

# **SANTA MONICA-MALIBU UNIFIED SCHOOL DISTRICT**

Reissued Audit Report

## **CALIFORNIA ASSESSMENT OF STUDENT PERFORMANCE AND PROGRESS PROGRAM**

Chapter 489, Statutes of 2013;  
and Chapter 32, Statutes of 2014

*July 1, 2013, through June 30, 2016*



**BETTY T. YEE**  
California State Controller

January 2019



**BETTY T. YEE**  
California State Controller

January 17, 2019

Ben Drati, Ed.D., Superintendent  
Santa Monica-Malibu Unified School District  
1651 16th Street  
Santa Monica, CA 90404

Dear Dr. Drati:

The State Controller's Office (SCO) audited the costs claimed by the Santa Monica-Malibu Unified School District for the legislatively mandated California Assessment of Student Performance and Progress Program for the period of July 1, 2013, through June 30, 2016.

This reissued report updates our previous report, dated December 12, 2018. The previous report contained an incorrect draft watermark on the Schedule. This correction does not affect the audit findings and recommendations.

The district claimed \$13,404,759 for the mandated program. Our audit found that the entire amount is unallowable, primarily because the district claimed reimbursement for ineligible and unsupported costs. The State paid the district \$1,000. Following issuance of this audit report, the SCO's Local Government Programs and Services Division will notify the district of the adjustment to its claims via a system-generated letter for each fiscal year in the audit period.

This final audit report contains an adjustment to costs claimed by the district. If you disagree with the audit findings, you may file an Incorrect Reduction Claim (IRC) with the Commission on State Mandates (Commission). Pursuant to the Commission's regulations, outlined in Title 2, *California Code of Regulations*, section 1185.1, subdivision (c), an IRC challenging this adjustment must be filed with the Commission no later than three years following the date of this report, regardless of whether this report is subsequently supplemented, superseded, or otherwise amended. You may obtain IRC information on the Commission's website at [www.csm.ca.gov/forms/IRCForm.pdf](http://www.csm.ca.gov/forms/IRCForm.pdf).

If you have any questions, please contact Lisa Kurokawa, Chief, Compliance Audits Bureau, by telephone at (916) 327-3138.

Sincerely,

*Original signed by*

JIM L. SPANO, CPA  
Chief, Division of Audits

JLS/as

cc: Melody Canady, Assistant Superintendent, Business Services  
Santa Monica-Malibu Unified School District  
Jacqueline Mora, Ed.D., Assistant Superintendent, Educational Services  
Santa Monica-Malibu Unified School District  
Gerardo Cruz, Director of Fiscal Services  
Santa Monica-Malibu Unified School District  
Bertha Roman, Director of Educational Technology  
Santa Monica-Malibu Unified School District  
Ruthy Mangle, Director of Information Services  
Santa Monica-Malibu Unified School District  
Anna Chhabria, Director of Purchasing  
Santa Monica-Malibu Unified School District  
Ashraf Khimani, Accountant  
Santa Monica-Malibu Unified School District  
Dr. Richard Tahvildaran-Jesswein, President, Board of Education  
Santa Monica-Malibu Unified School District  
Keith D. Crafton, Director, Business Advisory Services  
Los Angeles County Office of Education  
Caryn Moore, Director  
School Fiscal Services Division  
California Department of Education  
Amy Tang-Paterno, Education Fiscal Services Consultant  
Government Affairs Division  
California Department of Education  
Jeff Bell, Program Budget Manager  
Education Systems Unit  
California Department of Finance  
Edward Hanson, Principal Program Budget Analyst  
Education Systems Unit  
California Department of Finance  
Anita Dagan, Manager  
Local Government Programs and Services Division  
State Controller's Office

# Contents

## Reissued Audit Report

<b>Summary .....</b>	<b>1</b>
<b>Background .....</b>	<b>1</b>
<b>Objective, Scope, and Methodology .....</b>	<b>3</b>
<b>Conclusion .....</b>	<b>4</b>
<b>Follow-up on Prior Audit Findings .....</b>	<b>4</b>
<b>Views of Responsible Officials .....</b>	<b>4</b>
<b>Reason for Reissuance .....</b>	<b>4</b>
<b>Restricted Use .....</b>	<b>5</b>
<b>Corrected Schedule—Summary of Program Costs .....</b>	<b>6</b>
<b>Findings and Recommendations .....</b>	<b>8</b>
<b>Attachment—District’s Response to Draft Audit Report</b>	

# Reissued Audit Report

## Summary

The State Controller's Office (SCO) audited the costs claimed by the Santa Monica-Malibu Unified School District for the legislatively mandated California Assessment of Student Performance and Progress (CAASPP) Program for the period of July 1, 2013, through June 30, 2016.

The district claimed \$13,404,759 for the mandated program. Our audit found that the entire amount is unallowable, primarily because the district claimed reimbursement for ineligible and unsupported costs. The State paid the district \$1,000.

## Background

Education Code Section 60640, as amended by the Statutes of 2013, Chapter 489 (Assembly Bill 484) and the Statutes of 2014, Chapter 32 (Senate Bill 858); and Title 5, *California Code of Regulations*, sections 850, 852, 853, 853.5, 857, 861(b)(5), and 864, as added or amended by Register 2014, Nos. 6, 30, and 35 established the CAASPP Program and replaced the Standardized Testing and Reporting (STAR) Program, effective January 1, 2014. The CAASPP Program requires school districts to transition from paper and pencil multiple-choice tests to computer-based tests.

On January 22, 2016, the Commission on State Mandates (Commission) adopted a decision finding that the test claim statutes and regulations impose a reimbursable state-mandated program upon school districts within the meaning of Article XIII B, Section 6 of the California Constitution and Government Code (GC) section 17514.

The Commission adopted the parameters and guidelines on March 25, 2016. The program's parameters and guidelines establish the State mandated and define the reimbursement criteria. In compliance with GC section 17558, the SCO issues claiming instructions to assist school districts in claiming mandated program reimbursable costs.

The Commission approved reimbursable activities as follows:

- Beginning January 1, 2014, provide "a computing device, the use of an assessment technology platform, and the adaptive engine" to administer the CAASPP Program assessments to all pupils via computer; this includes the acquisition of, and ongoing compliance with, minimum technology requirements.
- Beginning February 3, 2014, each local education agency's (LEA) CAASPP Program coordinator shall be responsible for assessment technology, and shall ensure current and ongoing compliance with minimum technology specifications as identified by the CAASPP Program contractor(s) or consortium.
- Beginning February 3, 2014, LEAs notify parents or guardians each year of their pupil's participation in the CAASPP Program assessment system, including notification that notwithstanding any other provision of law, a parent's or guardian's written request to excuse his or her child from any of all parts of the CAASPP Program assessments shall be granted.

