

Miami-Dade County Public Schools



Internal Audit Report

Limited Scope Review of the District's Public Records Request Process



Based on the audit testing performed, the public records request process is functioning properly and in compliance with Florida Statute and School Board Policy.

JULY 2019

THE SCHOOL BOARD OF MIAMI-DADE COUNTY, FLORIDA

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Superintendent of Schools

Mr. Alberto M. Carvalho

Office of Management and Compliance Audits

Ms. Maria T. Gonzalez, CPA

Chief Auditor

Contributors To This Report:

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Ms. Patricia Tumelty, MBA

Audit Supervised and Reviewed by:

Mr. Jon Goodman, CPA, CFE





Miami-Dade County Public Schools

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Superintendent of Schools
Alberto M. Carvalho

Miami-Dade County School Board

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June 21, 2019

The Honorable Chair and Members of The School Board of Miami-Dade County, Florida
Members of The School Board Audit and Budget Advisory Committee
Mr. Alberto M. Carvalho, Superintendent of Schools

Ladies and Gentlemen:

We performed a limited scope review of the District's public records request process, which was initiated based on a specific action delineated in Agenda Item H-13 Revised *Public Information and Access* that was unanimously approved by the Board at its January 16, 2019, School Board Meeting. This audit engagement was an addition to the Office of Management and Compliance Audits' 2019 Annual Audit Plan, and the addition was discussed at the Audit and Budget Advisory Committee of February 5, 2019.

The objectives of this audit were to determine whether processes and procedures for submitting, receiving, reviewing, and responding to public information requests complied with applicable State law and School Board Policy, and report the adequacy of the timelines observed as well as any applicable costs for a sample of public records requests transacted during the audit period. The scope of our audit was limited to those stated objectives and comprised public information requests received during the period of January 1, 2018, through March 12, 2019.

Our testing sample of public information records requests made during the audit period disclosed that the requests tested complied with applicable Florida Statute and School Board Policy in terms of applicable timelines and costs charged. In addition, based on our testing, we determined that the processes and procedures for submitting, receiving, reviewing, and responding to public information records requests are in place and adequate for effective compliance with applicable Florida Statute and School Board Policy.

We would like to thank the management of the Office of Communications for their cooperation and courtesies extended to our staff during this audit.

Sincerely,

Maria T. Gonzalez, CPA
Chief Auditor
Office of Management and Compliance Audits

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EXECUTIVE SUMMARY

We included this audit engagement in the 2019 Audit Plan, and discussed this addition to the Plan at the Audit and Budget Advisory Committee of February 5, 2019. The genesis of this engagement stems from one of the action items corresponding to School Board agenda item H-13 Revised *Public Information and Access*, that was unanimously approved by the Board at its January 16, 2019, School Board meeting. Specifically, action item no. 2 requires the Superintendent to provide “upon verification by the Chief Auditor, a framework for the current procedures and related timelines for submitting, receiving, reviewing, and responding to public information requests.”

In order to appropriately address this request, we performed a limited scope review of the District’s current procedures and related timelines for submitting, receiving, reviewing, and responding to public records requests (PRRs).

The objectives of this audit were to:

1. Determine whether processes and procedures for submitting, receiving, reviewing, and responding to public records requests complied with applicable State law and School Board Policy, and
2. Report the adequacy of the timelines observed as well as any applicable costs for a sample of PRRs transacted during the audit period.

The scope of our audit was limited to those stated objectives and comprised public records requests received during the period of January 1, 2018, through March 12, 2019. During the approximate 15-month audit period, approximately 1,400 PRRs were received and opened by the District’s Citizen Information Center (CIC).

Our testing sample of PRRs made during the audit period disclosed that those PRRs tested complied with applicable Florida Statute and School Board Policy in terms of applicable timelines and costs charged.

Although CIC began developing a formal procedures manual/guidebook prior to our review, it was finalized during our fieldwork in April 2019. Based on our testing and procedures performed, controls appear to be in place for effective compliance with applicable Florida Statute and School Board Policy. Additionally, we noted that:

- On average, PRRs were acknowledged by the CIC on the same day they were submitted by the requestor.
- Of our sample of 40 PRRs selected for testing, seven PRRs disclosed a related cost to the requestor, ranging from \$22 to \$142, and totaling approximately \$400. Said fees collected were properly supported by cost estimates calculated by the custodian of records, which we deemed accurate. Those fees collected were properly and timely submitted to the Office of Treasury Management.
- Based on our sample of 40 PRRs, the time between the PRR received by CIC and the records provided to the requestor averaged 31 days.

