



4928 S Western Ave  
Los Angeles, CA 90062  
☎ 323-792-4403  
📱 323-615-4243  
📠 323-792-4418  
🌐 [www.invictusla.com](http://www.invictusla.com)

Finding Number: 2024-001

Description: LCFF Unduplicated Pupil Counts Action Plan

Contact Person: Dr. LaTonya Derbigny, Executive Director

Anticipated Completion Date: March 31, 2025

In response to the audit finding regarding LCFF Unduplicated Pupil Counts, Invictus Leadership Academy will implement a comprehensive system to ensure accurate documentation and reporting of FRPM and EL student status.

Our first priority is establishing a robust document management system to address the core issues identified in the audit. We will house all FRPM and EL documentation, including historical records from our Provision 2 base year, in a filing system that is readily accessible for verification and audit purposes.

Secondly, we are developing detailed written procedures for collecting and maintaining eligibility documentation. These procedures will guide staff through proper documentation requirements, verification steps, and reporting protocols. The new procedures will be particularly focused on ensuring proper documentation is collected during new student enrollment, as this has been identified as a gap in our current system.

Staff training is the next component of our corrective action. All office staff will receive comprehensive training on documentation requirements, CalPADS reporting procedures, filing of required information, and our new verification processes. This training will ensure consistent application of our procedures and help prevent future documentation gaps.

For new student enrollment, we are implementing a protocol that includes specific documentation requirements for both FRPM and EL status, including our requesting of prior school records and establishing clear tracking mechanisms to ensure all required documentation is received and properly filed.

To maintain ongoing compliance, we will institute a regular monitoring system and quarterly compliance reports to the administration. A particular emphasis will be placed on pre-certification review of CalPADS data to ensure accuracy before submission. Each verification step will be documented to create a clear audit trail.

Lastly, we have completed a review of all our current student FRPM and EL designations to ensure accurate classification and documentation. Any necessary corrections will be submitted to CalPADS. Through these measures, we aim to address the identified deficiencies and establish sustainable systems that will prevent similar issues in the future. The Executive Director will personally oversee the implementation of these corrective actions to ensure their effectiveness and completion by the target date.