying pupils, or pupils attending the school without payment. Some items to consider about the All Pupil count are:
2. If the school has pupils that are age eligible for kindergarten, but considers the students to be enrolled in a child care program rather than being enrolled in educational programming, the students should not be included in the All Pupil count. As with all grades, kindergarteners may be enrolled in educational programming and enrolled in before and after school care.
3. Pupils in grades K4-12 educational programming must be included in the All Pupil count, even if the school does not offer a particular grade to SNSP students.
4. The All Pupil count is the same for the Choice programs and SNSP.
5. Pupils that meet the attendance requirements but are not eligible due to not meeting the other SNSP eligibility requirements are to be included in the All Pupil count, but not in the SNSP Pupil count.
6. The All Pupil count does not include students only enrolled in child care (identified in Step 2.8) or partnership/contract pupils (identified in Step 2.9).
7. All students at the school that meet the count requirements in Step 2.6 must be included in the All Pupil count.
8. Adding Kindergarten Grade: If the auditor believes a kindergarten grade should be added that was not previously included in the all pupil count, the auditor must send an email requesting approval to add the grade to [dpichoiceauditreports@dpi.wi.gov](mailto:dpichoiceauditreports@dpi.wi.gov), if the school also participates in the Choice program, or [snsp@dpi.wi.gov](mailto:snsp@dpi.wi.gov), if the school only participates in the SNSP. The email should include the grade the school would like to add and confirmation of the following:
   1. If the school is participating in the Choice program, the grade is fully accredited (if the rest of the elementary grades are fully accredited) or the grade is preaccredited (if the other elementary grades for the school are preaccredited).
   2. The pupils in the grade are not enrolled in the public school district and attending the private school as a partnership/contract pupil.
   3. The grade has the minimum number of instructional hours, which are as follows for schools participating in the Choice program:
      1. 437 for K4 programs and half time K5 programs
      2. 630 for K5 that is 3 Full Days (.6 FTE)
      3. 840 for K5 that is 4 Full Days (.8 FTE)
      4. 1,050 for K5 that is 5 Full Days (1.0 FTE)

Or as follows for schools only participating in the SNSP:

1. 437 for K4 programs and half time K5 programs
2. 525 for K5 that is 3 Full Days (.6 FTE)
3. 700 for K5 that is 4 Full Days (.8 FTE)
4. 875 for K5 that is 5 Full Days (1.0 FTE)
   1. The school considers the students enrolled in educational programming rather than child care.
   2. The school has attendance records that support the attendance for the grade. If the school is participating in the Choice program, the official attendance records must be in the SIS.
5. Required Pupil Testing: The auditor must determine if the All Pupil count is correct by completing the following:
   1. Select a sample of at least 60 pupils identified as not participating in the SNSP from classroom records and determine that the selected pupils were included in the official attendance records. Original classroom records may include classroom grade books or other records maintained by teachers identifying daily attendance or absences, grades or other indications of instruction such as progress reports. The original classroom records used must be different than the official attendance records in order to test the completeness of the all pupil count. These records must be teacher originated. Copies of classroom records or attendance summaries are not considered original classroom records.

If the auditor uses records from the SIS for original classroom records and the records can be modified by individuals other than the classroom teacher, the auditor must complete one of the following:

* Obtain printed original classroom records for the count date and any day before and any day after the count date, if any pupil met the count requirements based on being in attendance any day before and any day after the count date. The teacher must sign the records to show they are teacher originated.
* Obtain the add/edit detail for the records and ensure no changes were made by an individual other than the classroom teacher. If any changes were made by an individual other than the classroom teacher, confirm with the classroom teacher that the change was correct.
  1. The sample selected from the original classroom records must include records from each classroom. If students are in different classrooms during different periods, the auditor may select one of the periods and use all of the classroom records for that period. If the school’s non-SNSP enrollment is less than 60 pupils, all classroom records must be reviewed to determine that the All Pupil count is properly reported.
  2. The sample selected from the original classroom records must be extended in increments of 60 pupils for each exception found until no additional exceptions are found or all classroom records have been examined.

1. All Pupil Count Reporting:
   1. The All Pupil count reported by the school in the count report is automatically included in the “Per DPI” column of the January Enrollment Audit when the school is selected on the cover page.
   2. Input the All Pupil count per the auditor examination in the “Per Examination” column on Schedule 1-1, Lines 1-7. This All Pupil count must be based on the count, by grade category, per the official attendance records that were tested as explained in this section.
   3. If the K4 pupils are moved to a different category based on the procedures in Step 1.4, the K4 All Pupil count must also be moved to the correct category by the auditor.

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* 1. **Services to be Provided Agreement:** Determine if the school had a signed agreement with each parent or guardian indicating the services to be provided by January 13, 2023. The agreement must be signed and dated by the school and parent by January 13, 2023. If the IEP or services plan will be implemented as written, the school must have a signed agreement indicating that. If the school did not have an agreement for a pupil by January 13, 2023, the pupil must be identified as ineligible as described in Appendix A.

