

**MIAMI -DADE COUNTY PUBLIC SCHOOLS**

***Internal Audit Report  
Selected  
Schools/Centers***



*At 36 of 37 Schools, The Financial  
Statements Were Fairly Stated.*

*At Eight Schools, Controls Over The  
Bookkeeping Function and the  
Athletics Fund, Disbursements, the  
Disposal/Management of Property,  
Title I Program Procedures, Full-Time  
Equivalent (FTE) Reporting and School  
Site Data Security Need  
Improvement.*

*Property Inventory Results Were  
Satisfactory At Most Schools Where  
A Property Inventory Was  
Conducted.*

**MARCH 2015**

**THE SCHOOL BOARD OF MIAMI-DADE COUNTY, FLORIDA**

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Mr. Alberto M. Carvalho  
Superintendent of Schools

Mr. Jose F. Montes de Oca, CPA  
Chief Auditor  
Office of Management and Compliance Audits

**Contributors To This Report:**

School Audits Performed by:

Ms. Yvonne M. Barrios  
Ms. Pamela L. Davis  
Mr. Hugo Garcia, CFE  
Ms. Maite Jimenez  
Ms. Mariela Jimenez-Linaje  
Mr. Reginald Lafontant  
Mr. Elliott Satz  
Ms. Glendys Serra  
Ms. Patricia A. Tumelty  
Ms. Jeannie Vilato  
Ms. Jana E. Wright

School Audits Supervised and Reviewed by:

Ms. Maria T. Gonzalez, CPA  
Ms. Tamara Wain, CPA

Property Audit Supervised and Performed by:

Mr. Rolando Gonzalez and Property Audits Staff

School Audit Report Prepared by:

Ms. Maria T. Gonzalez, CPA





# Miami-Dade County Public Schools

*giving our students the world*

**Superintendent of Schools**  
**Alberto M. Carvalho**

**Chief Auditor**  
*Jose F. Montes de Oca, CPA*

**Miami-Dade County School Board**  
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*Dr. Martin Karp*  
*Lubby Navarro*  
*Dr. Marta Pérez*  
*Raquel A. Regalado*

February 27, 2015

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/Centers

Ladies and Gentlemen:

This report includes the audit results of 37 schools/centers currently reporting to the North Region, Central Region, South Region, the Education Transformation Office (ETO) and the Division of Adult/Vocational, Alternative and Community Education. The audit period of four of the 37 school audits is two fiscal years ended June 30, 2014, while the audit period of the remaining 33 school audits is one fiscal year ended June 30, 2014. At nine schools/centers, there was a change of Principal since the prior audit.

The main objectives of these audits were to express an opinion on the financial statements of the schools/centers, evaluate compliance with District policies and procedures, and ensure that assets are properly safeguarded. The audits included a review of internal funds at all the schools/centers. On a selected basis, we reviewed payroll, credit card purchases, Title I Program and procedures, Full-Time-Equivalent (FTE) reporting and student records, and selected aspects of data security. The audits also included the results of property inventories.

Our audits disclosed that the financial statements of most of the schools/centers reported herein were fairly stated. At 29 of the 37 schools/centers, we found general compliance with prescribed policies and procedures, and site records were maintained in good order. Property inventory results for most schools/centers reported herein were satisfactory.

At eight schools/centers, depending on the school audited, we cited deficiencies in the bookkeeping of the funds, the disbursement function, oversight over FTE records and procedures, the management and disposal of property, and the monitoring of school site data security. For the second year in a row, one of these eight schools was operating the Internal Fund's Athletics Fund with a deficit balance, while another school could not account for some of their inventoried equipment. At one other school, we cited non-compliance with Title I Program requirements. Specifically, School Operations had referred a citizen's complaint to our office, where it was alleged that a violation of Title I policy at that school had occurred for several years. Our audit substantiated the allegation that a staff member occupying a Title I funded position had customarily performed clerical duties not in alignment with the position's duties and responsibilities, and recommended that the District self-report this instance of non-compliance with Title I policy to the Florida Department of Education. Additional allegations made by the complainant implying fraudulent payroll practices at the school and the unfair elimination of a secretarial position formerly occupied by the complainant's wife were unsubstantiated, as noted in the report.

