STATE OF FLORIDA AUDITOR GENERAL

Attestation Examination

Report No. 2018-023
October 2017

CHARLOTTE COUNTY DISTRICT SCHOOL BOARD

Florida Education Finance Program
Full-Time Equivalent Student Enrollment
and
Student Transportation

For the Fiscal Year Ended
June 30, 2016

Sherrill F. Norman, CPA
Auditor General

Board Members and Superintendent

During the 2015-16 fiscal year, Dr. Douglas K. Whittaker served as Superintendent of Charlotte County Schools through 9-30-15, and Steve Dionisio served as Superintendent after that date. Also, the following individuals served as Board members:

Board Member	District No.
Lee Swift, Chair to 11-16-15	1
Alleen Miller	2
Robert Segur, Vice Chair from 11-17-15	3
Ian Vincent	4
Barbara Rendell, Chair from 11-17-15, Vice Chair to 11-16-15	5

The team leader was Christopher E. Tynes, CPA, and the examination was supervised by Aileen B. Peterson, CPA, CPM.

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CHARLOTTE COUNTY DISTRICT SCHOOL BOARD

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CHARLOTTE COUNTY DISTRICT SCHOOL BOARD

LIST OF ABBREVIATIONS

CELLA	Comprehensive English Language Learning Assessment
CMW	Class Minutes, Weekly
DEUSS	Date Entered United States School
ELL	English Language Learner
ESE	Exceptional Student Education
ESOL	English for Speakers of Other Languages
FAC	Florida Administrative Code
FEFP	Florida Education Finance Program
FTE	Full-Time Equivalent
IDEA	Individuals with Disabilities Education Act
IEP	Individual Educational Plan
OJT	On-the-Job Training
PK	Prekindergarten
SBE	State Board of Education

SUMMARY

SUMMARY OF ATTESTATION EXAMINATION

Except for the material noncompliance described below involving reporting errors or records that were not properly or accurately prepared or were not available at the time of our examination and could not be subsequently located for students in ESOL, Career Education 9-12, and student transportation the Charlotte County District School Board (District) complied, in all material respects, with State requirements relating to the classification, assignment, and verification of the full-time equivalent (FTE) student enrollment and student transportation as reported under the Florida Education Finance Program (FEFP) for the fiscal year ended June 30, 2016. Specifically, we noted:

- Exceptions involving reporting errors or records that were not properly or accurately prepared or were not available at the time of our examination and could not be subsequently located for 28 of the 82 students in our ESOL test and 22 of the 98 students in our Career Education 9-12 test. None of the students in our ESOL and Career Education 9-12 tests attended charter schools.
- Exceptions involving the reported ridership classification or eligibility for State transportation funding for 42 of the 365 students in our student transportation test.

Noncompliance related to the reported FTE student enrollment resulted in 40 findings. The resulting proposed net adjustment to the District's reported, unweighted FTE totaled negative 24.1419 (23.9919 applicable to District schools other than charter schools and .1500 applicable to charter schools) but has a potential impact on the District's weighted FTE of negative 31.5877 (30.1334 applicable to District schools other than charter schools and 1.4543 applicable to charter schools). Noncompliance related to student transportation resulted in 6 findings and a proposed net adjustment of negative 140 students.

The weighted adjustments to the FTE student enrollment are presented in our report for illustrative purposes only. The weighted adjustments to the FTE do not take special program caps and allocation factors into account and are not intended to indicate the weighted FTE used to compute the dollar value of adjustments. That computation is the responsibility of the Department of Education. However, the gross dollar effect of our proposed adjustments to the FTE may be estimated by multiplying the proposed net weighted adjustment to the FTE student enrollment by the base student allocation amount. The base student allocation for the fiscal year ended June 30, 2016, was $4,154.45 per FTE. For the District, the estimated gross dollar effect of our proposed adjustments to the reported FTE student enrollment is negative $131,230 (negative 31.5877 times $4,154.45), of which $125,188 is applicable to District schools other than charter schools and $6,042 is applicable to charter schools.

We have not presented an estimate of the potential dollar effect of our proposed adjustments to student transportation because there is no equivalent method for making such an estimate.

The ultimate resolution of our proposed adjustments to the FTE student enrollment and student transportation and the computation of their financial impact is the responsibility of the Department of Education.

THE DISTRICT

The District was established pursuant to Section 1001.30, Florida Statutes, to provide public educational services for the residents of Charlotte County, Florida. Those services are provided primarily to PK through 12th-grade students and to adults seeking career education-type training. The District is part of the State system of public education under the general direction and control of the SBE. The geographic boundaries of the District are those of Charlotte County.

The governing body of the District is the District School Board that is composed of five elected members. The executive officer of the Board is the appointed Superintendent of Schools. The District had 20 schools other than charter schools, 2 charter schools, and 1 virtual education cost center serving PK through 12th-grade students.

For the fiscal year ended June 30, 2016, State funding totaling $14.8 million was provided through the FEFP to the District for the District-reported 15,621.19 unweighted FTE as recalibrated, which included 336.23 unweighted FTE as recalibrated for charter schools. The primary sources of funding for the District are funds from the FEFP, local ad valorem taxes, and Federal grants and donations.

FEFP

FTE Student Enrollment

Florida school districts receive State funding through the FEFP to serve PK through 12th-grade students (adult education is not funded by the FEFP). The FEFP was established by the Florida Legislature in 1973 to guarantee to each student in the Florida public school system, including charter schools, the availability of programs and services appropriate to the student's educational needs that are substantially equal to those available to any similar student notwithstanding geographic differences and varying local economic factors. To provide equalization of educational opportunity in Florida, the FEFP formula recognizes: (1) varying local property tax bases, (2) varying program cost factors, (3) district cost differentials, and (4) differences in per-student costs for equivalent educational programs due to sparsity and dispersion of student population.

The funding provided by the FEFP is based on the numbers of individual students participating in particular educational programs. A numerical value is assigned to each student according to the student's hours and days of attendance in those programs. The individual student thus becomes equated to a numerical value known as an unweighted FTE student enrollment. For brick and mortar school students, one student would be reported as 1.0 FTE if the student was enrolled in six courses per day at 50 minutes per course for the full 180-day school year (i.e., six courses at 50 minutes each per day is 5 hours of class a day or 25 hours per week, which equates to 1.0 FTE). For virtual education students, one student would be reported as 1.0 FTE if the student has successfully completed six courses or credits or the prescribed level of content that counts toward promotion to the next grade. A student who completes less than six credits will be reported as a fraction of an FTE. Half-credit completions will be included in determining an FTE student enrollment. Credits completed by a student in excess of the minimum required for that student for graduation are not eligible for funding.

All FTE student enrollment is capped at 1.0 FTE except for the FTE student enrollment reported by the Department of Juvenile Justice for students beyond the 180-day school year. School districts report all

FTE student enrollment regardless of the 1.0 FTE cap. The Department of Education combines all FTE student enrollment reported for the student by all school districts, including the Florida Virtual School Part-Time Program, using a common student identifier. The Department of Education then recalibrates all reported FTE student enrollment for each student to 1.0 FTE if the total reported FTE for the student exceeds 1.0 FTE. The FTE student enrollment reported for extended school year periods and the Department of Juvenile Justice FTE student enrollment reported beyond the 180-day school year is not included in the recalibration to 1.0 FTE.

Student Transportation

Any student who is transported by the District must meet one or more of the following conditions in order to be eligible for State transportation funding: live 2 or more miles from school, be physically handicapped, be a Career Education 9-12 or an ESE student who is transported from one school center to another where appropriate programs are provided, or be on a route that meets the criteria for hazardous walking conditions specified in Section 1006.23 Florida Statutes. Additionally, Section 1002.33(20)(c), Florida Statutes, provides that the governing board of the charter school may provide transportation through an agreement or contract with the district school board, a private provider, or parents. The charter school and the sponsor shall cooperate in making arrangements that ensure that transportation is not a barrier to equal access for all students residing within a reasonable distance of the charter school as determined in its charter. The District received $3.2 million for student transportation as part of the State funding through the FEFP.

AUDITOR GENERAL
STATE OF FLORIDA

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The President of the Senate, the Speaker of the
House of Representatives, and the
Legislative Auditing Committee

INDEPENDENT AUDITOR'S REPORT

Report on Full-Time Equivalent Student Enrollment

We have examined the Charlotte County District School Board's (District's) compliance with State requirements relating to the classification, assignment, and verification of the full-time equivalent (FTE) student enrollment reported under the Florida Education Finance Program for the fiscal year ended June 30, 2016. These requirements are found primarily in Sections 1011.60, 1011.61, and 1011.62, Florida Statutes; State Board of Education Rules, Chapter 6A-1, Florida Administrative Code; and the *FTE General Instructions 2015-16* issued by the Department of Education.

Management's Responsibility for Compliance

District management is responsible for the District's compliance with the aforementioned State requirements, including the design, implementation, and maintenance of internal control to prevent, or detect and correct, noncompliance due to fraud or error.

