

Report No. 2023-005  
August 2022

**STATE OF FLORIDA AUDITOR GENERAL**

Attestation Examination

**HOLMES COUNTY  
DISTRICT SCHOOL BOARD**

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

For the Fiscal Year Ended  
June 30, 2021



Sherrill F. Norman, CPA  
Auditor General

## Board Members and Superintendent

During the 2020-21 fiscal year, Buddy L. Brown served as Superintendent from November 17, 2020, and Terry L. Mears served as Superintendent before that date, and the following individuals served as Board members:

	<u>District No.</u>
Kaci Johnson	1
Wilburn G. Baker, Vice Chair	2
Alan Justice, Chair	3
Shirley Owens	4
Leesa Lee	5

The team leader was Alice Pounds, CPA, and the examination was supervised by Jennifer Taylor, CPA.

Please address inquiries regarding this report to Aileen B. Peterson, CPA, CPM, Audit Manager, by e-mail at [aileenpeterson@aud.state.fl.us](mailto:aileenpeterson@aud.state.fl.us) or by telephone at (850) 412-2972.

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**HOLMES COUNTY DISTRICT SCHOOL BOARD  
TABLE OF CONTENTS**

Page  
No.

SUMMARY .....	i
<b>INDEPENDENT AUDITOR’S REPORT ON FULL-TIME EQUIVALENT STUDENT ENROLLMENT .....</b>	<b>1</b>
SCHEDULE A – POPULATIONS, TEST SELECTION, AND TEST RESULTS	
Reported Full-Time Equivalent Student Enrollment .....	4
Schools and Students.....	4
Teachers.....	5
Proposed Adjustments .....	5
SCHEDULE B – EFFECT OF PROPOSED ADJUSTMENTS ON WEIGHTED FULL-TIME EQUIVALENT STUDENT ENROLLMENT .....	6
SCHEDULE C – PROPOSED ADJUSTMENTS BY SCHOOL.....	7
SCHEDULE D – FINDINGS AND PROPOSED ADJUSTMENTS	
Overview.....	9
Findings.....	9
SCHEDULE E – RECOMMENDATIONS AND REGULATORY CITATIONS .....	13
NOTES TO SCHEDULES.....	16
<b>INDEPENDENT AUDITOR’S REPORT ON STUDENT TRANSPORTATION .....</b>	<b>19</b>
SCHEDULE F – POPULATIONS, TEST SELECTION, AND TEST RESULTS.....	22
SCHEDULE G – FINDINGS AND PROPOSED ADJUSTMENTS	
Overview.....	24
Findings.....	24
SCHEDULE H – RECOMMENDATIONS AND REGULATORY CITATIONS.....	28
NOTES TO SCHEDULES.....	29
MANAGEMENT’S RESPONSE .....	30

# HOLMES COUNTY DISTRICT SCHOOL BOARD

## LIST OF ABBREVIATIONS

DEUSS	Date Entered United States School
DIT	Days in Term
DJJ	Department of Juvenile Justice
DOE	Department of Education
ELL	English Language Learner
ESE	Exceptional Student Education
ESOL	English for Speakers of Other Languages
FAC	Florida Administrative Code
FEFP	Florida Education Finance Program
FLVS	Florida Virtual School
FTE	Full-Time Equivalent
IDEA	Individuals with Disabilities Education Act
IEP	Individual Educational Plan
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 English for Speakers of Other Languages (ESOL) and Exceptional Student Education (ESE) Support Levels 4 and 5, the Holmes 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, 2021. 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 two of the three students in our ESOL test and two of the three students in our ESE Support Levels 4 and 5 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 ten findings. The resulting proposed net adjustment to the District's reported, unweighted FTE totaled negative 1.2284 but has a potential impact on the District's weighted FTE of negative 4.8623. Noncompliance related to student transportation resulted in 6 findings and a proposed net adjustment of negative 18 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, 2021, was \$4,319.49 per FTE. For the District, the estimated gross dollar effect of our proposed adjustments to the reported FTE student enrollment is negative \$21,003 (negative 4.8623 times \$4,319.49).

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 Holmes 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 Holmes 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 nine schools<sup>1</sup> and two 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, 2021, State funding totaling \$19.4 million was provided through the FEFP to the District for the District-reported 2,887.65 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

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<sup>1</sup> Includes the John M. McKay Scholarships for Students with Disabilities and the Family Empowerment Scholarship Programs identified with special use school numbers.

of Juvenile Justice (DJJ) for FTE student enrollment earned beyond the 180-day school year, FTE related to John M. McKay Scholarships for Students with Disabilities Program, and FTE reported for the Family Empowerment Scholarship Program are 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 and FTE related to the John M. McKay Scholarships for Students with Disabilities Program. However, if a student only has FTE student enrollment reported in one FTE membership survey<sup>2</sup> 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 and FTE related to John M. McKay Scholarships for Students with Disabilities Program.