- We developed and submitted to CIC two PRRs for testing purposes. In both instances, the CIC responded in compliance with their procedures/guidelines/timelines, without exception.

BACKGROUND

Justification For This Audit

At the January 16, 2019, School Board Meeting, the School Board unanimously approved Agenda item H-13 Revised *Public Information and Access*, that was proffered by School Board Member Dr. Steve Gallon III. The agenda item illustrates issues related to access to public information, means for improving access to public meetings and records, and proposes eight action items to address these issues. We have included this agenda item in Appendix A of this report for reference purposes.

Specific to this agenda item, action item no. 2 requires the Superintendent to provide “upon verification by the Chief Auditor, a framework for the current procedures and related timelines for submitting, receiving, reviewing, and responding to public information requests.”

Upon the Office of Management and Compliance Audits’ further discussion with the maker of the item as to how to best address this request for verification, we included this audit engagement in the 2019 Audit Plan. This engagement was discussed at the Audit and Budget Advisory Committee of February 5, 2019. On February 7, 2019, we commenced this limited scope review of the public information request process with the intention of bringing its results to the Audit and Budget Advisory Committee scheduled for July 16, 2019.

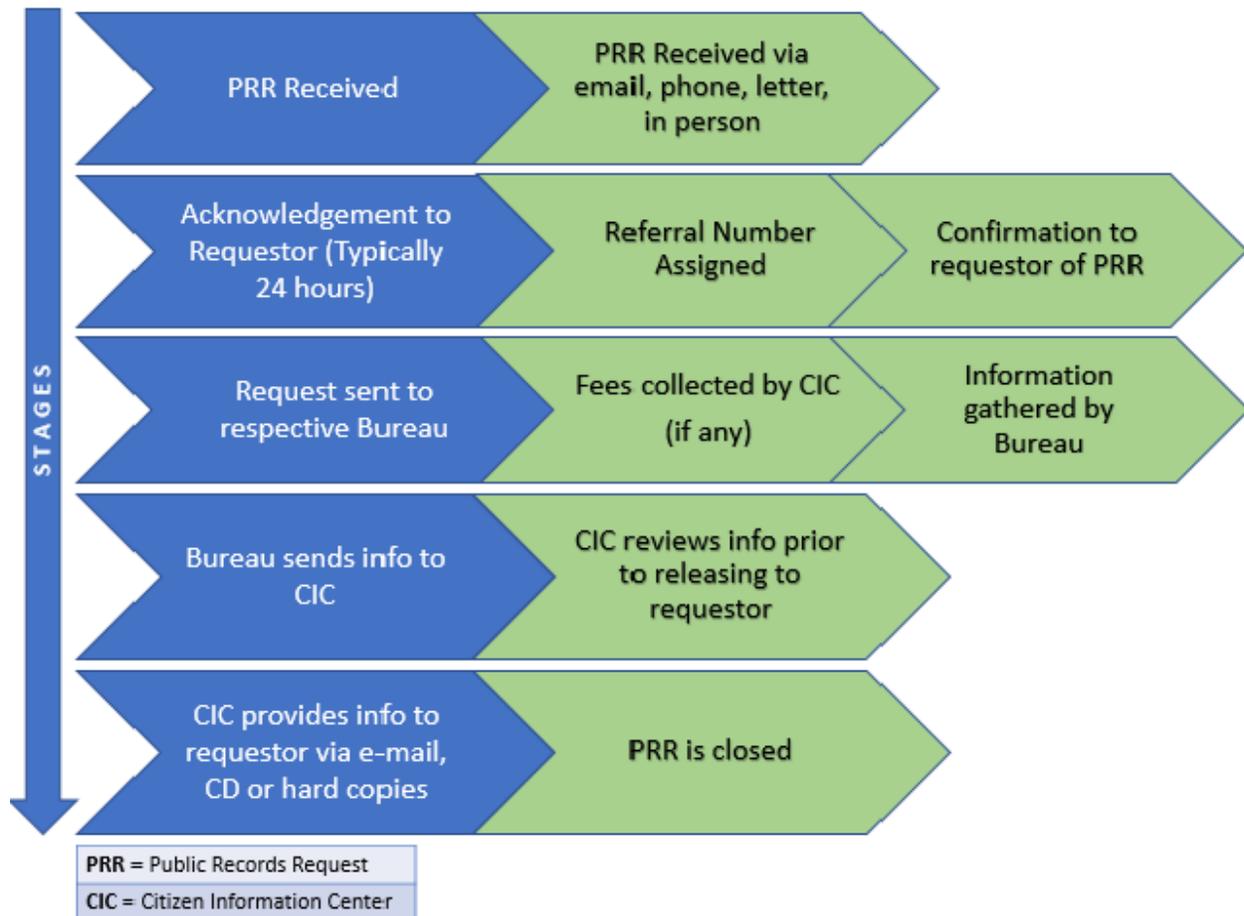
Governance Over Public Information

Public records requests (PRRs) are governed by Chapter 119 Florida Statutes, *Public Records*, which provides that any records made or received by any public agency in the course of its official business are available for inspection, unless specifically exempted by the Florida Legislature. This law was enacted in 1909 and is known as the “Public Records Law”. Public records include traditional written records, as well as maps, books, tapes, photographs, film, sound recordings, data processing software, or other material, regardless of the physical form, characteristics, or means of transmissions, made or received pursuant to law or ordinance or in connection with the transaction of official business by any agency. In addition, School Board Policy 8310, *Public Records*, provides guidance in this area and covers who is responsible for handling a public records request, an overview of the handling of the request and fees that may apply. This Florida law and Miami-Dade County Public Schools’ (M-DCPS) policy are designed to provide transparency and open government.

District’s Office And Process Over Public Information Requests