Auditor's Responsibility

Our responsibility is to express an opinion on the District's compliance with State requirements based on our examination. Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants and the standards applicable to attestation engagements contained in *Government Auditing Standards* issued by the Comptroller General of the United States. Those standards require that we plan and perform the examination to obtain reasonable assurance about whether the classification, assignment, and verification of the full-time equivalent student enrollment reported by the District under the Florida Education Finance Program complied with State requirements in all material respects.

An examination involves performing procedures to obtain evidence about whether the District complied with State requirements. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risks of material noncompliance, whether due to fraud or error. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for

our opinion. Our examination does not provide a legal determination on the District's compliance with State requirements. The legal determination of the District's compliance with these requirements is the responsibility of the Department of Education.

An examination by its nature does not include a review of all records and actions of District management and staff and, as a consequence, cannot be relied upon to identify all instances of noncompliance, fraud, abuse, or inefficiency. Because of these limitations and the inherent limitations of internal control, an unavoidable risk exists that some material noncompliance may not be detected, even though the examination is properly planned and performed in accordance with attestation standards.

Opinion

Our examination disclosed material noncompliance with State requirements relating to the classification, assignment, and verification of full-time equivalent student enrollment as reported under the Florida Education Finance Program for students in our English for Speakers of Other Languages and Career Education 9-12 tests involving reporting errors or records that were not properly or accurately prepared or were not available at the time of our examination and could not be subsequently located.

In our opinion, except for the material noncompliance with State requirements described in the preceding paragraph involving reporting errors or records that were not properly or accurately prepared or were not available at the time of our examination and could not be subsequently located for students in English for Speakers of Other Languages and Career Education 9-12, the Charlotte County District School Board complied, in all material respects, with State requirements relating to the classification, assignment, and verification of the full-time equivalent student enrollment reported under the Florida Education Finance Program for the fiscal year ended June 30, 2016.

Other Reporting Required by *Government Auditing Standards*

In accordance with *Government Auditing Standards*, we are required to report all deficiencies that are considered to be significant deficiencies or material weaknesses[1] in internal control; fraud and noncompliance with provisions of laws or regulations that have a material effect on the District's compliance with State requirements; and any other instances that warrant the attention of those charged with governance; noncompliance with provisions of contracts or grant agreements that has a material effect on the District's compliance with State requirements; and abuse that has a material effect on the District's compliance with State requirements. We are also required to obtain and report the views of responsible officials concerning the findings, conclusions, and recommendations, as well as any planned corrective actions.

We performed our examination to express an opinion on the District's compliance with State requirements and not for the purpose of expressing an opinion on the District's related internal control over compliance with State requirements; accordingly, we express no such opinion. Because of its limited purpose, our examination would not necessarily identify all deficiencies in internal control over compliance that might be significant deficiencies or material weaknesses. However, the material noncompliance mentioned

[1] A significant deficiency is a deficiency or a combination of deficiencies in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance. A material weakness is a deficiency, or combination of deficiencies, in internal control such that there is a reasonable possibility that material noncompliance will not be prevented, or detected and corrected, on a timely basis.

above is indicative of significant deficiencies considered to be material weaknesses in the District's internal controls related to reporting errors or records that were not properly or accurately prepared or were not available at the time of our examination and could not be subsequently located for students in English for Speakers of Other Languages and Career Education 9-12. Our examination disclosed certain findings that are required to be reported under *Government Auditing Standards* and all findings, along with the views of responsible officials, are described in *SCHEDULE D* and *MANAGEMENT'S RESPONSE*, respectively. The impact of this noncompliance with State requirements on the District's reported full-time equivalent student enrollment is presented in *SCHEDULES A, B, C,* and *D*.

The District's written response to this examination has not been subjected to our examination procedures and, accordingly, we express no opinion on it.

Purpose of this Report

Pursuant to Section 11.45(4)(c), Florida Statutes, this report is a public record and its distribution is not limited. Attestation standards established by the American Institute of Certified Public Accountants require us to indicate that the purpose of this report is to provide an opinion on the District's compliance with State requirements. Accordingly, this communication is not suitable for any other purpose.

Respectfully submitted,



Sherrill F. Norman, CPA
Tallahassee, Florida
October 9, 2017

SCHEDULE A

POPULATIONS, TEST SELECTION, AND TEST RESULTS
FULL-TIME EQUIVALENT STUDENT ENROLLMENT

Reported FTE Student Enrollment

The funding provided by the FEFP is based on the numbers of individual students participating in particular educational programs. The FEFP funds ten specific programs that are grouped under the following four general program titles: Basic, ESOL, ESE, and Career Education 9-12. The unweighted FTE represents the FTE prior to the application of the specific cost factor for each program. (See *SCHEDULE B* and NOTE A3., A4., and A5.) For the fiscal year ended June 30, 2016, the Charlotte County District School Board (District) reported to the Department of Education 15,621.19 unweighted FTE as recalibrated, which included 336.23 unweighted FTE as recalibrated for charter schools, at 20 District schools other than charter schools, 2 charter schools, and 1 virtual education cost center.

Schools and Students

As part of our examination procedures, we tested the FTE student enrollment reported to the Department of Education for schools and students for the fiscal year ended June 30, 2016. (See NOTE B.) The population of schools (23) consisted of the total number of brick and mortar schools in the District that offered courses, including charter schools, as well as the virtual education cost centers in the District that offered virtual instruction in the FEFP-funded programs. The population of students (10,530) consisted of the total number of students in each program at the schools and cost centers in our tests. Our Career Education 9-12 student test data includes only those students who participated in OJT.

We noted the following material noncompliance: exceptions involving reporting errors or records that were not properly or accurately prepared or were not available at the time of our examination and could not be subsequently located for 28 of the 82 students in our ESOL test,[2] and 22 of the 98 students in our Career Education 9-12 test.[3] None of the students in our ESOL and Career Education 9-12 tests attended charter schools.

Our populations and tests of schools and students are summarized as follows:

Programs	Number of Schools		Number of Students at Schools Tested		Students With	Recalibrated Unweighted FTE		Proposed
	Population	Test	Population	Test	Exceptions	Population	Test	Adjustments
Basic	21	12	8,000	146	7	11,468.0300	116.0997	1.7487
Basic with ESE Services	23	12	2,013	109	5	3,177.9800	88.1223	(1.4018)
ESOL	18	10	202	82	28	236.1700	56.1397	(18.8635)
ESE Support Levels 4 and 5	20	11	145	98	8	199.8400	64.3545	(1.7985)
Career Education 9-12	7	3	170	98	22	539.1700	23.2089	(3.8268)
All Programs	23	12	10,530	533	70	15,621.1900	347.9251	(24.1419)

[2] For ESOL, the material noncompliance is composed of Findings 2, 3, 8, 9, 15, 16, 17, 20, 22, 26, 29, 30, 31, and 34 on *SCHEDULE D*.

[3] For Career Education 9-12, the material noncompliance is composed of Findings 5, 6, 11, and 28 on *SCHEDULE D*.

Teachers

We also tested teacher qualifications as part of our examination procedures. (See NOTE B.) Specifically, the population of teachers (342, of which 337 are applicable to District schools other than charter schools and 5 are applicable to charter schools) consisted of the total number of teachers at schools in our test who taught courses in ESE Support Levels 4 and 5, Career Education 9-12, or taught courses to ELL students, and of the total number of teachers reported under the virtual education cost center in our test who taught courses in Basic, Basic with ESE Services, ESE Support Levels 4 and 5, Career Education 9-12, or taught courses to ELL students. From the population of teachers, we selected 125 and found exceptions for 8 teachers. None of the teachers with exceptions taught at charter schools.

Proposed Adjustments

Our proposed adjustments present the net effects of noncompliance disclosed by our examination procedures, including those related to our test of teacher qualifications. Our proposed adjustments generally reclassify the reported FTE to Basic education, except for noncompliance involving a student's enrollment or attendance in which case the reported FTE is taken to zero. (See *SCHEDULES B, C,* and *D*.)

The ultimate resolution of our proposed adjustments to the FTE student enrollment and the computation of their financial impact is the responsibility of the Department of Education.

SCHEDULE B

EFFECT OF PROPOSED ADJUSTMENTS ON WEIGHTED FULL-TIME EQUIVALENT STUDENT ENROLLMENT

District Schools Other Than Charter Schools		Proposed Net	Cost	Weighted
No.	Program (1)	Adjustment (2)	Factor	FTE (3)
101	Basic K-3	5.9410	1.115	6.6242
102	Basic 4-8	7.4456	1.000	7.4456
103	Basic 9-12	(11.4879)	1.005	(11.5453)
111	Grades K-3 with ESE Services	.4561	1.115	.5086
113	Grades 9-12 with ESE Services	(2.3577)	1.005	(2.3695)
130	ESOL	(18.8635)	1.180	(22.2589)
254	ESE Support Level 4	(1.2987)	3.613	(4.6922)
300	Career Education 9-12	(3.8268)	1.005	(3.8459)
	Subtotal	(23.9919)		(30.1334)

Charter Schools		Proposed Net	Cost	Weighted
No.	Program (1)	Adjustment (2)	Factor	FTE (3)
103	Basic 9-12	(.1500)	1.005	(.1508)
113	Grades 9-12 with ESE Services	.4998	1.005	.5023
254	ESE Support Level 4	(.4998)	3.613	(1.8058)
	Subtotal	(.1500)		(1.4543)

Total of Schools		Proposed Net	Cost	Weighted
No.	Program (1)	Adjustment (2)	Factor	FTE (3)
101	Basic K-3	5.9410	1.115	6.6242
102	Basic 4-8	7.4456	1.000	7.4456
103	Basic 9-12	(11.6379)	1.005	(11.6961)
111	Grades K-3 with ESE Services	.4561	1.115	.5086
113	Grades 9-12 with ESE Services	(1.8579)	1.005	(1.8672)
130	ESOL	(18.8635)	1.180	(22.2589)
254	ESE Support Level 4	(1.7985)	3.613	(6.4980)
300	Career Education 9-12	(3.8268)	1.005	(3.8459)
	Total	(24.1419)		(31.5877)

Notes: (1) See NOTE A7.

