

Report No. 2018-202  
April 2018

**STATE OF FLORIDA AUDITOR GENERAL**

Attestation Examination

**MONROE COUNTY  
DISTRICT SCHOOL BOARD**

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

For the Fiscal Year Ended  
June 30, 2017



Sherrill F. Norman, CPA  
Auditor General

## Board Members and Superintendent

During the 2016-17 fiscal year, Mark T. Porter served as Superintendent and the following individuals served as Board members:

<u>Board Member</u>	<u>District No.</u>
Bobby Highsmith, Vice Chair from 11-22-16	1
Andy Griffiths, Chair to 11-21-16	2
Mindy Conn from 11-22-16	3
Ed Davidson to 11-21-16	3
John R. Dick, Chair from 11-22-16, Vice Chair to 11-21-16	4
Ronald A. Martin	5

The team leader was Olukemi T. Latilo, 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](mailto:davidhughes@aud.state.fl.us) or by telephone at (850) 412-2971.

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**MONROE COUNTY DISTRICT SCHOOL BOARD**  
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# **MONROE COUNTY DISTRICT SCHOOL BOARD**

## **LIST OF ABBREVIATIONS**

CMW	Class Minutes, Weekly
DEUSS	Date Entered United States School
DIT	Days in Term
DOE	Department of Education
ELL	English Language Learner
EP	Educational Plan
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

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## 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 and student transportation, the Monroe 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, 2017. 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 21 of the 131 students in our ESOL test. Ten (8 percent) of the 131 students in our ESOL test attended charter schools and 3 (14 percent) of the 21 students with exceptions attended charter schools.
- Exceptions involving the reported ridership classification or eligibility for State transportation funding for 85 of the 225 students in our student transportation test.

Noncompliance related to the reported FTE student enrollment resulted in 15 findings. The resulting proposed net adjustment to the District's reported, unweighted FTE totaled negative 12.5262 (all applicable to District schools other than charter schools) but has a potential impact on the District's weighted FTE of negative 17.1671 (16.8635 applicable to District schools other than charter schools and .3036 applicable to charter schools). Noncompliance related to student transportation resulted in 5 findings and a proposed net adjustment of negative 1,929 students.

The weighted adjustments to the FTE student enrollment are presented in our report for illustrative purposes only. The weighted adjustments to the FTE student enrollment 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 (DOE). However, the gross dollar effect of our proposed adjustments to the FTE may be estimated by multiplying the proposed net weighted adjustments to the FTE student enrollment by the base student allocation amount. The base student allocation for the fiscal year ended June 30, 2017, was \$4,160.71 per FTE. For the District, the estimated gross dollar effect of our proposed adjustments to the reported FTE student enrollment is negative \$71,427 (negative 17.1671 times \$4,160.71), of which \$70,164 is applicable to District schools other than charter schools and \$1,263 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 DOE.

## THE DISTRICT

The District was established pursuant to Section 1001.30, Florida Statutes, to provide public educational services for the residents of Monroe 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 Monroe 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 12 schools other than charter schools, 6 charter schools, and 2 virtual education cost centers serving PK through 12th-grade students.

For the fiscal year ended June 30, 2017, State funding totaling \$5.2 million was provided through the FEFP to the District for the District-reported 8,217.36 unweighted FTE as recalibrated, which included 1,137.18 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.

School districts report all FTE student enrollment regardless of the 1.0 FTE cap. The DOE combines all FTE student enrollment reported for the student by all school districts, including the Florida Virtual School.

The DOE 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 by the Department of Juvenile Justice for FTE student enrollment earned beyond the 180-day school year is not included in the recalibration to 1.0 FTE.

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. However, if a student only has FTE student enrollment reported in one survey of the 180-day school year (Survey 2 or Survey 3), the FTE student enrollment reported will be capped at .5000 FTE, even if FTE student enrollment is reported in Survey 1 or Survey 4, with the exception of FTE student enrollment reported by the Department of Juvenile Justice for students beyond the 180-day school year.

### **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 classified as a student with a disability under the IDEA, 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 \$1.04 million for student transportation as part of the State funding through the FEFP.

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Sherrill F. Norman, CPA  
Auditor General

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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 Monroe 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, 2017. 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 2016-17* 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 misstatements 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 test 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, the Monroe 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, 2017.

### ***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<sup>1</sup> 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

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<sup>1</sup> 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. 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  
April 9, 2018

# 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, 2017, the Monroe County District School Board (District) reported to the DOE 8,217.36 unweighted FTE as recalibrated, which included 1,137.18 unweighted FTE as recalibrated for charter schools, at 12 District schools other than charter schools, 6 charter schools, and 2 virtual education cost centers.