The Citizen Information Center (CIC) is the central department in M-DCPS where individuals, businesses, organizations and the media may go to make a public records request. A request may be made in person (walk-in), by phone, or by regular or electronic mail and the CIC website. The CIC website provides a contact telephone number, access to Form 6315 *Information Request Sheet* and a link for the online submission of a request.

The following illustration displays the PRR process from receipt of the request to providing the requested records.



At the commencement of our limited scope review, CIC staff provided evidence that they were in the process of developing written guidelines (procedures manual). During our fieldwork in April 2019, CIC provided us with the final *Public Records Request Guidebook*, which had been reviewed by the Office of the School Board Attorney and soon after placed on the District’s website. The guidebook consists of 13 pages which cover:

- Office of Communications role in the PRR process and outline of the process;
- Florida Statute 119 – Public Records Act, Board Rule 8310 – Public Records, Board Rule 8330 – Student Records and Board Rule 8320 – Records Management;
- A frequently asked questions section;
- A quick start guide with concise steps;
- Guidance when estimating a PRR cost, including a uniform cost estimate form (FM 7749);
- A list of definitions relating to PRRs; and
- Contact telephone numbers and e-mail addresses for the CIC, Office of Communications, and other related offices.

OBJECTIVES, SCOPE AND METHODOLOGY

The objectives of this audit were to:

1. Determine whether processes and procedures for submitting, receiving, reviewing, and responding to public records requests complied with applicable State law and School Board Policy, and
2. Report the adequacy of the timelines observed as well as any applicable costs for a sample of PRRs transacted during the audit period.

The scope of our audit was limited to those stated objectives and comprised public records requests received during the period of January 1, 2018, through March 12, 2019. During the approximate 15-month audit period, approximately 1,400 PRRs were received and opened by the District's Citizen Information Center (CIC).

Of the 1,400 PRRs, approximately 800 were routed to Miami-Dade Schools Police, 200 to Human Capital Management, 120 to Financial Services, and the remaining to various departments within the District.

Audit procedures included:

- Reviewing applicable statutes, policies, procedures, and forms;
- Interviewing selected staff of the Office of Communications and other related departments;
- Conducting walk-throughs and observing the public records request process;
- Reviewing any lawsuits or official complaints corresponding to any PRRs transacted during the audit period;
- Testing the process by developing and submitting two of our own public records requests; and
- Selecting a random sample and testing various timelines and costs/fees charged.