(2) These proposed net adjustments are for unweighted FTE. (See *SCHEDULE C*.)

(3) Weighted adjustments to the FTE are presented for illustrative purposes only. The weighted adjustments to the FTE do not take special program caps or allocation factors into consideration and are not intended to indicate the FTE used to compute the dollar value of adjustments. That computation is the responsibility of the Department of Education. (See NOTE A5.)

SCHEDULE C

PROPOSED ADJUSTMENTS BY SCHOOL
FULL-TIME EQUIVALENT STUDENT ENROLLMENT

No.	Program	Proposed Adjustments (1) #0021	#0031	#0041	Balance Forward
101	Basic K-3	2.4906	.....	.8302	3.3208
102	Basic 4-8	.....	.....	.....	.0000
103	Basic 9-12	.....	2.2373	.....	2.2373
111	Grades K-3 with ESE Services	.....	.....	.....	.0000
113	Grades 9-12 with ESE Services	.....	.....	.....	.0000
130	ESOL	(2.4906)	(2.2373)	(.8302)	(5.5581)
254	ESE Support Level 4	.....	(.1700)	.....	(.1700)
300	Career Education 9-12	.....	(.4783)	.....	(.4783)
Total		.0000	(.6483)	.0000	(.6483)

Note: (1) These proposed net adjustments are for unweighted FTE. (See NOTE A5.)

No.	Brought Forward	Proposed Adjustments (1) #0051	#0111	#0121	#0161	Balance Forward
101	3.3208	.....	(.4019)	.....	(1.0000)	1.9189
102	.0000	.....	1.2453	.7170	(.5200)	1.4423
103	2.2373	.9388	.....	.....	(15.0088)	(11.8327)
111	.0000	.....	.5137	.....	.....	.5137
113	.0000	.....	.....	.....	(2.0129)	(2.0129)
130	(5.5581)	(1.0172)	(.8434)	(.7170)	(.7024)	(8.8381)
254	(.1700)	.....	(.5975)	.....	(.5312)	(1.2987)
300	(.4783)	(.4458)	.....	.....	(2.9027)	(3.8268)
Total	(.6483)	(.5242)	(.0838)	.0000	(22.6780)	(23.9343)

Note: (1) These proposed net adjustments are for unweighted FTE. (See NOTE A5.)

Proposed Adjustments (1)

No.	Brought Forward	#0181	#0201	#0301	#0502*	Balance Forward
101	1.9189	.....	3.5757	.4464	.....	5.9410
102	1.4423	4.7580	1.2453	.....	.....	7.4456
103	(11.8327)	.....	.....	.....	(.1500)	(11.9827)
111	.5137	.....	(.0576)	.....	.....	.4561
113	(2.0129)	.....	.....	.....	.4998	(1.5131)
130	(8.8381)	(4.7580)	(4.8210)	(.4464)	.....	(18.8635)
254	(1.2987)	.....	.....	.....	(.4998)	(1.7985)
300	(3.8268)	.....	.....	.....	.....	(3.8268)
Total	(23.9343)	.0000	(.0576)	.0000	(.1500)	(24.1419)

Note: (1) These proposed net adjustments are for unweighted FTE. (See NOTE A5.)

*Charter School

No.	Program	Brought Forward	Proposed Adjustments (1) #7004	Total
101	Basic K-3	5.9410	.....	5.9410
102	Basic 4-8	7.4456	.....	7.4456
103	Basic 9-12	(11.9827)	.3448	(11.6379)
111	Grades K-3 with ESE Services	.4561	.....	.4561
113	Grades 9-12 with ESE Services	(1.5131)	(.3448)	(1.8579)
130	ESOL	(18.8635)	.....	(18.8635)
254	ESE Support Level 4	(1.7985)	.....	(1.7985)
300	Career Education 9-12	(3.8268)	.....	(3.8268)
Total		(24.1419)	.0000	(24.1419)

Note: (1) These proposed net adjustments are for unweighted FTE. (See NOTE A5.)

SCHEDULE D

FINDINGS AND PROPOSED ADJUSTMENTS
FULL-TIME EQUIVALENT STUDENT ENROLLMENT

Overview

Management is responsible for determining that the FTE student enrollment as reported under the FEFP is in compliance with State requirements. These requirements are found primarily in Sections 1011.60, 1011.61, and 1011.62, Florida Statutes; SBE Rules, Chapter 6A-1, FAC; and the *FTE General Instructions 2015-16* issued by the Department of Education. Except for the material noncompliance involving reporting errors or records that were not properly or accurately prepared or were not available at the time of our examination and could not be subsequently located for students in ESOL and Career Education 9-12, the Charlotte County District School Board (District) complied, in all material respects, with State requirements relating to the classification, assignment, and verification of the FTE student enrollment as reported under the FEFP for the fiscal year ended June 30, 2016. All noncompliance disclosed by our examination procedures is discussed below and requires management's attention and action as presented in *SCHEDULE E*.

Findings	**Proposed Net Adjustments (Unweighted FTE)**
Our examination included the July and October 2015 reporting survey periods and the February and June 2016 reporting survey periods (See NOTE A6.). Unless otherwise specifically stated, the Findings and Proposed Adjustments presented herein are for the October 2015 reporting survey period, the February 2016 reporting survey period, or both. Accordingly, our Findings do not mention specific reporting survey periods unless necessary for a complete understanding of the instances of noncompliance being disclosed.	
Districtwide – Incorrect Reporting of Course Schedules	
1. [Ref. 1] The District reported students' schedules with course numbers unrelated to the subject area of instruction provided. Students taking various courses were reported under course No. 1700370 (Critical Thinking and Study Skills) instead of the course number reflecting the underlying related subject content. District management indicated that this reporting was for students taking courses online either for credit recovery or to satisfy the State requirement that students complete at least one online course. At the time of completion, the course numbers were updated in District records to reflect the actual courses taken but the updated course numbers were not reported to the Department of Education. We present this disclosure finding with no proposed adjustment.	.0000

Findings		Proposed Net Adjustments (Unweighted FTE)
Sallie Jones Elementary School (#0021)		
2. [Ref. 2101] ELL Committees for three ELL students were not convened by October 1 (one student) or within 30 school days prior to the students' DEUSS anniversary dates (two students) to consider the students' continued ESOL placements beyond 3 years from the students' DEUSS. We propose the following adjustment:		
101 Basic K-3	2.4906	
130 ESOL	(2.4906)	.0000
		.0000
Charlotte High School (#0031)		
3. [Ref. 3101] ELL Committees for five ELL students were not convened by October 1 (one student) or within 30 school days prior to the students' DEUSS anniversary dates (four students) to consider the students' continued ESOL placements beyond 3 years from the students' DEUSS. We also noted that the English language proficiencies of two of the students were not assessed within 30 school days prior to the students' DEUSS anniversary dates and one of the students scored English language proficient on all areas of the March 2015 CELLA test. We propose the following adjustment:		
103 Basic 9-12	2.1651	
130 ESOL	(2.1651)	.0000
4. [Ref. 3102] The schedule for one ESE student who was provided both on-campus and homebound instruction was incorrectly reported. The CMW reported for on-campus instruction was overreported and should have been limited to the actual CMW provided for on-campus instruction. We propose the following adjustment:		
254 ESE Support Level 4	(.1700)	(.1700)
5. [Ref. 3103] School records did not demonstrate that four Career Education 9-12 students who participated in OJT worked during the reporting survey periods. We propose the following adjustment:		
300 Career Education 9-12	(.4049)	(.4049)
6. [Ref. 3104] More hours were reported than was supported by the timecard for one Career Education 9-12 student who participated in OJT. We propose the following adjustment:		
300 Career Education 9-12	(.0734)	(.0734)

