

Report No. 2021-027
September 2020

STATE OF FLORIDA AUDITOR GENERAL

Attestation Examination

**NASSAU COUNTY
DISTRICT SCHOOL BOARD**

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

For the Fiscal Year Ended
June 30, 2019



Sherrill F. Norman, CPA
Auditor General

Board Members and Superintendent

During the 2018-19 fiscal year, Dr. Kathy Burns served as Superintendent and the following individuals served as Board members:

	<u>District No.</u>
Donna Martin, Chair	1
Gail G. Cook, Vice Chair	2
Jamie Deonas	3
Russell L. Johnson from 12-4-18	4
Dr. Kimberly Joyce Fahlgren through 8-1-18 ^a	4
Lissa Braddock from 11-20-18	5
Jonathan R. Petree through 11-19-18	5

^a Board member resigned and position remained vacant from 8-2-18, through 12-3-18.

The team leader was Clayton Dyer 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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NASSAU COUNTY DISTRICT SCHOOL BOARD
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NASSAU 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
DJJ	Department of Juvenile Justice
ELL	English Language Learner
ESE	Exceptional Student Education
ESOL	English for Speakers of Other Languages
FAC	Florida Administrative Code
FEFP	Florida Education Finance Program
FTE	Full-Time Equivalent
IDEA	Individuals with Disabilities Education Act
IEP	Individual Educational Plan
OJT	On-the-Job Training
PK	Prekindergarten
SBE	State Board of Education

SUMMARY

SUMMARY OF ATTESTATION EXAMINATION

Except for the material noncompliance described below involving reporting errors or records that were not properly or accurately prepared or were not available at the time of our examination and could not be subsequently located for students in Basic with ESE Services, ESOL, ESE Support Levels 4 and 5, and Career Education 9-12, the Nassau 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, including teacher certification, and student transportation as reported under the Florida Education Finance Program (FEFP) for the fiscal year ended June 30, 2019. 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 9 of the 75 students in our Basic with ESE Services test, 10 of the 34 students in our ESOL test, 16 of the 65 students in our ESE Support Levels 4 and 5 test, and 29 of the 78 students in our Career Education 9-12 test.

The District did not report any charter schools; therefore, all our tests relate to District schools other than charter schools and to the District's virtual instruction programs. Noncompliance related to the reported FTE student enrollment resulted in 20 findings. The resulting proposed net adjustment to the District's reported, unweighted FTE totaled negative 15.5600 but has a potential impact on the District's weighted FTE of negative 19.6611. Noncompliance related to student transportation resulted in 7 findings and a proposed net adjustment of negative 256 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, 2019, was \$4,204.42 per FTE. For the District, the estimated gross dollar effect of our proposed adjustments to the reported FTE student enrollment is negative \$82,664 (negative 19.6611 times \$4,204.42).

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 Nassau 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 Nassau 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 schools and 3 virtual education cost centers serving PK through 12th-grade students. The District did not report any charter schools.

For the fiscal year ended June 30, 2019, State funding totaling \$34 million was provided through the FEFP to the District for the District-reported 12,121.90 unweighted FTE as recalibrated. 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 (DJJ) 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 DJJ for students beyond the 180-day school year. However, if a student only has FTE student enrollment reported in one FTE membership survey¹ 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 DJJ 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 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. The District received \$3 million for student transportation as part of the State funding through the FEFP.

¹ FTE is determined and reported during the school year by means of four FTE membership surveys that are conducted under the direction of district and school management. See Note A6. for more information on surveys.

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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 Nassau 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 including teacher certification reported under the Florida Education Finance Program for the fiscal year ended June 30, 2019. 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 2018-19* 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 including teacher certification reported by the District under the Florida Education Finance Program complied with State requirements in all material respects.

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

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

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

Opinion

Our examination disclosed material noncompliance with State requirements relating to the classification, assignment, and verification of full-time equivalent student enrollment as reported under the Florida Education Finance Program for students in our Basic with Exceptional Student Education Services, English for Speakers of Other Languages, Exceptional Student Education Support Levels 4 and 5, and Career Education 9-12 tests involving reporting errors or records that were not properly or accurately prepared or were not available at the time of our examination and could not be subsequently located.

In our opinion, except for the material noncompliance with State requirements described in the preceding paragraph involving reporting errors or records that were not properly or accurately prepared or were not available at the time of our examination and could not be subsequently located for students in Basic with Exceptional Student Education Services, English for Speakers of Other Languages, Exceptional Student Education Support Levels 4 and 5, and Career Education 9-12, the Nassau 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 including teacher certification reported under the Florida Education Finance Program for the fiscal year ended June 30, 2019.