### **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 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 \$702,829 for student transportation as part of the State funding through the FEFP.

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<sup>2</sup> 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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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 Holmes 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, 2021. 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 2020-21* 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 for a direct examination engagement 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 modified 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.

We are required to be independent of the District and to meet our other ethical responsibilities, in accordance with relevant ethical requirements relating to our examination engagement.

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, waste, abuse, or inefficiency. Because of these limitations and the inherent limitations of internal control, an unavoidable risk exists that some material noncompliance may not be detected, even though the examination is properly planned and performed in accordance with attestation standards.

## **Opinion**

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

In our opinion, except for the material noncompliance with State requirements described in the preceding paragraph involving reporting errors or records that were not properly or accurately prepared or were not available at the time of our examination and could not be subsequently located for students in English for Speakers of Other Languages and Exceptional Student Education Support Levels 4 and 5, the Holmes 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, 2021.

## **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, and waste 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.

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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.

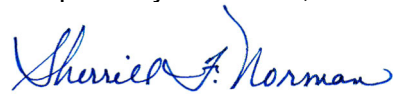
We performed our examination to express an opinion on the District's compliance with State requirements and not for the purpose of expressing an opinion on the District's related internal control over compliance with State requirements; accordingly, we express no such opinion. Because of its limited 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 reporting errors or records that were not properly or accurately prepared or were not available at the time of our examination and could not be subsequently located for students in English for Speakers of Other Languages and Exceptional Student Education Support Levels 4 and 5. Our examination disclosed certain findings that are required to be reported under *Government Auditing Standards* and all findings, along with the views of responsible officials, are described in *SCHEDULE D* and *MANAGEMENT'S RESPONSE*, respectively. The impact of this noncompliance with State requirements on the District's reported 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,



Sherrill F. Norman, CPA  
Tallahassee, Florida  
July 21, 2022

# 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, 2021, the Holmes County District School Board (District) reported to the DOE 2,887.65 unweighted FTE as recalibrated at nine District schools and two 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, 2021. (See NOTE B.) The population of schools (11) 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 (2,346) consisted of the total number of students in each program at the schools and cost centers in our tests.

We noted the following material noncompliance: exceptions involving reporting errors or records that were not properly or accurately prepared or were not available at the time of our examination and could not be subsequently located for 2 of the 3 students in our ESOL test<sup>4</sup> and 2 of the 3 students in our ESE Support Levels 4 and 5 test.<sup>5</sup> The District did not report any charter schools.

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

Programs	Number of Schools		Number of Students at Schools Tested		Students With Exceptions	Recalibrated Unweighted FTE		Proposed Adjustments
	Population	Test	Population	Test		Population	Test	
Basic	10	5	1,948	52	2	2,339.0700	35.6856	1.2232
Basic with ESE Services	9	5	392	26	1	430.3300	17.1137	(1.0253)
ESOL	5	3	3	3	2	4.7800	1.5175	(.6395)
ESE Support Levels 4 and 5	5	3	3	3	2	2.0500	1.0268	(.7868)
Career Education 9-12	5	-	-	-	-	<u>111.4200</u>	<u>.0000</u>	<u>.0000</u>
All Programs	11	5	<u>2,346</u>	<u>84</u>	<u>7</u>	<u>2,887.6500</u>	<u>55.3436</u>	<u>(1.2284)</u>

<sup>4</sup> For ESOL, the material noncompliance is composed of Findings 1 and 4 on *SCHEDULE D*.

<sup>5</sup> For ESE Support Levels 4 and 5, the material noncompliance is composed of Findings 2 and 9 on *SCHEDULE D*.

## **Teachers**

We also tested teacher qualifications as part of our examination procedures. (See NOTE B.) Specifically, the population of teachers (74) 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 44 and found exceptions for 4 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

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

<u>No. Program</u> <sup>1</sup>	<u>Proposed Net Adjustment</u> <sup>2</sup>	<u>Cost Factor</u>	<u>Weighted FTE</u> <sup>3</sup>
102 Basic 4-8	1.0088	1.000	1.0088
103 Basic 9-12	.2144	1.012	.2170
111 Grades K-3 with ESE Services	(.0250)	1.124	(.0281)
112 Grades 4-8 with ESE Services	(.5835)	1.000	(.5835)
113 Grades 9-12 with ESE Services	(.4168)	1.012	(.4218)
130 ESOL	(.6395)	1.184	(.7572)
255 ESE Support Level 5	<u>(.7868)</u>	5.462	<u>(4.2975)</u>
Total	<u>(1.2284)</u>		<u>(4.8623)</u>

<sup>1</sup> See NOTE A7.