Findings			Proposed Net Adjustments (Unweighted FTE)
Charlotte High School (# 0031) (Continued)			
7. [Ref. 3170] The parents of an ELL student taught by one out-of-field teacher were not notified of the teacher's out-of-field status in ESOL. We propose the following adjustment:			
	103 Basic 9-12	.0722	
	130 ESOL	(.0722)	.0000
			(.6483)
Peace River Elementary School (#0041)			
8. [Ref. 4101] An ELL Committee for one ELL student was not convened by October 1 to consider the student's continued ESOL placement beyond 3 years from the student's DEUSS. We propose the following adjustment:			
	101 Basic K-3	.8302	
	130 ESOL	(.8302)	.0000
			.0000
Lemon Bay High School (#0051)			
9. [Ref. 5101] An ELL Committee for one ELL student was not convened by October 1 to consider the student's continued ESOL placement beyond 3 years from the student's DEUSS. We propose the following adjustment:			
	103 Basic 9-12	.8612	
	130 ESOL	(.8612)	.0000
10. [Ref. 5102] The schedule for one ESE student who was provided both on-campus and homebound instruction was incorrectly reported. The CMW reported for on-campus instruction was overreported and should have been limited to the actual CMW provided for on-campus instruction. We propose the following adjustment:			
	103 Basic 9-12	(.0784)	(.0784)
11. [Ref. 5103] School records did not demonstrate that two Career Education 9-12 students who participated in OJT worked during the reporting survey periods. We propose the following adjustment:			
	300 Career Education 9-12	(.4458)	(.4458)

Findings			Proposed Net Adjustments (Unweighted FTE)
Lemon Bay High School (#0051) (Continued)			
12. [Ref. 5170] The parents of an ELL student taught by one out-of-field teacher were not notified of the teacher's out-of-field status in ESOL and Reading until November 30, 2015, which was after the October 2015 reporting survey period. We propose the following adjustment:			
	103 Basic 9-12	.0714	
	130 ESOL	(.0714)	.0000
13. [Ref. 5171] One teacher taught a Basic subject area class that included an ELL student but had earned none of the 60 in-service training points in ESOL strategies required by SBE Rule 6A-6.0907, FAC, and the teacher's in-service training timeline, until November 29, 2015, which was after the October 2015 reporting survey period. We propose the following adjustment:			
	103 Basic 9-12	.0846	
	130 ESOL	(.0846)	.0000
			(.5242)
Neil Armstrong Elementary School (#0111)			
14. [Ref. 11101] Two ESE students (one student was in our Basic with ESE Services test and one student was in our ESE Support Levels 4 and 5 test) were reported for 1,750 CMW (or .7294 FTE) of instruction; however, the School's daily instructional schedule supported only 1,650 CMW (or .6875 FTE) of instruction. We propose the following adjustment:			
	111 Grades K-3 with ESE Services	(.0419)	
	254 ESE Support Level 4	(.0419)	(.0838)
15. [Ref. 11102] The courses that were eligible for reporting in Program No. 130 (ESOL) were incorrectly reported in Program No. 101 (Basic K-3) for one ELL student in the October 2015 reporting survey period. We propose the following adjustment:			
	101 Basic K-3	(.4019)	
	130 ESOL	.4019	.0000
16. [Ref. 11103] The English language proficiency of one ELL student was not assessed and an ELL Committee not convened within 30 school days prior to the student's DEUSS anniversary date to consider the student's continued ESOL placement beyond 3 years from the student's DEUSS. We propose the following adjustment:			

Findings		Proposed Net Adjustments (Unweighted FTE)
Neil Armstrong Elementary School (#0111) (Continued)		
102 Basic 4-8	.4151	
130 ESOL	(.4151)	.0000

17. [Ref. 11104] An ELL Committee for one student, who scored proficient on all areas of the March 2015 CELLA test, did not document at least two of the five ESOL placement criteria specified in SBE Rule 6A-6.09022(3), FAC, prior to recommending the student's continued ESOL placement. We propose the following adjustment:

102 Basic 4-8	.8302	
130 ESOL	(.8302)	.0000

18. [Ref. 11105] The *Matrix of Services* form for one ESE student was not available at the time of our examination and could not be subsequently located. We propose the following adjustment:

111 Grades K-3 with ESE Services	1.0000	
254 ESE Support Level 4	(1.0000)	.0000

19. [Ref. 11106] One ESE student was not reported in accordance with the student's *Matrix of Services* form. We propose the following adjustment:

111 Grades K-3 with ESE Services	(.4444)	
254 ESE Support Level 4	.4444	.0000
		(.0838)

Punta Gorda Middle School (#0121)

20. [Ref. 12101] One ELL student reported in the ESOL Program was beyond the maximum 6-year period allowed for State funding of ESOL. We propose the following adjustment:

102 Basic 4-8	.7170	
130 ESOL	(.7170)	.0000
		.0000

Findings	Proposed Net Adjustments (Unweighted FTE)

Charlotte Technical Center (#0161)

21. [Ref. 16108] The number of CMW in several students' schedules was incorrectly reported. The School's bell schedules supported varying numbers of CMW of instruction (500, 720, 900, 1,500, or 1,700 CMW), depending on the program; however, the students were reported for CMW ranging from 450 to 3,400 CMW. Student course schedules should reflect the correct number of CMW according to the School's bell schedules in order for the FTE to be properly calculated and recalibrated. Since most of the students were reported within the District for the entire school year and their reported FTE was recalibrated to 1.0, this incorrect reporting did not affect their ultimate funding level. Thus, we present this disclosure finding with no proposed adjustment for these students. However, for those students' whose reporting did affect their ultimate funding level, we cited and proposed adjustments in Finding 22 (Ref. 16107) and 23 (Ref. 16103).

.0000

22. [Ref. 16107] The course schedules for 55 students (1 student was in our ESOL test) were incorrectly reported. The schedules supported only 720 CMW of instruction; however, the students were reported for 1,440 CMW of instruction. In addition, the English language proficiency of the ELL student in our test was not assessed and an ELL Committee was not convened within 30 school days prior to the student's DEUSS anniversary date to consider the student's continued ESOL placement beyond 3 years from the student's DEUSS. We propose the following adjustment:

102	Basic 4-8	(.5200)	
103	Basic 9-12	(13.1367)	
113	Grades 9-12 with ESE Services	(2.1493)	
130	ESOL	(.4624)	(16.2684)

23. [Ref. 16103] The course schedules for five students (two students were in our Basic test and three students were in our Basic with ESE Services test) were incorrectly reported. We noted the following exceptions:

a. Four of the students' schedules supported only 500 CMW (or .1667 FTE); however, three of the students were reported for 675 CMW (or .1824, .1875, or .2076 recalibrated FTE) in the October 2015 and February 2016 reporting survey periods, and one student was reported for 950 CMW (or .2332 recalibrated FTE) in the October 2015 reporting survey period and 1,225 CMW (or .3006 recalibrated FTE) in the February 20116 reporting survey period.

Charlotte Technical Center (#0161) (Continued)

b. One student's schedule supported only 900 CMW (or .3000 FTE); however, the student was reported for 1,700 CMW (or .5000 recalibrated FTE) in the October 2015 reporting survey period.

We propose the following adjustment:

103 Basic 9-12	(.4004)	
113 Grades 9-12 with ESE Services	(.1548)	(.5552)

24. [Ref. 16101] Four students (three were in our Basic test and one was in our Basic with ESE Services test) were not in attendance during one of the reporting survey periods. In addition, the number of CMW reported in the schedules of two of the students was overreported. The students were reported for 1,440 CMW (or .4800 FTE) of instruction; however, the students were only scheduled for 720 CMW (or .2400 FTE) of instruction. We propose the following adjustment:

103 Basic 9-12	(1.7117)	
113 Grades 9-12 with ESE Services	(.2400)	(1.9517)

25. [Ref. 16102] One PK student was incorrectly reported for FEFP funding. The student was not an IDEA student and the student's parents were not enrolled in a Teenage Parent Program. We propose the following adjustment:

101 Basic K-3	(1.0000)	(1.0000)

26. [Ref. 16104] The ESOL file for one ELL student was not available at the time of our examination and could not be subsequently located. We propose the following adjustment:

103 Basic 9-12	.2400	
130 ESOL	(.2400)	.0000

27. [Ref. 16105] The file for one ESE student did not contain a *Matrix of Services* form to support the student's reporting in program No. 254 (ESE Support Level 4). We propose the following adjustment:

113 Grades 9-12 with ESE Services	.5312	
254 ESE Support Level 4	(.5312)	.0000

Findings		Proposed Net Adjustments (Unweighted FTE)
Charlotte Technical Center (#0161) (Continued)		
28. [Ref. 16106] School records did not demonstrate that 14 of the 15 Career Education 9-12 students who participated in OJT worked during the reporting survey periods, and more hours were reported than were supported by 1 student's timecard. We propose the following adjustment:		
300 Career Education 9-12	(2.9027)	(2.9027)
		(22.6780)
L. A. Ainger Middle School (#0181)		
29. [Ref. 18101] ELL Committees for five students were not convened by October 1 (three students) or within 30 school days prior to the students' DEUSS anniversary dates (two students) to consider the students' continued ESOL placements beyond 3 years from the students' DEUSS. We also noted that four of the students scored proficient on all areas of the CELLA test and the *ELL Student Plan* for one of these students was not available at the time of our examination and could not be subsequently located. We propose the following adjustment:		
102 Basic 4-8	2.8464	
130 ESOL	(2.8464)	.0000
30. [Ref. 18102] The English language proficiency was not assessed and an ELL Committee not convened within 30 school days prior to one ELL student's DEUSS anniversary date to consider the student's continued ESOL placement beyond 3 years from the student's DEUSS. We propose the following adjustment:		
102 Basic 4-8	.7080	
130 ESOL	(.7080)	.0000
31. [Ref. 18103] One ELL student in the ESOL Program was beyond the maximum 6-year period allowed for State funding of ESOL. We propose the following adjustment:		
102 Basic 4-8	.5664	
130 ESOL	(.5664)	.0000