- Beginning February 3, 2014, score and transmit the CAASPP tests in accordance with manuals or other instructions provided by the contractor or the California Department of Education (CDE).
- Beginning February 3, 2014, identify pupils unable to access the computer-based version of the CAASPP tests; and report to the CAASPP Program contractor the number of pupils unable to access the computer-based version of the test.
- Beginning February 3, 2014, report to CDE if a pupil in grade 2 was administered a diagnostic assessment in English Language Arts and Mathematics that is aligned with the Common Core academic content standards pursuant to Education Code section 60644.
- Beginning February 3, 2014, comply with any and all requests from CAASPP Program contractors, and abide by any and all instructions provided by the CAASPP Program contractor or consortium, whether written or oral, that are provided for training or provided for in the administration of a CAASPP test.
- Beginning August 27, 2014, the CAASPP Program test site coordinator shall be responsible for ensuring that all designated supports, accommodations, and individualized aids are entered into the registration system.

The Commission also found that the following state and federal funds must be identified and deducted as offsetting revenue from any school district's reimbursement claims:

- Statutes 2013, chapter 48 (\$1.25 billion in Common Core implementation funding), *if* used by a school district on any of the reimbursable CAASPP activities to support the administration of computer-based assessments.
- Funding apportioned by State Board of Education (SBE) from Statutes 2014, chapter 25, Line Item 6110-113-0001, schedule (8), for fiscal year 2013-2014 CAASPP costs.
- Funding apportioned by SBE from Statutes 2015, chapter 10, Line Item 6100-113-0001, schedule (7) for fiscal year 2014-2015 CAASPP costs.
- Statutes 2014, chapter 25 (Line Item 6110-488) and chapter 32 (appropriation for outstanding mandate claims) *if* used by a school district on any of the reimbursable CAASPP activities.
- Statutes 2014, chapter 25, Line Item 6110-182-0001, Provision 2 (appropriation "to support network connectivity infrastructure grants") *if* used by a school district on any of the reimbursable CAASPP activities.

Any other offsetting revenue the claimant experiences in the same program as a result of the same statutes or executive orders found to contain the mandate shall be deducted from the costs claimed. In addition, reimbursement for this mandate from any source, including but not limited to, service fees collected, federal funds, and other applicable state funds, shall be identified and deducted from any claim submitted for reimbursement.

## **Objective, Scope, and Methodology**

The objective of our audit was to determine whether costs claimed represent increased costs resulting from the legislatively mandated CAASPP Program. Specifically, we conducted this audit to determine whether costs claimed were supported by appropriate source documents, were not funded by another source, and were not unreasonable and/or excessive.

The audit period was July 1, 2013, through June 30, 2016.

To achieve our objective, we:

- Reviewed the annual mandated cost claims filed by the district for the audit period to identify the material cost components of each claim and to determine whether there were any errors or any unusual or unexpected variances from year to year. We also reviewed the activities claimed to determine whether they adhered to the SCO's claiming instructions and the program's parameters and guidelines;
- Completed an internal control questionnaire by interviewing key district staff, and discussed the claim preparation process with district staff to determine what information was obtained, who obtained it, and how it was used;
- Requested and reviewed supporting time documentation for the entire audit period. The district did not provide contemporaneous time documents to support the time and activities claimed as required by the program's parameters and guidelines;
- Requested and reviewed lists of existing computing devices as of December 31, 2013; June 30, 2014; and June 30, 2015. We used the Smarter Balanced Technology Readiness Calculator to determine the number of computing devices and network bandwidth that the district needed to administer the CAASPP tests to all eligible pupils within the testing window provided by CDE. We also set the number of available hours for the testing computers each day at six, as the district had used the same time increment in a presentation to the school board in November 2013;
- Requested and reviewed lists of surplus computing devices for the audit period;
- Requested and reviewed lists of computing devices purchased during the audit period;
- Requested and reviewed expenditure reports for the claimed materials and supplies, fixed assets, and contracted services;
- Compared all claimed indirect cost rates to the rates approved by the CDE. We noted no errors; therefore, we accepted the rates as claimed; and
- Traced all claimed materials and supplies, fixed assets, and contracted service costs to the district's accounting records. We noted that all claimed costs for materials and supplies, fixed assets, and contracted services were fully funded by a combination of revenues from bond proceeds and CDE funds.

GC sections 12410, 17558.5, and 17561 provide the legal authority to conduct this audit. We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

We limited our review of the district's internal controls to gaining an understanding of the transaction flow and claim preparation process as necessary to develop appropriate auditing procedures. Our audit scope did not assess the efficiency or effectiveness of program operations. We did not audit the district's financial statements.

## **Conclusion**

Our audit found that the district did not comply with the requirements outlined in the Objective, Scope, and Methodology section. The district claimed unsupported and ineligible costs, and costs that were funded by other sources, as quantified in the accompanying Schedule and described in the Findings and Recommendations section of this report.

For the audit period, Santa Monica-Malibu Unified School District claimed \$13,404,759 for costs of the legislatively mandated CAASPP Program. Our audit found that the entire amount is unallowable. For the FY 2015-16 claim, the State paid the district \$1,000.

Following issuance of this audit report, the SCO's Local Government Programs and Services Division will notify the district of the adjustment to its claims via a system-generated letter for each fiscal year in the audit period.

## **Follow-up on Prior Audit Findings**

We have not previously conducted an audit of the district's legislatively mandated CAASPP Program.

## **Views of Responsible Officials**

We issued a draft audit report on October 17, 2018. Dr. Ben Drati, Superintendent, Santa Monica-Malibu Unified School District, responded by letter dated October 26, 2018 (Attachment), and neither agreed nor disagreed with the audit results. This final audit report includes the district's response.

On December 12, 2018, we informed Gerardo Cruz, Director of Fiscal and Business Services, via email and telephone call, that the final audit report incorrectly identified the Schedule as a draft.

## **Reason for Reissuance**

This report has been reissued to remove the draft watermark from the Schedule. This correction does not affect the audit findings and recommendations.



