

**GADSDEN COUNTY
DISTRICT SCHOOL BOARD**

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

For the Fiscal Year Ended
June 30, 2015



Sherrill F. Norman, CPA
Auditor General

Board Members and Superintendent

During the 2014-15 fiscal year, Reginald C. James served as Superintendent and the following individuals served as Board members:

<u>Board Member</u>	<u>District No.</u>
Audrey D. Lewis, Chair from 11-18-14, Vice Chair to 11-17-14	1
Steve Scott from 11-18-14	2
Judge B. Helms Jr. to 11-17-14	2
Isaac Simmons Jr., Vice Chair from 11-18-14	3
Charlie D. Frost	4
Roger P. Milton, Chair to 11-17-14	5

The team leader was John Ray Speaks, Jr., CPA, and the examination was supervised by Aileen B. Peterson, CPA, CPM.

Please address inquiries regarding this report to J. David Hughes, CPA, Audit Manager, by e-mail at davidhughes@aud.state.fl.us or by telephone at (850) 412-2971.

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GADSDEN COUNTY DISTRICT SCHOOL BOARD
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SUMMARY

SUMMARY OF ATTESTATION EXAMINATION

Except for the material noncompliance described below involving teachers and 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 Basic with Exceptional Student Education (ESE) Services, English for Speakers of Other Languages (ESOL), and ESE Support Levels 4 and 5, the Gadsden 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 as reported under the Florida Education Finance Program (FEFP) for the fiscal year ended June 30, 2015. Specifically:

- Of the 44 teachers in our test, 14 did not meet State requirements governing certification, School Board approval of out-of-field teacher assignments, notification to parents regarding teachers' out-of-field status, or the earning of required in-service training points in ESOL strategies. Five of the 44 teachers (11 percent) in our test taught at charter schools and 1 of the 14 teachers with exceptions (7 percent) taught at charter schools.
- 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. The table below shows the total number of students included in each of our tests, as well as the number and percentage of students who attended charter schools who were included in our tests. The table also shows the number of students with exceptions in each of our tests, as well as the number and percentage of students with exceptions who attended charter schools.

Program Tested	Number of Students			Number of Students		
	Included in Test	Included in Test who Attended Charter Schools	Percentage	With Exceptions	With Exceptions who Attended Charter Schools	Percentage
Basic with ESE Services	35	3	9%	5	1	20%
ESOL	57	12	21%	57	12	21%
ESE Support Level 4 and 5	3	1	33%	2	1	50%
Totals	<u>95</u>	<u>16</u>		<u>64</u>	<u>14</u>	

Because of the material noncompliance involving the reported ridership classification or eligibility for State transportation funding, the District did not comply, 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, 2015. Specifically, we noted exceptions involving the reported ridership classification or eligibility for State transportation funding for all of the 269 students in our student transportation test.

Noncompliance related to the reported FTE student enrollment resulted in 23 findings. The resulting proposed net adjustment to the District's reported, unweighted FTE totaled to negative 14.9314 (14.0144 is applicable to District schools other than charter schools and .9170 is applicable to charter schools) but has a potential impact on the District's weighted FTE of negative 23.7147 (19.0343 is applicable to District schools other than charter schools and 4.6804 is applicable to charter schools).

Noncompliance related to student transportation resulted in 10 findings and a proposed net adjustment of negative 6,843 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, 2015, was \$4,031.77 per FTE. For the District, the estimated gross dollar effect of our proposed adjustments to the reported FTE student enrollment is negative \$95,612 (negative 23.7147 times \$4,031.77), of which \$76,742 is applicable to District schools other than charter schools and \$18,870 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 Gadsden County, Florida. Those services are provided primarily to prekindergarten 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 State Board of Education. The geographic boundaries of the District are those of Gadsden 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 elected Superintendent of Schools. The District had 17 District schools other than charter schools, 2 charter schools, 2 District cost centers, and 2 virtual education cost centers serving prekindergarten through 12th-grade students. For the fiscal year ended June 30, 2015, State funding totaling \$24.4 million was provided through the FEFP to the District for the District-reported 5,524.75 unweighted FTE as recalibrated, which included 481.93 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 prekindergarten 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 upon 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 classes per day at 50 minutes per class for the full 180-day school year (i.e., six classes 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.

For the 2013-14 school year and beyond, all FTE student enrollment is capped at 1.0 FTE except for the FTE student enrollment reported by the Department of Juvenile Justice (DJJ) 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 DJJ 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(4), 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 \$1.55 million for student transportation as part of the State funding through the FEFP.



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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 ON FULL-TIME EQUIVALENT (FTE) STUDENT ENROLLMENT

We have examined the Gadsden County District School Board's (District's) compliance with State requirements relating to the classification, assignment, and verification of the FTE student enrollment as reported under the Florida Education Finance Program (FEFP) for the fiscal year ended June 30, 2015. These requirements are found primarily in Sections 1011.60, 1011.61, and 1011.62, Florida Statutes; State Board of Education (SBE) Rules, Chapter 6A-1, Florida Administrative Code; and the *FTE General Instructions 2014-15* issued by the Department of Education. As discussed in the representation letter, management is responsible for the District's compliance with State requirements. 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 (AICPA) and the standards applicable to attestation engagements contained in *Government Auditing Standards* issued by the Comptroller General of the United States and, accordingly, included examining, on a test basis, evidence supporting management's assertion about the District's compliance with the aforementioned State requirements and performing such other procedures as we considered necessary in the circumstances. We believe that our examination provides a reasonable basis for our opinion. The legal determination of the District's compliance with these requirements is, however, ultimately the responsibility of the Department of Education.

Our examination disclosed material noncompliance with State requirements relating to the classification, assignment, and verification of FTE student enrollment as reported under the FEFP for teachers and students in our Basic with Exceptional Student Education (ESE) Services, English for Speakers of Other Languages (ESOL), and ESE Support Levels 4 and 5 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 mentioned above involving teachers and 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 Basic with ESE Services, ESOL, and ESE Support Levels 4 and 5, the Gadsden County District School Board 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, 2015.

In accordance with attestation standards established by the AICPA and *Government Auditing Standards*, we are required to report all deficiencies that are considered to be significant deficiencies or material weaknesses¹ 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 or on compliance and other matters; accordingly, we express no such opinions. 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 teacher certification and 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 Basic with ESE Services, ESOL, and ESE Support Levels 4 and 5. 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 FTE 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.