If the school obtained an agreement and the auditor reviewed it as part of the Enrollment Audit procedures for a previous count date, confirm with the school that the school and parent still agreed that the school should provide the services specified in the previous written agreement as of January 13, 2023. A new services agreement is only required if the services to be provided change. The school does not need to have a written document from the parent indicating there are no changes in the agreement if no changes were requested by the parent. However, if the school indicates a parent or the school requested a change to the agreement prior to January 13, 2023 and a new agreement was not entered into by January 13, 2023, the student would not be eligible for the 2nd Friday in January count.

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# SNSP APPLICATION & TRANSFER REQUEST REVIEW

The procedures in this section must be completed for pupils that meet both of the following:

* The pupil is included in the 2nd Friday in January count or should be added to the count based on the procedures in Section 2. Students that were counted on the 2nd Friday in January count have a 1 in the “FINAL HC Jan” column in the DPI Pupil Information Report.
* The pupil has a “No” in the “App/Transfer Request Audited?” column in the DPI Pupil Information Report.

The testing completed in this section must use the information in the Jan 2023 Apps and Transfers Report. Certain procedures in this section are only applicable for applications or transfer requests. The Jan 2023 Apps and Transfers Report identifies if each pupil had an application or transfer request in the “App or Transfer” column.

* 1. **Obtain Paper Applications & Transfer Requests:** Request the SNSP paper application or transfer request and all supporting documentation from the school for the students that require an application/transfer request review. If the school does not have a paper application or transfer request, as applicable, for a student, the student is ineligible. Document school staff contacted for access to applications/transfer requests and contact dates.

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* 1. **Determine if Eligible to be Added:** Determine that any application or transfer request that needs to be added to the 2nd Friday in January count has “Eligible” identified in the “2nd Friday Jan Eligibility” column in the DPI Pupil Information Report. If the “2nd Friday Jan Eligibility” column states “Ineligible”, the pupil cannot be added to the 2nd Friday in January SNSP pupil count.

If the pupil is not listed on the DPI Pupil Information Report, complete the following:

* + - 1. Ask the school if they have submitted the application or transfer request to DPI in the SNSP Portal and, if it was submitted, the date it was submitted. If they submitted it in the SNSP Portal by January 13, 2023 and it is **not** included in the DPI Pupil Information Report, the student was determined ineligible by DPI and cannot be added.
      2. If the application or transfer request hasn’t been submitted yet or was submitted after January 13, 2023, ensure the application or transfer request is eligible by completing the remaining procedures in this section. The school must have determined the application eligible by January 13, 2023 for it to be eligible to be added.
      3. If the application or transfer request is determined eligible and has not yet been submitted to DPI, advise the school they must submit the application or transfer request in the SNSP Portal.
      4. If the application or transfer request was determined eligible as explained above, send an email to [snsp@dpi.wi.gov](mailto:snsp@dpi.wi.gov) after the school submits the application or transfer request in the SNSP Portal. In the email, identify the following:

The student’s name,

The application id that was assigned in the SNSP Portal, which can be obtained from the school, and

An indication that the pupil needs to be added to the January 2023 SNSP pupil count based on the January 2023 Enrollment Audit Procedures.

Additionally, please load a copy of the pupil’s paper application or transfer request to the January Enrollment Audit Kiteworks Submission folder. After receiving all the information, the DPI will review it and determine if the pupil can be added. If DPI provides an email indicating the pupil can be added, the email must be part of the January 2023 Enrollment Audit pdf submitted to DPI.

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* 1. **Paper Application/Transfer Request Complete:** Ensure all parts of the paper application or transfer request are complete except the race, ethnicity, telephone number, middle initials, and name suffixes. This includes verifying the school name is completed at the top and the parent’s or guardian’s initials are included in the first two boxes under the parent or guardian certification section. In the Jan 2023 Apps and Transfers Report, Columns G-J are application only columns and Columns T-Y are transfer request only columns.

If any blank fields are identified (except the gender, race, ethnicity, telephone number, middle initials, and name suffixes), determine if the paper application or transfer request is correctable. If the following items are identified, the application or transfer request is ineligible and may not be corrected:

* The parent signature does not match the parent name.
* The paper application or transfer request is completed by a student who was not yet 18 at the time they completed the application or transfer request.
* The date application or transfer request received, parent signature, or parent date signed was not filled out on the paper application or transfer request.

If any other areas are determined to be incomplete, determine if the pupil still meets the eligibility requirements based on the complete and correct information. If so, the paper application or transfer request may be corrected as described in Step 3.4. Otherwise, the application or transfer request must be identified as ineligible as described in Appendix A. Items that may be identified that result in the application or transfer request being determined ineligible are as follows:

* The application being ineligible due to residency or status of the IEP or services plan, or
* The transfer request being ineligible due to residency, the student not being continuously enrolled in the SNSP, or the student having been determined to no longer have a disability through an IEP reevaluation.