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

<sup>3</sup> 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>Proposed Adjustments</u> <sup>1</sup>			<u>Balance Forward</u>
	<u>#0061</u>	<u>#0111</u>	<u>#0262</u>	
102 Basic 4-8	.....	.4253	.....	.4253
103 Basic 9-12	.2142	.....	.....	.2142
111 Grades K-3 with ESE Services	.....	.....	(.0250)	(.0250)
112 Grades 4-8 with ESE Services	.....	.....	.....	.0000
113 Grades 9-12 with ESE Services	.....	.....	.....	.0000
130 ESOL	(.2142)	(.4253)	.....	(.6395)
255 ESE Support Level 5	<u>(.1200)</u>	.....	.....	<u>(.1200)</u>
Total	<u>(.1200)</u>	<u>.0000</u>	<u>(.0250)</u>	<u>(.1450)</u>

<sup>1</sup> These proposed net adjustments are for unweighted FTE. (See Note A5.)

<u>No.</u> <u>Program</u>	<u>Brought Forward</u>	<u>Proposed Adjustments</u> <sup>1</sup>		<u>Total</u>
		<u>#7004</u>	<u>#7023</u>	
102 Basic 4-8	.4253	.5835	.....	1.0088
103 Basic 9-12	.2142	.1666	(.1664)	.2144
111 Grades K-3 with ESE Services	(.0250)	.....	.....	(.0250)
112 Grades 4-8 with ESE Services	.0000	(.5835)	.....	(.5835)
113 Grades 9-12 with ESE Services	.0000	(.2500)	(.1668)	(.4168)
130 ESOL	(.6395)	.....	.....	(.6395)
255 ESE Support Level 5	<u>(.1200)</u>	<u>.....</u>	<u>(.6668)</u>	<u>(.7868)</u>
Total	<u>(.1450)</u>	<u>(.0834)</u>	<u>(1.0000)</u>	<u>(1.2284)</u>

<sup>1</sup> These proposed net adjustments are for unweighted FTE. (See Note A5.)

# SCHEDULE D

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## FINDINGS AND PROPOSED ADJUSTMENTS FULL-TIME EQUIVALENT STUDENT ENROLLMENT

### Overview

Holmes 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 2020-21* 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 2020 reporting survey periods and the February and June 2021 reporting survey periods (See NOTE A6.). Unless otherwise specifically stated, the Findings and Proposed Adjustments presented herein are for the October 2020 reporting survey period, the February 2021 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)**

### Ponce de Leon High School (#0061)

1. [Ref. 6101] An *ELL Student Plan* for one ELL student was not available at the time of our examination and could not be subsequently located. In addition, an ELL Committee did not timely convene to consider the student's continued ESOL placement beyond 3 years from the student's DEUSS anniversary date. We propose the following adjustment:

103 Basic 9-12	.2142	
130 ESOL	<u>(.2142)</u>	.0000

2. [Ref. 6102] One ESE student enrolled in the Hospital and Homebound Program was not in attendance during the February 2021 reporting survey period. Consequently, the student did not meet the FTE eligibility requirement for FEFP funding. We propose the following adjustment:

255 ESE Support Level 5	<u>(.1200)</u>	<u>(.1200)</u>
		<u>(.1200)</u>

**Findings**

**Ponce de Leon Elementary School (#0111)**

3. [Ref. 11171] One teacher was not properly certified and was not approved by the School Board to teach out of field. The teacher held certification in ESE but taught a course that required certification in Elementary Education. We also noted that the parents of the ELL student were not notified of the teacher’s out-of-field status. Since the student taught by this teacher was adjusted in Finding 4 (Ref. 11101), we present this disclosure finding with no proposed adjustment. .0000

4. [Ref. 11101] An *ELL Student Plan* for one ELL student was not prepared until April 8, 2021, which was after the February 2021 reporting survey. We propose the following adjustment:

102 Basic 4-8	.4253	
130 ESOL	<u>(.4253)</u>	<u>.0000</u>
		<u>.0000</u>

**Bonifay K-8 School (#0262)**

5. [Ref. 26201] One ESE student was not in attendance during the February 2021 reporting survey period and did not meet the FTE eligibility requirement for FEFP funding. We propose the following adjustment:

111 Grades K-3 with ESE Services	<u>(.0250)</u>	<u>(.0250)</u>
		<u>(.0250)</u>

**Holmes Virtual Franchise - FLVS (#7004)**

6. [Ref. 700401] One Basic virtual education student was incorrectly reported for a course that was not scheduled and completed during the 180-day school year or completed under the exceptions provided in the *FTE General Instructions 2020-21*. This course was completed prior to the beginning of the 180-day regular school year, was not for credit recovery, and was not eligible to be reported for FEFP funding for the 2020-21 school year. We propose the following adjustment:

103 Basic 9-12	<u>(.0834)</u>	(.0834)
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7. [Ref. 700471/72] Two teachers were not properly certified and were not approved by the School Board to teach out of field. The teachers held certification in Elementary Education and Physical Education, respectively, but taught courses that *(Finding Continues on Next Page)*