**Restricted Use**

This audit report is solely for the information and use of the Santa Monica-Malibu Unified School District, the Los Angeles County Office of Education, the California Department of Education, the California Department of Finance, and the SCO; it is not intended to be and should not be used by anyone other than these specified parties. This restriction is not intended to limit distribution of this audit report, which is a matter of public record.

*Original signed by*

JIM L. SPANO, CPA  
Chief, Division of Audits

January 17, 2019

## Corrected Schedule— Summary of Program Costs July 1, 2013, through June 30, 2016

Cost Elements	Actual Costs Claimed	Allowable per Audit	Audit Adjustment	Reference <sup>1</sup>
<u>July 1, 2013, through June 30, 2014</u>				
Direct costs:				
Salaries and benefits				
Assess technology	\$ 54,706	\$ -	\$ (54,706)	
Notify parents or guardians	4,762	-	(4,762)	
Score and transmit CAASPP tests	30,405	-	(30,405)	
Review supplemental videos and webcasts	16,668	-	(16,668)	
Read and view CAASPP materials	4,762	-	(4,762)	
Total salaries and benefits	<u>111,303</u>	<u>-</u>	<u>(111,303)</u>	Finding 1
Materials and supplies				
Computers, browsers, or peripherals	4,306	-	(4,306)	
Total materials and supplies	<u>4,306</u>	<u>-</u>	<u>(4,306)</u>	Finding 2
Fixed assets				
Computers, browsers, or peripherals	171,802	-	(171,802)	
Internet service, network equipment, consultants, or engineers	28,031	-	(28,031)	
Total fixed assets	<u>199,833</u>	<u>-</u>	<u>(199,833)</u>	Finding 3
Total direct costs	315,442	-	(315,442)	
Indirect costs	<u>6,682</u>	<u>-</u>	<u>(6,682)</u>	Finding 1, 2
Total direct and indirect costs	322,124	-	(322,124)	
Less offsetting revenues and reimbursements	(204,139)	(223,663)	(19,524)	Finding 5
Audit adjustment to eliminate negative balance	-	223,663	223,663	
Total program costs	<u>\$ 117,985</u>	<u>-</u>	<u>\$ (117,985)</u>	
Less amount paid by the State <sup>2</sup>		-		
Allowable costs claimed in excess of amount paid		<u>\$ -</u>		
<u>July 1, 2014, through June 30, 2015</u>				
Direct costs:				
Salaries and benefits				
Internet service, network equipment, consultants, or engineers	\$ 60,376	\$ -	\$ (60,376)	
Assess technology	55,197	-	(55,197)	
Notify parents or guardians	4,734	-	(4,734)	
Score and transmit CAASPP tests	31,223	-	(31,223)	
Review supplemental videos and webcasts	16,568	-	(16,568)	
Read and review CAASPP materials	4,734	-	(4,734)	
Total salaries and benefits	<u>172,832</u>	<u>-</u>	<u>(172,832)</u>	Finding 1
Materials and supplies				
Computers, browsers, or peripherals	19,690	11,383	(8,307)	
Total materials and supplies	<u>19,690</u>	<u>11,383</u>	<u>(8,307)</u>	Finding 2
Fixed assets				
Computers, browsers, or peripherals	3,710,940	-	(3,710,940)	
Internet service, network equipment, consultants, or engineers	4,776,673	-	(4,776,673)	
Total fixed assets	<u>8,487,613</u>	<u>-</u>	<u>(8,487,613)</u>	Finding 3
Total direct costs	8,680,135	11,383	(8,668,752)	
Indirect costs	<u>11,032</u>	<u>652</u>	<u>(10,380)</u>	Finding 1, 2
Total direct and indirect costs	8,691,167	12,035	(8,679,132)	
Less offsetting revenues and reimbursements	(27,194)	(8,507,303)	(8,480,109)	Finding 5
Audit adjustment to eliminate negative balance	-	8,495,268	8,495,268	
Total program costs	<u>\$ 8,663,973</u>	<u>-</u>	<u>\$ (8,663,973)</u>	
Less amount paid by the State <sup>2</sup>		-		
Allowable costs claimed in excess of amount paid		<u>\$ -</u>		

## Corrected Schedule (continued)

Cost Elements	Actual Costs Claimed	Allowable per Audit	Audit Adjustment	Reference <sup>1</sup>
<u>July 1, 2015, through June 30, 2016</u>				
Direct costs:				
Salaries and benefits				
Internet service, network equipment, consultants or engineers	\$ 64,868	\$ -	\$ (64,868)	
Assess technology	92,548	-	(92,548)	
Notify parents or guardians	5,381	-	(5,381)	
Score and transmit CAASPP tests	33,764	-	(33,764)	
Review supplemental videos and webcasts	18,834	-	(18,834)	
Read and view CAASPP materials	5,381	-	(5,381)	
Enter designated supports and accommodations	5,381	-	(5,381)	
Total salaries and benefits	<u>226,157</u>	<u>-</u>	<u>(226,157)</u>	Finding 1
Materials and supplies				
Computers, browsers, or peripherals	12,719	7,794	(4,925)	
Total materials and supplies	<u>12,719</u>	<u>7,794</u>	<u>(4,925)</u>	Finding 2
Contract services				
Internet service, network equipment, consultants, or engineers	98,791	-	(98,791)	
Total contract services	<u>98,791</u>	<u>-</u>	<u>(98,791)</u>	Finding 4
Fixed assets				
Computers, browsers, and peripherals	2,024,477	-	(2,024,477)	
Internet service, network equipment, consultants, or engineers	2,239,452	-	(2,239,452)	
Total fixed assets	<u>4,263,929</u>	<u>-</u>	<u>(4,263,929)</u>	Finding 3
Total direct costs	4,601,596	7,794	(4,593,802)	
Indirect costs	21,205	490	(20,715)	Finding 1, 2, 4
Total direct and indirect costs	4,622,801	8,284	(4,614,517)	
Less offsetting revenues and reimbursements	-	(4,363,501)	(4,363,501)	Finding 5
Audit adjustment to eliminate negative balance	-	4,355,217	4,355,217	
Total program costs	<u>\$ 4,622,801</u>	<u>-</u>	<u>\$ (4,622,801)</u>	
Less amount paid by the State <sup>2</sup>		(1,000)		
Allowable costs claimed in excess of amount paid		<u>\$ (1,000)</u>		
<u>Summary: July 1, 2013, through June 30, 2016</u>				
Direct costs:				
Salaries and benefits				
Internet service, network equipment, consultants, or engineers	\$ 125,244	\$ -	\$ (125,244)	
Assess technology	202,451	-	(202,451)	
Notify parents or guardians	14,877	-	(14,877)	
Score and transmit CAASPP tests	95,392	-	(95,392)	
Review supplemental videos and webcasts	52,070	-	(52,070)	
Read and view CAASPP materials	14,877	-	(14,877)	
Enter designated supports and accommodations	5,381	-	(5,381)	
Total salaries and benefits	<u>510,292</u>	<u>-</u>	<u>(510,292)</u>	Finding 1
Materials and supplies				
Computers, browsers, or peripherals	36,715	19,177	(17,538)	
Total materials and supplies	<u>36,715</u>	<u>19,177</u>	<u>(17,538)</u>	Finding 2
Contract services				
Internet service, network equipment, consultants or engineers	98,791	-	(98,791)	
Total contract services	<u>98,791</u>	<u>-</u>	<u>(98,791)</u>	Finding 4
Fixed assets				
Computers, browsers, peripherals	5,907,219	-	(5,907,219)	
Internet service, network equipment, consultants, or engineers	7,044,156	-	(7,044,156)	
Total fixed assets	<u>12,951,375</u>	<u>-</u>	<u>(12,951,375)</u>	Finding 3
Total direct costs	13,597,173	19,177	(13,577,996)	
Indirect costs	38,919	1,142	(37,777)	Finding 1, 2, 4
Total direct and indirect costs	13,636,092	20,319	(13,615,773)	
Less offsetting revenues and reimbursements	(231,333)	(13,094,467)	(12,863,134)	Finding 5
Audit adjustment to eliminate negative balance	-	13,074,148	13,074,148	
Total program costs	<u>\$ 13,404,759</u>	<u>-</u>	<u>\$ (13,404,759)</u>	
Less amount paid by the State <sup>2</sup>		(1,000)		
Allowable costs claimed in excess of amount paid		<u>\$ (1,000)</u>		