Specifically, we randomly selected 40 PRRs that were received by the CIC during the audit period and ascertained or noted the following:

- (1) Date the PRR was received by CIC;
- (2) Acknowledgement of the PRR by CIC;
- (3) Who sent the PRR (attorney, media, citizen, organization);
- (4) Form of communication (regular mail, phone, walk in, electronic mail);
- (5) The type of request (police report, board meeting, personnel data, etc.);
- (6) Exemptions or denials applied;
- (7) PRR cost estimates;
- (8) The results of the PRR; and
- (9) Date the records were provided, or response provided to the requestor.

Of the 40 sampled PRRs, 28 percent of the requests were submitted by private citizens, 23 percent originated from private companies, 15 percent were made by the media, 13

percent derived from law firms, 13 percent involved requests from M-DCPS employees, and the remaining eight percent were made by other government agencies.

We conducted this audit in accordance with *Generally Accepted Government Auditing Standards* issued by the Comptroller General of the United States of America Government Accountability Office (GAO). Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our conclusions based on our audit objectives.

AUDIT RESULTS AND CONCLUSIONS

Our testing of sampled public records requests (PRRs) made during the audit period disclosed that all 40 PRRs tested complied with applicable Florida Statute and School Board Policy in terms of applicable timelines and costs charged.

Although the Citizen Information Center (CIC) began developing a formal procedures manual/guidebook prior to our review, it was finalized during our fieldwork in April 2019. Based on our testing and procedures performed, controls appear to be in place for effective compliance with applicable Florida Statute and School Board Policy. Additionally, we noted:

- On average, PRRs were acknowledged by the CIC on the same day they were submitted by the requestor (refer to page 8).
- Of our sample of 40 PRRs selected for testing, seven PRRs disclosed a related cost to the requestor, ranging from \$22 to \$142, and totaling approximately \$400. Said fees collected were properly supported by cost estimates calculated by the custodian of records, which we deemed accurate. Those fees collected were properly and timely submitted to the Office of Treasury Management (refer to page 9).
- Based on our sample of 40 PRRs, the time between the PRR received by CIC and the records provided to the requestor averaged 31 days. This 31-day average closely aligned with CIC's FY 2017-2018 reported average of 33 days response and completion of a PRR (refer to page 10).
- We developed and submitted to CIC two PRRs for testing purposes. In both instances, the CIC responded in compliance with their procedures/guidelines/timelines, without exception. One of the two PRRs had a fee requiring payment in order to proceed with the records requested (refer to page 12).

Management was in agreement with the conclusions outlined in this report. Refer to their response on page 16 of this report.

For additional details on our conclusions, refer to the following four sections.

ACKNOWLEDGEMENT OF A PUBLIC RECORDS REQUEST (PRR)

Florida Statute Chapter 119.07(1)(c) states that “A custodian of public records and his or her designee must acknowledge requests to inspect or copy records promptly and respond to such requests in good faith. A good faith response includes making reasonable efforts to determine from other officers or employees within the agency whether such a record exists and, if so, the location at which the record can be accessed.” Similarly, School Board Policy 8310 sets forth “A custodian of public records and/or designee must acknowledge requests to inspect or copy records promptly and respond to such request in good faith.” No specific timeline is provided by either the Florida Statute or School Board Policy as to when acknowledgement must be sent to the requestor from the date the request is received.

Our review of 40 PRRs received during the audit period disclosed that the average acknowledgement time by the Citizen Information Center (CIC) was the same day and ranged up to seven calendar days¹.

All the PRRs sampled had acknowledgement by CIC to the requestor documented. The acknowledgement consisted of a memorandum, typically transmitted to the requestor via electronic mail, providing the assigned referral number, advising that the request had been received and “routed to the appropriate staff”. Regarding cost, the memorandum provided the following disclosure: “Should complying with your request require extensive use of information technology resources or extensive clerical or supervisory assistance, an estimated cost shall be provided to you prior to the actual gathering of the records.”