### Schools and Students

As part of our examination procedures, we tested the FTE student enrollment reported to the DOE for schools and students for the fiscal year ended June 30, 2017. (See NOTE B.) The population of schools (20) 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 (4,026) 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 21 of the 131 students in our ESOL test.<sup>2</sup> Ten (8 percent) of the 131 students in our ESOL test attended charter schools and 3 (14 percent) of the 21 students with exceptions attended charter schools.

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

<u>Programs</u>	<u>Number of Schools</u>		<u>Number of Students at Schools Tested</u>		<u>Students With Exceptions</u>	<u>Recalibrated Unweighted FTE</u>		<u>Proposed Adjustments</u>
	<u>Population</u>	<u>Test</u>	<u>Population</u>	<u>Test</u>		<u>Population</u>	<u>Test</u>	
Basic	20	6	2,922	57	0	5,852.7300	23.3884	2.7331
Basic with ESE Services	18	5	633	43	2	1,571.5300	21.6918	(1.8620)
ESOL	15	4	425	131	21	569.1500	50.8382	(11.1000)
ESE Support Levels 4 and 5	8	3	26	24	2	47.1900	20.1150	(1.0002)
Career Education 9-12	4	1	<u>20</u>	<u>17</u>	<u>1</u>	<u>176.7600</u>	<u>3.6117</u>	<u>(1.2971)</u>
All Programs	20	6	<u>4,026</u>	<u>272</u>	<u>26</u>	<u>8,217.3600</u>	<u>119.6451</u>	<u>(12.5262)</u>

<sup>2</sup> For ESOL, the material noncompliance is composed of Findings 4, 5, 6, 11, and 14 on *SCHEDULE D*.

## **Teachers**

We also tested teacher qualifications as part of our examination procedures. (See NOTE B.) Specifically, the population of teachers (199, of which 179 are applicable to District schools other than charter schools and 20 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 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. From the population of teachers, we selected 56 and found exceptions for 5 teachers. Ten (18 percent) of the 56 teachers in our test taught at charter schools and 1 (20 percent) of the 5 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 DOE.

# SCHEDULE B

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

<u>District Schools Other Than Charter Schools</u>			
<u>No. Program (1)</u>	<u>Proposed Net Adjustment (2)</u>	<u>Cost Factor</u>	<u>Weighted FTE (3)</u>
101 Basic K-3	.3808	1.103	.4200
102 Basic 4-8	1.7808	1.000	1.7808
103 Basic 9-12	(1.4342)	1.001	(1.4356)
112 Grades 4-8 with ESE Services	.1414	1.000	.1414
113 Grades 9-12 with ESE Services	(2.0034)	1.001	(2.0054)
130 ESOL	(9.0943)	1.194	(10.8586)
254 ESE Support Level 4	(1.0002)	3.607	(3.6077)
300 Career Education 9-12	<u>(1.2971)</u>	1.001	<u>(1.2984)</u>
Subtotal	<u>(12.5262)</u>		<u>(16.8635)</u>
<u>Charter Schools</u>			
<u>No. Program (1)</u>	<u>Proposed Net Adjustment (2)</u>	<u>Cost Factor</u>	<u>Weighted FTE (3)</u>
101 Basic K-3	.8300	1.103	.9155
102 Basic 4-8	1.1757	1.000	1.1757
130 ESOL	<u>(2.0057)</u>	1.194	<u>(2.3948)</u>
Subtotal	<u>.0000</u>		<u>(.3036)</u>
<u>Total of Schools</u>			
<u>No. Program (1)</u>	<u>Proposed Net Adjustment (2)</u>	<u>Cost Factor</u>	<u>Weighted FTE (3)</u>
101 Basic K-3	1.2108	1.103	1.3355
102 Basic 4-8	2.9565	1.000	2.9565
103 Basic 9-12	(1.4342)	1.001	(1.4356)
112 Grades 4-8 with ESE Services	.1414	1.000	.1414
113 Grades 9-12 with ESE Services	(2.0034)	1.001	(2.0054)
130 ESOL	(11.1000)	1.194	(13.2534)
254 ESE Support Level 4	(1.0002)	3.607	(3.6077)
300 Career Education 9-12	<u>(1.2971)</u>	1.001	<u>(1.2984)</u>
Total	<u>(12.5262)</u>		<u>(17.1671)</u>

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 DOE. (See NOTE A5.)