Findings		Proposed Net Adjustments (Unweighted FTE)

L. A. Ainger Middle School (#0181) (Continued)

32. [Ref. 18170] One teacher was not properly certified and was not approved by the School Board to teach out of field until December 8, 2015, which was after the October 2015 reporting survey period. The teacher held certification in Middle Grades Integrated Curriculum but taught a course that required certification in Reading. We also noted that the students' parents were not notified of the teacher's out-of-field status until January 1, 2016, which was also after the October 2015 reporting survey period. We propose the following adjustment:

102 Basic 4-8	.0708	
130 ESOL	(.0708)	.0000

33. [Ref. 18171] One teacher taught Language Arts to classes that included ELL students but was not properly certified to teach ELL students and was not approved by the School Board to teach such students out of field. In addition the parents of the students were not notified of the teacher's out-of-field status and the teacher had earned only 60 of the 300 in-service training points in ESOL strategies required by SBE Rule 6A-1.0503(4)(b)2., FAC, and the teacher's in-service training timeline. We propose the following adjustment:

102 Basic 4-8	.5664	
130 ESOL	(.5664)	.0000
		.0000

Liberty Elementary School (#0201)

34. [Ref. 20101] ELL Committees for five ELL students were not convened by October 1 (four students) or within 30 school days prior to the student's DEUSS anniversary date (one student) to consider the students' continued ESOL placements beyond 3 years from the students' DEUSS. We propose the following adjustment:

101 Basic K-3	2.4906	
102 Basic 4-8	1.2453	
130 ESOL	(3.7359)	.0000

Findings		Proposed Net Adjustments (Unweighted FTE)
Liberty Elementary School (#0201) (Continued)		
35. [Ref. 20102] The schedule for one ESE student who was provided both on-campus and homebound instruction was incorrectly reported. The CMW reported for on-campus instruction was overreported and should have been limited to the actual CMW provided for on-campus instruction. We propose the following adjustment:		
111 Grades K-3 with ESE Services	(.0576)	(.0576)
36. [Ref. 20170] One teacher taught Primary Language Arts to classes that included ELL students but was not properly certified to teach ELL students and was not approved by the School Board to teach such students out of field. We also noted that the parents of the students were not notified of the teacher's out-of-field status. We propose the following adjustment:		
101 Basic K-3	1.0851	
130 ESOL	(1.0851)	.0000
		(.0576)
Kingsway Elementary School (#0301)		
37. [Ref. 30170] One teacher taught Primary Language Arts to classes that included an ELL student but had earned only 60 of the 240 in-service training points in ESOL strategies required by SBE Rule 6A-1.0503(4)(b)2., FAC, and the teacher's in-service training timeline. We propose the following adjustment:		
101 Basic K-3	.4464	
130 ESOL	(.4464)	.0000
		.0000
Florida SouthWestern Collegiate High School (#0502) Charter School		
38. [Ref. 50201] The course schedule for one Basic student in the October 2015 reporting survey period was incorrectly reported. The student was scheduled for 1,575 CMW of instruction (or .5250 FTE); however, the student was reported for 2,025 CMW of instruction (or .6750 FTE). We propose the following adjustment:		
103 Basic 9-12	(.1500)	(.1500)

Findings		Proposed Net Adjustments (Unweighted FTE)
Florida SouthWestern Collegiate High School (#0502) Charter School (Continued)		
39. [Ref. 50202] One ESE student was incorrectly reported in program No. 254 (ESE Support Level 4) based on the services provided at the student's previous school. The student's IEP covering the current school placement indicated that the student was to receive only consultative ESE services; consequently, the student should have been reported in program No. 113 (Grades 9-12 with ESE Services). We propose the following adjustment:		
113 Grades 9-12 with ESE Services	.4998	
254 ESE Support Level 4	(.4998)	.0000
		(.1500)
Charlotte Virtual Franchise (#7004)		
40. [Ref. 700470] One teacher was not properly certified and was not approved by the School Board to teach out of field. The teacher held certification in Biology but taught courses that required certification in Earth-Space Science. We also noted that the students' parents were not notified of the teacher's out-of-field status. We propose the following adjustment:		
103 Basic 9-12	.3448	
113 Grades 9-12 with ESE Services	(.3448)	.0000
		.0000
Proposed Net Adjustment		**(24.1419)**

SCHEDULE E

RECOMMENDATIONS AND REGULATORY CITATIONS
FULL-TIME EQUIVALENT STUDENT ENROLLMENT

RECOMMENDATIONS

We recommend that Charlotte County District School Board (District) management exercise more care and take corrective action, as appropriate, to ensure that: (1) students' schedules are reported with course numbers that accurately reflect the courses taught; (2) students are reported in the proper FEFP funding categories for the correct amount of FTE and documentation is retained to support that reporting; (3) students' course schedules are reported in accordance with the Schools' daily instructional and bell schedules; (4) only students who are in membership during the reporting survey week and in attendance at least 1 day during the reporting survey period are reported for FEFP funding; (5) students assessed as English language proficient are continued in the ESOL Program based on the placement recommendations of ELL Committees that have documented at least two of the criteria specified in SBE Rule 6A-6.09022(3), FAC; (6) the English language proficiency of students being considered for continuation of their ESOL placements (beyond the initial 3-year base period) is assessed by October 1 if the students' DEUSS falls within the first 2 weeks of the school year or within 30 school days prior to the students' DEUSS, and ELL Committees are timely convened subsequent to these assessments; (7) *ELL Student Plans* are timely prepared and retained in the students' files; (8) ELL students are not reported in the ESOL Program for more than the 6-year period allowed for State funding of ESOL; (9) ESE students are reported in the correct program number as supported by the students' IEPs and in accordance with the students' *Matrix of Services* forms that are properly prepared and retained in the students' files; (10) the on-campus portion of the course schedules for students who are alternately assigned to the Hospital and Homebound Program and school-based programs reflect the actual instruction provided during the reporting survey period; (11) students in Career Education 9-12 who participate in OJT are reported in accordance with timecards that are accurately completed, signed, and retained in readily-accessible files; (12) only PK students who are students with a disability under the IDEA or whose parents are enrolled in a Teenage Parent Program are reported for FEFP funding; (13) teachers are properly certified or, if teaching out of field, are timely approved by the School Board to teach out of field; (14) parents are timely notified when their children are assigned to out-of-field teachers; and (15) ESOL teachers earn the appropriate in-service training points as required by Rule and in accordance with the teachers' in-service training timelines.

The absence of statements in this report regarding practices and procedures followed by the District should not be construed as acceptance, approval, or endorsement of those practices and procedures. Additionally, the specific nature of this report does not limit or lessen the District's obligation to comply with all State requirements relating to the classification, assignment, and verification of the FTE student enrollment as reported under the FEFP.

Reporting

Section 1007.271(21), Florida Statutes, *Dual Enrollment Programs*
Section 1011.60, Florida Statutes, *Minimum Requirements of the Florida Education Finance Program*
Section 1011.61, Florida Statutes, *Definitions*
Section 1011.62, Florida Statutes, *Funds for Operation of Schools*
SBE Rule 6A-1.0451, FAC, *Florida Education Finance Program Student Membership Surveys*
SBE Rule 6A-1.045111, FAC, *Hourly Equivalent to 180-Day School Year*
SBE Rule 6A-1.04513, FAC, *Maintaining Auditable FTE Records*
FTE General Instructions 2015-16

Attendance

Section 1003.23, Florida Statutes, *Attendance Records and Reports*
SBE Rule 6A-1.044(3) and (6)(c), FAC, *Pupil Attendance Records*
SBE Rule 6A-1.04513, FAC, *Maintaining Auditable FTE Records*
FTE General Instructions 2015-16
Comprehensive Management Information System: Automated Student Attendance Recordkeeping System Handbook

ESOL

Section 1003.56, Florida Statutes, *English Language Instruction for Limited English Proficient Students*
Section 1011.62(1)(g), Florida Statutes, *Education for Speakers of Other Languages*
SBE Rule 6A-6.0901, FAC, *Definitions Which Apply to Programs for English Language Learners*
SBE Rule 6A-6.0902, FAC, *Requirements for Identification, Eligibility, and Programmatic Assessments of English Language Learners*
SBE Rule 6A-6.09021, FAC, *Annual English Language Proficiency Assessment for English Language Learners (ELLs)*
SBE Rule 6A-6.09022, FAC, *Extension of Services in English for Speakers of Other Languages (ESOL) Program*
SBE Rule 6A-6.0903, FAC, *Requirements for Exiting English Language Learners from the English for Speakers of Other Languages Program*
SBE Rule 6A-6.09031, FAC, *Post Reclassification of English Language Learners (ELLs)*
SBE Rule 6A-6.0904, FAC, *Equal Access to Appropriate Instruction for English Language Learners*