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.

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 AICPA require us to indicate that this report is intended solely for the information and use of the Legislative Auditing Committee, members of the Florida Senate and the Florida House of Representatives, the SBE, the Department of Education, and applicable District management and is not intended to be and should not be used by anyone other than these specified parties.

Respectfully submitted,



Sherrill F. Norman, CPA
Tallahassee, Florida
December 6, 2016

SCHEDULE A

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

Reported FTE

The funding provided by the Florida Education Finance Program (FEFP) is based upon 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, English for Speakers of Other Languages (ESOL), Exceptional Student Education (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, 2015, the Gadsden County District School Board (District) reported to the Department of Education 5,524.75 unweighted FTE as recalibrated, which included 481.93 unweighted FTE as recalibrated for charter schools, at 17 District schools other than charter schools, 2 charter schools, 2 District cost centers, and 2 virtual education cost centers.

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, 2015. (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 designated District virtual education cost centers in the District that offered virtual instruction in the FEFP-funded programs. The population of students (3,523) consisted of the total number of students in each program at the schools and cost centers in our tests.

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 5 of the 35 students in our Basic with ESE Services test,² all of the 57 students in our ESOL test,³ and 2 of the 3 students in our ESE Support Levels 4 and 5 test.⁴ Three of the 35 students (9 percent) in our Basic with ESE Services test attended charter schools and 1 of the 5 students with exceptions (20 percent) attended charter schools. Twelve of the 57 students (21 percent) in our ESOL test attended charter schools and 12 of the 57 students with exceptions (21 percent) attended charter schools. Similarly, 1 of the 3 students (33 percent) in our ESE Support Levels 4 and 5 test attended charter schools and 1 of the 2 students with exceptions (50 percent) attended charter schools.

² For Basic with ESE Services, the material noncompliance is composed of Findings 3, 6, 10, 15, and 23 on *SCHEDULE D*.

³ For ESOL, the material noncompliance is composed of Finding 1 and 10 on *SCHEDULE D*.

⁴ For ESE Support Levels 4 and 5, the material noncompliance is composed of Findings 2 and 22 on *SCHEDULE D*.

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

Programs	Number of Schools		Number of Students at Schools Tested		Students with Exceptions	Recalibrated Unweighted FTE		Proposed Adjustments
	Population	Test	Population	Test		Population	Test	
Basic	19	10	2,894	104	5	4,463.9700	84.9660	34.0089
Basic with ESE Services	20	9	429	35	5	771.2800	25.1179	1.4182
ESOL	6	5	197	57	57	145.7400	40.9218	(48.8815)
ESE Support Levels 4 and 5	8	3	3	3	2	26.7500	2.4154	(1.4770)
Career Education 9-12	6	0	<u>0</u>	<u>0</u>	<u>0</u>	<u>117.0100</u>	<u>.0000</u>	<u>.0000</u>
All Programs	23	10	<u>3,523</u>	<u>199</u>	<u>69</u>	<u>5,524.7500</u>	<u>153.4211</u>	<u>(14.9314)</u>

Teachers

We also tested teacher qualifications as part of our examination procedures. (See NOTE B.) Specifically, the population of teachers (102, of which 89 are applicable to District schools other than charter schools and 13 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 English Language Learner (ELL) students, and of the total number of teachers reported under virtual education cost centers 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.

We noted the following material noncompliance: 14 of the 44 teachers in our test did not meet State requirements governing certification, School Board approval of out-of-field teacher assignments, notification to parents regarding teachers' out-of-field status, or the earning of required in-service training points in ESOL strategies.⁵ Five of the 44 teachers (11 percent) in our test taught at charter schools and 1 of the 14 teachers with exceptions (7 percent) 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.

⁵ For teachers, the material noncompliance is composed of Findings 4, 7, 12, 14, 16, 17, 18, 19, 20, and-21 on *SCHEDULE D.*

SCHEDULE B

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

District Schools Other Than Charter Schools			
No. Program (1)	Proposed Net Adjustment (2)	Cost Factor	Weighted FTE (3)
101 Basic K-3	27.6566	1.126	31.1413
102 Basic 4-8	6.8427	1.000	6.8427
111 Grades K-3 with Exceptional Student Education (ESE) Services	.8561	1.126	.9640
112 Grades 4-8 with ESE Services	.0717	1.000	.0717
130 English for Speakers of Other Languages (ESOL)	(48.8815)	1.147	(56.0671)
254 ESE Support Level 4	(.5600)	3.548	(1.9869)
Subtotal	(14.0144)		(19.0343)
Charter Schools			
No. Program (1)	Proposed Net Adjustment (2)	Cost Factor	Weighted FTE (3)
102 Basic 4-8	(.4904)	1.000	(.4904)
112 Grades 4-8 with ESE Services	.4904	1.000	.4904
255 ESE Support Level 5	(.9170)	5.104	(4.6804)
Subtotal	(.9170)		(4.6804)
Total of Schools			
No. Program (1)	Proposed Net Adjustment (2)	Cost Factor	Weighted FTE (3)
101 Basic K-3	27.6566	1.126	31.1413
102 Basic 4-8	6.3523	1.000	6.3523
111 Grades K-3 with ESE Services	.8561	1.126	.9640
112 Grades 4-8 with ESE Services	.5621	1.000	.5621
130 ESOL	(48.8815)	1.147	(56.0671)
254 ESE Support Level 4	(.5600)	3.548	(1.9869)
255 ESE Support Level 5	(.9170)	5.104	(4.6804)
Total	(14.9314)		(23.7147)

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 (FTE) STUDENT ENROLLMENT

<u>No.</u> <u>Program</u>	<u>Proposed Adjustments (1)</u>			<u>Balance Forward</u>
	<u>#0001</u>	<u>#0041</u>	<u>#0091</u>	
101 Basic K-3	29.4675	4.0150	.0516	33.5341
102 Basic 4-8	11.0114	.3750	11.3864
111 Grades K-3 with Exceptional Student Education (ESE) Services4850	.0100	.4950
112 Grades 4-8 with ESE Services0000
130 English for Speakers of Other Languages (ESOL) (40.4789)		(4.8750)	(45.3539)
254 ESE Support Level 4	(.4984)	(.0616)	(.5600)
255 ESE Support Level 50000
Total	<u>.0000</u>	<u>(.4984)</u>	<u>.0000</u>	<u>(.4984)</u>