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* 1. **Corrections through Strike Through Method:** Determine that any corrections to the paper applications and transfer requests are made as follows:
* Using a “~~strike through line~~” with indelible ink and not with the use of correction fluid, i.e. “white out.” Any paper applications and transfer requests corrected with “white-out” are ineligible.
* The school administrator or designee must initial all changes made to the paper application or transfer requests and must have written documentation to support the change.

As a reminder, the parent signature or signature date and the date application/transfer request received may not be added after:

* Applications: The school sends the IEP/services plan verification email to the Local Education Agency (LEA) that developed the IEP or services plan or the email to the resident school district; or
* Transfer Requests: The school sends a letter of acceptance or denial to the parent.

If these are missing, the application/transfer request is ineligible. Complete the ineligible pupil procedures described in Appendix A for the pupil.

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* 1. **IEP/Services Plan Requirement (application only):** The SNSP school sends an email directly to the LEA that developed the IEP or services plan requesting that the LEA verify the student had an IEP or services plan that met SNSP requirements. The LEA must verify the pupil meets the SNSP requirements. The emails the schools should use are available in the Student Application and Transfer Request Information Bulletin available at <https://dpi.wi.gov/parental-education-options/special-needs-scholarship/student-applications-processing>. If the school is not using the verification emails provided by the DPI, advise the school they should use them in the future to ensure all the required components are included. This procedure explains what must be included in the verification email in order for it to be sufficient, even if DPI’s template emails are not used.

The LEA verifies that the student has an IEP or services plan that meets the SNSP requirements by providing a copy of the IEP or services plan to the private school in response to the IEP/services plan verification request from the private school. The LEA does not have to separately state in the email which requirement the student meets. For each application, the auditor must verify all of the following.

* + The school sent the IEP/services plan verification email to the LEA that developed the IEP/services plan **after** the application was received and determined eligible, other than having the LEA verify the IEP/services plan requirement was met. As part of this verification, ensure that the date application received and parent/guardian signature date are on or before the date the IEP/services plan verification email was sent to the LEA.
  + The student name, date of birth, and date application received in the school’s verification email matches the paper application.
  + The school’s verification email states the following are the IEP/services plan requirements that result in a student being eligible:

The above individual must meet one of the following to be eligible:

• The student has an IEP or services plan that is being implemented as of the date application received listed above; or

• The student has an IEP or services plan that was developed no earlier than September 15, 2019 AND the student has not had a more recent reevaluation since the plan was developed that determined that he or she no longer had a disability.

* + The email specifies that the LEA should send the IEP or services plan if the requirement above is met. **If the email only asks that the LEA send the IEP or services plan to the school and not that it be sent if the IEP/services plan requirement is met, the email is not sufficient for the requirements.** For example, the email in Appendix A of the Student Application and Transfer Request Information Bulletin indicates:

Please reply to this email within five (5) business days with one of the following:

• If the student meets the above requirements, provide a copy of the student’s most recent IEP or services plan.

• If the student does not meet the above requirements, indicate the LEA has no record that the student meets the above requirements.

* + The verification email sent by the school must specify whether or not the pupil resides in the school district that developed the IEP/services plan. If the pupil did not reside in the district that developed the IEP or services plan, confirm the school also sent the email in Appendix B of the Student Application and Transfer Request Information Bulletin to the resident school district. If the school did not notify the resident school district of the SNSP pupil as required, the school must send the email as soon as possible. Failure to send this part of the email/separate email would not result in the application being ineligible.
  + The school must have an email from the LEA, which was sent in response to the school IEP/services plan verification request email described above, with a copy of the IEP or services plan attached.
    1. Verification Email Not Received by the 2nd Friday in January: If the school did not meet all of the requirements described above by January 13, 2023, the pupil must be identified as ineligible for a 2nd Friday in January 2023 payment as described in Appendix A. Contact the DPI for proper reporting if:
       1. The school sent an IEP/services plan verification email but it did not include one or more of the requirements described above; or
       2. The school received an email from the LEA with the IEP or services plan but it is not clear that it was received in response to the school’s IEP/services plan verification request email.
    2. Verification Email from LEA Indicated Requirement Not Met: If the school received an email from the LEA indicating that the student did **not** have an IEP or services plan that met the SNSP requirements, the application must be identified as ineligible as described in Appendix A.
    3. Verification Email from LEA Indicated Requirement Met: If the school received an email by January 13, 2023 from the LEA, in response to the IEP/services plan verification request, that met all of the requirements above, review the paper application and ensure the following:
       1. The IEP or services plan checked in the “For School Use Only” section matches the LEA’s verification email;
       2. The IEP or services plan checked in the “IEP or Services Plan Requirement” section matches the LEA’s verification email; and
       3. The name of the LEA that developed the IEP or services plan in the “IEP or Services Plan Requirement” section is the LEA that sent the LEA verification email. **The name of the LEA cannot be abbreviated.** “District” may be included or excluded at the end of the name of a district.