¹ In one instance, an acknowledgement that took seven days was received on January 2, 2018, during the Winter Recess and acknowledged by CIC on Tuesday, January 9, 2018. The 2018 District’s Winter Recess for students and employees began on Monday, December 25, 2017, and ended on Friday, January 5, 2018.

PRR FEE COLLECTION

According to Florida Statute Chapter 119.07(4) “The custodian of public records shall furnish a copy or a certified copy of the record upon payment of the fee prescribed by law.” The fee if not prescribed by law should be 15 cents per one-sided copy for duplicated copies, no more than an additional 5 cents for each two-sided copy and for all other copies the actual cost of duplication of the public records. Furthermore, the statute states that if the public record requires extensive use of technology resources or extensive clerical or supervisory assistance, the agency may charge the actual cost of duplication, a special service charge, which shall be reasonable and based on the cost incurred. School Board Policy sets forth the identical rates for duplication cost, however, School Board Policy states: “If the nature or volume of the public records requested to be copied or inspected will require extensive use of information technology resources or more than fifteen (15) minutes of clerical or supervisory assistance by District personnel, a special service charge attributable to the extensive use of the information technology resources and/or the labor cost of the personnel providing the service will be collected as permitted by State law.”

When applicable to the response, the requestor was given the option of an electronic rate offered in lieu of a rate for producing hardcopies. The electronic rate only included the cost of labor incurred. All the fees were supported by cost estimates provided by the custodian of record(s). Fees must be prepaid to proceed with the records information request. Payments can be made in cash or checks made payable to Miami-Dade County Public Schools.

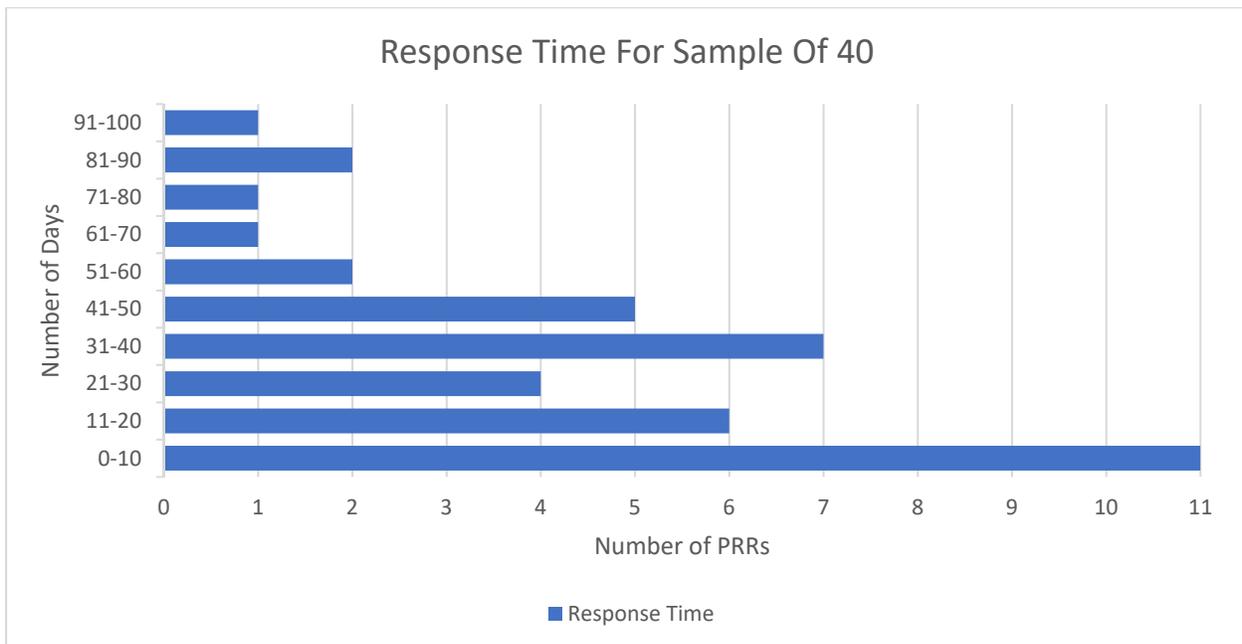
During our review of fees, we found seven (17.5 percent) out of the 40 PRRs sampled to have fees, ranging from \$22 to \$142 and totaling approximately \$400. These fees typically consisted of labor charges to produce the documentation and the cost of materials. Five out of the seven fees totaling \$214 were prepaid, receipted, and timely submitted to the Office of Treasury Management. The other two PRRs were not paid by the requestor and according to CIC administration, the requests were closed after 30 days.