Career Education On-The-Job Attendance

SBE Rule 6A-1.044(6)(c), FAC, *Pupil Attendance Records*

Career Education On-The-Job Funding Hours

FTE General Instructions 2015-16

Exceptional Education

Section 1003.57, Florida Statutes, *Exceptional Students Instruction*
Section 1011.62, Florida Statutes, *Funds for Operation of Schools*

Section 1011.62(1)(e), Florida Statutes, *Funding Model for Exceptional Student Education Programs*
SBE Rule 6A-6.03028, FAC, *Provision of Free Appropriate Public Education (FAPE) and Development of Individual Educational Plans for Students with Disabilities*
SBE Rule 6A-6.03029, FAC, *Development of Individualized Family Support Plans for Children with Disabilities Ages Birth Through Five Years*
SBE Rule 6A-6.0312, FAC, *Course Modifications for Exceptional Students*
SBE Rule 6A-6.0331, FAC, *General Education Intervention Procedures, Evaluation, Determination of Eligibility, Reevaluation and the Provision of Exceptional Student Education Services*
SBE Rule 6A-6.0334, FAC, *Individual Educational Plans (IEPs) and Educational Plans (EPs) for Transferring Exceptional Students*
SBE Rule 6A-6.03411, FAC, *Definitions, ESE Policies and Procedures, and ESE Administrators*
SBE Rule 6A-6.0361, FAC, *Contractual Agreements with Nonpublic Schools and Residential Facilities*
Matrix of Services Handbook (2015 Edition)

Teacher Certification

Section 1012.42(2), Florida Statutes, *Teacher Teaching Out-of-Field; Notification Requirements*
Section 1012.55, Florida Statutes, *Positions for Which Certificates Required*
SBE Rule 6A-1.0502, FAC, *Non-certificated Instructional Personnel*
SBE Rule 6A-1.0503, FAC, *Definition of Qualified Instructional Personnel*
SBE Rule 6A-4.001, FAC, *Instructional Personnel Certification*
SBE Rule 6A-6.0907, FAC, *Inservice Requirements for Personnel of Limited English Proficient Students*

Virtual Education

Section 1002.321, Florida Statutes, *Digital Learning*
Section 1002.37, Florida Statutes, *The Florida Virtual School*
Section 1002.45, Florida Statutes, *Virtual Instruction Programs*
Section 1002.455, Florida Statutes, *Student Eligibility for K-12 Virtual Instruction*
Section 1003.498, Florida Statutes, *School District Virtual Course Offerings*

Charter Schools

Section 1002.33, Florida Statutes, *Charter Schools*

NOTES TO SCHEDULES

NOTE A – SUMMARY
FULL-TIME EQUIVALENT STUDENT ENROLLMENT

A summary discussion of the significant features of the Charlotte County District School Board (District), the FEFP, the FTE, and related areas is provided below.

1. The District

The District was established pursuant to Section 1001.30, Florida Statutes, to provide public educational services for the residents of Charlotte County, Florida. Those services are provided primarily to PK through 12th-grade students and to adults seeking career education-type training. The District is part of the State system of public education under the general direction and control of the SBE. The geographic boundaries of the District are those of Charlotte County.

The governing body of the District is the District School Board that is composed of five elected members. The executive officer of the Board is the appointed Superintendent of Schools. The District had 20 schools other than charter schools, 2 charter schools, and 1 virtual education cost center serving PK through 12th-grade students.

For the fiscal year ended June 30, 2016, State funding totaling $14.8 million was provided through the FEFP to the District for the District-reported 15,621.19 unweighted FTE as recalibrated, which included 336.23 unweighted FTE as recalibrated for charter schools. The primary sources of funding for the District are funds from the FEFP, local ad valorem taxes, and Federal grants and donations.

2. FEFP

Florida school districts receive State funding through the FEFP to serve PK through 12th-grade students (adult education is not funded by the FEFP). The FEFP was established by the Florida Legislature in 1973 to guarantee to each student in the Florida public school system, including charter schools, the availability of programs and services appropriate to the student's educational needs that are substantially equal to those available to any similar student notwithstanding geographic differences and varying local economic factors. To provide equalization of educational opportunity in Florida, the FEFP formula recognizes: (1) varying local property tax bases, (2) varying program cost factors, (3) district cost differentials, and (4) differences in per-student cost for equivalent educational programs due to sparsity and dispersion of student population.

3. FTE Student Enrollment

The funding provided by the FEFP is based on the numbers of individual students participating in particular educational programs. A numerical value is assigned to each student according to the student's hours and days of attendance in those programs. The individual student thus becomes equated to a numerical value known as an unweighted FTE student enrollment. For example, for PK through 3rd grade, 1.0 FTE is defined as one student in membership in a program or a group of programs for 20 hours per week for 180 days; for grade levels 4 through 12, 1.0 FTE is defined as one student in membership in a program or a group of programs for 25 hours per week for 180 days. For brick and mortar school

students, one student would be reported as 1.0 FTE if the student was enrolled in six courses per day at 50 minutes per course for the full 180-day school year (i.e., six courses at 50 minutes each per day is 5 hours of class a day or 25 hours per week, which equates to 1.0 FTE). For virtual education students, one student would be reported as 1.0 FTE if the student has successfully completed six courses or credits or the prescribed level of content that counts toward promotion to the next grade. A student who completes less than six credits will be reported as a fraction of an FTE. Half-credit completions will be included in determining an FTE student enrollment. Credits completed by a student in excess of the minimum required for that student for graduation are not eligible for funding.

4. Recalibration of FTE to 1.0

All FTE student enrollment is capped at 1.0 FTE except for the FTE student enrollment reported by the Department of Juvenile Justice for students beyond the 180-day school year. School districts report all FTE student enrollment regardless of the 1.0 FTE cap. The Department of Education combines all FTE student enrollment reported for the student by all school districts, including the Florida Virtual School Part-Time Program, using a common student identifier. The Department of Education then recalibrates all reported FTE student enrollment for each student to 1.0 FTE, if the total reported FTE for the student exceeds 1.0 FTE. The FTE student enrollment reported for extended school year periods and the Department of Juvenile Justice FTE student enrollment reported beyond the 180-day school year is not included in the recalibration to 1.0 FTE.

5. Calculation of FEFP Funds

The amount of State and local FEFP funds is calculated by the Department of Education by multiplying the number of unweighted FTE in each educational program by the specific cost factor of each program to obtain weighted FTEs. Weighted FTEs are multiplied by the base student allocation amount and that product is multiplied by the appropriate cost differential factor. Various adjustments are then added to obtain the total State and local FEFP dollars. All cost factors, the base student allocation amount, cost differential factors, and various adjustment figures are established by the Florida Legislature.

6. FTE Reporting Survey Periods

The FTE is determined and reported during the school year by means of four FTE membership survey periods that are conducted under the direction of district and school management. Each survey period is a testing of the FTE membership for a period of 1 week. The survey periods for the 2015-16 school year were conducted during and for the following weeks: survey period one was performed for July 6 through 10, 2015; survey period two was performed for October 12 through 16, 2015; survey period three was performed for February 8 through 12, 2016; and survey period four was performed for June 13 through 17, 2016.

7. Educational Programs

The FEFP funds ten specific programs under which instruction may be provided as authorized by the Florida Legislature. The general program titles under which these specific programs fall are: (1) Basic, (2) ESOL, (3) ESE, and (4) Career Education 9-12.

8. Statutes and Rules

The following statutes and rules are of significance to the administration of Florida public education:

Chapter 1000, Florida Statutes, *K-20 General Provisions*
Chapter 1001, Florida Statutes, *K-20 Governance*
Chapter 1002, Florida Statutes, *Student and Parental Rights and Educational Choices*
Chapter 1003, Florida Statutes, *Public K-12 Education*
Chapter 1006, Florida Statutes, *Support for Learning*
Chapter 1007, Florida Statutes, *Articulation and Access*
Chapter 1010, Florida Statutes, *Financial Matters*
Chapter 1011, Florida Statutes, *Planning and Budgeting*
Chapter 1012, Florida Statutes, *Personnel*
SBE Rules, Chapter 6A-1, FAC, *Finance and Administration*
SBE Rules, Chapter 6A-4, FAC, *Certification*
SBE Rules, Chapter 6A-6, FAC, *Special Programs I*

NOTE B – TESTING FTE STUDENT ENROLLMENT

Our examination procedures for testing provided for the selection of schools, students, and teachers using judgmental methods for testing the FTE student enrollment as reported under the FEFP to the Department of Education for the fiscal year ended June 30, 2016. Our testing process was designed to facilitate the performance of appropriate examination procedures to test the District's compliance with State requirements relating to the classification, assignment, and verification of the FTE student enrollment as reported under the FEFP. The following schools were selected for testing:

	School	Findings
	Districtwide – Incorrect Reporting of Course Schedules	1
1.	Sallie Jones Elementary School	2
2.	Charlotte High School	3 through 7
3.	Peace River Elementary School	8
4.	Lemon Bay High School	9 through 13
5.	Neil Armstrong Elementary School	14 through 19
6.	Punta Gorda Middle School	20
7.	Charlotte Technical Center	21 through 28
8.	L. A. Ainger Middle School	29 through 33
9.	Liberty Elementary School	34 through 36
10.	Kingsway Elementary School	37
11.	Florida SouthWestern Collegiate High School*	38 and 39
12.	Charlotte Virtual Franchise	40

* Charter School

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The President of the Senate, the Speaker of the
House of Representatives, and the
Legislative Auditing Committee

INDEPENDENT AUDITOR'S REPORT

Report on Student Transportation

We have examined the Charlotte County District School Board's (District's) compliance with State requirements relating to the classification, assignment, and verification of student transportation as reported under the Florida Education Finance Program for the fiscal year ended June 30, 2016. These requirements are found primarily in Chapter 1006, Part I, E. and Section 1011.68, Florida Statutes; State Board of Education Rules, Chapter 6A-3, Florida Administrative Code; and the *Student Transportation General Instructions 2015-16* issued by the Department of Education.