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 weaknesses² 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, 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

² 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.

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 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 Services, English for Speakers of Other Languages, Exceptional Student Education Support levels 4 and 5, and Career Education 9-12. Our examination disclosed certain findings that are required to be reported under *Government Auditing Standards* and all findings, along with the views of responsible officials, are described in *SCHEDULE D* and *MANAGEMENT'S RESPONSE*, respectively. The impact of this noncompliance with State requirements on the District's reported full-time equivalent student enrollment including teacher certification 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,

A handwritten signature in blue ink that reads "Sherrill F. Norman". The signature is fluid and cursive, with the first name being the most prominent.

Sherrill F. Norman, CPA
Tallahassee, Florida
September 23, 2020

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, 2019, the Nassau County District School Board (District) reported to the DOE 12,121.90 unweighted FTE as recalibrated at 17 District schools and 3 virtual education cost centers. The District did not report any charter schools.

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, 2019. (See NOTE B.) The population of schools (20) consisted of the total number of brick and mortar schools in the District that offered courses, as well as the virtual education cost centers in the District that offered virtual instruction in the FEFP-funded programs. The population of students (6,934) 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 9 of the 75 students in our Basic with ESE Services test,³ 10 of the 34 students in our ESOL test,⁴ 16 of the 65 students in our ESE Support level 4 and 5 test,⁵ and 29 of the 78 students in our Career Education 9-12 test.⁶

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	19	9	5,416	102	4	9,227.34	82.6298	(1.3570)
Basic with ESE Services	19	9	1,249	75	9	2,292.59	64.7643	(5.7082)
ESOL	13	7	75	34	10	106.82	23.4145	(4.6676)
ESE Support Levels 4 and 5	11	4	70	65	16	68.56	49.7132	(1.2264)
Career Education 9-12	4	3	124	78	29	426.59	25.2694	(2.6008)
All Programs	20	9	6,934	354	68	12,121.90	245.7912	(15.5600)

³ For Basic with ESE Services, the material noncompliance is composed of Findings 14 and 15 on *SCHEDULE D*.

⁴ For ESOL, the material noncompliance is composed of Findings 3, 4, 8, 9, 13, 15, 16, 17, and 18 on *SCHEDULE D*.

⁵ For ESE Support Levels 4 and 5, the material noncompliance is composed of Findings 5, 10, 14, and 15.

⁶ For Career Education 9-12, the material noncompliance is composed of Findings 2, 11, 12, 15, and 19 on *SCHEDULE D*.

Teachers

We also tested teacher qualifications as part of our examination procedures. (See NOTE B.) Specifically, the population of teachers (243) 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 80 and found exceptions for 2 teachers.

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>No. Program (1)</u>	<u>Proposed Net Adjustment (2)</u>	<u>Cost Factor</u>	<u>Weighted FTE (3)</u>
101 Basic K-3	.4245	1.108	.4703
102 Basic 4-8	.7690	1.000	.7690
103 Basic 9-12	(2.5505)	1.000	(2.5505)
112 Grades 4-8 with ESE Services	(4.3226)	1.000	(4.3226)
113 Grades 9-12 with ESE Services	(1.3856)	1.000	(1.3856)
130 ESOL	(4.6676)	1.185	(5.5311)
254 ESE Support Level 4	(1.1911)	3.619	(4.3106)
255 ESE Support Level 5	(.0353)	5.642	(.1992)
300 Career Education 9-12	<u>(2.6008)</u>	1.000	<u>(2.6008)</u>
Total	<u>(15.5600)</u>		<u>(19.6611)</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

PROPOSED ADJUSTMENTS BY SCHOOL FULL-TIME EQUIVALENT STUDENT ENROLLMENT

<u>No.</u> <u>Program</u>	<u>Proposed Adjustments (1)</u>			<u>Balance Forward</u>
	<u>#0151</u>	<u>#0221</u>	<u>#0231</u>	
101 Basic K-30000
102 Basic 4-8	4.9130	4.9130
103 Basic 9-125902	.5902
112 Grades 4-8 with ESE Services	(2.6630)	(2.6630)
113 Grades 9-12 with ESE Services5001	.5001
130 ESOL	(1.7588)	(.5902)	(2.3490)
254 ESE Support Level 4	(.4912)	(.5001)	(.9913)
255 ESE Support Level 50000
300 Career Education 9-12	<u>(.3654)</u>	<u>.....</u>	<u>(.8974)</u>	<u>(1.2628)</u>
Total	<u>(.3654)</u>	<u>.0000</u>	<u>(.8974)</u>	<u>(1.2628)</u>