We discussed the audit findings with school, region and district administrations, and their responses are included in this report. In closing, we would like to thank the schools/centers' staff and administration for the cooperation and consideration provided to the audit staff during the performance of these audits.

Sincerely,

Jose F. Montes de Oca, CPA  
Chief Auditor  
Office of Management and Compliance Audits

JFM:mtg



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## EXECUTIVE SUMMARY

The Office of Management and Compliance Audits has completed the audits of 37 schools/centers. These include 12 schools/centers that report to the North Region Office, two to the Central Region Office, 19 to the South Region Office, one to the Education Transformation Office (ETO), and three that report to the Adult/Vocational and Community Education Division within School Operations.

The 37 schools/centers comprise the audit results of four schools/centers with a two-fiscal year audit period ended June 30, 2014, and 33 schools/centers with a one-fiscal year audit period ended June 30, 2014. At nine schools/centers, there was a change of Principal since the prior audit.

The audits disclosed that 29 of the 37 schools/centers reported herein maintained their records in good order and in accordance with prescribed policies and procedures. The eight schools/centers with audit findings and the affected areas are as follows:

School/Center Name	Region	No. Of Findings	Area Of Findings							
			Book-keeping	Disbursements	Athletics Fund	School Site Data Security	Title I Personnel Issues	Title I Eq. & School Data Sec.	FTE	Mgt./Disposal of Property
1. Natural Bridge Elementary	North	1	1							
2. Norwood Elementary	North	1							1	
3. Palm Springs Elementary	North	1				1				
4. Highland Oaks Middle	North	1		1						
5. American Senior	North	3			1	1				1
6. Sweetwater Elementary	Central	2					1 (Citizen's Complaint)	1		
7. West Homestead K-8 Center	South	1							1	
8. Riviera Middle	South	2							1	1
Totals		12	1	1	1	2	1	1	3	2

As depicted in the table above, depending on the school audited, we cited deficiencies in the bookkeeping of the funds, the disbursement function, oversight over FTE records and procedures, the management and disposal of property, and the monitoring of school site data security. At American Senior, the Internal Fund's Athletics Fund continued to operate with a deficit balance. At Sweetwater Elementary, we cited certain non-compliance with Title I Program requirements. This resulted from several allegations that we investigated during the audit and that were part of a citizen's complaint. The initial complaint, which referred to possible violation of Title I policy at the school, was referred to our office by School Operations. Some of the allegations from the complainant were substantiated and others unsubstantiated, as noted in the report.

A Summary Schedule of Audit Findings listing audit results of current and prior audit periods for all schools/centers in this report is presented on pages 20-23. Responses are included following the recommendations in the *Findings and Recommendations* section of this report (Pages 32-83); and in the Appendix section in memorandum format (Pages 92-122).

*Notwithstanding the conditions and findings reported herein, at 36 of the 37 schools reported herein, the financial statements present fairly, in all material respects, the changes in fund balances arising from the cash transactions of the schools/centers during the 2012-2013 and/or 2013-2014 fiscal year(s), on the cash basis of accounting, depending on the school audited. At Natural Bridge Elementary, due to the conditions cited in the report, which include numerous errors associated with the recordkeeping of the internal funds of the school for the 2012-2013 and 2013-2014 fiscal years, as disclosed in the findings of the individual school audit report and in pages 32-35 of this report, the financial statements of the internal funds of the school do not fairly present the results of its operations, on the cash basis of accounting.*

*As of June 30, 2013, for 4 of the 37 schools reported herein, total combined receipts and disbursements amounted to \$2,132,156.62 and \$2,156,993.92, respectively; while total combined cash and investments amounted to \$342,519.96 (Page 10). As of June 30, 2014, for all 37 schools/centers reported herein, total combined receipts and disbursements amounted to \$8,109,663.86 and \$8,078,464.53, respectively; while total combined cash and investments amounted to \$1,820,953.83 (Pages 11-14).*