Management's Responsibility for Compliance

District management is responsible for the District's compliance with the aforementioned State requirements, including the design, implementation, and maintenance of internal control to prevent, or detect and correct, noncompliance due to fraud or error.

Auditor's Responsibility

Our responsibility is to express an opinion on the District's compliance with State requirements based on our examination. Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants and the standards applicable to attestation engagements contained in *Government Auditing Standards* issued by the Comptroller General of the United States. Those standards require that we plan and perform the examination to obtain reasonable assurance about whether the classification, assignment, and verification of student transportation reported by the District under the Florida Education Finance Program complied with State requirements in all material respects.

An examination involves performing procedures to obtain evidence about whether the District complied with State requirements. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risks of material noncompliance, whether due to fraud or error. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for

our opinion. Our examination does not provide a legal determination on the District's compliance with State requirements. The legal determination of the District's compliance with these requirements is, however, ultimately the responsibility of the Department of Education.

An examination by its nature does not include a review of all records and actions of District management and staff and, as a consequence, cannot be relied upon to identify all instances of noncompliance, fraud, abuse, or inefficiency. Because of these limitations and the inherent limitations of internal control, an unavoidable risk exists that some material noncompliance may not be detected, even though the examination is properly planned and performed in accordance with attestation standards.

Opinion

Our examination disclosed material noncompliance with State requirements relating to the classification, assignment, and verification of student transportation as reported under the Florida Education Finance Program involving the students' reported ridership classification or eligibility for State transportation funding.

In our opinion, except for the material noncompliance with State requirements described in the preceding paragraph involving the students' reported ridership classification or eligibility for State transportation funding, the Charlotte County District School Board complied, in all material respects, with State requirements relating to the classification, assignment, and verification of student transportation as reported under the Florida Education Finance Program for the fiscal year ended June 30, 2016.

Other Reporting Required by *Government Auditing Standards*

In accordance with attestation standards established by *Government Auditing Standards*, we are required to report all deficiencies that are considered to be significant deficiencies or material weaknesses[4] in internal control; fraud and noncompliance with provisions of laws or regulations that have a material effect on the District's compliance with State requirements; and any other instances that warrant the attention of those charged with governance; noncompliance with provisions of contracts or grant agreements that has a material effect on the District's compliance with State requirements; and abuse that has a material effect on the District's compliance with State requirements. We are also required to obtain and report the views of responsible officials concerning the findings, conclusions, and recommendations, as well as any planned corrective actions.

We performed our examination to express an opinion on the District's compliance with State requirements and not for the purpose of expressing an opinion on the District's related internal control over compliance with State requirements; accordingly, we express no such opinion. Because of its limited purpose, our examination would not necessarily identify all deficiencies in internal control over compliance that might be significant deficiencies or material weaknesses. However, the material noncompliance mentioned above is indicative of significant deficiencies considered to be material weaknesses in the District's internal controls related to students' reported ridership classification or eligibility for State transportation funding. Our examination disclosed certain findings that are required to be reported under *Government*

[4] A significant deficiency is a deficiency or a combination of deficiencies in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance. A material weakness is a deficiency, or combination of deficiencies, in internal control such that there is a reasonable possibility that material noncompliance will not be prevented, or detected and corrected, on a timely basis.

Auditing Standards and all findings, along with the views of responsible officials, are described in *SCHEDULE G* and *MANAGEMENT'S RESPONSE*, respectively. The impact of this noncompliance with State requirements on the District's reported student transportation is presented in *SCHEDULES F* and *G*.

The District's written response to this examination has not been subjected to our examination procedures and, accordingly, we express no opinion on it.

Purpose of this Report

Pursuant to Section 11.45(4)(c), Florida Statutes, this report is a public record and its distribution is not limited. Attestation standards established by the American Institute of Certified Public Accountants require us to indicate that the purpose of this report is to provide an opinion on the District's compliance with State requirements. Accordingly, this communication is not suitable for any other purpose.

Respectfully submitted,



Sherrill F. Norman, CPA
Tallahassee, Florida
October 9, 2017

SCHEDULE F

POPULATIONS, TEST SELECTION, AND TEST RESULTS
STUDENT TRANSPORTATION

Any student who is transported by the Charlotte County District School Board (District) must meet one or more of the following conditions in order to be eligible for State transportation funding: live 2 or more miles from school, be physically handicapped, be a Career Education 9-12 or an ESE student who is transported from one school center to another where appropriate programs are provided, or be on a route that meets the criteria for hazardous walking conditions specified in Section 1006.23(2), Florida Statutes. (See NOTE A1.)

As part of our examination procedures, we tested student transportation as reported to the Department of Education for the fiscal year ended June 30, 2016. (See NOTE B.) The population of vehicles (184) consisted of the total number of vehicles (buses, vans, or passenger cars) reported by the District for all reporting survey periods. For example, a vehicle that transported students during the July and October 2015 and February and June 2016 reporting survey periods would be counted in the population as four vehicles. Similarly, the population of students (13,478) consisted of the total number of students reported by the District as having been transported for all reporting survey periods. (See NOTE A2.) The District reported students in the following ridership categories:

Ridership Category	Number of Students Transported
Teenage Parents and Infants	17
Hazardous Walking	239
IDEA – PK through Grade 12, Weighted	1,059
All Other FEFP Eligible Students	12,163
Total	13,478

Students with exceptions are students with exceptions affecting their ridership category. Students cited only for incorrect reporting of days in term, if any, are not included in our error-rate determination.

We noted the following material noncompliance: exceptions involving the reported ridership classification or eligibility for State transportation funding for 42 of 365 students in our student transportation test.[5]

[5] For student transportation, the material noncompliance is composed of Findings 1, 3, 4, 5, and 6 on *SCHEDULE G*.

Our examination results are summarized below:

Description	Students With Exceptions	Students Proposed Net Adjustment
Our tests included 365 of the 13,478 students reported as being transported by the District.	42	(38)
In conjunction with our general tests of student transportation we identified certain issues related to 110 additional students.	110	(102)
Total	152	(140)

Our proposed net adjustment presents the net effect of noncompliance disclosed by our examination procedures. (See *SCHEDULE G*.)

The ultimate resolution of our proposed net adjustment and the computation of its financial impact is the responsibility of the Department of Education.

SCHEDULE G

FINDINGS AND PROPOSED ADJUSTMENTS
STUDENT TRANSPORTATION

Overview

Management is responsible for determining that student transportation as reported under the FEFP is in compliance with State requirements. These requirements are found primarily in Chapter 1006, Part I, E. and Section 1011.68, Florida Statutes; SBE Rules, Chapter 6A-3, FAC; and the *Student Transportation General Instructions 2015-16* issued by the Department of Education. Except for the material noncompliance involving the students' reported ridership classification or eligibility for State transportation funding, the Charlotte County District School Board (District) complied, in all material respects, with State requirements relating to the classification, assignment, and verification of student transportation as reported under the FEFP for the fiscal year ended June 30, 2016. All noncompliance disclosed by our examination procedures is discussed below and requires management's attention and action as presented in *SCHEDULE H*.

Findings

Students Transported Proposed Net Adjustments

Our examination procedures included both general tests and detailed tests. Our general tests included inquiries concerning the District's transportation of students and verification that a bus driver's report existed for each bus reported in a survey period. Our detailed tests involved verification of the specific ridership categories reported for students in our tests from the July and October 2015 reporting survey periods and the February and June 2016 reporting survey periods. Adjusted students who were in more than one reporting survey period are accounted for by reporting survey period. For example, a student included in our tests twice (i.e., once for the October 2015 reporting survey period and once for the February 2016 reporting survey period) will be presented in our Findings as two test students.