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

<u>No.</u>	<u>Brought Forward</u>	<u>Proposed Adjustments (1)</u>			<u>Total</u>
		<u>#0241</u>	<u>#0242</u>	<u>#0291</u>	
101	.0000	.42454245
102	4.9130	(4.1440)7690
103	.5902	(3.1407)	(2.5505)
112	(2.6630)	(1.6596)	(4.3226)
113	.5001	(1.8857)	(1.3856)
130	(2.3490)	(.4245)	(1.8941)	(4.6676)
254	(.9913)	(.1636)	(.0362)	(1.1911)
255	.0000	(.0273)	(.0080)	(.0353)
300	<u>(1.2628)</u>	<u>.....</u>	<u>.....</u>	<u>(1.3380)</u>	<u>(2.6008)</u>
Total	<u>(1.2628)</u>	<u>.0000</u>	<u>(5.9945)</u>	<u>(8.3027)</u>	<u>(15.5600)</u>

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

SCHEDULE D

FINDINGS AND PROPOSED ADJUSTMENTS FULL-TIME EQUIVALENT STUDENT ENROLLMENT

Overview

Nassau County District School Board (District) management is responsible for determining that the FTE student enrollment including teacher certification 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 2018-19* 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*.

**Proposed Net
Adjustments
(Unweighted FTE)**

Findings

Our examination included the July and October 2018 reporting survey periods and the February and June 2019 reporting survey periods (See NOTE A6.). Unless otherwise specifically stated, the Findings and Proposed Adjustments presented herein are for the October 2018 reporting survey period, the February 2019 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.

Emma Love Hardee Elementary School (#0081)

1. [Ref. 8101] The course schedules for several students were incorrectly reported. The School's bell schedule supported 1,527 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. We noted differences ranging from 150 to 163 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 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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Hilliard Middle-Senior High School (#0151)

2. [Ref. 15101] More work hours were reported than supported by the students' timecards for two Career Education 9-12 students who participated in OJT. We propose the following adjustment:

**Proposed Net
Adjustments
(Unweighted FTE)**

Findings

Hilliard Middle-Senior High School (#0151) (Continued)

300 Career Education 9-12	(.3654)	(.3654)
		(.3654)

Yulee Middle School (#0221)

3. [Ref. 22102] The English language proficiency of one ELL student was not assessed within 30 school days prior to the student’s DEUSS anniversary date to consider the student’s continued ESOL placement beyond 3 years from the student’s DEUSS. In addition, school records did not evidence that the student’s parents were invited to participate in their child’s ELL Committee meeting. We propose the following adjustment:

102 Basic 4-8	.3295	
130 ESOL	(.3295)	.0000

4. [Ref. 22103] The English language proficiency assessment that was the basis for one ELL student’s ESOL placement was not available at the time of our examination and could not be subsequently located; therefore, the student’s ESOL placement was not adequately supported. We propose the following adjustment:

102 Basic 4-8	.8442	
130 ESOL	(.8442)	.0000

5. [Ref. 22104] 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	.4912	
254 ESE Support Level 4	(.4912)	.0000

6. [Ref. 22170] School staff indicated that one teacher was hired as a permanent substitute; however, our review of the teacher’s classroom placement indicated that the teacher was not assigned to fill in for an absent teacher (i.e., in a limited temporary role) but was instead responsible for grading and evaluating students and did hold certification in Athletic Coaching.

Sections 1010.215(1)(c) and 1012.01(2)(a), Florida Statutes, provide that instructional personnel consist of classroom teachers, including substitutes, and means any K-12 staff member whose functions provide direct support in the learning process of students. Classroom teachers, including substitute teachers, are staff members who are assigned the professional activity of instructing students in courses in classroom situations, *(Finding Continues on Next Page)*

Findings

Yulee Middle School (#0221) (Continued)

including basic instruction, ESE, career education, and adult education. Further Section 1012.55(1)(b), Florida Statutes, indicates that each person employed or occupying a position, such as a teacher or other position in which the employee serves in an instructional capacity, in any public school of any district of this State shall hold the certificate required by laws and by SBE rules of the SBE in fulfilling the requirements of the law for the type of service rendered. Such positions include personnel providing direct instruction to students through a virtual environment or through a blended virtual and physical environment.