# SCHEDULE C

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## PROPOSED ADJUSTMENTS BY SCHOOL FULL-TIME EQUIVALENT STUDENT ENROLLMENT

<u>No.</u> <u>Program</u>	<u>Districtwide</u>	<u>Proposed Adjustments (1)</u>		<u>Balance Forward</u>
		<u>#0101</u>	<u>#0111</u>	
101 Basic K-3	.....	.....	.3808	.3808
102 Basic 4-8	(.3252)	.....	2.1060	1.7808
103 Basic 9-12	(10.2798)	8.8456	.....	(1.4342)
112 Grades 4-8 with ESE Services	(.3586)	.....	.5000	.1414
113 Grades 9-12 with ESE Services	(1.4198)	(.5836)	.....	(2.0034)
130 ESOL	.....	(6.6075)	(2.4868)	(9.0943)
254 ESE Support Level 4	.....	(.5002)	(.5000)	(1.0002)
300 Career Education 9-12	<u>.....</u>	<u>(1.2971)</u>	<u>.....</u>	<u>(1.2971)</u>
Total	<u>(12.3834)</u>	<u>(.1428)</u>	<u>.0000</u>	<u>(12.5262)</u>

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

\*Charter School

## SCHEDULE C

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### PROPOSED ADJUSTMENTS BY SCHOOL FULL-TIME EQUIVALENT STUDENT ENROLLMENT

<u>No.</u> <u>Program</u>	<u>Proposed Adjustments (1)</u>		
	<u>Brought Forward</u>	<u>#0341*</u>	<u>Total</u>
101 Basic K-3	.3808	.8300	1.2108
102 Basic 4-8	1.7808	1.1757	2.9565
103 Basic 9-12	(1.4342)	.....	(1.4342)
112 Grades 4-8 with ESE Services	.1414	.....	.1414
113 Grades 9-12 with ESE Services	(2.0034)	.....	(2.0034)
130 ESOL	(9.0943)	(2.0057)	(11.1000)
254 ESE Support Level 4	(1.0002)	.....	(1.0002)
300 Career Education 9-12	(1.2971)	.....	<u>(1.2971)</u>
Total	<u>(12.5262)</u>	<u>.0000</u>	<u>(12.5262)</u>

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

\*Charter School

# SCHEDULE D

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## 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 2016-17* issued by the DOE. All noncompliance disclosed by our examination procedures is discussed below and requires management’s attention and action as presented in *SCHEDULE E*.

### Findings

*Our examination included the July and October 2016 reporting survey periods and the February and June 2017 reporting survey periods (See NOTE A6.). Unless otherwise specifically stated, the Findings and Proposed Adjustments presented herein are for the October 2016 reporting survey period, the February 2017 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.*

**Proposed Net  
Adjustments  
(Unweighted FTE)**

### Districtwide – Reporting of Bell Schedules

1. [Ref. 11104/16101/34101] Student course schedules were incorrectly reported for three of the four nonvirtual schools tested. The daily instructional and bell schedules provided for the schools supported a varying number of instructional minutes per week that met the minimum reporting of CMW; however, the students’ course schedules were not reported in agreement with the daily instructional and bell schedules. We noted differences ranging from 10 CMW to 780 CMW. Student course schedules, which are necessary for the recalibration process to work properly, should reflect the correct number of CMW according to the school instructional and bell schedules. Since most of the students were reported at only one school for the entire school year and their reported FTE was recalibrated to 1.0, this incorrect reporting did not affect their ultimate funding level. As such, we present this disclosure finding with no proposed adjustment.

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**Findings**

**Districtwide – Reporting Multiple Student Identifier Numbers**

2. [Ref. 101] Our review of the District's reported data disclosed that there were 61 students who were reported using two different identification numbers (the social security number in the October 2016 reporting survey period and the student identifier number in the February 2017 reporting survey number). Consequently, the students' FTEs were not properly grouped with all reporting survey periods for the recalibration process and resulted in the overall FTE for each student to exceed 1.0000 FTE. We confirmed with DOE personnel that the FTE was more than 1.0000 FTE after all edits and the recalibration were made as originally reported with the two different identification numbers. Accordingly, we propose the following adjustment:

102 Basic 4-8	(.3252)	
103 Basic 9-12	(10.2798)	
112 Grades 4-8 with ESE Services	(.3586)	
113 Grades 9-12 with ESE Services	<u>(1.4198)</u>	<u>(12.3834)</u>
		<u>(12.3834)</u>

**Key West High School (#0101)**

3. [Ref. 10101] The EPs for two students in the Gifted Program were not available at the time of our examination and could not be subsequently located. We propose the following adjustment:

103 Basic 9-12	1.0838	
113 Grades 9-12 with ESE Services	<u>(1.0838)</u>	.0000

4. [Ref. 10102] ELL Committees for ten students were not convened by October 1 (three students) or within 30 school days prior to the students' DEUSS anniversary dates (seven students) to consider the students' continued ESOL placements beyond 3 years from the students' DEUSS. We also noted that the English language proficiency for seven of the students was not assessed within 30 school days prior to the students' DEUSS anniversary dates. We propose the following adjustment:

103 Basic 9-12	3.1773	
130 ESOL	<u>(3.1773)</u>	.0000

5. [Ref. 10103] One ELL student was reported in the ESOL Program beyond the maximum 6-year period allowed for State funding of ESOL. We propose the following adjustment:

**Proposed Net  
Adjustments  
(Unweighted FTE)**

**Findings**

**Key West High School (#0101) (Continued)**

103 Basic 9-12	.3570	
130 ESOL	<u>(.3570)</u>	.0000

6. [Ref. 10104] One ELL student’s English language proficiency was not assessed 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	.3570	
130 ESOL	<u>(.3570)</u>	.0000

7. [Ref. 10105] The *Matrix of Services* form for one ESE student was developed after the October 2016 reporting survey period. We propose the following adjustment:

113 Grades 9-12 with ESE Services	.5002	
254 ESE Support Level 4	<u>(.5002)</u>	.0000

8. [Ref. 10106] One Career Education 9-12 student who participated in OJT did not work during the February 2017 reporting survey period. We propose the following adjustment:

300 Career Education 9-12	<u>(.1428)</u>	(.1428)
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9. [Ref. 10170] One teacher taught a Basic subject area class that included ELL students but had earned only 18 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 adjustments:

103 Basic 9-12	.6337	
130 ESOL	<u>(.6337)</u>	.0000

10. [Ref. 10171/72] Two teachers were not properly certified and were not approved by the School Board to teach out of field. The teachers held certification in Biology but taught courses that required certification in Earth Space Science (Ref. 10171) and Technology Education (Ref. 10172). 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. 10171</u>		
103 Basic 9-12	2.0825	
130 ESOL	<u>(2.0825)</u>	.0000

**Proposed Net  
Adjustments  
(Unweighted FTE)**

**Findings**

**Key West High School (#0101)** (Continued)

<u>Ref. 10172</u>		
103 Basic 9-12	1.1543	
300 Career Education 9-12	<u>(1.1543)</u>	.0000
		<u>(.1428)</u>

**Horace O’Bryant School (#0111)**

11. [Ref. 11101] ELL Committees for six students were not convened by October 1 (four 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 the English language proficiency for two of the students was not assessed within 30 school days prior to the students’ DEUSS anniversary dates. In addition, the *ELL Student Plan* for one of the 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	2.1060	
130 ESOL	<u>(2.1060)</u>	.0000

12. [Ref. 11103] One ESE student was not reported in accordance with the student’s *Matrix of Services* form. We propose the following adjustment:

112 Grades 4-8 with ESE Services	.5000	
254 ESE Support Level 4	<u>(.5000)</u>	.0000

13. [Ref. 11170] One teacher taught Primary 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 of the students were not notified of the teacher's out-of-field status. We propose the following adjustment:

101 Basic K-3	.3808	
130 ESOL	<u>(.3808)</u>	.0000

.0000

**Sigsbee Elementary School (#0341) Charter School**

14. [Ref. 34102] The files for four ELL students did not contain evidence that the parents had been notified of the students’ ESOL placements. We propose the following adjustment:

**Proposed Net  
Adjustments  
(Unweighted FTE)**

**Findings**

**Sigsbee Elementary School (#0341) Charter School** (Continued)

101 Basic K-3	.8300	
102 Basic 4-8	.9296	
130 ESOL	<u>(1.7596)</u>	.0000

15. [Ref. 34170] One teacher who taught two different courses to an ELL student and was not properly certified or approved by the Charter School Board to teach out of field. The teacher held certification in English but taught a course that required certification in Social Studies. In addition, the teacher taught an English course but did not have the required ESOL endorsement to teach ELL students and was not approved by the Charter School Board to teach such students out of field. We also noted that the parents of the ELL student were not notified of the teacher’s out-of-field status in Social Studies or ESOL. We propose the following adjustment:

102 Basic 4-8	.2461	
130 ESOL	<u>(.2461)</u>	.0000
		<u>.0000</u>

**Proposed Net Adjustment** **(12.5262)**

## SCHEDULE E

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### RECOMMENDATIONS AND REGULATORY CITATIONS FULL-TIME EQUIVALENT STUDENT ENROLLMENT