1. [Ref. 51] Sixty-eight students (35 students were in our test) were incorrectly reported in the June 2016 reporting survey period. The students were participating in a 3rd-grade reading camp and were not otherwise eligible for State transportation funding. We propose the following adjustment:

June 2016 Survey		
19 Days in Term		
Hazardous Walking	(3)	
IDEA - PK through Grade 12, Weighted	(2)	
All Other FEFP Eligible Students	(63)	(68)

Findings		Students Transported Proposed Net Adjustments
2. [Ref. 52] Our general tests disclosed that 77 students were incorrectly reported in the All Other FEFP Eligible Students ridership category based on the students' transportation from their assigned school to another school to attend a Gifted Program. Only ESE students with disabilities who are classified under the IDEA when transported from one school center to another are eligible for State funding. ESE students enrolled in the Gifted Program are not considered students with disabilities. However, we determined that 8 of these students were otherwise eligible for reporting in the All Other FEFP Eligible Students ridership category based on living two miles or more from their assigned school and were transported from their home to school. The remaining students were not otherwise eligible for State transportation funding. We propose the following adjustments:		
October 2015 Survey		
14 Days in Term		
All Other FEFP Eligible Students	(10)	
17 Days in Term		
All Other FEFP Eligible Students	(27)	
90 Days in Term		
All Other FEFP Eligible Students	5	
February 2016 Survey		
19 Days in Term		
All Other FEFP Eligible Students	(16)	
18 Days in Term		
All Other FEFP Eligible Students	(14)	
15 Days in Term		
All Other FEFP Eligible Students	(1)	
14 Days in Term		
All Other FEFP Eligible Students	(9)	
90 Days in Term		
All Other FEFP Eligible Students	3	(69)

(***See Follow-Up to Management's Response Next Page***)

Findings		Students Transported Proposed Net Adjustments

Follow-Up to Management's Response (Ref. 52)

In his written response, the Superintendent indicated that the "finding determined students enrolled in the Omega (Gifted) program are not considered ESE and should not have been reported as eligible for state funding." The Superintendent also indicated that "these students were reported as having an IEP for the gifted program requiring transportation to specific schools offering the required educational opportunities" and that "these students have always been eligible for state funding under this criteria." Our Finding does not indicate that the students in the Gifted Program are not considered ESE. Rather, the Finding indicates that, while the students are ESE students, they are not students with disabilities and that only ESE students with disabilities who are classified under the IDEA when transported from one school center to another are eligible for State funding. Section 1011.68(1)(d), Florida Statutes, only provides for transportation funding from one school center to another for career, dual enrollment, or students with disabilities provided the student's IEP identifies the need for the instructional program or service and transportation to be provided by the school district. Accordingly, the finding stands as presented.

3. [Ref. 53] The IEPs for three students in our test did not document that the students met at least one of the five criteria required for reporting in the IDEA - PK through Grade 12, Weighted ridership category. However, we determined that the students were otherwise eligible for reporting in the All Other FEFP Eligible Students ridership category. We propose the following adjustments:

October 2015 Survey		
90 Days in Term		
IDEA - PK through Grade 12, Weighted	(2)	
All Other FEFP Eligible Students	2	
February 2016 Survey		
90 Days in Term		
IDEA - PK through Grade 12, Weighted	(1)	
All Other FEFP Eligible Students	1	0

4. [Ref. 54] One student in our test was not marked as riding the bus during the reporting survey period. We propose the following adjustment:

October 2015 Survey		
90 Days in Term		
All Other FEFP Eligible Students	(1)	(1)

Findings		Students Transported Proposed Net Adjustments

5. [Ref. 55] One middle school student in our test was incorrectly reported in the Hazardous Walking ridership category. The Hazardous Walking ridership category is designated for students in Grades K-6 who are enrolled in an elementary school and live less than 2 miles from school. Transportation records demonstrated that the student lived 2 or more miles from school and was otherwise eligible for reporting in the All Other FEFP Eligible Students ridership category. We propose the following adjustment:

February 2016 Survey		
90 Days in Term		
Hazardous Walking	(1)	
All Other FEFP Eligible Students	1	0

6. [Ref. 56] Two students in our test were not enrolled in school during the reporting survey period. We propose the following adjustment:

October 2015 Survey		
90 Days in Term		
Teenage Parents and Infants	(1)	
All Other FEFP Eligible Students	(1)	(2)
Proposed Net Adjustment		**(140)**

SCHEDULE H

RECOMMENDATIONS AND REGULATORY CITATIONS
STUDENT TRANSPORTATION

RECOMMENDATIONS

We recommend that Charlotte County District School Board (District) management exercise more care and take corrective action, as appropriate, to ensure that: (1) only ESE students classified as students with disabilities under the IDEA whose IEPs document the need for transportation or students attending nonresidential Department of Juvenile Justice programs are reported during the summer reporting surveys; (2) ESE students enrolled in the Gifted Program and being transported from one school center to another are not reported for State transportation funding; (3) students who are reported in the IDEA - PK through Grade 12, Weighted ridership category are documented as having met one of the five criteria required for reporting in a weighted ridership category as supported by the students' IEPs; (4) only those students who are in membership and are documented as having been transported at least 1 day during the 11-day reporting survey period are reported for State transportation funding; and (5) students that are not attending an elementary school are not reported in the Hazardous Walking ridership category.

The absence of statements in this report regarding practices and procedures followed by the District should not be construed as acceptance, approval, or endorsement of those practices and procedures. Additionally, the specific nature of this report does not limit or lessen the District's obligation to comply with all State requirements relating to the classification, assignment, and verification of student transportation as reported under the FEFP.

REGULATORY CITATIONS

Section 1002.33, Florida Statutes, *Charter Schools*
Chapter 1006, Part I, E., Florida Statutes, *Transportation of Public K-12 Students*
Section 1011.68, Florida Statutes, *Funds for Student Transportation*
SBE Rules, Chapter 6A-3, FAC, *Transportation*
Student Transportation General Instructions 2015-16

NOTES TO SCHEDULES

NOTE A - SUMMARY
STUDENT TRANSPORTATION

A summary discussion of the significant features of student transportation and related areas is provided below.

1. Student Eligibility

Any student who is transported by the District must meet one or more of the following conditions in order to be eligible for State transportation funding: live 2 or more miles from school, be physically handicapped, be a Career Education 9-12 or an ESE student who is transported from one school center to another where appropriate programs are provided, or be on a route that meets the criteria for hazardous walking conditions specified in Section 1006.23(2), Florida Statutes.

2. Transportation in Charlotte County

For the fiscal year ended June 30, 2016, the District received $3.2 million for student transportation as part of the State funding through the FEFP. The District's student transportation reported by survey period was as follows:

Survey Period	Number of Vehicles	Number of Students
July 2015	6	80
October 2015	86	6,700
February 2016	86	6,630
June 2016	6	68
Totals	184	13,478

3. Statutes and Rules

The following statutes and rules are of significance to the District's administration of student transportation:

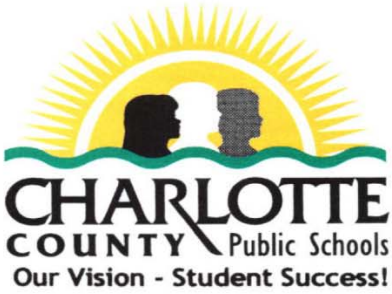
Section 1002.33, Florida Statutes, *Charter Schools*
Chapter 1006, Part I, E., Florida Statutes, *Transportation of Public K-12 Students*
Section 1011.68, Florida Statutes, *Funds for Student Transportation*
SBE Rules, Chapter 6A-3, FAC, *Transportation*

NOTE B – TESTING
STUDENT TRANSPORTATION

Our examination procedures for testing provided for the selection of students using judgmental methods for testing student transportation as reported to the Department of Education for the fiscal year ended June 30, 2016. Our testing process was designed to facilitate the performance of appropriate examination procedures to test the District's compliance with State requirements relating to the classification, assignment, and verification of student transportation as reported under the FEFP.

MANAGEMENT'S RESPONSE

Steve Dionisio
Superintendent



School Board

Ian Vincent, Chairman
Bob Segur, Vice-Chairman
Kim Amontree
Wendy Atkinson
Lee Swift

October 9, 2017

Ms. Sherrill F. Norman, CPA
Auditor General
Claude Denson Pepper Building, Room 476A
111 West Madison Street
Tallahassee, Florida 32055-1450

Attn: J. David Hughes

Dear Ms. Norman:

We have reviewed the findings in your report on the examination of full-time equivalent (FTE) students and the student transportation for Charlotte County Public Schools for the fiscal year ended June 30, 2016, and hereby submit our written response as required by law.

Based on our review of your findings and after further conversation with your department we do not dispute any of the findings for the FEFP FTE Student Enrollment in the draft report.

We do however question Student Transportation finding number 2. This finding determined students enrolled in the Omega (Gifted) program are not considered ESE and should not have been reported as eligible for state funding.

In all previous audits, these students were reported as having an IEP for the gifted program requiring transportation to specific schools offering the required educational opportunities. These students have always been eligible for state funding under this criteria.

Based on your office's reinterpretation of the statute, the auditors have been directed to disallow these students' eligibility for funding. This decision has not been shared with the districts, nor had any previous communication questioning the eligibility for funding been provided.

The district requests full funding of these students, as has been past practice, until such time as the Auditor General or FLDOE provide, in writing, to all districts, the basis for the reinterpretation of the statutes.

We appreciate the professional manner and collaborative approach your staff has demonstrated throughout the 2015-2016 Audit process and believe this approach will continue to help our district improve our FTE State Reporting.

Sincerely,

Steve Dionisio
Superintendent

Cc: file

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