If the information in a or b was not properly completed on the paper application or the name of the LEA was abbreviated, the school must correct it using the strike through method as described in Step 3.4.

If c is identified as a difference, determine if the verification email was sent to the correct LEA. The verification must be sent to and received from the LEA that developed the most recent IEP or services plan for the student.

* If the parent identified the wrong LEA on the paper application and the verification email was sent to the correct LEA, the school must update the information on the paper application to match the verification email using the strike through method as described in Step 3.4.
* If the verification email was sent to the wrong LEA, the application must be determined ineligible as explained in Appendix A.

The auditor does not need to determine that the last evaluation/reevaluation date is correct since this date may not be identified in the IEP or services plan. However, if the auditor questions the accuracy of the date, the auditor can make further inquiries of the school. In making this determination, the auditor should note that the last evaluation/reevaluation is not the date that the last IEP or services plan was written. IEP and services plans are often developed on an annual basis. The date that must be identified on the application is the last date an evaluation was completed by the district or the last date a reevaluation was waived. This should only be updated if the school has an email from the school district indicating that the evaluation or evaluation waiver occurred on a different date. The auditor does need to ensure the date is not blank in Step 3.3 and confirm it matches DPI’s data in Step 3.11.

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* 1. **Counted on Previous Count Date Email (transfer request only):** Determine that the school obtained an email from the DPI indicating that the student was counted on the previous count date.
     1. For transfer requests accepted from the 3rd Friday in September 2022 through the 2nd Friday in January 2023, the email must indicate that the student was counted on the 3rd Friday in September 2022.
     2. For transfer requests accepted from the 2nd Friday in January 2022 through the 3rd Friday in September 2022, the email must indicate that the student was counted on the 2nd Friday in January 2022.

The student’s name and date of birth in DPI’s email must exactly match the transfer request form.

If the school did not obtain this email from the DPI, it must obtain it by the due date of the enrollment audit. If the email is not received by the due date of the enrollment audit, the transfer request must be identified as ineligible in the Enrollment Audit as described in Appendix A.

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| Workpaper Reference or Procedure(s) Performed |  | Performed By and Date |  |

* 1. **IEP/Services Plan (transfer request only):** Complete all of the following:
     1. Review the IEP or Services Plan section of the paper transfer request form. Ensure that the parent did not indicate “No” to the question, “Did the IEP reevaluation result in a determination that the student has a disability?”. This indicates that the student was determined to no longer have a disability through the IEP reevaluation. Please note this question should only answered if the answer to the question, “Has the public school district completed an IEP reevaluation or waiver agreement since the student began participating in the SNSP?” is “Yes”.

If the pupil was determined to no longer have a disability, the pupil is not eligible to transfer so the transfer request must be determined ineligible as described in Appendix A.

* + 1. Determine that the school obtained the most recent IEP or services plan from the parent or guardian. Ensure the responses in the IEP or Services plan section match the IEP or services plan, including the identification of whether the pupil has an IEP or services plan, if applicable. If incorrect information is identified on the paper transfer request form, the school must update the information on the paper transfer request form to match the IEP or services plan provided by the parent or guardian using the strike through method as described in Step 3.4. If the most recent IEP reevaluation was waived, the determination of whether the student still has a disability should indicate yes. The school should have a copy of the IEP reevaluation waiver and the most recent IEP or services plan.

If the school has not obtained the most recent IEP or services plan, it must obtain it by the due date of the enrollment audit. If an IEP or services plan is not received by the due date of the enrollment audit, the transfer request must be identified as ineligible in the Enrollment Audit as described in Appendix A.

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| Workpaper Reference or Procedure(s) Performed |  | Performed By and Date |  |

* 1. **School District Verification:** Complete the following:
     1. Determine the school district that the address is in for each application or transfer request. The address used for the school district verification must be based on the address in the Jan 2023 Apps and Transfers Report. The address must be verified using one of the methods identified in the Residency Documentation Bulletin available at <https://dpi.wi.gov/parental-education-options/special-needs-scholarship/bulletins>. The school should have a copy of one of the permitted verification method documents. **The auditor must confirm that the school district verification option is one of the permitted options in Step 2 of the Residency Documentation Bulletin. No other school district verification options may be used unless there is an email from the DPI approving an alternative school district verification document.** If the school does not have one of the permitted documents, the auditor must complete one of the verification methods to determine the district for the address. If the pupil provided a Safe at Home card for the residency documentation, a school district verification document is not required so the remaining items in this procedure do not need to be completed.
     2. If the address is not in Wisconsin, the application or transfer request must be determined ineligible as described in Appendix A.
     3. Verify that the school district identified in 1 matches the “Current Resident School District” identified in the “Family Information” section of the paper application or transfer request. If it does not, the school must update the “Current Resident School District” using the strike through method described in Step 3.4. **Please note the “Current Resident School District” is a different part of the application/transfer request then the LEA that developed the IEP/services plan. Additionally, abbreviations cannot be used for the districts.** If an abbreviation was used, it must be corrected using the strike through method. “District” may be included or excluded at the end of the name of a district.