<sup>1</sup> See the Findings and Recommendations section.

<sup>2</sup> Payment amount current as of August 7, 2018.

# Findings and Recommendations

## **FINDING 1— Unallowable salaries and benefits**

The district claimed \$510,292 in salaries and benefits for the audit period. We found that the entire amount is unallowable. The costs are unallowable because the district did not provide contemporaneous time documents to support the time and activities claimed as required by the program's parameters and guidelines.

The district misinterpreted the program's parameters and guidelines requirement that it maintain contemporaneous source documentation to support all claimed salary and benefit costs for the audit period. Unallowable related indirect costs total \$30,539.

The district claimed salary and benefit costs for seven reimbursable activities:

- The CAASPP Program coordinator at the LEA shall be responsible for technology assessments, and shall ensure current and ongoing compliance with minimum technology specifications as identified by the CAASPP Program contractor(s) or consortium;
- Notify parents or guardians each year of their pupil's participation in the CAASPP assessment system, including notification that notwithstanding any other provision of law, a parent's or guardian's written request to excuse his or her child from any or all parts of the CAASPP assessments shall be granted;
- Score and transmit CAASPP tests in accordance with manuals or other instructions provided by the contractor or the CDE;
- Participate in the training directed by the CAASPP contractor(s) or consortium by reviewing any applicable supplemental videos and archived webcasts;
- Read the *CAASPP Smarter Balanced Online Test Administration Manual*; the *Smarter Balanced Usability, Accessibility, and Accommodations Guidelines*; and the *Test Administrator Reference Guide*, and view the associated Smarter Balanced training modules;
- The CAASPP Program test site coordinator shall be responsible for ensuring that all designated supports, accommodations, and individualized aids are entered into the registration system; and
- Provide broadband internet service with at least 20 Kbps per pupil to be tested simultaneously, acquire and install wireless or wired network equipment, and hire consultants or engineers to assist a district in completing and troubleshooting the installation.

To support the claimed salary and benefit costs, the district provided the following:

- CAASPP administrator teacher list for grades 3 through 8 and 11;
- Certificated Job Descriptions for Director, Assessment, Research, and Evaluation; and
- LEA CAASPP Program Coordinator checklist to support the hours and activities claimed.

The teacher list and certificated job descriptions provided do not specifically identify the reimbursable activities performed and the time devoted to each activity by each employee. Furthermore, the coordinator checklist identified only estimated time increments required to complete CAASPP Program activities. The time increments on the checklist do not represent the actual time spent to complete each activity.

These documents did not contemporaneously track the actual time spent on the reimbursable activities. The documents also did not identify which reimbursable activities were actually performed and which employees performed those activities. Therefore, these documents are not appropriate source documents.

The following table summarizes the audit adjustments related to salaries and benefits by fiscal year:

Fiscal Year	Salaries and Benefits			Claimed Indirect Cost Rate	Related Indirect Cost Adjustment	Total Audit Adjustment
	Amount Claimed	Amount Allowable	Audit Adjustment			
	2013-14	\$ 111,303	\$ -			
2014-15	172,832	-	(172,832)	5.73%	(9,903)	(182,735)
2015-16	226,157	-	(226,157)	6.28%	(14,203)	(240,360)
	<u>\$ 510,292</u>	<u>\$ -</u>	<u>\$ (510,292)</u>		<u>\$ (30,539)</u>	<u>\$ (540,831)</u>

The following table summarizes the audit adjustment related to salaries and benefits by reimbursable activity:

Reimbursable Activity	Salaries and Benefits		
	Amount Claimed	Amount Allowable	Audit Adjustment
Assess technology and ensure compliance	\$ 202,451	\$ -	\$ (202,451)
Notify parents or guardians	14,877	-	(14,877)
Score and transmit CAASPP tests	95,392	-	(95,392)
Review supplemental videos and webcasts	52,070	-	(52,070)
Read and view CAASPP materials	14,877	-	(14,877)
Enter supports and accommodations into registration system	5,381	-	(5,381)
Internet service, network equipment, consultants, engineers	125,244	-	(125,244)
Total	<u>\$ 510,292</u>	<u>\$ -</u>	<u>\$ (510,292)</u>

Section IV of the parameters and guidelines (Reimbursable Activities) states:

To be eligible for mandated cost reimbursement for any fiscal year, only actual costs may be claimed. Actual costs are those costs actually incurred to implement the mandated activities. Actual costs must be traceable and supported by source documents that show the validity of such costs, when they were incurred, and their relationship to the reimbursable activities. A source document is a document created at or near the same time the actual cost was incurred for the event or activity in question. Source documents may include, but are not limited to, employee time records or time logs, sign-in sheets, invoices, and receipts.