*Notwithstanding the conditions and findings reported herein, as of June 30, 2014, the internal control structure at 36 of 37 schools/centers generally functioned as designed by the District and implemented by the school administration, except for those conditions reported at the individual schools/centers. At Natural Bridge Elementary, for the 2012-2013 and 2013-2014 fiscal years, as disclosed in the findings of the individual school audit report, the internal control structure at the school was not generally functioning as designed by the school administration.*

*When conditions came to our attention that were deemed non-reportable, because they were immaterial or inconsequential, they were, nevertheless, discussed with management for their information and follow-up.*

## **INTERNAL FUNDS**

Internal funds records and procedures were reviewed at all 37 schools/centers. Of this total, 34 schools/centers were in general compliance with the procedures established in the *Manual of Internal Fund Accounting*. At the following three schools/centers, we found the following:

- At Natural Bridge Elementary, for the 2012-2013 and 2013-2014 fiscal years under audit, our review of the financial activity posted to the internal funds of this school disclosed many instances where transactions were posted in the automated accounting system to the wrong account, and funds from various activities were commingled in one single account. The errors were noted in the financial activity of field trips, donations, grants, 5<sup>th</sup> Grade year-end activities and a United Way

fundraiser. Right before the closing of the 2013-2014 fiscal year, several corrections were made in the system to reverse the errors. However, for most corrections made, transfers of funds were used in lieu of posting corrections, which prevented the financial statements from reflecting with accuracy total receipts recorded for the year in the individual accounts. Most errors resulted under the tenure of the former Treasurer who retired in February 2014 (Pages 32-35).

- At Highland Oaks Middle, we noted some instances where documentary evidence was not on file to demonstrate that the school had obtained three written quotations (including one from a certified minority enterprise) to justify the selection of the vendor and show that the lowest quotation was selected; or the disbursement included three written quotations and the lowest selected; however, none corresponded to a minority vendor certified with the District, and there was no documentation on file to indicate the reason for this omission. In addition, the school did not complete, did not sign and did not post a purchase order in the automated system to denote approval for the purchase and encumber the funds. The matter of the quotations had been discussed with the school administration in a previous audit (Pages 42-44).
- At American Senior, during the previous audit, the school was cited for operating the Athletics Fund with a deficit balance; however, in 2013-2014, the Athletics Fund continued operating with a deficit balance in subsequent months. There was a change of Principal at this school in July 2014. As a follow-up to the conditions previously noted, we reviewed the activity in the Athletics Fund from July 2014 up to the time of our visit, and similarly found that as of February 9, 2015, the Fund carried a deficit balance of approximately \$(2,570). In addition, net football game proceeds owed to the school by another senior high school had not been received, and the school had not followed up accordingly; and we noted several instances where athletic ticket sales were posted to the wrong individual sports account, and game reports contained errors. We also noted that the school did not follow established procedures for the disposal of School Board-owned property. School correspondence filed with the internal fund records confirmed what appeared to be a monetary donation. However, funds were actually proceeds from the sale of scrap metal. The scrap was from the refurbishment of the school's gymnasium which took place in June 2013. Upon receipt of payment, the school deposited the funds in the internal funds of the school and posted the revenue to a Classes and Clubs account. We were told that the purpose of the sale was to raise funds for the Physical Education Department. We were unable to verify the market value of the scrap because it had already been removed by the vendor, and quotes from other potential vendors were not obtained (Pages 45-51).

## PROPERTY

The results of physical inventories of property items with an individual cost of \$1,000 or more are reported for 40 schools/centers. These include all 37 schools/centers included in this report as well as the results of three other schools/centers: Robert R. Moton Elementary, Miami Palmetto Adult Education Center and Miami Sunset Adult Education Centers. These were pending publication until now.