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* 1. **Residency Documentation:** Determine if the school has residency documentation that meets all of the following requirements. If a student is participating in the Safe at Home program, the auditor must verify the school has a Safe at Home card with the name of one of the parents or guardians on the paper application or transfer request form and ensure the card is not expired. The remaining items in this procedure do not need to be completed for students participating in the Safe at Home program.
     1. Allowed Document: Determine that the school received one of the allowed residency documents identified in the Residency Documentation Bulletin and that the documentation meets the requirements described in the bulletin at <https://dpi.wi.gov/parental-education-options/special-needs-scholarship/student-applications-processing>.

If an Alternative Residency form was used, the auditor must review the Alternative Residency form to ensure that the student is listed in Section I, the explanation of the living situation is checked in Section II, the parent/legal guardian signed and dated the form in Section V, and the household occupant signed and dated the form in Section VI.

* + 1. Parent Name Matches: Determine that the residency documentation in 1 has the first and last name of one of the parents/guardians on the paper application or transfer request form. The name must exactly match except for capitalization, spacing, and punctuation. The parent’s middle initial and suffix do not need to be reviewed and any differences for these items should not be identified on the enrollment audit. If the first or last name on the documentation is a different legal name or misspelled, review Appendix A to determine how the application or transfer request can be corrected. If a different name is identified and there was no Alternative Residency Form, new residency documentation must be provided as explained in 5 below.
    2. Address Matches: Determine that the address on the school district verification document in 3.8 matches: (a) the residency documentation in 1 and (b) the Jan 2023 Apps and Transfers Report.

The chart below outlines which address elements on the residency documentation are required to match. If the address on the school district verification document in step 3.8 does not contain one of the required matching elements, such as a street direction or a suffix, the element(s) should not be on the residency documentation or the Jan 2023 Apps and Transfers Report.

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| **If element below is listed on the School District Verification Document** | **Match Required?** |
| **Street Number** | Yes |
| **Street Direction** (North, South, etc.) | Yes (abbreviations are allowed) |
| **Street Name** | Yes |
| **Street Suffix** (Lane, Road, Avenue, etc.) | Yes (abbreviations are allowed) |
| **Unit/Apartment Number or Description**  (Upper, Lower, Unit E10, Apt 207, Lot 7, etc.) | No |
| **City** | Yes |
| **State** | Yes (abbreviations are allowed but must be State of Wisconsin) |
| **Zip Code** | No |

When reviewing the address, keep the following in mind:

* *Period Placement & Abbreviations:* Differences in the street direction or street suffix that are due to period placement or the names being abbreviated versus not abbreviated do not need to be identified.
* *Spacing & Capitalization:* Differences due to spacing or capitalization do not need to be identified.
* *Street Name, Street Suffix, or City Misspelled on Residency Documentation:* If the street name, street suffix, or city is misspelled on the residency documentation, the documentation may be accepted if the parent emails or provides a signed letter to the school stating the correct address (which must match the school district verification document) and that the street name, street suffix, and/or city is misspelled on the documentation. Schools must keep the email or signed letter from the parent for their auditor review. The student application or transfer request must have the correct address information.

If the address, other than the unit number or zip code, is incorrect on the Jan 2023 Apps and Transfers Report, the address correction must be reported as described in Appendix A. For any address changes, complete the school district verification procedures in Step 3.8 to ensure the school district on the Jan 2023 Apps and Transfers Report is correct. If it is not, report the school district change in the enrollment audit. The only address correction that cannot be made is if the address is outside of Wisconsin. If so, the pupil must be identified as ineligible as described in Appendix A.

* + 1. Document Meets Date Requirement: Determine that the residency documentation in 1 meets the current requirement. The following should be used to determine if the documentation is current:
  + Except for a lease, a current document is one that is dated between 3 months before the date the application/transfer request was received and the date the application/transfer request was received.
  + A 2022 W2 would be considered current for 2022-23 applications and transfer requests received from January 2023-April 2023.
  + If the lease is a month to month lease, the starting date of the lease must be dated between 3 months before the date the application/transfer request was received and the date the application/transfer request was received.
  + If a lease with a term is used, the lease agreement is considered current if the lease term includes the date the application/transfer request was received. Expired leases are not acceptable. As a reminder, any lease used must meet the requirements described in 1.
    1. Residency Documentation Corrections: If the auditor identifies that the school did not receive the correct residency documentation, the school may obtain one of the allowed residency support documents that meets the requirements by the due date of the enrollment audit. The auditor must verify that the new documentation meets all of the residency requirements in 1 to 4 above. The date must meet the requirement based on the date the application or transfer request was received. If the school does not provide the auditor with the required documentation by the due date of the enrollment audit, the application or transfer request is ineligible.