Evidence corroborating the source documents may include, but is not limited to, worksheets, cost allocation reports (system generated), purchase orders, contracts, agenda, and declarations. Declarations must include a certification or declaration stating, "I certify (or declare) under penalty of perjury under the laws of the State of California that the foregoing is true and correct," and must further comply with the requirements of Code of Civil Procedure section 2015.5. Evidence corroborating the source documents may include data relevant to the reimbursable activities otherwise in compliance with local, state, and federal government requirements. However, corroborating documents cannot be substituted for source documents.

### Recommendation

We recommend that the district follow the mandated program claiming instructions and ensure that claimed costs are:

- Based on actual costs;
- For activities reimbursable under the program's parameters and guidelines; and
- Supported by contemporaneous source documentation.

### District's Response

The District does not contest the auditor's findings nor does the District agree with the basis of the finding.

### SCO Comment

Our finding and recommendation remain unchanged.

## **FINDING 2— Overstated materials and supplies**

The district claimed \$36,715 in materials and supplies for the audit period. We found that \$17,538 in materials and supplies is unallowable.

The district claimed \$36,715 in materials and supplies for the Computers, Browsers, or Peripherals cost component. The parameters and guidelines (section IV.A.1) include only keyboards, headphones, and a pointing device to satisfy the minimum technology specifications. Therefore, we determined that only the claimed cost of \$19,177 for headphones and pointing devices is reimbursable.

The district overstated materials and supplies because it misinterpreted the program's parameters and guidelines requirements regarding which items are eligible for reimbursement. Unallowable related indirect costs totaled \$1,034.

The following table summarizes the audit adjustments related to materials and supplies by fiscal year:

Fiscal Year	Materials and Supplies			Claimed Indirect Cost Rate	Related Indirect Cost Adjustment	Total Audit Adjustment
	Amount Claimed	Amount Allowable	Audit Adjustment			
	2013-14	\$ 4,306	\$ -			
2014-15	19,690	11,383	(8,307)	5.73%	(476)	(8,783)
2015-16	12,719	7,794	(4,925)	6.28%	(309)	(5,234)
	<u>\$ 36,715</u>	<u>\$ 19,177</u>	<u>\$ (17,538)</u>		<u>\$ (1,034)</u>	<u>\$ (18,572)</u>

Section IV.A.1 of the parameters and guidelines (Reimbursable Activities) states:

Beginning January 1, 2014, provide “a computing device, the use of an assessment technology platform, and the adaptive engine” to administer the CAASPP assessments to all pupils via computer, which includes the acquisition of and ongoing compliance with minimum technology specifications, as identified by the CAASPP contractor(s) or consortium. Reimbursement for this activity include the following:

A sufficient number of desktop or laptop computers, iPads, or other tablet computers for which Smarter Balanced provides secure browser support in the academic year, along with a keyboard, headphones, and a pointing device for each, to administer the CASPP to all eligible pupils with in the testing window provided by CDE regulations.

Recommendation

We recommend that the district follow the mandated program claiming instructions and ensure that claimed costs are:

- Based on actual costs;
- For activities reimbursable under the program’s parameters and guidelines; and
- Supported by contemporaneous source documentation.

District’s Response

The District does not contest the auditor’s findings nor does the District agree with the basis of the finding.

SCO Comment

Our finding and recommendation remain unchanged.

**FINDING 3—  
Unallowable fixed  
assets**

The district claimed \$12,951,375 in fixed assets for the audit period. We found that the entire amount is unallowable because the district did not meet the reimbursement requirements outlined in the program’s parameters and guidelines.

A requirement for reimbursement is that the district’s existing inventory of computing devices, broadband internet service, and technology infrastructure is not sufficient to administer the CAASPP tests to all eligible pupils during the testing window, based on the minimum technology specifications identified by the contractor(s) or consortium. For the audit period, the district had a sufficient existing inventory of computing devices, broadband internet service, and technology infrastructure, and was not aware of the reimbursement requirements outlined in the program’s parameters and guidelines.

The district claimed fixed asset costs for reimbursable activities related to 1) Computers, browsers, or peripherals; and 2) Internet service, network equipment, consultants, or engineers. The claimed costs represent the acquisition of computing devices and the expansion of existing technology infrastructure. (There are no unallowable related indirect costs for this object account, as the program’s claiming instructions exclude school districts from claiming indirect costs on fixed assets.)

The following table summarizes the audit adjustments related to fixed assets by fiscal year:

Fiscal Year	Fixed Assets		
	Amount Claimed	Amount Allowable	Audit Adjustment
2013-14	\$ 199,833	\$ -	\$ (199,833)
2014-15	8,487,613	-	(8,487,613)
2015-16	4,263,929	-	(4,263,929)
	<u>\$ 12,951,375</u>	<u>\$ -</u>	<u>\$ (12,951,375)</u>

The following table summarizes the audit adjustments related to fixed assets by reimbursable activity:

Reimbursable Activity	Fixed Assets		
	Amount Claimed	Amount Allowable	Audit Adjustment
Computers, browsers, or peripherals	\$ 5,907,219	\$ -	\$ (5,907,219)
Internet service, network equipment, consultants, or engineers	7,044,156	-	(7,044,156)
	<u>\$ 12,951,375</u>	<u>\$ -</u>	<u>\$ (12,951,375)</u>

The district claimed \$5,907,219 in fixed assets related to computers, browsers, or peripherals. We found that the entire amount is unallowable. Of that amount, the district claimed \$314,251 for laptop charging carts that is not reimbursable. Additionally, claimed costs of \$5,592,968 are unallowable because the district did not meet the existing inventory requirement outlined in the program’s parameters and guidelines.

The district claimed \$7,044,156 in fixed assets related to internet service, network equipment, consultants, or engineers. We found that the entire amount is unallowable because the district did not meet the existing inventory requirement outlined in the program’s parameters and guidelines.



**Existing inventory of computing devices and broadband internet service**

The district provided lists of computing devices that were counted by 16 school sites in October 2013 to prepare for CAASPP assessments. These lists were provided in multiple formats and files; with the district’s help, we consolidated the files into a master list that identifies operating system, processor specifications, memory size, hard drive space, and the user of each computing device. The district reviewed and approved the master list. This list was the basis of the existing inventory for computing devices as of December 31, 2013.