**Proposed Net  
Adjustments  
(Unweighted FTE)**

**Findings**

**Holmes Virtual Franchise - FLVS (#7004)** (Continued)

required certification in English (Ref. 700471) or Health (Ref. 700472). 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. 700471</u>		
102 Basic 4-8	.5835	
112 Grades 4-8 with ESE Services	<u>(.5835)</u>	.0000
<u>Ref. 700472</u>		
103 Basic 9-12	.2500	
113 Grades 9-12 with ESE Services	<u>(.2500)</u>	<u>.0000</u>
		 <u>(.0834)</u>

**Holmes Virtual-District Instruction Program (#7023)**

8. [Ref. 702301] One Basic virtual education student was incorrectly reported for three courses that were not completed during the 180-day school year. The *FTE General Instructions 2020-21* provide that if a student was not enrolled and reported in a virtual education course during Survey 2 or 3, the student must complete the course by the end of the 180-day school year. We propose the following adjustment:

103 Basic 9-12	<u>(.3332)</u>	(.3332)
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9. [Ref. 702302] One ESE student did not receive virtual instruction through a DOE-approved provider; consequently, the courses were not eligible to be reported for FEFP funding. We propose the following adjustment:

255 ESE Support Level 5	<u>(.6668)</u>	(.6668)
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**Follow-Up to Management's Response**

*In his written response, the Superintendent stated that the District does not concur with the finding and noted that "due to the significant needs of the student, a hybrid model was used to provide instruction since there were no online access points program available. The hybrid model used was Readtopia uploaded to Google Classroom, supplemental materials, and virtual/phone communication with providers because the family chose to keep the student at home and would not allow anyone in the home." Further, he stated that "we request that FLDOE reconsider the adjustments proposed in this finding." However, pursuant to Section 1002.45(2), Florida Statutes, the DOE annually publishes a list of providers approved to offer virtual instruction programs for funding through the FEFP and, as noted in the finding, the virtual instruction received by the student was not provided through a DOE-approved provider. Accordingly, our finding stands as presented. Any additional flexibility granted for the student will need to be resolved by the DOE through an informal hearing conference.*

**Proposed Net  
Adjustments  
(Unweighted FTE)**

**Findings**

**Holmes Virtual-District Instruction Program (#7023)** (Continued)

10. [Ref. 702371] One teacher was not properly certified and was not approved by the School Board to teach out of field. The teacher held certification in English, Elementary Education, and ESE but taught courses that required certification in Art, General Science, Health, Physical Education, or Math. 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:

103 Basic 9-12	.1668	
113 Grades 9-12 with ESE Services	<u>(.1668)</u>	<u>.0000</u>
		<u>(1.0000)</u>
<b>Proposed Net Adjustment</b>		<b><u>(1.2284)</u></b>

# SCHEDULE E

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

### RECOMMENDATIONS

We recommend that Holmes County District School Board (District) management exercise more care and take corrective action, as appropriate, to ensure that: (1) only students who are in membership during the survey week and in attendance at least 1 day of the reporting survey period are reported for FEFP funding; (2) *ELL Student Plans* are timely prepared and ELL Committees are timely convened to consider students' continued ESOL placements beyond 3 years from each student's DEUSS anniversary date; (3) students enrolled in virtual education courses after the February reporting survey complete the courses by the end of the regular 180-day school year; (4) only virtual instruction provided by a DOE-approved provider is reported for FEFP funding; (5) students enrolled in virtual education courses who complete the courses prior to the start of the regular school year are not reported for FEFP funding; and (6) teachers are properly certified, or if not properly certified, are approved by the School Board to teach out of field, and the students' parents are notified of the teacher's out-of-field assignment.

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 2020-21*

#### **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 2020-21*

*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 2020-21*

## **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

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<b>NOTE A – SUMMARY</b> <b>FULL-TIME EQUIVALENT STUDENT ENROLLMENT</b>
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A summary discussion of the significant features of the Holmes 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 Holmes 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 Holmes County.

The governing body of the District is the District School Board that is composed five elected members. The executive officer of the Board is the elected Superintendent of Schools. The District had nine schools and two virtual education cost centers serving PK through 12th-grade students.

For the fiscal year ended June 30, 2021, State funding totaling \$19.4 million was provided through the FEFP to the District for the District-reported 2,887.65 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. 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 DJJ for FTE student enrollment earned beyond the 180-day school year, FTE related to John M. McKay Scholarships for Students with Disabilities Program, and FTE reported for the Family Empowerment Scholarship Program are 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 and FTE related to the John M. McKay Scholarships for Students with Disabilities Program. However, if a student only has FTE student enrollment reported in one FTE membership 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 and FTE related to John M. McKay Scholarships for Students with Disabilities Program.

#### **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 2020-21 school year were conducted during and for the following weeks at the applicable schools: Survey 1 was performed July 6 through 10, 2020; Survey 2 was performed October 5 through 9, 2020; Survey 3 was performed February 8 through 12, 2021; and, Survey 4 was performed June 14 through 18, 2021.