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

No.	Brought Forward	<u>Proposed Adjustments (1)</u>				Balance Forward
		<u>#0141</u>	<u>#0171</u>	<u>#0191</u>	<u>#0211</u>	
101	33.5341	(.4557)	(4.4546)	(.9672)	27.6566
102	11.3864	(7.1138)	2.5701	6.8427
111	.4950	(.0442)	(.5619)	.96728561
112	.00000717	.0717
130	(45.3539)	(.8858)	(2.6418)	(48.8815)
254	(.5600)	(.5600)
255	<u>.0000</u>	<u>.....</u>	<u>.....</u>	<u>.....</u>	<u>.....</u>	<u>.0000</u>
Total	<u>(.4984)</u>	<u>(.4999)</u>	<u>(13.0161)</u>	<u>.0000</u>	<u>.0000</u>	<u>(14.0144)</u>

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

<u>No. Program</u>	<u>Proposed Adjustments (1)</u>		
	<u>Brought Forward</u>	<u>#9104*</u>	<u>Total</u>
101 Basic K-3	27.6566	27.6566
102 Basic 4-8	6.8427	(.4904)	6.3523
111 Grades K-3 with ESE Services	.85618561
112 Grades 4-8 with ESE Services	.0717	.4904	.5621
130 ESOL	(48.8815)	(48.8815)
254 ESE Support Level 4	(.5600)	(.5600)
255 ESE Support Level 5	<u>.0000</u>	<u>(.9170)</u>	<u>(.9170)</u>
Total	<u>(14.0144)</u>	<u>(.9170)</u>	<u>(14.9314)</u>

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

*Charter School

SCHEDULE D

FINDINGS AND PROPOSED ADJUSTMENTS FULL-TIME EQUIVALENT (FTE) STUDENT ENROLLMENT

Overview

Management is responsible for determining that the FTE student enrollment as reported under the Florida Education Finance Program (FEFP) is in compliance with State requirements. These requirements are found primarily in Sections 1011.60, 1011.61, and 1011.62, Florida Statutes; State Board of Education (SBE) Rules, Chapter 6A-1, Florida Administrative Code (FAC); and the *FTE General Instructions 2014-15* issued by the Department of Education. Except for the material noncompliance involving teachers and 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 Basic with Exceptional Student Education (ESE) Services, English for Speakers of Other Languages (ESOL), and ESE Support Levels 4 and 5, the Gadsden County District School Board 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, 2015. All noncompliance disclosed by our examination procedures is discussed below and requires management's attention and action as presented in *SCHEDULE E*.

Proposed Net Adjustments (Unweighted FTE)

Findings

Our examination included the July and October 2014 reporting survey periods and the February and June 2015 reporting survey periods (See NOTE A6.). Unless otherwise specifically stated, the Findings and Proposed Adjustments presented herein are for the October 2014 reporting survey period or the February 2015 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 – Reporting of English Language Learner (ELL) Students

1. [Ref. 101] Our review of the 56 ELL students selected in our test who were reported in the ESOL Program, which is administered by a District office that maintains the related records, disclosed the following:
 - a. The file for 1 ELL student was not available at the time of our examination and could not be subsequently located.
 - b. Three ELL students were reported in the ESOL Program beyond the maximum 6-year period allowed for State funding of ESOL.

Findings

Districtwide – Reporting of English Language Learner (ELL) Students (Continued)

- c. The *ELL Student Plans* for 52 ELL students were incomplete. The *Plans* did not include the students’ course schedules (7 students) or the course schedules were not made a part of the *Plans* until after the reporting survey periods (45 students). Additionally, District records did not demonstrate that the *ELL Student Plans* for 40 of the students were completed timely. We also noted that for 14 of the 40 students ELL Committees were not convened by October 1 to consider the students’ continued ESOL placements (7 students), the *Plans* covering the 2014-15 school year did not indicate the date the *Plans* were reviewed and updated (2 students), or the parents of the students were not notified of their children’s ESOL placements (5 students).

We propose the following adjustment:

101 Basic K-3	29.4675	
102 Basic 4-8	11.0114	
130 ESOL	<u>(40.4789)</u>	<u>.0000</u>
		<u>.0000</u>

George W. Munroe Elementary School (#0041)

2. [Ref. 4101] For one ESE student who was enrolled in school on the last day of the reporting survey period, School records did not evidence that the student was in attendance or was provided instruction on that day. We propose the following adjustment:

254 ESE Support Level 4	<u>(.4984)</u>	(.4984)
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3. [Ref. 4102] A portion of one ESE student’s course schedule was incorrectly reported in Program No. 101 (Basic K-3). Generally, the course schedules for ESE students should be reported entirely in ESE. We propose the following adjustment:

101 Basic K-3	(.4850)	
111 Grades K-3 with ESE Services	<u>.4850</u>	.0000

4. [Ref. 4171/72/73] Three teachers taught Primary Language Arts to classes that included ELL students but were not properly certified to teach ELL students and were 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 teachers’ out-of-field status. We propose the following adjustments:

<u>Ref. 4171</u>		
101 Basic K-3	3.0000	
130 ESOL	<u>(3.0000)</u>	.0000

**Proposed Net
Adjustments
(Unweighted FTE)**

Findings

George W. Munroe Elementary School (#0041) (Continued)

<u>Ref. 4172</u>		
101 Basic K-3	1.5000	
130 ESOL	<u>(1.5000)</u>	.0000
<u>Ref. 4173</u>		
102 Basic 4-8	.3750	
130 ESOL	<u>(.3750)</u>	<u>.0000</u>
		<u>(.4984)</u>

Havana Middle School (#0061)

5. [Ref. 6101] The course schedules for several students were incorrectly reported. The School’s daily bell schedule supported 1,820 instructional minutes per week and met the minimum reporting of Class Minutes Weekly (CMW); however, the students’ course schedules were not reported in agreement with the School’s bell schedule. Rather, we noted that the students were generally reported for 1,940 CMW. Student course schedules, which are necessary for the recalibration process to work appropriately, should reflect the correct number of CMW according to the School’s bell schedule. Since most of the students were reported at only this School or within the District for the entire school year and their reported FTE was recalibrated to 1.0, this incorrect reporting does not affect their ultimate funding level. As such, we present this disclosure Finding with no proposed adjustment.