At 40 schools/centers, Property Audits staff inventoried a total of 7,784 equipment items with a total approximate cost of \$20.8 million. Of the 40 inventories, 34 proved satisfactory. Regarding the remaining six schools/centers, a total of 15 equipment items with a total depreciated value of \$4,233 and a total acquisition cost of \$23,650 could not be located (refer to Property Schedules on Pages 28-30).

- At Riviera Middle, a similar matter regarding “unlocated” property was identified during the prior property inventory. This was discussed with the school for corrective action, and the Principal provided a corrective action plan. However, our most recent property inventory, which we conducted in January 2015, continued to disclose discrepancies with the inventory. Specifically, the school could not account for five items with a depreciated value of approximately \$1,670 and an acquisition cost of approximately \$7,620 (Pages 80-83).
- At American Senior, as previously summarized in the *Internal Funds Section* of this report, the school did not comport with procedures for school sales and the procedures for the disposal of school-owned property (Pages 49-51).

Property inventories also include the review of property losses reported by the schools/centers through the Plant Security Report process. Our analysis of Plant Security Report losses disclosed that nine items with a total depreciated value of zero and a total acquisition cost of \$12,681 were reported missing at three of the 40 schools/centers (Page 31). At Cutler Ridge Elementary, the school reported that several computers awaiting disposal were taken from the Principal’s Office. This incident was reported to M-DCPS Police and is under investigation.

## PAYROLL

We reviewed current payroll records and procedures at the following 14 schools/centers:

Schools/Centers	Region	Schools/Centers	Region
Flamingo Elementary <sup>1</sup>	North	Sweetwater Elementary	Central
Hialeah Gardens Elementary	North	West Homestead K-8 Center <sup>1</sup>	South
Natural Bridge Elementary	North	TERRA Environmental Research Institute	South
Treasure Island Elementary <sup>1</sup>	North	Nathan B. Young Elementary <sup>1</sup>	ETO
Highland Oaks Middle	North	George T. Baker Aviation Technical College <sup>1</sup>	Adult Ed.
American Senior <sup>1</sup>	North	South Dade Technical College <sup>1</sup>	Adult Ed.
Toussaint L'Ouverture Elementary <sup>1</sup>	Central	The English Center <sup>1</sup>	Adult Ed.

At all 14 schools/centers, there was general compliance with the *Payroll Processing Procedures Manual*.

## PURCHASING CARD (P-CARD) PROGRAM

We reviewed the P-Card Program's procedures and records at the following seven schools/centers:

Schools/Centers	Region	Schools/Centers	Region
Miami Gardens Elementary	North	Colonial Drive Elementary	South
Treasure Island Elementary	North	Jane S. Roberts K-8 Center	South
American Senior	North	The English Center	Adult Ed.
Jan Mann Opportunity School	North		

Our review disclosed that all seven schools/centers listed above generally complied with the *Purchasing Card Program Policies and Procedures Manual*.

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<sup>1</sup> Change of Principal at this school/center (9 schools/centers).

## TITLE I PROGRAM EXPENDITURES AND PROCEDURES

A review of Title I Program expenditures and procedures was conducted at the following school:

School/Center Name	Region Office	Audit Period	Total Expenditures
Sweetwater Elementary	Central	2013-2014 (for financial reporting purposes)	\$ 431,329
Total Title I Program Expenditures			\$ 431,329

Total expenditures incurred under various Title I programs amounted to approximately \$431 thousand. Results of our audits disclosed that the school was *not* compliant with the policies and procedures established by the *Title I Administration Handbook*. Details follow of the audit/investigation at this school:

- At Sweetwater Elementary, we investigated several allegations that stemmed from a citizen's complaint referred to our office by School Operations. Our audit substantiated that for several years, a staff member paid with Title I Program funds had not performed duties in alignment with the staff member's job description and responsibilities, and not in accordance with the corresponding collective bargaining agreement. In addition, this staff member was conducting fundraising activities and handling collections at the school site on behalf of the school's allied organization. The complainant further alleged that the Principal had compensated the staff member for part-time work not performed at the school site; and brought to our attention a payroll overpayment made by the District to the complainant's wife. While the evidence obtained did not point to part-time payroll practices that were fraudulent, we did corroborate the payroll overpayment. This was due to a payroll system functionality and human error, and our office has discussed the matter with the appropriate district and school site management for corrective action going forward. Furthermore, the payroll overpayment has been returned to the District. Other allegations made by the complainant related to the inappropriate work assignments of security monitors, unfair elimination of the complainant's wife position at the school, and unfair labor practices of the District were not substantiated by our audit. Regarding the unfair labor practices, we referred the matter to District representatives from Human Capital and Labor Relations for their consideration and response. According to them, that matter is closed since it was handled appropriately by the District. Aside from those matters associated with the complaint, our review of Title I Program procedures at the school site identified certain non-compliant matters related to the budgeting and spending Title I Program funds (funds earmarked for goods/services not fully utilized); equipment purchased with Title I Program funds not identified (no tags attached to new computer purchases), under-utilization of equipment (several computers stored in boxes for almost a year pending installation/wiring capability); and the improper disposal of equipment (one laptop without proper approvals from the Title I Administration Office) (Pages 55-71).



## FULL-TIME-EQUIVALENT (FTE) FUNDING

The following 14 schools/centers were selected for these audits:

Schools/Centers	Region Office	Survey Period (SP)	FTE Funding
Miami Gardens Elementary	North	2014-2015 SP 2	\$ 630,450
Natural Bridge Elementary	North	2013-2014 SP 3	1,356,106
Norwood Elementary	North	2014-2015 SP 2	1,290,592
Palm Springs Elementary	North	2013-2014 SP 3	1,588,843
Treasure Island Elementary	North	2013-2014 SP 3	1,396,846
Henry H. Filer Middle	North	2013-2014 SP 3	2,532,639
American Senior	North	2013-2014 SP 3	4,990,780
Dr. Carlos J. Finlay Elementary	South	2014-2015 SP 2	1,278,622
Florida City Elementary	South	2014-2015 SP 2	1,803,916
Palmetto Elementary	South	2014-2015 SP 2	1,491,447
Tropical Elementary	South	2014-2015 SP 2	1,084,379
West Homestead K-8 Center	South	2013-2014 SP 3	1,677,646
Glades Middle	South	2014-2015 SP 2	2,391,934
Riviera Middle	South	2014-2015 SP 2	1,729,805
Total FTE Funding			\$ 25,244,005

The total FTE funding amounted to approximately \$25.2 million for the 14 schools/centers combined. FTE records reviewed corresponded to the 2013-2014 fiscal year Survey Period 3 (February 2014) or 2014-2015 fiscal year Survey Period 2 (October 2014), depending on the school audited, as listed on the table above. Our FTE reviews disclosed that 11 of the 14 schools/centers were generally compliant with District policy. At three schools we found the following departure from established policies:

- At Norwood Elementary, West Homestead K-8 Center and Riviera Middle, we identified non-compliance with FTE reporting and documentation procedures related to the English for Speakers of Other Languages (ESOL) Program. We identified instances where the individual ELL/LEP Plan, the *Notice to Parents/Guardians of English Language Learners*, and/or a printout of the student schedule for students in secondary grades was not evident in the files, or the forms were not properly completed. In addition, we identified instances where the file did not have written evidence that a LEP Committee had met to assess the student's progress and continued participation in the ESOL Program.

Other discrepancies at West Homestead K-8 Center included non-compliance with FTE reporting and documentation procedures related to Exceptional Student Education and Gifted Student records. Specifically, certain key documents such as the *Individual Education Plan*, the *Educational Plan* and the *Matrix of Services Form* were not properly completed, showed discrepancies, or were not on file (Pages 36-38, 72-76 and 77-79).

