

July 15, 2025

On July 25, 2024 the Board of Education of the City of St. Louis authorized its outside legal counsel to engage the accounting firm Armanino to perform an assessment of certain administrative functions specifically related to administrative pay, hiring and credit card usage.

The executive summary, final report and recommendations from the assessment ("Armanino Report") were released to the public on December 10, 2024 and are available at www.slps.org/audit.

On December 10, 2024, the Board of Education of the City of St. Louis issued an initial response and commitment to the Armanino report.

A brief overview of recommendations and implementation status is listed below. Progress on the implementation of these recommendations will continue to be updated regularly at slps.org/audit. For FY26, an update on corrective action progress will be a standing agenda item for discussion at Board of Education work sessions.

BOARD OF EDUCATION OF THE CITY OF ST. LOUIS **Progress report as of July 15, 2025 to Armanino Report**

1. Internal Audit Function

- In December, 2025, the district hired a Director of Compliance and Internal Auditor. Currently, the internal auditor has a dotted line reporting function to the Board of Education's Audit Committee.
- In February, 2025, the Board of Education considered and adopted 25 policies and 11 procedures predominantly following Missouri School Board Association's guidance. These policies and procedures specifically address fiscal management including but not limited to audit governance, budgeting, fiscal accounting, inventory management, audits, purchasing, payment process, expense reimbursement and travel expenses. Following adoption, the district began training its relevant staff and implemented the policies and procedures as adopted.
- To date, the Board of Education has not yet implemented the policy regarding the Audit Committee's makeup and its roles and responsibilities. It is anticipated that the Board of Education will implement the new roles and responsibilities for its Audit Committee within the next quarter.

2. Board Oversight of Superintendent's Office

- The Board of Education has adopted the practice of utilizing consent agendas since its January 14, 2025 meeting. Similarly, the Board of Education has adopted a practice of reviewing and approving the superintendent's travel in advance.
- Each month, the Board reviews the district's credit card purchases, including any purchases made by the Superintendent.
- Some members of the Board of Education and the Superintendent received training on the district's travel and procurement procedures in FY25 and are scheduled for annual training in FY26.

- In February 2025, SLPS' Director of Compliance and Internal Auditor was assigned and began an audit of the district credit cards. Additionally, in mid-May 2025, the Director of Compliance and Internal Auditor began two additional audits on the district's a) procurement process and b) its compensation practices in hiring. Two completed audits will be reported out at the next Audit Committee meeting. These three audits will be included in the annual audit plan for FY26.
- In March, 2025, the district sought advice from its outside counsel on the whistleblower policy. It is the opinion of outside counsel that the district's policy tracks similar to that of MSBA and MCE and, therefore, revisions were not recommended.

3. Board Documentation, Board Minutes and Reports

- A full time Executive Assistant was hired by the district in January, 2025 who is solely assigned duties relating to the operation of the Board of Education. The individual is currently preparing the Board of Education's office to improve efficiency.
- The individual has received the basic certification from MSBA's Board Secretary Academy and is working towards the master certification.
- The Board of Education has not yet considered revisions to its bylaws regarding duties of officers and compliance with timely board documentation as of yet. It anticipates that it will by the end of this calendar year.
- The district has implemented a board document management platform on Diligent/Community. District staff and board members have been trained on this new platform. Ongoing training will occur as appropriate.
- The district has considered utilizing a transparency portal for Sunshine Law requests. At this time it is budgetary prohibited. The custodian of records will present an annual report to the Audit Committee during the Fall semester.

4. Policies and Procedures: Finance

- As stated, the Board of Education entered into an agreement with the Missouri School Board Association to use the Association's policy services to update existing policies and ensure compliance with statutory and regulatory requirements. Using MSBA's policies/procedures as a model, on February 11th, the Board adopted 25 financial policies and 11 financial procedures. Since, training and accountability has occurred as appropriate.

5. Policies and Procedures: Human Resources

- Utilizing the MSBA policies and procedures as models, the district has undertaken review of its HR policies and procedures utilizing a committee of stakeholders across the district including, HR, network superintendents, principals, AFT 420 representatives and staff. To date, the district has reviewed and revised more than 30 policies along with several procedures. It is anticipated that it will present to the Board of Education the district's recommendations on or about October 2025.

6. Credit Card Monthly Cycle Limits, Credit Card Policy and Procedures (Acceptable Purchases)

- As indicated, on February 11, 2025, the district adopted strict credit card procedures and documentation requirements. Adherence to these policies and procedures are currently being audited by the Internal Auditor who will report out her findings at the next Audit Committee meeting. This audit will be added to the FY26 audit plan.

7. Policy and Procedure Conflicts: Board Member Travel Purchases

- In December, 2024 the Board of Education's credit card was returned to the Finance Department. As indicated in February 2025, the district adopted a travel policy that includes the Board of Education, Policy DLCA Travel.

8. Credit Card Receipt and Documentation Retention

- In February 2025, SLPS' Director of Compliance and Internal Auditor was assigned and began an audit of the district credit cards, including document retention requirements per district policy. The results of her audit will be reported out at the next Audit Committee meeting.

9. Cardholder Agreement and Purchasing Card Training

- Since February 2025, more than 100 individuals have been trained on the credit card agreement and purchasing requirements under the district's travel and procurement policies. Positions trained include Board members, Cabinet members, principals, athletic and school staff. Additional trainings are continuing.

10. Communication and Culture

- The Board of Education will use the annual superintendent evaluation process to prioritize communication and culture as a goal of the Superintendent by which she is evaluated. The Board of Education will establish progress monitoring of the communication and culture goals.
- Several interviews with different media channels have been facilitated, testified in Jefferson City and write monthly newsletters to inform the community.
- The Superintendent facilitated monthly meetings from November 2024 to April 2025 with Union Leadership, established a Superintendent Advisory Group with the principals and a Back-to-School Brigade to support transportation.

[June 2025](#)

[May 2025](#)

[April 2025](#)

[March 2025](#)

[February 2025](#)

[January 2025](#)

[December 2024](#)

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[October 2024](#)

Audit Committee

The board will establish an audit committee in accordance with board policy on the establishment of committees and annually appoint members to the committee. The audit committee will consist of district employees whose positions are tied to the duties of the committee. The committee may consult with members of the community with expertise relevant to the completion of the audit committee's duties. The purpose of the audit committee is to serve as a liaison between the board/administration and the auditor.

The duties of the audit committee include:

1. Making recommendations to the board regarding the selection of an accounting firm to conduct the annual district audit.
2. Ensuring that fraud prevention practices are in place and effective.
3. Reviewing board-adopted ethics and conflict of interest policies and monitoring board member and staff adherence to those policies as they relate to fiscal matters.
4. Reviewing administrative procedures relating to purchasing, payment, management of funds received through grants, and control of receipts from student activities and fundraisers. Any recommendations for improving these procedures will be forwarded to the superintendent or designee.
5. Working with auditors and any state or federal officials to facilitate all audits.

The audit committee will operate in accordance with the Missouri Sunshine Act.