The auditor must complete the procedures in Appendix A for ineligible pupils and for any required corrections to the application or transfer request.

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| Workpaper Reference or Procedure(s) Performed |  | Performed By and Date |  |

* 1. **SNSP Administrator or SNSP Designee Signed the Paper Application or Transfer Request:** Determine that the paper application or transfer request was signed by an individual who was the SNSP Administrator or a SNSP designee as of the date the application or transfer request was received. See the listing of the SNSP Administrators and SNSP designees and the dates each individual may accept applications and transfer requests at <https://dpi.wi.gov/parental-education-options/special-needs-scholarship/january-enrollment-audit>. If a paper application has been signed as accepted by someone other than an individual who was the SNSP administrator or SNSP designee at the time the application or transfer request was determined eligible, the application must be determined ineligible as described in Appendix A.

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| Workpaper Reference or Procedure(s) Performed |  | Performed By and Date |  |

* 1. **Paper Application/Transfer Request Matches DPI’s Application or Transfer Request Information:** Ensure all parts of the paper application or transfer request, corrected for any identified errors in the previous procedures, match the Jan 2023 Apps and Transfers Report from DPI. If any of the information does not exactly match, determine what is correct. As previously noted, “District” may be included or excluded at the end of the name of a district. Review the previous procedure that relates to the incorrect information to determine if the application or transfer request can be corrected.

See Appendix A for an explanation of how to make corrections to the application or transfer request and how to report ineligible pupils.

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| Workpaper Reference or Procedure(s) Performed |  | Performed By and Date |  |

* 1. **K4, K5, or 1st Grade Eligibility:** If the student is in K4, K5, or 1st grade, determine if they met the age requirements by reviewing the date of birth on the application or transfer request. If a previous procedure identified that the date of birth or grade on the application or transfer request was incorrect, the age eligibility determination must be based on the correct grade and date of birth. The age eligibility requirements are as follows:

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| **Grade** | **Student must have been born on or before:** |
| K4 | September 1, 2018 |
| K5 | September 1, 2017 |
| 1st Grade | September 1, 2016 |

If the student is too young for a grade, the student is eligible ONLY IF the official attendance records support the student being in the lower grade they are age eligible for on the count date (or any day before or after as determined in Section 2). If the student is not age eligible for the SNSP, the student must be identified as ineligible as described in Appendix A.

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| Workpaper Reference or Procedure(s) Performed |  | Performed By and Date |  |

* 1. **Age 21:** Determine if the student was 21 as of September 1, 2022 or on the date they applied, whichever is later. If so, the student is not eligible to participate in the SNSP. Complete the procedures described in Appendix A for the student. If a previous procedure identified that the date of birth on the application was incorrect, the age eligibility determination must be based on the correct date of birth.

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| Workpaper Reference or Procedure(s) Performed |  | Performed By and Date |  |

* 1. **Break In Attendance:** For any applications or transfer requests that were accepted before September 2022 that were not previously audited per the DPI Pupil Information Report, ensure that the student meets one of the following:
     1. The student was on the school’s SNSP waiting list as of the 3rd Friday in September 2022 and was offered a SNSP seat between the 3rd Friday in September 2022 and 2nd Friday in January 2023.
     2. The student did not attend another school or a home-based private educational program between the dates the application or transfer request was accepted and when the student began to attend the school.

If the student does not meet one of the requirements, the school was required to obtain a new application for the student. The student must be determined ineligible as described in Appendix A.

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| Workpaper Reference or Procedure(s) Performed |  | Performed By and Date |  |

# Obtain a representation letter from school management

The representation letter must identify management’s responsibility for the pupil count data accompanying the auditor's report, including the Pupil Count Report and related class list, as well as the assertions attested to, including:

* Management’s acknowledgment of responsibility for proper reporting of pupil counts and obtaining of complete and accurate SNSP applications and transfer requests as required by Wis. Admin. Code PI 49.
* The following management assertions in regard to the determination of SNSP eligibility and reporting of pupil counts:
  + The school determined the student’s residency eligibility through residency documents provided by the student’s parent or guardian.
  + All paper applications and transfer requests submitted to the DPI were signed by the student’s parent or guardian and the SNSP administrator or SNSP designee, as the statutorily required proof of enrollment required for a SNSP payment on behalf of the student.
  + All corrections to applications and transfer requests were made as required by the DPI.
  + Pupils included on the school’s 2nd Friday in January Pupil Count Report to the DPI were either:
    - In attendance for instruction on that day, or
    - Had attended for instruction at least one day before and one day after the count date within the same school term; and during the period of absence were not enrolled in another school or a home-based private educational program.
* A statement that all known matters contradicting any of the assertions and any communication from the DPI or other regulatory agencies affecting the school’s 2nd Friday in January Pupil Count Report and the related assertions of management have been disclosed to the audit firm.
* A statement that all relevant records have been made available.
* A statement that any known events relevant to the proper reporting of pupil counts and eligibility for SNSP state aid payments have been disclosed to the audit firm.
* A statement that the school will retain all pupil records required for the audit for at least five years from the due date of the 2022-23 financial audit, unless requested to retain the records longer by the DPI or a law enforcement agency.
* A statement that the school will retain all SNSP applications and transfer requests and related documentation, IEP reevaluations, and quarterly progress reports and any correspondence to or about a pupil attending a private school under this section for at least five years from the end of the school year in which the pupil applies or five years after the pupil no longer attends the school, whichever occurs later, unless requested longer by the DPI or a law enforcement agency.

# APPENDIX A

**Identifying SNSP Ineligible Pupils and Corrections to SNSP Pupil Data in the Enrollment Audit Excel Document**

If any items are identified through the procedures in this guide, discuss them with the SNSP administrator. Document the discussion of identified exceptions and what procedures were performed to address them. Any errors identified must be processed as follows. The schedules referred to below are in the Enrollment Audit Excel document. All changes required to DPI’s data must be included in the Enrollment Audit, if correctable. The school should not send an email to DPI requesting the correction.

* + 1. Parent First or Last Name does not Match:

1. Legal Name Change: If the parent’s first or last name on the residency documentation is a previous legal name, the school may provide documentation showing the individual is the same person no later than the due date of the enrollment audit. If the school does not provide the documentation to the auditor by the due date of the enrollment audit, the pupil is not eligible. Examples of this documentation include an annotated birth certificate, marriage certificate, divorce decree, certificate of naturalization, certificate of citizenship, court order, etc. See the Residency Documentation Bulletin for an explanation of what documentation should be provided for a marriage certificate, certificate of naturalization, or certificate of citizenship.
2. Name Misspelled on Residency Documentation: If the parent has other residency documentation with the name correctly spelled, they may provide the other documentation. Otherwise, the parent may provide a written statement indicating the correct legal name and that the name on the residency documentation is misspelled. The letter is not required if the difference is only due to capitalization, spacing, or punctuation. If the school does not provide the documentation to the auditor by the due date of the enrollment audit, the pupil is not eligible.

This method can be used for minor differences, and if there are multiple last names and one of the last names matches the documentation. A letter is not sufficient if there are different names. If there are different names, the application must be determined ineligible in Schedule 2 of the enrollment audit.

* + 1. Student Name and Date of Birth Differences: If a difference is noted for a student’s first or last name or date of birth, the school must provide an annotated birth certificate or immunization record. Student name changes could also be supported by a court order identifying a legal name change. The auditor must use one of these documents to determine the correct name or date of birth. The student’s first and last name must be the legal name of the student. The student’s middle initial and suffix do not need to be reviewed and no changes need to be made if they are incorrect. Additionally, if the difference is due to spacing, capitalization or the use of a hyphen, no change is required. Step 2.5 explains how name and date of birth corrections are reviewed. If it is determined that DPI’s data must be corrected, identify the correction in the enrollment audit as described in 3 or 4 below. If it is determined that the pupil is not age eligible for the SNSP, complete the Ineligible Pupils section below.
    2. Correctable Errors:

1. Paper Application or Transfer Request Related Errors: If the discrepancy is correctable, the paper application or transfer request must be corrected using the strike-through method described in Step 3.4 if the application or transfer request was tested in Section 3 and residency corrections must be corrected as described in Step 3.9. If an error identified by the auditor is corrected by the school, the auditor must confirm that the information is correct in the DPI Pupil Information Report and/or applicable Jan 2023 Apps and Transfers Report and that any changes on the paper application or transfer request are made.
2. DPI’s Information Correct: If errors were identified but DPI’s information was correct, the pupil does not need to be listed on any of the enrollment audit schedules. The total number of these pupils with corrected applications, transfer requests, or continuing student documentation must be included on the top of Schedule 3. If there are none of these instances, zero must be inserted. The auditor must maintain a copy of the originally received documentation and any additional documentation in their workpapers.
3. DPI’s Information is NOT Correct: If DPI’s information needs to be corrected, the required corrections for the student must be listed on Schedule 3 if the pupil was already on the count or Schedule 4 if a pupil is being added to the count. If a correction is required for a pupil that is being added, see the Add a Pupil to the Count section below for information on how to include the change in the Enrollment Audit. Schools should not separately email corrections to the DPI; all corrections to DPI’s data identified through the procedures must be included in the Enrollment Audit and corrected through the Enrollment Audit process.