#### RECOMMENDATIONS

We recommend that Monroe County District School Board (District) management exercise more care and take corrective action, as appropriate, to ensure that: (1) students' course schedules are reported in accordance with the schools' daily instructional and bell schedules; (2) the English language proficiency of students being considered for continuation of their ESOL placements beyond the 3-year base period is timely assessed and ELL Committees are timely convened subsequent to these assessments; (3) *ELL Student Plans* are timely prepared, identify all of the courses that are to employ ESOL strategies, and are retained in the students' files; (4) ELL students are not reported in the ESOL Program for more than the 6-year period allowed for State funding of ESOL; (5) EPs and *Matrix of Services* forms for ESE students are timely prepared and are retained in the students' files; (6) ESE students are reported in accordance with the students' *Matrix of Services* forms that are dated, timely completed, and maintained in the students' files; (7) 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; (8) teachers are properly certified or, if teaching out of field, are timely approved by the District School Board or Charter School Board to teach out of field; (9) parents are timely notified when their children are assigned to teachers teaching out of field; (10) ESOL teachers earn the in-service training points required by SBE Rule 6A-6.0907, FAC, and the teachers' in-service training timelines; (11) parents are timely notified of their children's ESOL placements; and (12) the student identification number used to base the FTE reported to the DOE is consistently reported for all reporting survey periods.

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.

#### 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, 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 2016-17*

## **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 2016-17*

*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 2016-17*

## **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-6.0331, 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*

**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**

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<p style="text-align: center;"><b>NOTE A – SUMMARY</b> <b>FULL-TIME EQUIVALENT STUDENT ENROLLMENT</b></p>
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A summary discussion of the significant features of the Monroe 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 Monroe 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 Monroe 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 12 schools other than charter schools, 6 charter schools, and 2 virtual education cost centers serving PK through 12<sup>th</sup>-grade students.

For the fiscal year ended June 30, 2017, State funding totaling \$5.2 million was provided through the FEFP to the District for the District-reported 8,217.36 unweighted FTE as recalibrated, which included 1,137.18 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**

School districts report all FTE student enrollment regardless of the 1.0 FTE cap. The DOE combines all FTE student enrollment reported for the student by all school districts, including the Florida Virtual School. If the combined reported FTE for the student exceeds 1.0 FTE, the DOE recalibrates the reported FTE student enrollment for each student to 1.0 FTE. The FTE student enrollment reported by the Department of Juvenile Justice for FTE student enrollment earned beyond the 180-day school year is not included in the recalibration to 1.0 FTE.

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. However, if a student only has FTE student enrollment reported in one survey of the 180-day school year (Survey 2 or Survey 3), the FTE student enrollment reported will be capped at .5000 FTE, even if FTE student enrollment is reported in Survey 1 or Survey 4, with the exception of FTE student enrollment reported by the Department of Juvenile Justice for students beyond the 180-day school year.

#### **5. Calculation of FEFP Funds**

The amount of State and local FEFP funds is calculated by the DOE 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 2016-17 school year were conducted during and for the following weeks: Survey 1 was performed from July 11 through 15, 2016; Survey 2 was performed from October 10 through 14, 2016; Survey 3 was performed from February 6 through 10, 2017; and Survey 4 was performed from June 12 through 16, 2017.

## 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*

<b>NOTE B – TESTING FTE STUDENT ENROLLMENT</b>
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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 DOE for the fiscal year ended June 30, 2017. 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 Bell Schedules	1
Districtwide – Reporting Multiple Student Identifier Numbers	2
1. Key West High School	3 through 10
2. Horace O' Bryant School	11 through 13
3. Poinciana Elementary School	NA
4. Sigsbee Elementary School*	14 and 15
5. Monroe Virtual Franchise	NA
6. Monroe Virtual Academy Course	NA

\* Charter School



Sherrill F. Norman, CPA  
Auditor General

# 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 Student Transportation

We have examined the Monroe 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, 2017. 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 2016-17* 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 misstatements 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 Monroe 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, 2017.

### **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<sup>3</sup> 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*

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<sup>3</sup> 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  
April 9, 2018

# SCHEDULE F

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## POPULATIONS, TEST SELECTION, AND TEST RESULTS STUDENT TRANSPORTATION

Any student who is transported by the Monroe 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 classified as a student with a disability under the IDEA, 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 DOE for the fiscal year ended June 30, 2017. (See NOTE B.) The population of vehicles (88) 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 2016 and February and June 2017 reporting survey periods would be counted in the population as four vehicles. Similarly, the population of students (5,003) 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:

<u>Ridership Category</u>	<u>Number of Students Transported</u>
IDEA – PK through Grade 12, Weighted	153
All Other FEFP Eligible Students	<u>4,850</u>
Total	<u>5,003</u>

Students with exceptions are students with exceptions affecting their ridership category. Students cited only for incorrect reporting of DIT, 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 85 of 225 students in our student transportation test.<sup>4</sup>

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<sup>4</sup> For student transportation, the material noncompliance is composed of Findings 3, 4, and 5 on *SCHEDULE G*.