PRR RESPONSE TIME

Florida public records law does not set a response time on a public records requests (PRR). Instead, it refers to responding in good faith, which “includes making reasonable efforts to determine from other officers or employees within the agency whether such a record exists and, if so, the location at which the record can be accessed.”

During our review of the records provided to requestors we calculated how long it took the requestor to receive the records. Based on the results of our test sample, we found that it took between 0 and 97 calendar days to provide the records, with an average of 31 calendar days and median of 28 calendar days. This average closely aligned with the response times provided by the Office of Citizen Information Center (CIC) for the total population of PRRs transacted. For the fiscal year of 2017-2018, CIC reported the average for responding to and completing a PRR as 33 days.

The exhibit below graphically displays the number of days required to respond to and complete the PRRs sampled.



There are some factors that added to the response time of the PRRs tested, particularly, for those PRRs that exceeded the average time for a response. The factors are as follows:

- Ten-day letter is needed when a request is received for an employee’s complete personnel file. Florida Statute 1012.31(3)(a)3 provides an employee with the opportunity to review the file and respond before releasing the records.
- District Winter and Spring Recess for students and employees delayed the process.
- Delay of payment by the requestor to move forward with the request.

- Complexity or vagueness of the request required additional clarification from the requestor.
- Voluminous documents/records that require additional staff time to produce.
- Redactions to the documentation. For example, this would involve redacting information such as social security number, date of birth, telephone numbers, etc.

TWO PRRs DEVELOPED BY THE OFFICE OF MANAGEMENT AND COMPLIANCE AUDITS

We developed and submitted two of our own public records requests (PRRs) during the audit field work to test the process from the point of view of the requestor. Both PRRs were submitted a day or two before the District's Spring Recess (which spanned from Monday, March 25, 2019, to Friday, March 29, 2019). One of these requests was for a list of schools that received certain grant funds during a prior fiscal year, and the other required duplication of an audio/video related to a school meeting.

We accessed the Citizen Information Center's (CIC) website link to submit both PRRs and found the instructions on the website easy to follow. The website provides a contact telephone number, which we did not find the need to use to process our requests. The results are as follows:

- We received acknowledgement on both requests on the same day submitted.
- Eleven days had passed between the time that we submitted the request to the CIC and the time that we received an e-mail notice of a \$40² fee on one of the PRRs. The eleven days included the District's Spring Recess. A subsequent e-mail was received approximately one week later from the custodian of records to follow up on the request. The notification stated the following: "Please let us know if you're still interested or not to close out the ticket request." We did not proceed with the request.
- On the other PRR submitted, 34 calendar days passed between submitting the request to CIC and receiving the requested information. This also included the Spring Recess. The information was provided electronically, at no charge.

² \$40 fee breakdown consisted of \$29 for labor, \$6 for use of equipment and labeling, and \$5 for supplies. We determined that this fee calculated complied with the Florida Statute and School Board Policy.

Appendix A

Office of School Board Members
Board Meeting of January 16, 2019

January 15, 2019

Dr. Steve Gallon III, Board Member

Co-Sponsors:	Ms. Perla Tabares Hantman, Chair	}	A D D E D
	Dr. Dorothy Bendross-Mindingall		
	Ms. Susie V. Castillo		
	Dr. Lawrence S. Feldman		
	Ms. Maria Teresa Rojas		

SUBJECT: PUBLIC INFORMATION AND ACCESS

COMMITTEE: PERSONNEL, STUDENT, SCHOOL & COMMUNITY SUPPORT

LINK TO STRATEGIC

BLUEPRINT: INFORMED, ENGAGED, & EMPOWERED STAKEHOLDERS

The Miami-Dade County Public Schools (M-DCPS) is committed to policies and practices that promote and support professional, transparent, and efficient access to public information, pursuant to the provisions outlined in Chapters 119 and 286 of the Florida Statutes, as well as School Board Policies 8310 and 9120. Each cites practices and provisions that promote professional, transparent, and efficient access to public records, as well as laws and policies that support the public's *"right of access to public meetings and records."*

Consistent with Florida's history of Open Government, the School Board has consistently supported the public's right of access to School Board Meetings, workshops and committee meetings, as well as related school and district-related events. It has similarly supported the public's right to public records, as allowed under Chapter 119. In doing so, along with its legal and statutory obligation, the School Board has a duty to continue to review, define, and revise its practices, policies, and procedures regarding access to public records and participation at meetings.