## 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*

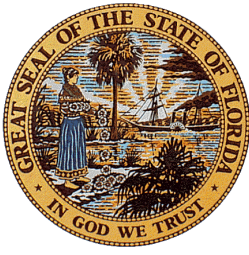
SBE Rules, Chapter 6A-4, FAC, *Certification*

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 including teacher certification as reported under the FEFP to the DOE for the fiscal year ended June 30, 2021. 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. Ponce de Leon High School	1 and 2
2. Ponce de Leon Elementary School	3 and 4
3. Bonifay K-8 School	5
4. Holmes Virtual Franchise - FLVS	6 and 7
5. Holmes Virtual-District Instruction Program	8 through 10



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 Holmes 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, 2021. 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 2020-21 (Appendix G)* 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 for a direct examination engagement 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.

We are required to be independent of the District and to meet our other ethical responsibilities, in accordance with relevant ethical requirements relating to our examination engagement.

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, waste, 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 Holmes 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, 2021.

## **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>6</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, and waste 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.

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<sup>6</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.

## 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  
July 21, 2022

# SCHEDULE F

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

Any student who is transported by the Holmes 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 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, 2021. (See NOTE B.) The population of vehicles (87) 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 2020 and February and June 2021 reporting survey periods would be counted in the population as four vehicles. Similarly, the population of students (2,431) 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	6
All Other FEFP Eligible Students	<u>2,425</u>
Total	<u>2,431</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 186 of the 2,431 students reported as being transported by the District.	-	10	(8)
In conjunction with our general tests of student transportation we identified certain issues related to 10 additional students.	-	<u>10</u>	<u>(10)</u>
Total	<u>(2)</u>	<u>20</u>	<u>(18)</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

Holmes 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 2020-21 (Appendix G)* 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*.

**Students  
Transported  
Proposed Net  
Adjustments**

### Findings

*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 2020 reporting survey periods and the February and June 2021 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 2020 reporting survey period and once for the February 2021 reporting survey period) will be presented in our Findings as two test students.*

1. [Ref. 56] Our general tests disclosed that the number of buses in operation was overstated by two buses. We determined that two passenger vans were incorrectly coded as buses. We propose the following adjustments:

**October 2020 Survey**

Number of Buses in Operation (1)

**February 2021 Survey**

Number of Buses in Operation (1)  
(2)

0

2. [Ref. 51] The number of DIT was incorrectly reported in the October 2020 and February 2021 reporting survey periods. All students were reported for 84 DIT in the October 2020 reporting survey period and 90 DIT in the February 2021 reporting survey period; however, the schools’ instructional calendars documented varying DIT for (*Finding Continues on Next Page*)

**Findings**

October 2020 and February 2021 reporting surveys respectively, as follows: Poplar Springs School DIT were 81 and 90; Bethlehem School, Bonifay K-8 School, Holmes County High School, and the Graduation Assistance Program DIT were all 81 and 88; and Ponce de Leon Elementary School and Ponce de Leon High School DIT were 81 and 89. We propose the following adjustments:

**October 2020 Survey**

84 Days in Term

IDEA - PK through Grade 12, Weighted	(3)	
All Other FEFP Eligible Students		(1159)

81 Days in Term

IDEA - PK through Grade 12, Weighted	3	
All Other FEFP Eligible Students		1022

78 Days in Term

All Other FEFP Eligible Students		137
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**February 2021 Survey**

90 Days in Term

IDEA - PK through Grade 12, Weighted	(3)	
All Other FEFP Eligible Students		(1148)

89 Days in Term

All Other FEFP Eligible Students		304
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88 Days in Term

IDEA - PK through Grade 12, Weighted	3	
All Other FEFP Eligible Students		<u>844</u>
		0

**Follow-Up to Management’s Response**

*In his written response, the Superintendent stated that, “Holmes District believes that Days in Term (DIT) were accurately reported based on its understanding of the Data Element: Days in Term and reporting instructions in the FTE General Instructions 2020-2021.” However, the FTE General Instructions 2020-21 (Appendix G, page 72) state that “school districts with fewer than 180 instructional days must report the actual number of days students were transported, not 180 days.” Accordingly, the DIT totals we included in the finding do not include days on which students received remote learning (e.g., Covid Health/Wellness related dates) because students were not actually transported on those dates.*

*The FTE General Instructions 2020-21 (Appendix G, pages 67 and 70) also provide (Follow-Up Continues on Next Page)*

**Findings**

that “transported refers to any student who rides the bus (or other approved transportation vehicle) for the purpose of attending school” and “students who ride home from school on a special bus route serving only those students attending after-school program or activities may not be reported for funding.” Accordingly, as the applicable schools were closed May 19 and 20 and students were transported for sports-related activities and not for the purpose of attending school, our DIT totals do not include these dates.