Our examination results are summarized below:

<u>Description</u>	<u>Buses</u>	<u>Students</u>	
	<u>Proposed Net Adjustment</u>	<u>With Exceptions</u>	<u>Proposed Net Adjustment</u>
We noted that the reported number of buses in operation was overstated.	(4)	-	-
Our tests included 225 of the 5,003 students reported as being transported by the District.	-	85	(85)
In conjunction with our general tests of student transportation we identified certain issues related to 1,844 additional students.	-	<u>1,844</u>	<u>(1,844)</u>
Total	<u>(4)</u>	<u>1,929</u>	<u>(1,929)</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 DOE.

# SCHEDULE G

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## 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 2016-17* issued by the DOE. 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 2016 reporting survey periods and the February and June 2017 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 (e.g., once for the October 2016 reporting survey period and once for the February 2017 reporting survey period) will be presented in our Findings as two test students.*

1. [Ref. 55] The number of buses in operation was overstated by two buses in the October 2016 reporting survey period and by two buses in the February 2017 reporting survey period due to data entry errors when keying in the bus numbers. We propose the following adjustments:

**October 2016 Survey**

Number of Buses in Operation (2)

**February 2017 Survey**

Number of Buses in Operation (2)  
(4)

0

**Students  
Transported  
Proposed Net  
Adjustments**

**Findings**

2. [Ref. 51] The number of DIT for four students (one student was in our test) in the July 2016 reporting survey period was incorrectly reported. The students were reported for 17 DIT rather than 8 DIT in accordance with the District’s summer instructional calendar. We propose the following adjustment:

**July 2016 Survey**

17 Days in Term

IDEA - PK through Grade 12, Weighted (4)

8 Days in Term

IDEA - PK through Grade 12, Weighted 4 0

3. [Ref. 52] Our general tests disclosed that District records did not evidence the reported ridership of 1,898 students (76 students were in our test). Students were not always marked as being transported on the bus drivers’ reports (1,612 students) and some students were not listed on the bus drivers’ reports of the students’ assigned buses (286 students). We also noted the following exceptions for 28 of the students:

- a. The IEPs for 7 of the students in our test reported in the IDEA – PK through Grade 12, Weighted ridership category did not indicate that the students met at least one of the five criteria for reporting in a weighted ridership category.
- b. Twenty-one PK students were incorrectly reported in the All Other FEFP Eligible Students ridership category. The students were not IDEA students and were attending Voluntary PK or Headstart Programs; consequently, these students were not eligible for State transportation funding.

We propose the following adjustments:

**July 2016 Survey**

8 Days in Term

IDEA - PK through Grade 12, Weighted (5)

**October 2016 Survey**

90 Days in Term

IDEA - PK through Grade 12, Weighted (9)  
All Other FEFP Eligible Students (1,085)

**February 2017 Survey**

90 Days in Term

IDEA - PK through Grade 12, Weighted (9)  
All Other FEFP Eligible Students (790) (1,898)

**Students  
Transported  
Proposed Net  
Adjustments**

**Findings**

4. [Ref. 53] Six students in our test were incorrectly reported in the IDEA – PK through Grade 12, Weighted ridership category. The students’ IEPs did not indicate that the students met at least one of the five criteria required for reporting in a weighted ridership category and the students were not otherwise eligible for State transportation funding. We propose the following adjustments:

**July 2016 Survey**

8 Days in Term

IDEA - PK through Grade 12, Weighted (1)

**October 2016 Survey**

90 Days in Term

IDEA - PK through Grade 12, Weighted (2)

**February 2017 Survey**

90 Days in Term

IDEA - PK through Grade 12, Weighted (1)

**June 2017 Survey**

15 Days in Term

IDEA - PK through Grade 12, Weighted (2) (6)

5. [Ref. 54] Our general tests disclosed that 25 PK students (3 students were in our test) were incorrectly reported in the All Other FEEP Eligible Students ridership category (24 students) or in the IDEA – PK through Grade 12, Weighted ridership category (1 student). The students were not IDEA students and were attending Voluntary PK or Headstart Programs; consequently, these students were not eligible for State transportation funding. We propose the following adjustments:

**February 2017 Survey**

90 Days in Term

All Other FEEP Eligible Students (24)