## DATA SECURITY

We reviewed the report titled “*Authorized Applications for Employees by Locations Report*” at the following 13 schools/centers:

Schools/Centers	Region	Schools/Centers	Region
Hialeah Gardens Elementary	North	Bel-Aire Elementary	South
Palm Springs Elementary	North	Cutler Ridge Elementary	South
Bob Graham Education Center	North	Palmetto Elementary	South
Henry H. Filer Middle	North	West Homestead K-8 Center	South
American Senior	North	Miami MacArthur South Senior	South
Toussaint L'Ouverture Elementary	Central	Brucie Ball Educational Center	South
Sweetwater Elementary	Central		

Our review disclosed that ten of 13 schools/centers generally complied with the review of the report and with the requirements for granting access to system applications. At three schools we found the following non-compliant matters:

- At Palm Springs Elementary, 29 staff members had access to the system application for managing the Electronic Grade Book Attendance (WGBA) (maximum of five staff approvers). One of the employees previously noted with access to the attendance manager application was hired as a substitute teacher during September-October 2014 (temporary substitutes are not allowed to access WGBA) (Pages 39-41).
- At Sweetwater Elementary, four staff members had access to the application for changing grades in ISIS (maximum of three staff approvers allowed). Just prior to our visit, access to the application for one employee (the staff member cited in the Title I complaint finding), was revoked by the Principal. For the 2013-2014 fiscal year, the number of employees with access to this application exceeded the threshold, and included both the staff member and the complainant’s wife noted in the Title I complaint finding. The number of employees remained at four until changes were made in October 2014 (Pages 68-71).

- At American Senior, the number of employee with access to the WGBA application ranged between 13 and 17 staff approvers during a period of several months in 2014-2015. Regarding the Electronic Grade Book Manager (WGBM) application, the report listed up to seven employees that should not have access to the application (maximum of five staff approvers). According to the data security monthly report, the former Principal was listed with access to several computer applications related to this school site. These included *Quad A* security access (Pages 49-51).

## **AUDIT OPINION**

The following tables summarize total cash receipts and disbursements, and financial position of cash and investments as of June 30, 2013 and/or June 30, 2014 (depending on the school/center audited) for the 37 schools/centers included herein. It also provides the audit opinion regarding the schools/centers' financial statements:

# **CONDENSED ANNUAL FINANCIAL REPORTS AND TOTAL CASH AND INVESTMENTS AS OF JUNE 30, 2013**

The Condensed Annual Financial Reports and Total Cash and Investments as of June 30, 2013 for four of the 37 schools/centers reported herein are:

Work Loc. No.	Schools/Centers	Beginning Balance	Receipts	Disbursements	End Balance	Checking	Investments		Total Cash and Investments
							Money Market Pool Fund	Other	
North Region Office Schools/Centers									
3661	Natural Bridge Elementary	\$ 8,235.55	\$ 27,712.92	\$ 27,003.77	\$ 8,944.70	\$ 7,078.73	\$ 1,865.97	\$ -	\$ 8,944.70
6241	Highland Oaks Middle	53,524.84	291,120.85	305,091.75	39,553.94	12,835.45	26,718.49	-	39,553.94
Adult Education Centers/Technical Colleges									
7801	George T. Baker Aviation Technical College	175,240.58	1,306,496.03	1,313,844.73	167,891.88	46,340.14	121,551.74	-	167,891.88
7702	South Dade Technical College	130,356.29	506,826.82	511,053.67	126,129.44	34,974.10	91,155.34	-	126,129.44
TOTALS		\$ 367,357.26	\$ 2,132,156.62	\$ 2,156,993.92	\$ 342,519.96	\$ 101,228.42	\$ 241,291.54	\$ -	\$ 342,519.96

## CONDENSED ANNUAL FINANCIAL REPORTS AND TOTAL CASH AND INVESTMENTS AS OF JUNE 30, 2014

The Condensed Annual Financial Reports and Total Cash and Investments as of June 30, 2014 for the 37 schools/centers reported herein are:

Work Loc. No.	Schools/Centers	Beginning Balance	Receipts	Disbursements	End Balance	Checking	Investments			Total Cash and Investments
							Money Market Pool Fund		Other	
North Region Office Schools/Centers										
1921	Flamingo Elementary	\$ 32,854.40	\$ 53,235.33	\$ 54,601.16	\$ 31,488.57	\$ 5,903.73	\$ 25,584.84	\$ -	\$ 31,488.57	
2111	Hialeah Gardens Elementary	9,999.51	320,901.09	320,127.37	10,773.23	3,606.50	7,166.73	-	10,773.23	
3241	Miami Gardens Elementary	4,627.37	13,722.66	14,084.60	4,265.43	3,097.83	1,167.60	-	4,265.43	
3661	Natural Bridge Elementary	8,944.70	37,625.45	37,005.25	9,564.90	7,689.13	1,875.77	-	9,564.90	
4001	Norwood Elementary	20,621.26	25,660.96	21,540.27	24,741.95	10,405.21	14,336.74	-	24,741.95	
4261	Palm Springs Elementary	17,780.70	47,324.43	43,651.85	21,453.28	17,284.79	4,168.49	-	21,453.28	
5481	Treasure Island Elementary	26,410.91	36,244.82	47,557.05	15,098.68	13,116.53	1,982.15	-	15,098.68	
0091	Bob Graham Education Center	27,166.89	569,257.98	567,293.60	29,131.27	20,005.30	9,125.97	-	29,131.27	
6171	Henry H. Filer Middle	19,976.33	114,235.62	101,125.81	33,086.14	17,464.15	15,621.99	-	33,086.14	

# **CONDENSED ANNUAL FINANCIAL REPORTS AND TOTAL CASH AND INVESTMENTS AS OF JUNE 30, 2014**

Work Loc. No.	Schools/Centers	Beginning Balance	Receipts	Disbursements	End Balance	Checking	Investments		Total Cash and Investments
							Money Market Pool Fund	Other	
6241	Highland Oaks Middle	39,553.94	238,056.99	252,186.29	25,424.64	8,566.81	16,857.83	-	25,424.64
7011	American Senior	183,741.99	491,827.96	465,148.01	210,421.94	45,478.01	164,943.93	-	210,421.94
8101	Jan Mann Opportunity School	15,896.49	5,345.32	4,440.44	16,801.37	14,810.61	1,990.76	-	16,801.37
<u>Central Region Office Schools/Centers</u>									
3051	Toussaint L'Ouverture Elementary	12,046.08	8,656.04	8,385.75	12,316.37	10,696.28	1,620.09	-	12,316.37
5431	Sweetwater Elementary	20,210.58	175,537.36	177,450.46	18,297.48	11,090.12	-	7,207.36	18,297.48
<u>South Region Office Schools/Centers</u>									
0261	Bel-Aire Elementary	6,689.97	12,104.69	12,712.50	6,082.16	3,889.91	2,192.25	-	6,082.16
0861	Colonial Drive Elementary	17,197.40	20,798.52	22,121.17	15,874.75	5,426.19	10,448.56	-	15,874.75
1241	Cutler Ridge Elementary	45,346.94	349,736.58	361,173.52	33,910.00	19,133.97	14,776.03	-	33,910.00
5061	Dr. Carlos J. Finlay Elementary	17,304.00	42,126.87	40,445.66	18,985.21	2,715.63	16,269.58	-	18,985.21