For each fiscal year, we accounted for the computing devices that did not meet the minimum technology specifications, devices that were disposed of, and new purchases to determine the number of computing devices available to students for CAASPP assessments.

The following table shows the number of existing computing devices that were available at the beginning of each fiscal year:

Fiscal Year	(A)	(B)	(C)	(D) = (A)+(B)+(C)	(E)	(F)	(G) = (D)+(E)+(F)
	Beginning Inventory	Devices Not Meeting Minimum Specifications	Devices Disposed Before Testing	Devices Available for Testing	Devices Disposed After Testing	New Purchases	Ending Inventory
2013-14	3,576	(120)	-	3,456	-	400	3,856
2014-15	3,856	(293)	(14)	3,549	-	4,765	8,314
2015-16	8,314	-	(37)	8,277	(5)	1,431	9,703
		<u>(413)</u>	<u>(51)</u>		<u>(5)</u>	<u>6,596</u>	

The district provided network service contracts indicating that the district’s broadband internet speed was 1 Gbps as of January 1, 2014, and 10 Gbps as of July 1, 2015.

**Determining the sufficiency of existing computing devices and broadband internet service**

CDE provides a tool called the Smarter Balanced Technology Readiness Calculator to assist districts in preparing technology resources for computer-based assessments. This web-based calculator estimates the number of days, and associated network bandwidth required, to administer English Language Arts and Mathematics assessments given the existing number of students, the current number of computers available for use in CAASPP testing, and the number of hours per day those computers are available for use in CAASPP testing. The district increased its district-wide bandwidth to 10 Gbps as of July 1, 2015; however, the calculator has a maximum preset network bandwidth of 1 Gbps.

We used the Smarter Balanced Technology Readiness Calculator to determine the number of computing devices and network bandwidth that the district needed to administer the CAASPP tests to all eligible pupils within the testing window provided by CDE. We set the number of available hours for the testing computers each day at six, as the district had used the same time increment in a presentation to the school board in November 2013.

The following table shows the number of computing devices and network bandwidth that the district needed to complete the assessments within the testing window:

Fiscal Year	Students Tested	Devices Needed for Testing	Days in Testing Window	District Internet Speed	Estimated Bandwidth Required
2013-14	6,287	195	42.99	1 Gbps	3.90 Mbps (0.39% of total bandwidth)
2014-15	5,929	132	59.89	1 Gbps	2.64 Mbps (0.26% of total bandwidth)
2015-16	5,779	129	59.73	1 Gbps	2.58 Mbps (0.26% of total bandwidth)

The following table shows the required number of days and network bandwidth that the district needed to complete the assessments using its existing inventory of computing devices:

Fiscal Year	Students Tested	Devices Available for Testing	Days to Complete Testing	District's Internet Speed	Estimated Bandwidth Required
2013-14	6,287	3,456	2.43	1 Gbps	69.12 Mbps (6.91% of total bandwidth)
2014-15	5,929	3,549	2.23	1 Gbps	70.98 Mbps (7.10% of total bandwidth)
2015-16	5,779	8,277	1.33	1 Gbps	115.58 Mbps (11.56% of total bandwidth)

For FY 2013-14, the district had 3,456 existing computing devices that met the minimum technology specifications for CAASPP assessments. The Smarter Balanced Technology Readiness Calculator estimated that the district could complete the assessments for 6,287 students in 2.43 days and use 6.91% of a 1-Gig bandwidth. However, CDE provided a 43-day testing window to complete the assessments, so the district would only need 195 computing devices and would use 0.39% of a 1-Gig bandwidth to complete the assessments.

For FY 2014-15, the district had 3,549 existing computing devices that met the minimum technology specifications for CAASPP assessments. The Smarter Balanced Technology Readiness Calculator estimated that the district could complete the assessments for 5,929 students in 2.23 days and use 7.10% of a 1-Gig bandwidth. However, CDE provided a 60-day testing window to complete the assessments, so the district only needed 132 computing devices and would use 0.26% of a 1-Gig bandwidth to complete the assessments.

For FY 2015-16, the district had 8,277 existing computing devices that met the minimum technology specifications for CAASPP assessments. The Smarter Balanced Technology Readiness Calculator estimated that the district could complete the assessments for 5,779 students in 1.33 days and use 11.56% of a 1-Gig bandwidth. However, CDE provided a 60-day testing window to complete the assessments, so the district would only need 129 computing devices and would use 0.26% of a 1-Gig bandwidth to complete the assessments.

Section IV.A of the parameters and guidelines (Reimbursable Activities) states:

Beginning January 1, 2014, provide “a computing device, the use of an assessment technology platform, and the adaptive engine” to administer the CAASPP assessments to all pupils via computer, which includes the acquisition of and ongoing compliance with minimum technology specifications, as identified by the CAASPP contractor(s) or consortium. Reimbursement for this activity include the following:

A sufficient number of desktop or laptop computers, iPads, or other tablet computers for which Smarter Balanced provides secure browser support in the academic year, along with a keyboard, headphones, and a pointing device for each, to administer the CASPP to all eligible pupils with in the testing window provided by CDE regulations.

Broadband internet service providing at least 20 Kbps per pupil to be tested simultaneously, costs for acquisition and installation of wireless or wired network equipment, and hiring consultants or engineers to assist a district in completing and troubleshooting the installation.

*Claimants shall maintain supporting documentation showing how their existing inventory of computing devices and accessories, technology infrastructure, and broadband internet service is not sufficient to administer the CAASPP test to all eligible pupils in the testing window, based on the minimum technical specifications identified by the contractor(s) or consortium.*

#### Recommendation

We recommend that the district:

- Establish and implement policies and procedures to ensure that staff follow the programs parameters and guidelines when preparing the mandated cost claims; and
- Ensure that claimed costs are based on actual costs, are for activities reimbursable under the program’s parameters and guidelines, and are supported by contemporaneous source documentation.

#### District’s Response

The District does not contest the auditor’s findings nor does the District agree with the basis of the finding.

#### SCO Comment

Our finding and recommendation remain unchanged.

### **FINDING 4— Unallowable contracted services**

The district claimed \$98,791 in contracted services for the audit period. We found that the entire amount is unallowable because the district did not meet the reimbursement requirements outlined in the program’s parameters and guidelines.