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Havana Elementary School (#0091)

6. [Ref. 9102] A portion of one ESE student’s course schedule was incorrectly reported in Program No. 101 (Basic K-3). Generally, the course schedules for ESE students should be reported entirely in ESE. We propose the following adjustment:

101 Basic K-3	(.0100)	
111 Grades K-3 with ESE Services	<u>.0100</u>	.0000

7. [Ref. 9171] One teacher was not properly certified and was not approved by the School Board to teach out of field. The teacher held certification in Varying Exceptionalities but taught a course that required certification in Visually Impaired. We also noted that the parents of the student were not notified of the teacher’s out-of-field status. We propose the following adjustment:

**Proposed Net
Adjustments
(Unweighted FTE)**

Findings

Havana Elementary School (#0091) (Continued)

101 Basic K-3	.0616	
254 ESE Support Level 4	<u>(.0616)</u>	<u>.0000</u>
		<u>.0000</u>

Greensboro Elementary School (#0141)

8. [Ref. 14101] The attendance of one student (in our Basic test) could not be validated during the October 2014 reporting survey period; thus, the student should not have been reported for FEFP funding in that reporting survey period. Additionally we noted that a portion of the student’s course schedule in the February 2015 reporting survey period was incorrectly reported in Program No. 101 (Basic K-3). Generally, the course schedules for ESE students should be reported entirely in ESE. We propose the following adjustment:

101 Basic K-3	(.4557)	
111 Grades K-3 with ESE Services	<u>(.0442)</u>	<u>(.4999)</u>
		<u>(.4999)</u>

Gretna Elementary School (#0171)

9. [Ref. 17101] The course schedules for several students were incorrectly reported. The School’s daily bell schedule supported 1,775 instructional minutes per week and met the minimum reporting of CMW; however, the students’ course schedules were not reported in agreement with the School’s bell schedule. Rather, we noted that the students were generally reported for 1,975 CMW. Student course schedules, which are necessary for the recalibration process to work appropriately, should reflect the correct number of CMW according to the School’s bell schedule. Since most of the students were reported at only this School or within the District for the entire school year and their reported FTE was recalibrated to 1.0, this incorrect reporting does not affect their ultimate funding level. As such, we present this disclosure Finding with no proposed adjustment.

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10. [Ref. 17102] Our examination of the School’s attendance procedures and our review of student attendance records disclosed that sufficient safeguards were not in place to ensure that student attendance records were complete, accurate, and *(Finding Continues on Next Page)*

Findings

Gretna Elementary School (#0171) (Continued)

maintained in an auditable format pursuant to SBE Rules 6A-1.044, and 6A-1.04513, FAC, and the Department of Education's *Comprehensive Management Information System: Automated Student Attendance Recordkeeping System Handbook*. School staff indicated that student's attendance was recorded utilizing the District's Web-based automated attendance recording system, Skyward. Teachers were required to record students' attendance daily during homeroom. Teachers accessed Skyward by using a separate username and password (i.e., a second log-in was required to access the system.) Teachers were instructed to mark the appropriate attendance code for students who were absent, tardy, and unexcused. If the teacher recorded a student's attendance for the day or if the attendance was taken but the student was not marked as absent, the student's attendance record defaulted to present. During our review, we noted the following:

- a. Student attendance records were not consistently updated in Skyward to reflect when the students arrived late to school as documented by the School's *Student Sign-In Logs*.
- b. Substitute teachers' manual attendance rosters were not retained for the 2014-15 school year.
- c. The *Unrecorded Class Attendance* report, generated from Skyward and documented those teachers who did not record student attendance on a given day was not monitored by the School's staff and, as a result, the documentation to support a monitor's review was not created or retained for the 2014-15 school year.

We reviewed the *Attendance Transaction Tracking* report generated from Skyward, which indicates when and by whom student attendance records were recorded or changed and was the underlying data to support student attendance activity. We were able to find documentation to support the attendance of all except 25 of our test students during the October 2014 reporting survey period. Additionally, we were able to confirm that attendance was taken by 1 teacher for only 1 day of the February 2015 reporting survey period; however, 1 test student was marked absent on this day; therefore, this student's attendance could not be validated.

Consequently, we were unable to validate the attendance of 26 students (1 student was in our Basic test, 1 student was in our Basic with ESE Services test, and 1 student was in our ESOL test). We propose the following adjustment:

**Proposed Net
Adjustments
(Unweighted FTE)**

Findings

Gretna Elementary School (#0171) (Continued)

101 Basic K-3	(4.0000)	
102 Basic 4-8	(7.1138)	
111 Grades K-3 with ESE Services	(1.0165)	
130 ESOL	<u>(.8858)</u>	(13.0161)

11. [Ref. 17103] A portion of the course schedule of one ESE student (who was in our Basic test) was incorrectly reported in Program No. 101 (Basic K-3). Generally, the course schedules for ESE students should be reported entirely in ESE. We propose the following adjustment:

101 Basic K-3	(.4546)	
111 Grades K-3 with ESE Services	<u>.4546</u>	.0000

12. [Ref. 17171] One teacher taught Primary Language Arts to a class that included an ELL student 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 student were not notified of the teacher's out-of-field status. Since the student is cited in Finding 1 (Ref. 101), we present this disclosure Finding with no proposed adjustment:

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(13.0161)

St. Johns Elementary School (#0191)

13. [Ref. 19102] A portion of the course schedules for two ESE students (who were in our Basic Test) were incorrectly reported in Program No. 101 (Basic K-3). Generally, the course schedules for ESE students should be reported entirely in ESE. We propose the following adjustment:

101 Basic K-3	(.9672)	
111 Grades K-3 with ESE Services	<u>.9672</u>	.0000
		<u>.0000</u>

James A. Shanks Middle School (#0211)

14. [Ref. 21178] One teacher taught Language Arts to a class 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
(Finding Continues on Next Page)

**Proposed Net
Adjustments
(Unweighted FTE)**

Findings

James A. Shanks Middle School (#0211) (Continued)

of the ELL students were not notified of the teachers' out-of-field status. Since the student was cited in Finding 1 (Ref. 101), we present this disclosure Finding with no proposed adjustment.