Although School Board policies are framed and driven by law, the administration and implementation of these policies are guided by practices and procedures, as stipulated in School Board Policy 8310, and are delegated to the Superintendent. Pursuant to School Board Policy 8310, *"the Superintendent has designated the Office of Public Relations to be responsible for handling public records request and the department shall designate a person or persons to coordinate requests."*

In addition to complying with provisions outlined in Chapters 119 and 286 of the Florida Statutes, the School Board *"shall inform the public on matters regarding District policies, finances, programs, personnel, and operations...and the Superintendent shall implement an information program designed to notify the general public of the achievements and needs of the schools."* Many of these functions are also developed and performed by the Office of Public Relations, which is also responsible for announcements to parents and the general public, news releases, and responses to the media.

**Revised
H-13**

As the digital information age continues to expand, new, innovative and increasingly efficient ways to both respond to public records request and inform the public about the work of the School Board and its members, achievements of the school district, and needs of the schools should continuously be explored.

For example, although M-DCPS televises live meetings on WLRN, many school districts across the nation, devoid of their own television station or license, utilize services and technology platforms that allow school boards and districts to post videos and audio files of meetings online so that the public can observe deliberations on its own time, without having to attend meetings in person. Some districts even use technology platforms on which the public can submit feedback to guide policymaking—in *real time*. These technology platforms also provide for not only meeting notices and agendas to be placed online, but also to provide historical links to meetings and corresponding footage in which the items and video/audio footage are integrated and placed alongside each other. Presently, the District does not provide for such integrated access and related historical footage, save for those that may be requested and provided on a disk. Current no-cost or low-cost technology platforms provide for a more efficient and sustainable enhancement to this matter. Thus, this is an opportune time to research, assess, evaluate, and explore the adoption and utilization of such technology to not only expand public access and engagement in School Board and related meetings, but as well as the public's ability to request, receive, and/or access public records.

This item seeks to direct the Superintendent, in consultation with the School Board Attorney, to review policies, practices, and procedures that address and comply with Chapters 119 and 286 of the Florida Statutes governing access to public records and school board meetings, workshops, and school and district activities, and to research, assess, evaluate, and explore the adoption and utilization of technologies to expand public access to School Board and related meetings, and to request, receive, and/or access public records.

This item has been reviewed and approved by the School Board Attorney for legal sufficiency.

**ACTION PROPOSED BY
DR. STEVE GALLON III:**

That The School Board of Miami-Dade County, Florida, direct the Superintendent to:

1. review, in consultation with the School Board Attorney, policies, practices, and procedures that address and comply with Chapters 119 and 286 of the Florida Statutes governing access to public records and attendance and participation at school board meetings, workshops, and school and district related activities;
2. provide, in consultation and upon verification by the Chief Auditor, a framework for the current procedures and related timelines for submitting, receiving, reviewing, and responding to public information requests;
3. research and review best practices throughout the state for the submission, receipt, review, and response to public information requests;

4. explore new ways to inform the public about the work of the School Board and its members, achievements of the school district, and needs of the schools and students;
5. make policy recommendations or revisions, where appropriate;
6. develop and implement new and/or revised practices and procedures for the submission, receipt, review, and response to public information requests;
7. research, develop, and implement new and/or revised practices and procedures that contemplates and integrates technologies to expand public access to School Board and related meetings to the public, such as online links available after the School Board meeting has occurred; and
8. provide an update to the School Board at a Committee Meeting or Board Workshop, inclusive of any proposed changes, no later than the School Board Meeting of April 17, 2019.