The district claimed contracted service costs for the reimbursable activity related to internet service, network equipment, consultants, or engineers. The claimed costs represent services to expand existing technology

infrastructure. The district claimed these contracted service costs because it misinterpreted the program’s parameters and guidelines requirement that it maintain documentation to prove that its existing technology infrastructures were not sufficient to administer the CAASPP test to all eligible pupils within the testing window. The district already met the minimum specifications related to broadband internet service and technology infrastructure (see more details in Finding 3—Unallowable fixed assets). Unallowable related indirect costs total \$6,204.

The following table summarizes the audit adjustments related to contracted services by fiscal year:

Fiscal Year	Contracted Services			Claimed Indirect Cost Rate	Related Indirect Cost Adjustment	Total Adjustment
	Amount Claimed	Amount Allowable	Audit Adjustment			
2015-16	\$ 98,791	\$ -	\$ (98,791)	6.28%	\$ (6,204)	\$ (104,995)
	<u>\$ 98,791</u>	<u>\$ -</u>	<u>\$ (98,791)</u>		<u>\$ (6,204)</u>	<u>\$ (104,995)</u>

A requirement for reimbursement is that the district’s broadband internet service is not sufficient to administer the CAASPP tests to all eligible pupils in the testing window, based on the minimum technology specifications identified by the contractor(s) or consortium. For FY 2015-16, the district had sufficient existing broadband internet service, as the network service contracts stated that the district’s broadband internet speed was 10 Gbps as of July 1, 2015.

We used the Smarter Balanced Technology Readiness Calculator to determine the network bandwidth the district needed to administer the CAASPP Program tests to all eligible pupils in the testing window provided by CDE.

The following table shows the network bandwidth that the district needed to complete the assessments within the testing window:

**Smarter Balanced Technology Readiness Calculator**

Fiscal Year	Students Tested	Devices Needed for Testing	Days in Testing Window	District Internet Speed	Estimated Bandwidth Required
2015-16	5,779	129	59.73	1 Gbps	2.58 Mbps (0.26% of total bandwidth)

The following table shows the number of days and network bandwidth that the district needed to complete the assessments using its existing inventory of computing devices:

**Smarter Balanced Technology Readiness Calculator**

Fiscal Year	Students Tested	Devices Available for Testing	Days to Complete Testing	District's Internet Speed	Estimated Bandwidth Required
2015-16	5,779	8,277	1.33	1 Gbps	115.58 Mbps (11.56% of total bandwidth)

For FY 2015-16, the district had 8,277 existing computing devices that met the minimum technology specifications for CAASPP assessments. The Smarter Balanced Technology Readiness Calculator estimated that the district could complete the assessments for 5,779 students in 1.33 days and use 11.56% of a 1-Gig bandwidth. However, CDE provided a 60-day testing window to complete the assessments, so the district would only need 129 computing devices and use 0.26% of a 1-Gig bandwidth to complete the assessments.

Section IV.A of the parameters and guidelines (Reimbursable Activities) states:

Beginning January 1, 2014, provide “a computing device, the use of an assessment technology platform, and the adaptive engine” to administer the CAASPP assessments to all pupils via computer, which includes the acquisition of and ongoing compliance with minimum technology specifications, as identified by the CAASPP contractor(s) or consortium. Reimbursement for this activity include the following:

A sufficient number of desktop or laptop computers, iPads, or other tablet computers for which Smarter Balanced provides secure browser support in the academic year, along with a keyboard, headphones, and a pointing device for each, to administer the CASPP to all eligible pupils with in the testing window provided by CDE regulations.

Broadband internet service providing at least 20 Kbps per pupil to be tested simultaneously, costs for acquisition and installation of wireless or wired network equipment, and hiring consultants or engineers to assist a district in completing and troubleshooting the installation.

*Claimants shall maintain supporting documentation showing how their existing inventory of computing devices and accessories, technology infrastructure, and broadband internet service is not sufficient to administer the CAASPP test to all eligible pupils in the testing window, based on the minimum technical specifications identified by the contractor(s) or consortium.*

#### Recommendation

We recommend that the district follow the mandated program claiming instructions and ensure that claimed costs are:

- Based on actual costs;
- For activities reimbursable under the program’s parameters and guidelines; and
- Supported by contemporaneous source documentation.

#### District’s Response

The District does not contest the auditor’s findings nor does the District agree with the basis of the finding.

#### SCO Comment

Our finding and recommendation remain unchanged.

**FINDING 5—  
Underreported  
Offsetting Revenues**

The district reported \$231,333 in offsetting revenues for the audit period. We found that the district understated offsetting revenue by \$12,863,134.

The district misinterpreted the program’s parameters and guidelines requirement that it identify and deduct any reimbursement for this mandate from any source.

For the audit period, the district applied \$249,383 from CDE for CAASPP Program activities as follows:

- \$229,859 of Common Core State Standards Implementation Funds; and
- \$19,524 of Assessment Apportionments.

In November 2012, Santa Monica-Malibu voters approved Measure ES, a \$385 million general obligation bond to accomplish a number of facility projects and to acquire additional computers and related technology.

For FY 2014-15 and FY 2015-16, the district used these bond proceeds to fund \$12,845,084 of claimed costs for computing devices and technology infrastructure. The district did not reduce the claimed costs by the amount of these bond proceeds.

Based on the district’s accounting records, we found that the district used a combination of revenues from the bond proceeds (\$12,845,084) and CDE (\$249,383) to fund claimed costs of \$13,094,467 for salaries and benefits, materials and supplies, contracted services, and fixed assets.

The following table summarizes the audit adjustments related to offsetting revenues by fiscal year:

Fiscal Year	Offset Reported	Revenue Applied to CAASPP Program	Audit Adjustment
2013-14	\$ (204,139)	\$ (223,663)	\$ (19,524)
2014-15	(27,194)	(8,507,303)	(8,480,109)
2015-16	-	(4,363,501)	(4,363,501)
	<u>\$ (231,333)</u>	<u>\$ (13,094,467)</u>	<u>\$ (12,863,134)</u>

Section VII of the parameters and guidelines (Offsetting Revenues and Reimbursements) states that the following state and federal funds must be identified as offsetting revenues:

- Statutes 2013, chapter 48 (\$1.25 billion in Common Core implementation funding), if used by a school district on any of the reimbursable CAASPP activities to support the administration of computer-based assessments.
- Funding apportioned by SBE from Statutes 2014, chapter 25, Line Item 6110-113-0001, schedule (8), for fiscal year 2013-2014 CAASPP costs.
- Funding apportioned by SBE from Statutes 2015, chapter 10, Line Item 6100-113-0001, schedule (7) for fiscal year 2014-2015 CAASPP costs.