Our finding stands as presented and we suggest that District staff seek further DOE guidance to help mitigate any such instances going forward. Any resulting adjustment will need to be resolved by the DOE through an informal hearing conference.

3. [Ref. 52] Our general tests disclosed that seven PK students were incorrectly reported in the All Other FEFP Eligible Students ridership category. District records did not evidence that the students were classified as students with disabilities under IDEA or that the students’ parents were enrolled in the Teenage Parent Program; consequently, the students were not eligible to be reported for State transportation funding. We propose the following adjustments:

**October 2020 Survey**

81 Days in Term

All Other FEFP Eligible Students (1)

**February 2021 Survey**

88 Days in Term

All Other FEFP Eligible Students (6) (7)

4. [Ref. 53] Our general tests disclosed that three students were incorrectly reported in the All Other FEFP Eligible Students ridership category. The students were not marked as being transported during the applicable reporting survey periods; consequently, the students should not have been reported for State transportation funding. We propose the following adjustments:

**October 2020 Survey**

81 Days in Term

All Other FEFP Eligible Students (2)

**February 2021 Survey**

88 Days in Term

All Other FEFP Eligible Students (1) (3)

**Students  
Transported  
Proposed Net  
Adjustments**

**Findings**

5. [Ref. 54] Eight students in our test lived less than 2 miles from their assigned schools and were not otherwise eligible for State transportation funding. We also noted that one of these students was not marked as riding the bus during the February 2021 reporting survey period. We propose the following adjustments:

**October 2020 Survey**

81 Days in Term

All Other FEFP Eligible Students (1)

78 Days in Term

All Other FEFP Eligible Students (1)

**February 2021 Survey**

89 Days in Term

All Other FEFP Eligible Students (2)

88 Days in Term

All Other FEFP Eligible Students (4) (8)

6. [Ref. 55] Two ESE students were incorrectly reported in the IDEA – PK through Grade 12, Weighted ridership category. The students’ IEPs did not document one of the five criteria required for weighted reporting. We noted that the students lived more than 2 miles from their assigned schools and were eligible to be reported in the All Other FEFP Eligible Students ridership category. We propose the following adjustments:

**October 2020 Survey**

81 Days in Term

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

**February 2021 Survey**

88 Days in Term

IDEA - PK through Grade 12, Weighted (1)  
All Other FEFP Eligible Students 1 0

**Proposed Net Adjustment (18)**

# SCHEDULE H

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## RECOMMENDATIONS AND REGULATORY CITATIONS STUDENT TRANSPORTATION

### RECOMMENDATIONS

We recommend that Holmes County District School Board (District) management exercise more care and take corrective action, as appropriate, to ensure that: (1) the number of DIT and the number of buses in operation are accurately reported; (2) only PK students who are classified as IDEA students or whose parents are enrolled in a Teenage Parent Program are reported for State transportation funding; (3) only those students who are documented as enrolled during the survey week and recorded on bus drivers' reports as having been transported at least 1 day during the reporting survey period are reported for State transportation funding; (4) 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 or more miles from their assigned schools; and (5) students who are reported in the IDEA - PK through Grade12, Weighted ridership category are documented as having met one of the five criteria required for reporting in the weighted ridership category as noted on the students' IEPs.

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 2020-21 (Appendix G)*

# 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 the Holmes 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 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 Holmes County

For the fiscal year ended June 30, 2021, the District received \$702,829 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>
October 2020	43	1,162	211
February 2021	<u>44</u>	<u>1,269</u>	<u>148</u>
Totals	<u>87</u>	<u>2,431</u>	<u>359</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, 2021. 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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**HOLMES COUNTY SCHOOL BOARD**  
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BONIFAY, FL 32425  
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**SUPERINTENDENT**  
**Buddy L. Brown**  
**BOARD MEMBERS**  
Wilburn Baker, Chair  
Leesa Lee, Vice-Chair  
Kaci Johnson  
Alan Justice  
Shirley Owens

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July 21, 2022

Sherrill F. Norman, CPA  
Auditor General  
111 West Madison Street  
Tallahassee, FL 32399-1450

Dear Ms. Norman:

This letter is in response to the preliminary and tentative findings, adjustments, and recommendations related to the full-time equivalent (FTE) students under the Florida Education Finance Program (FEFP) and student transportation for the fiscal year ended June 30, 2021.

The Holmes County School District is committed to accurate reporting of all FTE in accordance with state law and state regulations, as well as operating in an effective and efficient manner. The following pages contain corrective actions already in progress or planned for the very near future to address the recommendations made in the preliminary and tentative report.

If any further information is needed regarding these responses, please do not hesitate to contact us.