Since the teacher was providing direct instructional services, was not approved by the School Board to teach out of field, and the students’ parents were not notified of the teacher’s out-of-field status, we propose the following adjustment:

102 Basic 4-8	3.7393	
112 Grades 4-8 with ESE Services	(3.1542)	
130 ESOL	<u>(.5851)</u>	<u>.0000</u>
		<u>.0000</u>

Yulee High School (#0231)

7. [Ref. 23101] The course schedules for several students were incorrectly reported. The School’s bell schedule supported 1,635 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. We noted differences ranging from 150 to 2,065 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 one school for the entire school year and their reported FTE was recalibrated to 1.0, this incorrect reporting did not affect the students’ ultimate funding level. As such, we present this disclosure finding with no proposed adjustment.

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8. [Ref. 23102] School records did not evidence that the parents of one ELL student were invited to participate in their child’s ELL Committee meeting. We propose the following adjustment:

103 Basic 9-12	.2164	
130 ESOL	<u>(.2164)</u>	<u>.0000</u>

**Proposed Net
Adjustments
(Unweighted FTE)**

Findings

Yulee High School (#0231) (Continued)

9. [Ref. 23103] 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:

103 Basic 9-12	.3738	
130 ESOL	<u>(.3738)</u>	.0000

10. [Ref. 23104] One ESE student was not reported in accordance with the student's *Matrix of Services* form. We propose the following adjustment:

113 Grades 9-12 with ESE Services	.5001	
254 ESE Support Level 4	<u>(.5001)</u>	.0000

11. [Ref. 23105] Timecards were not available at the time of our examination and could not be subsequently located for three Career Education 9-12 students who participated in OJT. We propose the following adjustment:

300 Career Education 9-12	<u>(.6810)</u>	(.6810)
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12. [Ref. 23106] The timecard for one Career Education 9-12 student who participated in OJT was signed by the employer on October 3, 2018, prior to the October 2018 FTE membership survey week. We propose the following adjustment:

300 Career Education 9-12	<u>(.2164)</u>	<u>(.2164)</u>
		<u>(.8974)</u>

Hilliard Elementary School (#0241)

13. [Ref. 24101] The *ELL Student Plan* (Plan) for one ELL student was incomplete as the course schedule showing which courses were to employ ESOL strategies was not made part of the Plan until February 12, 2019, which was after the February 2019 reporting survey period. We propose the following adjustment:

101 Basic K-3	.4245	
130 ESOL	<u>(.4245)</u>	<u>.0000</u>
		<u>.0000</u>

Findings

Wildlight Elementary School (#0242)

14. [Ref. 24201] Our examination of the School’s instructional day disclosed that the School did not provide the 900-hour equivalent to students as prescribed by Section 1011.60(2), Florida Statutes; SBE Rule 6A-1.045111, FAC; and the *FTE General Instructions* 2018-19, page 1. Specifically, the number of CMW provided to the 4th and 5th grades was less than 1,500 CMW and, in conjunction with the early release days and reduced number of minutes on Wednesdays, resulted in overreporting the FTE for 221 students (2 students were in our Basic test, 5 students were in our Basic with ESE Services test, and 8 students were in our ESE Support Levels 4 and 5 test). Our recalculation of the FTE and hours of instruction disclosed that only 875.5 hours of the required 900 hours of instruction (or .9728 total FTE) were provided for the 2018-19 school year; therefore, FTE was overstated by 5.9945 FTE. We propose the following adjustment:

102 Basic 4-8	(4.1440)	
112 Grades 4-8 with ESE Services	(1.6596)	
254 ESE Support Level 4	(.1636)	
255 ESE Support Level 5	<u>(.0273)</u>	<u>(5.9945)</u>

(5.9945)

Fernandina Beach High School (#0291)

15. [Ref. 29101] Our examination disclosed that the School did not provide the 180 days of instruction or the 900-hour equivalent to students as prescribed by Section 1011.60(2), Florida Statutes; SBE Rule 6A-1.045111, FAC; and the *FTE General Instructions* 2018-19, page 1. Specifically, we noted that 12th-grade students were released on May 10, 2019, which was 10 school days prior to the last day of school for the rest of the student population. The resulting effect of the above, in conjunction with the early release days and reduced number of instructional minutes on Wednesdays, resulted in the overreporting of the FTE for 510 students (2 students were in our Basic test, 4 students were in our Basic with ESE Services test, 1 student was in our ESOL test, 6 students were in our ESE Support Levels 4 and 5 test, and 18 students were in our Career Education 9-12 test). Our recalculation of the FTE and hours of instruction disclosed that only 864.5 hours of the required 900 hours of instruction (or .9617 total FTE) were provided for the 2018-19 school year; therefore, FTE was overstated by 7.5056 FTE. We propose the following adjustment:

**Proposed Net
Adjustments
(Unweighted FTE)**

Findings

Fernandina Beach High School (#0291) (Continued)

103 Basic 9-12	(4.8203)	
113 Grades 9-12 with ESE Services	(1.8857)	
130 ESOL	(.0673)	
254 ESE Support Level 4	(.0362)	
255 ESE Support Level 5	(.0080)	
300 Career Education 9-12	<u>(.6881)</u>	(7.5056)

16. [Ref. 29102] The *ELL Student Plans* (Plans) for two ELL students were incomplete as the course schedules showing which courses were to employ ESOL strategies were not made part of the Plans until March 1, 2019, which was after the February 2019 reporting survey period. We propose the following adjustment:

103 Basic 9-12	.6742	
130 ESOL	<u>(.6742)</u>	.0000

17. [Ref. 29103] One ELL student was reported in the ESOL Program beyond the maximum 6-year period allowed for State funding of ESOL. In addition, the student was only provided 867.33 of the required 900 hours of annual instruction. We propose the following adjustment:

103 Basic 9-12	.1287	
130 ESOL	<u>(.1651)</u>	(.0364)

18. [Ref. 29104] The English language proficiency of one ELL student was not assessed within 30 school days prior to the student's DEUSS anniversary date to consider the student's continued ESOL placement beyond 3 years from the student's DEUSS. We propose the following adjustment:

103 Basic 9-12	.4170	
130 ESOL	<u>(.4170)</u>	.0000

19. [Ref. 29105] The timecards for five Career Education 9-12 students who participated in OJT were not available at the time of our examination and could not be subsequently located. In addition, the students were only provided 867.33 of the required 900 hours of annual instruction. We propose the following adjustment:

103 Basic 9-12	(.1108)	
300 Career Education 9-12	<u>(.6499)</u>	(.7607)

**Proposed Net
Adjustments
(Unweighted FTE)**

Findings

Fernandina Beach High School (#0291) (Continued)

20. [Ref. 29170] One teacher taught a Basic subject area class 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 teacher’s in-service training timeline. We propose the following adjustment:

103 Basic 9-12	.5705	
130 ESOL	<u>(.5705)</u>	<u>.0000</u>
		<u>(8.3027)</u>
Proposed Net Adjustment		<u>(15.5600)</u>

SCHEDULE E

RECOMMENDATIONS AND REGULATORY CITATIONS FULL-TIME EQUIVALENT STUDENT ENROLLMENT

RECOMMENDATIONS

We recommend that Nassau County District School Board (District) management exercise more care and take corrective action, as appropriate, to ensure that: (1) student course schedules are reported in accordance with the schools' daily instructional and bell schedules and are fully funded only when students are provided the minimum required hours of instruction; (2) ESE students are reported in accordance with the students' *Matrix of Services* forms; (3) appropriate documentation is retained to support each student's ESOL placement; (4) the English language proficiency of students being considered for continuation of their ESOL placements beyond the initial 3-year base period is assessed by October 1 if the students DEUSS falls within the first 2 weeks of the school year, or within 30 school days prior to the students' DEUSS anniversary dates, and ELL Committees are timely convened subsequent to these assessments; (5) *ELL Student Plans* are timely prepared; (6) parents are invited to their children's ELL Committee meetings; (7) ELL students are not reported in the ESOL Program for more than the 6-year period allowed for State funding of ESOL; (8) students in Career Education 9-12 who participate in OJT are reported in accordance with timecards that are accurately and timely completed, signed, and retained in readily accessible files; (9) all teachers, including the teachers hired as substitute teachers, serving in a role consistent with that of a classroom teacher as provided by Florida Statutes and SBE rules, are properly certified, or if not properly certified, are approved by the School Board or Charter School Board to teach out of field, and the students' parents are notified of the teacher's out-of-field placement; and (10) ESOL teachers earn the appropriate in-service training points as required by SBE Rule 6A-6.0907, FAC, 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 including teacher certification 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*

FTE General Instructions 2018-19

Attendance

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

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

FTE General Instructions 2018-19

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 2018-19

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 Matrix of Services Handbook (2017 Edition)*

Teacher Certification

Section 1010.215(1)(c), Florida Statutes, *Educational Funding Accountability*
Section 1012.01(2)(a), Florida Statutes, *Definitions, Classroom Teachers*
Section 1012.42(2), Florida Statutes, *Teacher Teaching Out-of-Field; Notification Requirements*
Section 1012.55, Florida Statutes, *Positions for Which Certificates Required*
Section 1012.56, Florida Statutes, *Educator Certification Requirements*
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-4.0021, FAC, *Florida Teacher Certification Examinations*
SBE Rule 6A-6.0907, FAC, *Inservice Requirements for Personnel of Limited English Proficient Students*

Virtual Education

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

Charter Schools

Section 1002.33, Florida Statutes, *Charter Schools*

NOTES TO SCHEDULES

NOTE A – SUMMARY FULL-TIME EQUIVALENT STUDENT ENROLLMENT

A summary discussion of the significant features of the Nassau 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 Nassau 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 Nassau 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 schools and 3 virtual education cost centers serving PK through 12th-grade students.