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15. [Ref. 21101] A portion of the course schedule of one ESE student (who was in our Basic with ESE Services test) was incorrectly reported in Program No. 102 (Basic 4-8). Generally, the course schedules for ESE students should be reported entirely in ESE. We propose the following adjustment:

102 Basic 4-8	(.0717)	
112 Grades 4-8 with ESE Services	<u>.0717</u>	.0000

16. [Ref. 21171] One teacher was not properly certified and was not approved by the School Board to teach out of field. The teacher held certification in Music but taught a course that required certification in English and ESOL. 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:

102 Basic 4-8	.2856	
130 ESOL	<u>(.2856)</u>	.0000

17. [Ref. 21172] One teacher taught Language Arts to a class that included ELL students but were not properly certified to teach ELL students and were not approved by the School Board to teach such students out of field. We also noted that the parents of the ELL students were not notified of the teacher's out-of-field status. We propose the following adjustment:

102 Basic 4-8	.5712	
130 ESOL	<u>(.5712)</u>	.0000

18. [Ref. 21173] One teacher did not complete the General Knowledge requirements within 1 calendar year of the date of employment under a temporary certificate. We propose the following adjustment:

102 Basic 4-8	.6426	
130 ESOL	<u>(.6426)</u>	.0000

Findings

James A. Shanks Middle School (#0211) (Continued)

19. [Ref. 21174] One teacher was not properly certified and was not approved by the School Board to teach out of field. The teacher held certification in Math but taught a course that required certification in Social Science. We also noted that the parents of the students were not notified of the teacher’s out-of-field status and the teacher 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. We propose the following adjustment:

102 Basic 4-8	.2856	
130 ESOL	<u>(.2856)</u>	.0000

20. [Ref. 21175/76/77] Three teachers taught Basic subject area classes that included ELL students but had earned none of the 60 in-service training points in ESOL strategies required by SBE Rule 6A-6.0907, FAC, and the teachers’ in-service training timelines. We propose the following adjustments:

<u>Ref. 21175</u>		
102 Basic 4-8	.1428	
130 ESOL	<u>(.1428)</u>	.0000

<u>Ref. 21176</u>		
102 Basic 4-8	.4284	
130 ESOL	<u>(.4284)</u>	.0000

<u>Ref. 21177</u>		
102 Basic 4-8	.2856	
130 ESOL	<u>(.2856)</u>	<u>.0000</u>

.0000

Crossroad Academy Charter School (#9104)

21. [Ref. 910471] One teacher was not properly certified and was not approved by the School Board to teach Biology out of field until November 17, 2014, which was after the October 2014 reporting survey period. We also noted that the parents of one student were not notified of the teacher’s out-of-field status. Since the student was cited in Finding 23 (Ref. 910402), we present this disclosure Finding with no proposed adjustment:

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**Proposed Net
Adjustments
(Unweighted FTE)**

Findings

Crossroad Academy Charter School (#9104) (Continued)

22. [Ref. 910401] One ESE student who was enrolled in the Hospital and Homebound Program was reported as receiving both on-campus instruction (.4218 per survey) and homebound instruction (.0367 FTE per survey); however, the student was only receiving homebound instruction during the reporting survey periods. We also noted that the homebound teacher’s contact logs supporting the student’s instructional minutes for the student’s homebound instruction contained conflicting information; therefore, School records did not demonstrate the level of instruction provided to the student. We propose the following adjustment:

255 ESE Support Level 5	(.9170)	(.9170)
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23. [Ref. 910402] A portion of the course schedule of one ESE student (who was in our Basic with ESE Services test) was incorrectly reported in Program No. 102 (Basic 4-8). Generally, the course schedules for ESE students should be reported entirely in ESE. We propose the following adjustment:

102 Basic 4-8	(.4904)	
112 Grades 4-8 with ESE Services	.4904	.0000
		(.9170)

Proposed Net Adjustment		<u>(14.9314)</u>
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SCHEDULE E

RECOMMENDATIONS AND REGULATORY CITATIONS FULL-TIME EQUIVALENT (FTE) STUDENT ENROLLMENT

RECOMMENDATIONS

We recommend that Gadsden County District School Board (District) management exercise more care and take corrective action, as appropriate, to ensure that: (1) only students who are in membership and in attendance at least 1 day during the 11-day survey period are reported with the survey's results and the related source attendance records are retained to support this reporting; (2) there is proper monitoring to ensure that all teachers have taken attendance; (3) students' schedules are reported in accordance with the actual instructional time as reflected on the schools' bell schedules; (4) students are reported in the proper funding categories and documentation is retained to support that reporting; (5) *English Language Learner (ELL) Student Plans* are timely prepared and updated and include students' course schedules supporting the courses that would employ English for Speakers of Other Languages (ESOL) strategies; (6) ELL students are not reported beyond the maximum 6-year period allowed for State funding of ESOL; (7) ELL Committees are convened to consider students' continued ESOL placements (beyond the initial 3-year base period) within 30 school days prior to the students Date Entered United States School (DEUSS) anniversary dates, or by October 1 if the students' DEUSS falls within the first two weeks of school; (8) parents are timely notified of their children's ESOL placements; (9) students enrolled only in the Hospital and Homebound Program are not reported for on-campus instruction and homebound teachers' contact logs are properly prepared and support the students' reported instructional time in the Hospital and Homebound Program; (10) teachers are either properly certified, or if out of field, are approved to teach out of field by the District or Charter School Boards; (11) parents are timely notified of the teachers' out-of-field status; (12) teachers with temporary teaching certificates demonstrate mastery of General Knowledge within 1 calendar year of the date of employment under the temporary certificate; and (13) ESOL teachers earn the appropriate in-service training points in ESOL strategies as required by State Board of Education (SBE) Rule 6A-6.0907, Florida Administrative Code, and 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 Florida Education Finance Program.