**June 2017 Survey**

15 Days in Term

IDEA - PK through Grade 12, Weighted (1) (25)

**Proposed Net Adjustment**

**(1,929)**

# SCHEDULE H

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## RECOMMENDATIONS AND REGULATORY CITATIONS STUDENT TRANSPORTATION

### RECOMMENDATIONS

We recommend that Monroe County District School Board (District) management exercise more care and take corrective action, as appropriate, to ensure that: (1) the number of buses in operation and the number of DIT are accurately reported and documentation is maintained to support that reporting; (2) 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; (3) only PK students classified as IDEA students or whose parents are enrolled in a Teenage Parent Program are reported for State transportation funding; (4) students reported in 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 noted on the students' IEPs; and (5) transported students are reported in the correct ridership category as evidenced by appropriate supporting documentation.

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 2016-17*

## NOTES TO SCHEDULES

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<b>NOTE A - SUMMARY STUDENT TRANSPORTATION</b>
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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 classified as a student with a disability under the IDEA, 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 Monroe County

For the fiscal year ended June 30, 2017, the District received \$1.04 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:

<u>Survey Period</u>	<u>Number of Vehicles</u>	<u>Number of Students</u>
July 2016	9	26
October 2016	32	2,646
February 2017	34	2,302
June 2017	<u>13</u>	<u>29</u>
Totals	<u>88</u>	<u>5,003</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*

SBE Rules, Chapter 6A-3, FAC, *Transportation*

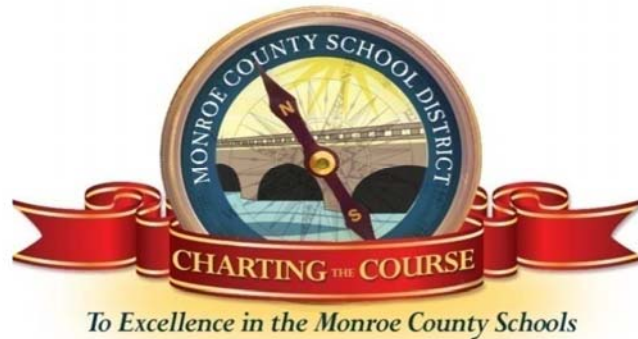
<b>NOTE B – TESTING STUDENT TRANSPORTATION</b>
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Our examination procedures for testing provided for the selection of students using judgmental methods for testing student transportation as reported to the DOE for the fiscal year ended June 30, 2017. 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

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MARK T. PORTER  
Superintendent of Schools



## Members of the Board

District # 1  
BOBBY HIGSMITH  
Chairman

District # 2  
ANDY GRIFFITHS

District # 3  
MINDY CONN  
Vice-Chairman

District # 4  
JOHN R. DICK

District # 5  
RONALD A. MARTIN

April 9, 2018

Ms. Sherrill F. Norman, CPA  
Auditor General  
State of Florida  
G74 Claude Pepper Building  
111 West Madison Street  
Tallahassee, FL 32399-1450

Dear Ms. Norman,

I have reviewed the list of preliminary and tentative findings and recommendations based on your examination of Monroe County District School Board's compliance with State requirements regarding the determination and reporting of full-time equivalent (FTE) students under the Florida Education Finance Program and the number of students transported as reported for the fiscal year ended June 30, 2017. The District agrees with all of the findings noted.

Corrective actions to be taken are noted below by reference number. Those findings that have similar responses are grouped together.

### Florida Education Finance Program

#### Finding 1

Student course schedules were incorrectly reported for three of the four nonvirtual schools tested.  
Reference Number 11104, 16101, and 34101

**As noted in the finding, the incorrect reporting did not affect the District's ultimate funding level. However, upon notification by the auditor, staff identified and corrected the issue.**

#### Finding 2

Sixty one students were reported using two different identification numbers causing issues with the recalibration process.  
Reference Number 101

**The State Department of Education was aware of the reporting anomalies as they were the basis for a successful school grade appeal (Key West Collegiate High School) and was processed by the Evaluation/Accountability team following the survey 2-3 Match process for value-added modeling**

development. The SIS used in October used the legacy student identification number (often the SSN with an X or a “44xxxxxxx” number where the digits following the 44 were not zero). The SIS used in the Spring used the FOCUS student identification number which was typically “44000xxxxx”.

According to the 2016-2017 FTE Reporting Guidelines the students are supposed to be reported including all FTE associated with them and then it is the department’s responsibility to cap FTE at 1.000 or 0.5000 depending upon the scenario.