For the fiscal year ended June 30, 2019, State funding totaling \$34 million was provided through the FEFP to the District for the District-reported 12,121.90 unweighted FTE as recalibrated. 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 DJJ 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 DJJ 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 DJJ 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 Surveys

The FTE is determined and reported during the school year by means of four FTE membership surveys that are conducted under the direction of district and school management. Each survey is a determination of the FTE membership for a period of 1 week. The surveys for the 2018-19 school year were conducted during and for the following weeks: Survey 1 was performed July 9 through 13, 2018; Survey 2 was performed October 8 through 12, 2018; Survey 3 was performed February 4 through 8, 2019; and Survey 4 was performed June 10 through 14, 2019.

7. Educational Programs

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

8. Statutes and Rules

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

Chapter 1000, Florida Statutes, *K-20 General Provisions*

Chapter 1001, Florida Statutes, *K-20 Governance*

Chapter 1002, Florida Statutes, *Student and Parental Rights and Educational Choices*

Chapter 1003, Florida Statutes, *Public K-12 Education*

Chapter 1006, Florida Statutes, *Support for Learning*

Chapter 1007, Florida Statutes, *Articulation and Access*

Chapter 1010, Florida Statutes, *Financial Matters*

Chapter 1011, Florida Statutes, *Planning and Budgeting*

Chapter 1012, Florida Statutes, *Personnel*

SBE Rules, Chapter 6A-1, FAC, *Finance and Administration*

SBE Rules, Chapter 6A-4, FAC, *Certification*

SBE Rules, Chapter 6A-6, FAC, *Special Programs I*

NOTE B – TESTING FTE STUDENT ENROLLMENT
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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 including teacher certification as reported under the FEFP to the DOE for the fiscal year ended June 30, 2019. 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 including teacher certification as reported under the FEFP. The following schools were selected for testing:

<u>School</u>	<u>Findings</u>
1. Emma Love Hardee Elementary School	1
2. Hilliard Middle-Senior High School	2
3. Yulee Middle School	3 through 6
4. Yulee High School	7 through 12
5. Hilliard Elementary School	13
6. Wildlight Elementary School	14
7. Fernandina Beach High School	15 through 20
8. Nassau Virtual Franchise	NA
9. Nassau Virtual Instruction Program (District Provided)	NA



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 Student Transportation

We have examined the Nassau 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, 2019. 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 *FTE General Instructions 2018-19 (Appendix F)* issued by the Department of Education.

Management's Responsibility for Compliance

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

Auditor's Responsibility

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

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

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

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

Opinion

In our opinion, the Nassau County District School Board complied, in all material respects, with State requirements relating to the classification, assignment, and verification of student transportation reported under the Florida Education Finance Program for the fiscal year ended June 30, 2019.

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 weaknesses⁷ 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, 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. 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. 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. 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.

⁷ 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.

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
September 23, 2020

SCHEDULE F

POPULATIONS, TEST SELECTION, AND TEST RESULTS STUDENT TRANSPORTATION

Any student who is transported by the Nassau County District School Board (District) must meet one or more of the following conditions 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, 2019. (See NOTE B.) The population of vehicles (175) 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 2018 and February and June 2019 reporting survey periods would be counted in the population as four vehicles. Similarly, the population of students (12,149) consisted of the total number of funded 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 Funded Students Transported</u>
IDEA – PK through Grade 12, Weighted	490
All Other FEFP Eligible Students	<u>11,659</u>
Total	<u>12,149</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.

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.	(2)	-	-
Our tests included 271 of the 12,149 students reported as being transported by the District.	-	7	(4)
In conjunction with our general tests of student transportation we identified certain issues related to 254 additional students.	-	<u>254</u>	<u>(252)</u>
Total	<u>(2)</u>	<u>261</u>	<u>(256)</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

FINDINGS AND PROPOSED ADJUSTMENTS STUDENT TRANSPORTATION

Overview

Nassau County District School Board (District) 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 *FTE General Instructions 2018-19 (Appendix F)* 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 2018 reporting survey periods and the February and June 2019 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 2018 reporting survey period and once for the February 2019 reporting survey period) will be presented in our Findings as two test students.