REGULATORY CITATIONS

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, Florida Administrative Code, *Florida Education Finance Program Student Membership Surveys*

SBE Rule 6A-1.045111, Florida Administrative Code, *Hourly Equivalent to 180-Day School Year*

SBE Rule 6A-1.04513, Florida Administrative Code, *Maintaining Auditable FTE Records*
FTE General Instructions 2014-15

Attendance

Section 1003.23, Florida Statutes, *Attendance Records and Reports*

SBE Rule 6A-1.044(3) and (6)(c), Florida Administrative Code, *Pupil Attendance Records*

SBE Rule 6A-1.04513, Florida Administrative Code, *Maintaining Auditable FTE Records*
FTE General Instructions 2014-15

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, Florida Administrative Code, *Definitions Which Apply to Programs for English Language Learners*

SBE Rule 6A-6.0902, Florida Administrative Code, *Requirements for Identification, Eligibility, and Programmatic Assessments of English Language Learners*

SBE Rule 6A-6.09021, Florida Administrative Code, *Annual English Language Proficiency Assessment for English Language Learners (ELLs)*

SBE Rule 6A-6.09022, Florida Administrative Code, *Extension of Services in English for Speakers of Other Languages (ESOL) Program*

SBE Rule 6A-6.0903, Florida Administrative Code, *Requirements for Exiting English Language Learners from the English for Speakers of Other Languages Program*

SBE Rule 6A-6.09031, Florida Administrative Code, *Post Reclassification of English Language Learners (ELLs)*

SBE Rule 6A-6.0904, Florida Administrative Code, *Equal Access to Appropriate Instruction for English Language Learners*

Career Education On-The-Job Attendance

SBE Rule 6A-1.044(6)(c), Florida Administrative Code, *Pupil Attendance Records*

Career Education On-The-Job Funding Hours

SBE Rule 6A-6.055(3), Florida Administrative Code, *Definitions of Terms Used in Vocational Education and Adult Programs*

FTE General Instructions 2014-15

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, Florida Administrative Code, *Provision of Free Appropriate Public Education (FAPE) and Development of Individual Educational Plans for Students with Disabilities*

SBE Rule 6A-6.03029, Florida Administrative Code, *Development of Individualized Family Support Plans for Children with Disabilities Ages Birth Through Five Years*

SBE Rule 6A-6.0312, Florida Administrative Code, *Course Modifications for Exceptional Students*

SBE Rule 6A-6.0331, Florida Administrative Code, *General Education Intervention Procedures, Evaluation, Determination of Eligibility, Reevaluation and the Provision of Exceptional Student Education Services*

SBE Rule 6A-6.0334, Florida Administrative Code, *Individual Educational Plans (IEPs) and Educational Plans (EPs) for Transferring Exceptional Students*

SBE Rule 6A-6.03411, Florida Administrative Code, *Definitions, ESE Policies and Procedures, and ESE Administrators*

SBE Rule 6A-6.0361, Florida Administrative Code, *Contractual Agreement with Nonpublic Schools and Residential Facilities*

Matrix of Services Handbook (2012 Revised 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, Florida Administrative Code, *Non-certificated Instructional Personnel*

SBE Rule 6A-1.0503, Florida Administrative Code, *Definition of Qualified Instructional Personnel*

SBE Rule 6A-4.001, Florida Administrative Code, *Instructional Personnel Certification*

SBE Rule 6A-6.0907, Florida Administrative Code, *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

<p style="text-align: center;">NOTE A – SUMMARY FULL-TIME EQUIVALENT (FTE) STUDENT ENROLLMENT</p>

A summary discussion of the significant features of the Gadsden County District School Board (District), the Florida Education Finance Program (FEFP), the FTE, and related areas follows:

1. The District

The District was established pursuant to Section 1001.30, Florida Statutes, to provide public educational services for the residents of Gadsden County, Florida. Those services are provided primarily to prekindergarten 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 State Board of Education (SBE). The geographic boundaries of the District are those of Gadsden 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 elected Superintendent of Schools. The District had 17 District schools other than charter schools, 2 charter schools, 2 District cost centers, and 2 virtual education cost centers serving prekindergarten through 12th-grade students. For the fiscal year ended June 30, 2015, State funding totaling \$24.4 million was provided through the FEFP to the District for the District-reported 5,524.75 unweighted FTE as recalibrated, which included 481.93 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 prekindergarten 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 upon 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 prekindergarten 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

classes per day at 50 minutes per class for the full 180-day school year (i.e., six classes 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

For the 2013-14 school year and beyond, all FTE student enrollment is capped at 1.0 FTE except for the FTE student enrollment reported by the Department of Juvenile Justice (DJJ) 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 the 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 the 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 DJJ 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 2014-15 school year were conducted during and for the following weeks: survey period one was performed for July 7 through 11, 2014; survey period two was performed for October 13 through 17, 2014; survey period three was performed for February 9 through 13, 2015; and survey period four was performed for June 15 through 19, 2015.

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) English for Speakers of Other Languages, (3) Exceptional Student Education, 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, Florida Administrative Code, *Finance and Administration*

SBE Rules, Chapter 6A-4, Florida Administrative Code, *Certification*

SBE Rules, Chapter 6A-6, Florida Administrative Code, *Special Programs I*

NOTE B – TESTING FTE STUDENT ENROLLMENT
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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, 2015. 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:

<u>School</u>	<u>Findings</u>
Districtwide – Reporting of English Language Learner Students	1
1. George W. Munroe Elementary School	2 through 4
2. Havana Middle School	5
3. Havana Elementary School	6 through 7
4. Greensboro Elementary School	8
5. Gretna Elementary School	9 through 12
6. St. Johns Elementary School	13
7. James A. Shanks Middle School	14 through 20
8. Gadsden County Virtual Instruction Program	NA
9. Gadsden Virtual School Franchise	NA
10. Crossroad Academy Charter School*	21 through 23

* 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 ON STUDENT TRANSPORTATION

We have examined the Gadsden 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 (FEFP) for the fiscal year ended June 30, 2015. These requirements are found primarily in Chapter 1006, Part I, E. and Section 1011.68, Florida Statutes; State Board of Education (SBE) Rules, Chapter 6A-3, Florida Administrative Code; and the *Student Transportation General Instructions 2014-15* issued by the Department of Education. As discussed in the representation letter, management is responsible for the District's compliance with State requirements. 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 (AICPA) and the standards applicable to attestation engagements contained in *Government Auditing Standards* issued by the Comptroller General of the United States and, accordingly, included examining, on a test basis, evidence supporting management's assertion about the District's compliance with the aforementioned State requirements and performing such other procedures as we considered necessary in the circumstances. We believe that our examination provides a reasonable basis for our opinion. The legal determination of the District's compliance with these requirements is, however, ultimately the responsibility of the Department of Education.

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

In our opinion, because of the effect of the material noncompliance with State requirements mentioned above involving the students' reported ridership classification or eligibility for State transportation funding, the Gadsden County District School Board has not complied with the aforementioned State requirements

relating to the classification, assignment, and verification of student transportation as reported under the FEFP for the fiscal year ended June 30, 2015.