- Statutes 2014, chapter 25 (Line Item 6110-488) and chapter 32 (appropriation for outstanding mandate claims) *if* used by a school district on any of the reimbursable CAASPP activities.
- Statutes 2014, chapter 25, Line Item 6110-182-0001, Provision 2 (appropriation “to support network connectivity infrastructure grants”) *if* used by a school district on any of the reimbursable CAASPP activities.

Any other offsetting revenue the claimant experiences in the same program as a result of the same statutes or executive orders found to contain the mandate shall be deducted from the costs claimed. In addition, reimbursement for this mandate from any source, including but not limited to, service fees collected, federal funds, and other applicable state funds, shall be identified and deducted from any claim submitted for reimbursement.

### Recommendation

We recommend that the district follow the mandated program claiming instructions and ensure that all offsetting revenues applied to the CAASPP Program are identified and deducted from claimed costs.

### District’s Response

The District neither agrees nor disagrees with the auditor’s findings. The district used a portion of its Measure ES bond funds to pay for the purchase of computers and related technology needed to administer the Smarter Balanced Summative Assessments. Bond funds were available to upgrade instructional technology, Internet and network connections, and to upgrade and replace computers. Because these funds were available for costs deemed to be reimbursable, the district used these funds for these purposes with the intent of not having to put cost pressures on the district’s existing general funds.

### SCO Comment

Our finding and recommendation remain unchanged.

Section VII of the parameters and guidelines states:

Any other offsetting revenue the claimant experiences in the same program as a result of the same statutes or executive orders found to contain the mandate shall be deducted from the costs claimed. In addition, reimbursement for this mandate from any source, including but not limited to, service fees collected, federal funds, and other applicable state funds, shall be identified and deducted from any claim submitted for reimbursement.

The district chose to use Measure ES funds for the purchase of classroom technology, computers, and network infrastructure. Reimbursement for mandated costs is not required, as the district used Measure ES proceeds to fund the mandated activities.

**Attachment—  
District’s Response to  
Draft Audit Report**

---





SANTA MONICA - MALIBU UNIFIED SCHOOL DISTRICT

October 26, 2018

Lisa Kurokawa, Chief  
Compliance Audits Bureau  
Division of Audits  
California State Controller's Office  
P.O. Box 942850  
Sacramento, CA 94250-5874

Re: Santa Monica-Malibu Unified School District  
California Assessment of Student Performance and Progress Program  
Audit of Annual Reimbursement Claim  
For the Period of July 1, 2013, through June 30, 2016

Dear Ms. Kurokawa:

The Santa Monica-Malibu Unified School District (District) is responding to the draft audit report regarding costs claimed for the legislatively mandated California Assessment of Student Performance and Progress Program for the period July 1, 2013, through June 30, 2016.

**Finding 1: Unallowable salaries and benefits:**

The preliminary findings state that the district claimed \$510,292 in salaries and benefits for the audit period and that the entire amount is unallowable because "the district did not provide contemporaneous time documents to support the time and activities claimed as required by the program's parameters and guidelines".

- **District Response:** The District does not contest the auditor's findings nor does the District agree with the basis of the finding.

**Finding 2: Overstated materials and supplies:**

The preliminary findings state that the district claimed \$36,715 in materials and supplies for the audit period and that \$17,538 in materials and supplies is unallowable.

- **District Response:** The District does not contest the auditor's findings nor does the District agree with the basis of the finding.

**Finding 3: Unallowable fixed assets:**

The preliminary findings state that the district claimed \$12,951,375 in fixed assets for the audit period and that the entire amount is unallowable because the costs did not meet the reimbursement requirements outlined in the program's parameters and guidelines.

- **District Response:** The District does not contest the auditor's findings nor does the District agree with the basis of the finding.

(continued on page 2)



SANTA MONICA - MALIBU UNIFIED SCHOOL DISTRICT

**Finding 4: Unallowable contracted services:**

The district claimed \$98,791 in contracted services for the audit period and that the entire amount is unallowable because “the district already met the minimum specifications related to broadband internet service and technology infrastructure”.

- **District Response:** The District does not contest the auditor’s findings nor does the District agree with the basis of the finding.

**Finding 5: Underreported Offsetting Revenues:**

The preliminary findings state that the district reported \$231,333 in offsetting revenues for the audit period but did not further reduce claimed costs by the amount of bond proceeds used to fund the costs for computing devices and technology infrastructure.

- **District Response:** The District neither agrees nor disagrees with the auditor’s findings. The district used a portion of its Measure ES bond funds to pay for the purchase of computers and related technology needed to administer the Smarter Balanced Summative Assessments. Bond funds were available to upgrade instructional technology, Internet and network connections, and to upgrade and replace computers. Because these funds were available for costs deemed to be reimbursable, the district used these funds for these purposes with the intent of not having to put cost pressures on the district’s existing general funds.

We request that our response be published with the final audit report as well as shared with the Executive Office of the State Controller.

Sincerely,

Dr. Ben Drati,  
Superintendent

- CC: Dr. Richard Tahvildaran-Jesswein, Board of Education President  
Mr. Jon Kean, Board of Education Vice President  
Board of Education Members  
Ms. Melody Canady, Assistant Superintendent of Business & Fiscal Services  
Dr. Jacqueline Mora, Assistant Superintendent of Education Services  
Mr. Gerardo Cruz, Director of Business & Fiscal Services  
Ms. Ruthy Mangle, Director of Information Technology  
Ms. Anna Chhabria, Director of Purchasing  
Dr. Irene Gonzalez-Castillo, Director of Curriculum & Instruction  
Ms. Bertha Roman, Director of Education Technology  
Ms. Ashraf Khimani, Bond Accountant

SANTA MONICA-MALIBU UNIFIED SCHOOL DISTRICT

1651 Sixteenth Street • Santa Monica • California 90404-3891 • (310) 450-8338 • www.smmusd.org  
Board of Education: Oscar de la Torre • Craig Foster • Jon Kean • Maria Leon-Vazquez  
Laurie Lieberman • Ralph Mechur • Dr. Richard Tahvildaran-Jesswein

**State Controller's Office  
Division of Audits  
Post Office Box 942850  
Sacramento, CA 94250**

**<http://www.sco.ca.gov>**