Sincerely,

Buddy L. Brown  
Superintendent of Schools

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## Full-Time Equivalent Student Enrollment

The District does not concur with the following findings:

Finding #	Ref. #	Finding Summary	Response/Corrective Action
9	702302	One ESE student did not receive virtual instruction through a DOE-approved provider; consequently, the courses were not eligible to be reported for FEFP funding.	Due to the significant needs of the student, a hybrid model was used to provide instruction since there were no online access points program available. The hybrid model used was Readtopia uploaded to Google Classroom, supplemental materials, and virtual/phone communication with providers because the family chose to keep the student at home and would not allow anyone in the home. We chose this as the most appropriate way to report what was being done for the student. Therefore, we request that FLDOE reconsider the adjustments proposed in this finding. Person Responsible: Donnita Butorac

The District concurs with the following findings:

Finding #	Ref. #	Finding Summary	Response/Corrective Action
1	6101	An ELL Student Plan for one ELL student was not available at the time of our examination and could not be subsequently located. In addition, an ELL Committee did not timely convene to consider the student's continued ESOL placement beyond 3 years from the student's DEUSS anniversary date.	The district had thought that the report due date was the date they student entered our school district, not the date that the student entered a school in the Unites States. We have reviewed all ELL Plan student files and have updated the review date for each student to reflect the anniversary date of entering a school in the United States. This date will be used moving forward to review ELL plans. Person Responsible: Pam Price Expected Completion: June 2, 2022
2	6102	One ESE student enrolled in the Hospital and Homebound	This error in reporting was clerical. The Director of ESE and MIS

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		Program was not in attendance during the February 2021 reporting survey period. Consequently, the student did not meet the FTE eligibility requirement for FEFP funding.	Coordinator will review and stress the importance of quality data entry to all personnel. Verification reports including attendance for the Hospital/Homebound program will be printed and reviewed prior to Survey Reporting. Person Responsible: Donnita Butorac and Summer Alford Expected Completion Date: October 1, 2022
3	11171	One teacher was not properly certified and was not approved by the School Board to teach out of field. The teacher held certification in ESE but taught a course that required certification in Elementary Education. We also noted that the parents of the ELL student were not notified of the teacher's out-of-field status.	This error will be corrected by providing school leadership information on submitting teachers to be board approved as teaching out of field and verifying courses taught by teachers holding the correct certification using the course code directory. Person Responsible: Pam Price Expected Completion: October 1, 2022
4	11101	An ELL Student Plan for one ELL student was not prepared until April 8, 2021, which was after the February 2021 reporting survey.	We have met with guidance counselors and reminding them that as soon as an ELL students enrolls in their school the district ELL office must be notified immediately to begin support. We believe that this notification will ensure that we hold all ELL meetings in a timely manner and support the ELL student at their new school. Person Responsible: Pam Price Expected Completion: June 2, 2022
5	26201	One ESE student was not in attendance during the February 2021 reporting survey period and did not meet the FTE eligibility requirement for FEFP funding.	This error in reporting was clerical. The Director of ESE and MIS Coordinator will review and stress the importance of quality data entry to all personnel. Verification reports including attendance will be printed and reviewed prior to Survey Reporting. Person Responsible: Donnita Butorac and Summer Alford Expected Completion Date: October 1, 2022
6	700401	One Basic virtual education student was incorrectly	This was a data entry error. District MIS staff will stress the

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		reported for a course that was not scheduled and completed during the 180-day school year or completed under the exceptions provided in the FTE General Instructions 2020-21. This course was completed prior to the beginning of the 180-day regular school year, was not for credit recovery, and was not eligible to be reported for FEFP funding for the 2020-21 school year.	importance of quality data entry to all appropriate personnel. Person responsible: Summer Alford Expected Completion: October 1, 2022
7	700471/72	Two teachers were not properly certified and were not approved by the School Board to teach out of field. The teachers held certification in Elementary Education and Physical Education, respectively, but taught courses that Two teachers were not properly certified and were not approved by the School Board to teach out of field. The teachers held certification in Elementary Education and Physical Education, respectively, but taught courses that	This error will be corrected by providing the director of the virtual program information to verify that teachers hired to teach virtual courses are certified to teach the course and if they are not certified, they are submitted to the board for approval to teach out of field. Person Responsible: Pam Price Expected Completion: October 1, 2022
8	702301	One Basic virtual education student was incorrectly reported for three courses that were not completed during the 180-day school year. The FTE General Instructions 2020-21 provide that if a student was not enrolled and reported in a virtual education course during Survey 2 or 3, the student must complete the course by the end of the 180-day school year.	This was a data entry error. District MIS staff will stress the importance of quality data entry to all appropriate personnel. Person responsible: Summer Alford Expected Completion: October 1, 2022
10	702371	One teacher was not properly certified and was not approved by the School Board to teach out of field. The teacher held certification in English, Elementary Education, and ESE but taught courses that required certification in Art, General Science, Health,	This error will be corrected by providing the director of the virtual program information to verify that teachers hired to teach virtual courses are certified to teach the course and if they are not certified, they are submitted to the board for approval to teach out of field. Person Responsible: Pam Price