In accordance with attestation standards established by the AICPA and *Government Auditing Standards*,⁶ we are required to report all deficiencies considered to be significant deficiencies or material weaknesses⁶ 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 or on compliance and other matters, accordingly, we express no such opinions. 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 the students' reported ridership classification or eligibility for State transportation funding. 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 G* and *MANAGEMENT'S RESPONSE*, respectively. The impact of this noncompliance 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.

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 AICPA require us to indicate that this report is intended solely for the information and use of the Legislative Auditing Committee, members of the Florida Senate and the Florida House of Representatives, the SBE, the Department of Education, and applicable District management and is not intended to be and should not be used by anyone other than these specified parties.

Respectfully submitted,



Sherrill F. Norman, CPA
Tallahassee, Florida
December 6, 2016

⁶ 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.

SCHEDULE F

POPULATIONS, TEST SELECTION, AND TEST RESULTS STUDENT TRANSPORTATION

Any student who is transported by the Gadsden 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 Exceptional Student Education 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(4), 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, 2015. (See NOTE B.) The population of vehicles (193) consisted of the total number of vehicles (buses, vans, or passenger cars) reported by the District for each reporting survey period. For example, a vehicle that transported students during the July and October 2014 and February and June 2015 reporting survey periods would be counted in the population as four vehicles. Similarly, the population of students (6,843) consisted of the total number of students reported by the District as having been transported for each reporting survey period. (See NOTE A2.) The District reported students in the following ridership categories:

<u>Ridership Category</u>	<u>Number of Students Transported</u>
Teenage Parents and Infants	4
Individuals with Disabilities Education Act – Prekindergarten through Grade 12, Weighted All Other Florida Education Finance Program Eligible Students	553
	<u>6,286</u>
Total	<u>6,843</u>

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 all 269 students in our student transportation test.⁷

⁷ For student transportation, the material noncompliance is composed of Findings 1, 2, and 3 on SCHEDULE G.

Our examination results are summarized below:

<u>Description</u>	<u>Students</u>	
	<u>With Exceptions</u>	<u>Proposed Net Adjustment</u>
Our tests included 269 of the 6,843 students reported as being transported by the District.	269	(269)
We also noted certain issues in conjunction with our general tests of student transportation that resulted in the addition of 6,574 students.	<u>6,574</u>	<u>(6,574)</u>
Total	<u>6,843</u>	<u>(6,843)</u>

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 Florida Education Finance Program (FEFP) is in compliance with State requirements. 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 2014-15* issued by the Department of Education. Because of the effect of the material noncompliance involving the students' reported ridership classification or eligibility for State transportation funding, the Gadsden County District School Board (District) has not complied 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, 2015. 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 2014 reporting survey periods and the February and June 2015 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 2014 reporting survey period and once for the February 2015 reporting survey period) will be presented in our Findings as two test students.

1. [Ref. 51] The reported ridership of 203 students (4 students were in our test) reported in the July 2014 reporting survey period was not adequately supported. We determined that the *Bus Ridership Attendance Reports* utilized to record student ridership at the time of transportation were not printed until July 24, 2014, which was after the July 2014 reporting survey period. Consequently, these reports could not have been used to record student ridership at the time of transportation. We propose the following adjustment:

July 2014 Survey

20 Days in Term

Individuals Disability Education Act (IDEA) –

Prekindergarten(PK) through Grade 12, Weighted

(3)

**Students
Transported
Proposed Net
Adjustments**

Findings

July 2014 Survey (Continued)

16 Days in Term

IDEA - PK through Grade 12, Weighted	(197)	
All Other FEFP Eligible Students	<u>(6)</u>	(203)

2. [Ref. 52] Our review of the District’s procedures used to document student ridership and supporting records disclosed that the process in place for recording student ridership was contrary to Department of Education (DOE) guidance, *Technical Assistance Note: Guidelines for Maintenance of Records for Audits of Transportation Funding, No. T-06-12*. According to DOE guidance, student ridership must be recorded by the bus driver who transported the students during the 11-day window of the reporting survey period, and the bus driver must sign the bus driver report attesting to the students’ ridership. Our review disclosed that, contrary to this guidance, *Transportation Rosters* documenting student ridership were completed by school personnel rather than bus drivers. Additionally, the District did not retain most of the original *Transportation Rosters* (source documents).

Since there was either no source documents available or the available source documents were not completed and signed by the bus drivers, the ridership of all 6,636 students reported in the October 2014 and February 2015 reporting survey periods could not be validated. We propose the following adjustments:

October 2014 Survey

90 Days in Term

Teenage Parents and Infants	(2)	
IDEA - PK through Grade 12, Weighted	(179)	
All Other FEFP Eligible Students	(3,055)	

February 2015 Survey

90 Days in Term

Teenage Parents and Infants	(2)	
IDEA - PK through Grade 12, Weighted	(173)	
All Other FEFP Eligible Students	<u>(3,225)</u>	(6,636)

3. [Ref. 53] The bus driver’s report supporting the only student ridership reported in the June 2015 reporting survey period (four students) was not available at the time of our examination and could not be subsequently located. We propose the following adjustment:

June 2015 Survey

16 Days in Term

IDEA - PK through Grade 12, Weighted	(4)	(4)
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Findings

4. [Ref. 54] The number of days in term (DIT) for 207 students was incorrectly reported in the July 2014 (203 students) and June 2015 (4 students) reporting survey periods. The students were reported for 16 or 20 DIT but should have been reported for 8, 12, or 18 DIT, in accordance with the schools' instructional calendars. Since the students are cited in Finding 1 (Ref. 51) and Finding 3 (Ref. 53), we are presenting this disclosure finding with no proposed adjustments.

0

5. [Ref. 55] Our general test of reported ridership disclosed that seven students (two students were in our test) reported in the IDEA – PK through Grade 12, Weighted ridership category were not identified with a primary exceptionality code in the State FTE database and the District records did not demonstrate *Individual Educational Plans (IEPs)* that documented that the students had met one of the five criteria required for reporting in a weighted ridership category. Since the students are cited in Finding 2 (Ref. 52), we are presenting this disclosure finding with no proposed adjustments.