1. [Ref. 52] Our general tests disclosed that the reported number of buses in operation was overstated by two due to passenger cars being reported as buses. We propose the following adjustments:

October 2018 Survey

Number of Buses in Operation (1)

February 2019 Survey

Number of Buses in Operation (1)
(2)

0

2. [Ref. 51] The number of DIT for five students was incorrectly reported. The students were reported for 8 DIT rather than the 12 DIT, in accordance with the District's extended school year calendar. We propose the following adjustment:

June 2019 Survey

12 Days in Term

IDEA - PK through Grade 12, Weighted

5

		Students Transported Proposed Net Adjustments
<u>Findings</u>		
<u>8 Days in Term</u>		
IDEA - PK through Grade 12, Weighted	(5)	0
3. [Ref. 53] Our general tests disclosed that five bus drivers' reports were not signed by the bus drivers attesting to the accuracy of the ridership of the 252 students (1 student was in our test) reported on these buses. We propose the following adjustment:		
February 2019 Survey		
<u>90 Days in Term</u>		
IDEA - PK through Grade 12, Weighted	(8)	
All Other FEFP Eligible Students	(244)	(252)
4. [Ref. 54] Our general tests disclosed that one student was not marked as riding the bus; therefore, the student should not have been reported for State transportation funding. We propose the following adjustment:		
October 2018 Survey		
<u>90 Days in Term</u>		
All Other FEFP Eligible Students	(1)	(1)
5. [Ref. 55] Four students in our test were incorrectly reported in the IDEA - PK through Grade 12, Weighted ridership category. The IEPs for three students did not document that the students' met at least one of the five criteria required for reporting in a weighted ridership category and the IEP for one student was missing at the time of the examination could not be subsequently located. We determined that two students lived 2 miles or more from the students' assigned schools and one student's IEP authorized transportation services in the Extended School Year Program and were eligible to be reported in the All Other FEFP Eligible Students ridership category and the remaining student was not otherwise eligible for State transportation funding. We propose the following adjustments:		
July 2018 Survey		
<u>6 Days in Term</u>		
IDEA - PK through Grade 12, Weighted	(1)	
All Other FEFP Eligible Students	1	
October 2018 Survey		
<u>90 Days in Term</u>		
IDEA - PK through Grade 12, Weighted	(2)	
All Other FEFP Eligible Students	1	

**Students
Transported
Proposed Net
Adjustments**

Findings

February 2019 Survey

90 Days in Term

IDEA - PK through Grade 12, Weighted	(1)	
All Other FEFP Eligible Students	<u>1</u>	(1)

6. [Ref. 56] Two students in our test were incorrectly reported in the All Other FEFP Eligible Students ridership category. The students lived less than 2 miles from the students' assigned schools and were not otherwise eligible for State transportation funding. We propose the following adjustments:

October 2018 Survey

90 Days in Term

IDEA - PK through Grade 12, Weighted	(1)	
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February 2019 Survey

90 Days in Term

All Other FEFP Eligible Students	<u>(1)</u>	(2)
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7. [Ref. 57] Two students in our general test were incorrectly reported in the IDEA – PK through Grade 12, Weighted ridership category. The students were not classified as students with disabilities under the IDEA; however, the students lived 2 miles or more from their assigned schools and were eligible for reporting in the All Other FEFP Eligible Students ridership category. We propose the following adjustments:

October 2018 Survey

90 Days in Term

IDEA - PK through Grade 12, Weighted	(2)	
All Other FEFP Eligible Students	<u>2</u>	<u>0</u>

Proposed Net Adjustment

(256)

SCHEDULE H

RECOMMENDATIONS AND REGULATORY CITATIONS STUDENT TRANSPORTATION

RECOMMENDATIONS

We recommend that Nassau 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; (2) all bus drivers' reports documenting student ridership during the reporting survey periods are signed and dated by the bus drivers attesting to the validity and correctness of the students' ridership; (3) only those students who are documented as enrolled in school during the survey week and recorded on bus driver reports as having been transported at least 1 day during the reporting survey period are reported for State transportation funding; (4) students who are reported in a weighted ridership category are documented as having met at least one of the five criteria required for weighted classification as indicated on each student's IEP; and (5) the distance from home to school is verified prior to students being reported in the All Other FEFP Eligible Students ridership category based on living 2 miles or more from their assigned schools.