If corrections are required for a pupil that was already counted, complete Schedule 3 as follows:

* + **“Source is data per DPI Pupil Information Report” Columns:** List the name, grade, and scholarship type on the DPI Pupil Information Report for every student on this schedule.
  + **Audited Columns:** These columns should only be completed if there is a change in the pupil name, grade, or scholarship type. Information on completing the respective columns is as follows:
* *Grade Changes:* Identify the correct grade per the official attendance records on Schedule 3 in the corrected grade column.
* *Pupil Name Changes:* Identify the correct name, per the annotated birth certificate, immunization record, or court order identifying a legal name change, on Schedule 3 in the corrected pupil first name and corrected pupil last name columns.
* *Scholarship Type:* If the IEP reevaluation determination for a continuing student was not properly reported to the DPI in the Preliminary Enrollment Report or September Enrollment Audit, identify the correct type in the corrected scholarship type column. If the pupil was determined to no longer have a disability, identify “Partial” in the column. If the pupil was determined to still have a disability or if the reevaluation was waived by the parent and school district, identify “Full” in the column. The correct grade must also be identified in the corrected grade column if there is a scholarship type change. Note the date of the reevaluation and the disability determination in the “Required Corrections to DPI’s Data” column.
  + **Required Corrections to DPI’s Data Column:** The auditor must identify the information that needs to be corrected and what the correct information is in this column for any changes to DPI’s data except changes to the pupil name, grade, or scholarship type. The following provides additional information for certain changes:
* *Pupil Name, Grade, or Scholarship Type Changes:* If the change is to the pupil name or grade only the type of change (pupil first name, pupil last name, grade, or scholarship type) needs to be identified in this column. If the change is to the scholarship type, note the date of the reevaluation and the disability determination in the “Required Corrections to DPI’s Data” column.
  + - *Parent Name Changes:* Identify which parent needs to be corrected and if the first or last name needs to be corrected. Then, separately identify the first name and last name for any names that require correction. For example, if the first name for parent 1 needs to be corrected from “Mary” to “Marcy” and the last name for parent 2 must be corrected from “Smithy” to “Smith”, insert “Correct Parent 1 First Name to: Marcy, and Correct Parent 2 Last Name to: Smith” in the “Required Correction(s) to DPI’s Data” column.
    1. Add a Pupil to the Count: If a pupil is being added to the count, the pupil should only be included on Schedule 4. The grade, pupil name, and scholarship type identified in this schedule should be based on the audited information. If a correction must be made to DPI’s data for pupils on Schedule 4, the correction(s) must be identified in the “Required Corrections to DPI’s Data” column in Schedule 4. If a change is required to the pupil’s first name and/or last name, note this in the “Required Corrections to DPI’s Data” column. For example, if the pupil’s last name should be corrected to “Garcia Rodriguez”, insert “Pupil last name” in the “Required Corrections to DPI’s Data” column and type “Garcia Rodriguez” in the “Audited Last Name” column. If no changes are required for a pupil listed on Schedule 4, insert “None” in the “Required Corrections to DPI’s Data” column.
    2. Ineligible Pupils: Any pupils who are ineligible that have a 1 in the FINAL HC Jan column in the DPI Pupil Information Report must be included as ineligible on Schedule 2. If a pupil is not eligible, determine all the reasons that the pupil does not qualify. See the “Ineligibility Reasons” tab in the enrollment audit document for a listing of most ineligibility reasons (other reasons may be identified by the auditor).

If a pupil is determined ineligible by the auditor and/or DPI, the parent may submit a new application and provide the supporting documentation to the school if the student is still eligible. This application will then be subject to testing for the first count date the application is counted.

* + 1. Workpaper Retention Requirement for SNSP Applications & Transfer Requests with Items Identified: If a student listed on Schedule 2, 3, or 4 had an application or transfer request tested in Section 3, the auditor must retain the complete application or transfer request in the workpapers, including all supporting application or transfer request documentation. All supporting documentation must be maintained in the workpapers, even if the ineligibility reason does not specifically relate to the documentation (e.g. residency documentation should be maintained in the workpaper even if the ineligibility reason is related to the IEP/services plan requirements).
    2. Workpaper Retention Requirements for All Students with Items Identified:
* A copy of the official attendance records for the student must be maintained in the audit workpapers if the ineligibility reason is attendance related.
* A copy of the annotated birth certificate, immunization record, or court order identifying a legal name change must be maintained in the workpapers if the pupil has an item identified related to their name or date of birth.
* The IEP reevaluation must be retained for any pupil included on Schedule 2, 3, or 4 for IEP related reasons.