Appendix B

MEMORANDUM

June 6, 2019

TO: Ms. Maria T. Gonzalez, Chief Auditor
Office of Management and Compliance Audits

FROM: Ms. Daisy Gonzalez-Diego, Chief Communications Officer *DGD*
Office of Communications

**SUBJECT: RESPONSE TO REPORT – LIMITED SCOPE REVIEW OF THE
DISTRICT'S PUBLIC INFORMATION RECORDS REQUEST
PROCESS**

I am in receipt of your report: Limited Scope Review of The District's Public Information Records Request Process and am in agreement with the conclusions outlined therein. The staff of the Office of Communications will continue to strive to ensure that Public Records Requests are processed in accordance with Chapter 119, Florida's Public Records Law and School Board Policy 8310 – Public Records. I appreciate the opportunity provided by this process to deeply examine our procedures in order to ensure that we are following best practices.

Mr. Rolando A. Martin, District Director, Communications has expressed to me that the staff of Management and Compliance Audits engaged in this audit are consummate professionals who provided a thorough and fair examination of the public records request process.

DGD:ram
M055

cc: Mr. Jon Goodman
Mr. Rolando A. Martin

Anti-Discrimination Policy

Federal and State Laws

The School Board of Miami-Dade County, Florida adheres to a policy of nondiscrimination in employment and educational programs/activities and strives affirmatively to provide equal opportunity for all as required by:

Title VI of the Civil Rights Act of 1964 - prohibits discrimination on the basis of race, color, religion, or national origin.

Title VII of the Civil Rights Act of 1964 as amended - prohibits discrimination in employment on the basis of race, color, religion, gender, or national origin.

Title IX of the Education Amendments of 1972 - prohibits discrimination on the basis of gender.

Age Discrimination in Employment Act of 1967 (ADEA) as amended - prohibits discrimination on the basis of age with respect to individuals who are at least 40.

The Equal Pay Act of 1963 as amended - prohibits gender discrimination in payment of wages to women and men performing substantially equal work in the same establishment.

Section 504 of the Rehabilitation Act of 1973 - prohibits discrimination against the disabled.

Americans with Disabilities Act of 1990 (ADA) - prohibits discrimination against individuals with disabilities in employment, public service, public accommodations and telecommunications.

The Family and Medical Leave Act of 1993 (FMLA) - requires covered employers to provide up to 12 weeks of unpaid, job-protected leave to "eligible" employees for certain family and medical reasons.

The Pregnancy Discrimination Act of 1978 - prohibits discrimination in employment on the basis of pregnancy, childbirth, or related medical conditions.

Florida Educational Equity Act (FEEA) - prohibits discrimination on the basis of race, gender, national origin, marital status, or handicap against a student or employee.

Florida Civil Rights Act of 1992 - secures for all individuals within the state freedom from discrimination because of race, color, religion, sex, national origin, age, handicap, or marital status.

Title II of the Genetic Information Nondiscrimination Act of 2008 (GINA) - prohibits discrimination against employees or applicants because of genetic information.

Boy Scouts of America Equal Access Act of 2002 – no public school shall deny equal access to, or a fair opportunity for groups to meet on school premises or in school facilities before or after school hours, or discriminate against any group officially affiliated with Boy Scouts of America or any other youth or community group listed in Title 36 (as a patriotic society).

Veterans are provided re-employment rights in accordance with P.L. 93-508 (Federal Law) and Section 295.07 (Florida Statutes), which stipulate categorical preferences for employment.

In Addition:

School Board Policies 1362, 3362, 4362, and 5517 - Prohibit harassment and/or discrimination against students, employees, or applicants on the basis of sex, race, color, ethnic or national origin, religion, marital status, disability, genetic information, age, political beliefs, sexual orientation, gender, gender identification, social and family background, linguistic preference, pregnancy, citizenship status, and any other legally prohibited basis. Retaliation for engaging in a protected activity is also prohibited.

For additional information contact:

Office of Civil Rights Compliance (CRC)
Executive Director/Title IX Coordinator
155 N.E. 15th Street, Suite P104E
Miami, Florida 33132
Phone: (305) 995-1580 TDD: (305) 995-2400
Email: crc@dadeschools.net Website: <http://crc.dadeschools.net>

Rev: 08/2017



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***Limited Scope Review of the District's
Public Records Request Process***

JULY 2019

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