0

6. [Ref. 56] Our general test of reported ridership disclosed that 58 PK students (1 student was in our test) were incorrectly reported in the All Other FEFP Eligible Student ridership category. The students were not IDEA students and their parents were not enrolled in the Teenage Parent Program. Since the students are cited in Finding 2 (Ref. 52) we are presenting this disclosure finding with no proposed adjustments.

0

7. [Ref. 57] We determined that nine students in our test were incorrectly reported in the IDEA - PK through Grade 12, Weighted ridership category. We noted that the *IEPs* for five of the students did not indicate that the students met at least one of the five criteria required for reporting in a weighted ridership category; however, we noted that the students lived 2 miles or more from their assigned schools and would have been eligible for reporting in the All Other FEFP Eligible Students ridership category. The files for the other four students did not contain *IEPs* covering the reporting survey periods; however, we noted that one student lived 2 miles or more from the student's assigned school and would have been eligible for reporting in the All Other FEFP Eligible Students ridership category. Since the students are cited in Findings 1 and 4 (Ref. 51 and 54 – seven students) and 2 (Ref. 52 – two students), we present this disclosure Finding with no proposed adjustment.

0

**Students
Transported
Proposed Net
Adjustments**

Findings

8. [Ref. 58] Twenty-seven students in our test were incorrectly reported in the All Other FEFP Eligible Students ridership category. The students lived less than 2 miles from assigned school and were not otherwise eligible to be reported for State transportation funding. Since the students are cited in Finding 2 (Ref. 52), we present this disclosure Finding with no proposed adjustment.

0

9. [Ref. 59] The home addresses for three students in our test were not recorded in the District's Student Information Management System (Skyward); therefore, District records did not demonstrate the students' eligibility for State transportation funding. Since the students involved are cited in Finding 2 (Ref. 52), we present this disclosure Finding with no proposed adjustment.

0

10. [Ref. 60] Thirty-nine students in our test were either not listed on a *Transportation Roster* or were listed but not marked as riding. Consequently, the students were not eligible for State transportation funding. Since the students involved are cited in Findings 1 (Ref. 51) and 2 (Ref. 52), we present this disclosure Finding with no proposed adjustment.

0

Proposed Net Adjustments

(6,843)

SCHEDULE H

RECOMMENDATIONS AND REGULATORY CITATIONS STUDENT TRANSPORTATION

RECOMMENDATIONS

We recommend that Gadsden County District School Board (District) management exercise more care and take corrective action, as appropriate, to ensure that: (1) all *Transportation Rosters* documenting student ridership during the reporting survey periods are timely completed, signed, and dated by the bus drivers who provided the actual transportation and retained; (2) home addresses are maintained and retained for all students reported for student ridership; (3) the number of days in term is accurately reported in accordance with the District's instructional schedules; (4) only those students who are in membership and are documented as having been transported at least 1 day during the reporting survey period are reported for State transportation funding; (5) the distance from home to assigned school is verified prior to reporting students in the All Other Florida Education Finance Program (FEFP) Eligible Students ridership category; (6) students reported in the Individual with Disabilities Act (IDEA) - Prekindergarten (PK) through Grade 12, Weighted ridership category are appropriately documented as meeting one of the five criteria required for reporting in a weighted ridership category as noted on the students' *Individual Educational Plans (IEPs)*; (7) *IEPs* are maintained in readily accessible files; and (8) only PK students who are classified as IDEA students or whose parents are enrolled in a Teenage Parent Program are reported for State transportation funding.

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*

State Board of Education Rules, Chapter 6A-3, Florida Administrative Code, *Transportation Student Transportation General Instructions 2014-15*

NOTES TO SCHEDULES

NOTE A - SUMMARY STUDENT TRANSPORTATION
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A summary discussion of the significant features of student transportation and related areas follows:

1. Student Eligibility

Any student who is transported by bus 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 Exceptional Student Education 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(4), Florida Statutes.

2. Transportation in Gadsden County

For the fiscal year ended June 30, 2015, the District received \$1.55 million for student transportation as part of the State funding through the Florida Education Finance Program (FEFP). The District's student transportation reported by survey period was as follows:

<u>Survey Period</u>	<u>Number of Vehicles</u>	<u>Number of Students</u>
July 2014	47	203
October 2014	70	3,236
February 2015	68	3,400
June 2015	<u>8</u>	<u>4</u>
Total	<u>193</u>	<u>6,843</u>

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*

State Board of Education Rules, Chapter 6A-3, Florida Administrative Code, *Transportation*

NOTE B – TESTING STUDENT TRANSPORTATION
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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, 2015. 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

The School Board of Gadsden County



"Building A Brighter Future"

ROGER P. MILTON
SUPERINTENDENT OF SCHOOLS

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December 5, 2016

Ms. Sherrill F. Norman, CPA
State of Florida Auditor General
111 West Madison Street
Tallahassee, Florida 32399-1450

Dear Ms. Norman:

This letter comes in response to the preliminary and tentative report regarding the Gadsden County District School Board FEFP Audit conducted by your department for the year ending June 30, 2015. The district's response to the preliminary findings is as follows:

Out-of-field teachers and parent notification	All out-of-field teachers will be presented to the Board for its approval and parents will be notified in writing by the respective school principal.
Reporting of correct FEFP program numbers.	Additional training and revised procedures are in place to identify and eliminate errors in reporting FEFP program numbers. Simulations are being used to detect potential errors.
Recording of daily attendance	Adequate safeguards and procedures have been put in place to ensure accurate recording and reporting of daily student attendance.
Inconsistency in bell schedule minutes with student schedule minutes.	Additional monitoring of student schedule minutes is in place to safeguard reporting minutes that are inconsistent with the bell schedule. The monitoring takes place at multiple levels or review.
Teachers with ESOL students in basic classes who lack required in-service points in ESOL strategies	Students enrolled in basic (core) classes will no longer be assigned to teachers who have not met at least the minimum requirement to teach ESOL students.
Student transportation documentation.	Revised and new procedures have been implemented that are consistent with Florida Statutes regarding Transportation FEFP.

The district provided documentation of ridership during the audit process; however, the auditor determined the documentation was not substantial enough to prove ridership. The district disagrees with the auditor's position on this matter (424-51 and 424-52) and will appeal the findings at the appropriate time.

Sincerely,

Roger P. Milton
Superintendent of Schools

RP:JWBjr:jb

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MIDWAY, FL 32343

STEVE SCOTT
DISTRICT NO. 2
QUINCY, FL 32351
HAVANA, FL 32333

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