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*
FTE General Instructions 2018-19 (Appendix F)

NOTES TO SCHEDULES

NOTE A - SUMMARY STUDENT TRANSPORTATION
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A summary discussion of the significant features of the Nassau County District School Board (District) 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 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 Nassau County

For the fiscal year ended June 30, 2019, the District received \$3 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 Funded Students</u>	<u>Number of Courtesy Riders</u>
July 2018	10	39	31
October 2018	78	6,015	574
February 2019	80	6,060	-
June 2019	<u>7</u>	<u>35</u>	<u>-</u>
Totals	<u>175</u>	<u>12,149</u>	<u>605</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*

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 DOE for the fiscal year ended June 30, 2019. 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



Kathy K. Burns, Ed.D.
Superintendent of Schools

The Nassau County School District

1201 Atlantic Avenue
Fernandina Beach, Florida 32034

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Management's Response to FTE and Transportation Audit September 23, 2020

Sherrill F. Norman, Auditor General
Office of the Auditor General
111 West Madison Street
Tallahassee, Florida 32399-1450

Dear Ms. Norman,

The following is our response to the audit findings in your Florida Education Finance Program Full-Time Equivalent Student and Student Transportation Audit for the fiscal year ended June 30, 2019.

1. Concerning the findings (Ref#'s 8101, 23101) related to students' schedules not being in agreement with the school's bell schedule, we will 1) emphasize the importance of reviewing this item for accuracy on the Principal's FTE Certification Checklist, 2) provide training for data entry personnel, and 3) provide a FTE update for principals concerning this audit finding at the October 13, 2020 principals meeting.
2. Concerning the findings (Ref#'s 15101, 23105, 23106, 29105) related to discrepancies and unavailability of timecards for OJT students, in some of the cases this was due to irregularities in the student's work schedule that happened to occur on the survey week including student illness as well as missing time cards. The District employs an instructor specifically tasked with the OJT program. This instructor works with school-level personnel to ensure proper documentation is received for each student to ensure proper FTE reporting. At the September 15, 2020 Principals' Meeting breakout session, principals were reminded about circumstances that have led to past audit findings. Students that were not able to demonstrate employment and an adequate work schedule have been removed from the program. The district will conduct self-audits at the conclusion of each survey.
3. Concerning the findings (Ref#'s 22102, 22103, 23102, 23103, 24101, 29102, 29103, 29104, 29170) related to
 - retention of appropriate documentation to support each student's ESOL placement,
 - assessment of English language proficiency of students being considered for continuation of ESOL placements and timely convening of ELL Committees subsequent to these assessments,
 - timely preparation of ELL Student Plans,
 - course schedules reflecting the ELL Students Plans,

Our mission is to develop each student as an inspired life-long learner and problem-solver with the strength of character to serve as a productive member of society.

The Nassau County School District does not discriminate on the basis of race, color, national origin, gender, age, disability or marital status in its educational programs, services or activities, or in its hiring or employment practices.



The Nassau County School District

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- parental invitation to child's ELL Committee meeting,
- the reporting of an ELL student beyond the six year maximum,
- required teacher in-service training for a course with ELL students;

we will review our procedures to ensure staff members are aware of their responsibilities in supporting and documenting the services provided to our ELL students.

4. Concerning the findings (Ref#'s 22104, 23104) related to incorrect Matrix of Service being reported, we will continue to look for ways to ensure that students are reported in accordance with the appropriate, supporting documentation. We will emphasize the importance of this item on the Principal's FTE Certification Checklist to ensure the most recent documentation is reviewed and the Student Database updated during the survey period.
5. Concerning the findings (Ref# 22170) related to a teacher who was teaching out of field without board approval and without parent notification, the District will treat these individuals as being Out-of-Field. They will be placed on the board agenda during the appropriate FTE week as Out-of-Field, and the Out-of-Field Notification forms will be sent out.
6. Concerning the findings (Ref# 29101) related to a school not providing the 180 days of instruction or 900-hour equivalent, as prescribed by statute, due to the school releasing 12th grade students 10 school days early, the District will require all high schools to have the last day for 12th graders be the same as the last day for all students.
7. Concerning the findings (Ref#s 52, 51, 53, 54, 55, 56, 57) related to transportation, we will review our procedures for reporting FTE and develop appropriate checks and balances to ensure the proper reporting of data.
8. Concerning the findings (Ref# 24201) related to an elementary school not meeting the 900-hours of required instructional time, district personnel will review with each principal their school's instructional day schedule and ensure the required number of instructional hours are met.

Sincerely,

Kathy K. Burns
Superintendent of Schools
904-491-9900

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