Further, the general instructions specifically point out that if a student is only reported in one of the two surveys then the department will recalibrate the FTE to 0.5000. It is not clear why these students were allowed to be reported beyond the cap simply because of the mis-matched student identifier. The department has a variety of ways that these students could have been matched (ALIAS ID, Name, Gender, Birthdate) that would have resulted in them being properly identified – or the department could have treated them as isolated students being reported in a single survey in which case their FTE should have been restricted to 0.5000.

Findings 3 and 7

Instances were noted in which Matrix of Services forms and Educational Plans (EP) were not timely prepared and/or retained in the students’ files.

Reference Number: 10101 and 10105

**The District has enhanced its procedures and oversight to ensure that appropriate documentation is maintained in the students’ files.**

Findings 4, 6, and 11

English language proficiency of students being considered for continuation of their ESOL placements was not assessed within 30 school days prior to the student’s Date Entered United States School (DEUSS) or by October 1 if the students’ DEUSS falls within the first two weeks of school, or to consider the students’ continued placement beyond three years nor were ELL committees timely convened subsequent to these assessments.

Reference Numbers: 10102, 10104, and 11101

**The District will enhance its procedures and oversight to ensure that students are identified and assessed within 30 school days prior to their DEUSS anniversary date or October 1, as appropriate. In addition, the District will enhance its procedures to ensure that the ELL committee meets to consider extended placement for those students eligible for extended placement.**

Finding 5

An Instance was noted in which the District reported an English Language Learner (ELL) student in excess of the 6-year period allowed for State funding.

Reference Numbers: 10103

**The District has implemented enhanced procedures to ensure that ELL students that exceed the 6-year maximum are not reported for ELL weighted funding.**

Finding 8

Timecards for a Career Education student who participated in on-the-job training (OJT) did not work during the reporting survey period.

Reference Number: 10105

**The District will enhance its procedures to ensure that Career Education students who participate in OJT and do not work during the survey period are not reported for funding purposes.**

Finding 9

An Instance was noted where a teacher taught a Basic subject area class included ELL students had not earned sufficient in-service training hours as required by State Board of Education rule.

Reference Number: 10170

**The District will enhance its procedures to ensure that instructional personnel that teach ELL students have earned sufficient in-service training points to comply with the State Board of Education rule.**

Finding 10, 13, and 15

Instances were noted in which teachers taught classes that included ELL students which they were not properly certified to teach. These teachers had not been approved by the School Board or the Charter School Board to teach out of field. The parents of students in these classes were not notified of the teachers' out-of-field status.

Reference Numbers: 10171, 10172, 11170 and 34170

**The District will continue to enhance its procedures to ensure that teachers are properly certified to teach the classes reported for FEEP funding as well as ensuring that parents are appropriately notified of teachers' out-of-field status.**

Finding 12

A student was not reported in accordance with the student's *Matrix of Services* form.

Reference Number: 11103

**The District will continue to enhance its procedures to ensure that students are reported in accordance with their *Matrix of Services* form.**

Finding 14

Files for three ELL students did not contain evidence that the parents had been notified of the students' ESOL placements.

Reference Number: 34102

**The District will continue to enhance its procedures to ensure that student files contain evidence of the required notification.**

### **Transportation**

Finding 1

The reported number of buses in operation was overstated.

Reference Number 55

**The District will continue to enhance its procedures to ensure that the number of buses are accurately reported.**

Finding 2

Students were incorrectly reported for the number of Days in Term (DIT) during the July 2016 reporting survey.

Reference Number: 51

**The District will continue to enhance its procedures to ensure that the DIT is correctly reported.**

Finding 3

District records did not always evidence reported ridership. Instances were noted in which students were not listed on the bus driver reports or were not marked as being transported.

Reference Numbers: 52

**The District will continue to enhance its procedures to evidence the reported ridership of all students transported. The District will also enhance its procedures to ensure that students are marked as being transported and that students are listed on the bus drivers' reports.**

Finding 3.a. and 4

Students were incorrectly reported in weighted ridership categories. Instances were noted where documentation was not available to support the inclusion of student in the weighted ridership categories.

Reference Numbers: 52 and 53

**The District will enhance its procedures to ensure that students reported for weighted ridership categories meet the appropriate criteria for such reporting and that documentation is available to support the student's inclusion in the weighted ridership categories.**

Findings 3.b and 5

Students transported were incorrectly reported or were not otherwise eligible for State transportation funding.

Reference Numbers: 52 and 54

**The District will enhance its procedures to ensure that all students transported are correctly and accurately reported and that only eligible student riders are reported for funding.**

We appreciate the professionalism of staff throughout the audit process.

Sincerely,



Mark T. Porter, Superintendent  
Monroe County Schools