		Physical Education, or Math. We also noted that the parents of the students were not notified of the teacher's out-of-field status.	Expected Completion: October 1, 2022
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**Student Transportation**

The District does not concur with the following findings:

Finding #	Ref. #	Finding Summary	Response/Corrective Action
2	51	The number of DIT was incorrectly reported in the October 2020 and February 2021 reporting survey periods. All students were reported for 84 DIT in the October 2020 reporting survey period and 90 DIT in the February 2021 reporting survey period; however, the schools' instructional calendars documented varying DIT for October 2020 and February 2021 reporting surveys respectively, as follows: Poplar Springs School DIT were 81 and 90; Bethlehem School, Bonifay K-8 School, Holmes County High School, and the Graduation Assistance Program DIT were all 81 and 88; and Ponce de Leon Elementary School and Ponce de Leon High School DIT were 81 and 89.	Holmes District believes that Days In Term {DIT} were accurately reported based on its understanding of the Data Element: Days In Term and the reporting instructions in the FTE General Instructions 2020-2021. All closures/cancellations that occurred before Survey Date Certain were deducted from the DIT reported for that survey period. There was one scheduled Remote Learning Day (January 15) in which no students were transported, however this was still an instructional day and, by our understanding should still be included in DIT {For FTE Student Reporting Purposes). The three remote learning days for PDLH and two at BHS were originally scheduled as regular school days, but because of COVID numbers the decision was made (after date certain) to conduct classes remotely for those schools. In the case of PDLH, the bus routes were unchanged for those days as transportation was needed for PDLE students on the same route. The DIT used for FTE and transportation is the same student field in our system and it would seem inconsistent to report a different number of DIT in the Transportation format and the Teacher Course format. The

			<p>district makes every attempt to be consistent in reporting data as it is on Date Certain for the survey being reported. Events occurring after Date Certain are not recorded/updated/amended in the data reported to FDOE. The processing/amendment window is used ONLY to correct data that was "in place" BEFORE Survey Date Certain but not entered correctly before the date certain "snapshot" was taken. Several of the days cited by the auditor in these findings occurred after date certain and some (Health/Wellness-Dec 17-18; State Championships Bonifay Schools-May 19-20) even after the Survey Amendment Period was closed. It is NOT POSSIBLE for the district to reduce the number of Days in Term reported for a survey period after the amendment window closes.</p>
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The District concurs with the following findings:

Finding #	Ref. #	Finding Summary	Response/Corrective Action
1	56	Our general tests disclosed that the number of buses in operation was overstated by two buses. We determined that two passenger vans were incorrectly coded as buses.	The number of buses in operation was overstated by two buses due to vans being incorrectly coded as buses. This error has been corrected. Person Responsible: JaLisa Brannon Expected Completion: June 30, 2022
3	52	Our general tests disclosed that seven PK students were incorrectly reported in the All Other FEFP Eligible Students ridership category. District records did not evidence that the students were classified as students with disabilities under IDEA or that the students' parents were enrolled in the	This was a data entry error. PK students were enrolled and assigned the wrong transportation membership category upon enrollment. The District will provide training and review for data clerks with regard to the finding. In addition, preliminary reports will be pulled prior to each survey to verify transportation data

		Teenage Parent Program; consequently, the students were not eligible to be reported for State transportation funding.	such as Transportation Membership Category. Person Responsible: Summer Alford MIS and Shane Bush Transportation Coordinators Expected Completion: February 1, 2023
4	53	Our general tests disclosed that three students were incorrectly reported in the All Other FEFP Eligible Students ridership category. The students were not marked as being transported during the applicable reporting survey periods; consequently, the students should not have been reported for State transportation funding.	This reporting error will be corrected by providing additional training and support to bus drivers on the students being marked as riding during the reporting window. Person Responsible: Shane Bush Transportation Director Expected completion: February 1, 2023
5	54	Eight students in our test lived less than 2 miles from their assigned schools and were not otherwise eligible for State transportation funding. We also noted that one of these students was not marked as riding the bus during the February 2021 reporting survey period.	This reporting error will be corrected using the maps in our student information system to ensure students living less than 2 miles are not reported for state transportation funding. Person Responsible: Summer Alford MIS and Shane Bush Transportation Dept. Expected completion: February 1, 2023
6	55	Two ESE students were incorrectly reported in the IDEA – PK through Grade 12, Weighted ridership category. The students' IEPs did not document one of the five criteria required for weighted reporting. We noted that the students lived more than 2 miles from their assigned schools and were eligible to be reported in the All Other FEFP Eligible Students ridership category.	This error in reporting was clerical. The Director of ESE and MIS Coordinator will review and stress the importance of quality data entry to all personnel. Verification reports will be printed and reviewed prior to Survey Reporting. Person Responsible: ESE Donnita Butorac and MIS Summer Alford Expected Completion Date: February 1, 2023