# **CONDENSED ANNUAL FINANCIAL REPORTS AND TOTAL CASH AND INVESTMENTS AS OF JUNE 30, 2014**

Work Loc. No.	Schools/Centers	Beginning Balance	Receipts	Disbursements	End Balance	Checking	Investments		Total Cash and Investments
							Money Market Pool Fund	Other	
2001	Florida City Elementary	15,026.21	16,719.27	16,625.29	15,120.19	6,663.55	8,456.64	-	15,120.19
2021	Gloria Floyd Elementary	11,091.45	177,188.31	176,037.41	12,242.35	8,355.58	3,886.77	-	12,242.35
2261	Greenglade Elementary	17,020.89	132,084.24	132,606.16	16,498.97	7,261.03	9,237.94	-	16,498.97
2891	William Lehman Elementary	34,556.29	321,012.78	324,418.69	31,150.38	591.88	30,558.50	-	31,150.38
4221	Palmetto Elementary	29,293.05	424,514.91	428,614.07	25,193.89	16,906.96	8,286.93	-	25,193.89
5521	Tropical Elementary	16,238.10	82,601.99	80,058.18	18,781.91	9,095.83	9,686.08	-	18,781.91
5951	Whispering Pines Elementary	19,757.37	246,367.33	251,114.53	15,010.17	2,554.87	12,455.30	-	15,010.17
4691	Jane S. Roberts K-8 Center	25,421.80	319,434.59	314,894.60	29,961.79	14,964.73	14,997.06	-	29,961.79
5791	West Homestead K-8 Center	18,394.01	23,626.33	23,261.49	18,758.85	2,587.17	16,171.68	-	18,758.85
6211	Glades Middle	45,704.42	151,367.78	157,918.18	39,154.02	19,589.35	19,564.67	-	39,154.02
6801	Riviera Middle	29,496.98	79,531.03	81,057.38	27,970.63	7,527.20	20,443.43	-	27,970.63
7171	Medical Academy For Science And Technology Senior	17,507.47	98,883.51	87,239.01	29,151.97	4,044.72	25,107.25	-	29,151.97

**CONDENSED ANNUAL FINANCIAL REPORTS  
AND TOTAL CASH AND INVESTMENTS AS OF JUNE 30, 2014**

Work Loc. No.	Schools/Centers	Beginning Balance	Receipts	Disbursements	End Balance	Checking	Investments		Total Cash and Investments
							Money Market Pool Fund	Other	
7029	TERRA Environmental Research Institute	120,175.42	645,429.38	603,825.97	161,778.83	20,185.79	141,593.04	-	161,778.83
7631	Miami MacArthur South Senior	26,327.02	11,316.22	20,565.57	17,077.67	2,439.94	14,637.73	-	17,077.67
9732	Brucie Ball Educational Center	10,788.44	2,288.66	2,898.67	10,178.43	3,345.50	6,832.93	-	10,178.43
<u>Education Transformation Office (ETO) School/Center</u>									
5971	Nathan B. Young Elementary	7,698.47	9,835.02	11,625.90	5,907.59	4,566.95	1,340.64	-	5,907.59
<u>Adult Education Centers/Technical Colleges</u>									
7801	George T. Baker Aviation Technical College	167,891.88	1,401,477.29	1,411,960.04	157,409.13	35,219.52	122,189.61	-	157,409.13
7702	South Dade Technical College	126,129.44	371,326.64	378,345.94	119,110.14	27,476.46	91,633.68	-	119,110.14
7841	The English Center	524,866.33	1,032,259.91	1,024,346.69	532,779.55	82,329.63	450,449.92	-	532,779.55
<b>TOTALS</b>		\$ 1,789,754.50	\$ 8,109,663.86	\$ 8,078,464.53	\$ 1,820,953.83	\$ 496,087.36	\$ 1,317,659.11	\$ 7,207.36	\$ 1,820,953.83



# CONDENSED ANNUAL FINANCIAL REPORTS AND TOTAL CASH AND INVESTMENTS AS OF JUNE 30, 2013 AND/OR JUNE 30, 2014

## AUDIT OPINION


### Audit Opinion on Financial Statements and Overall Assessment of Internal Controls Over Financial Reporting

Notwithstanding the conditions and findings reported herein, at 36 of the 37 schools reported herein, the financial statements present fairly, in all material respects, the changes in fund balances arising from the cash transactions of the schools/centers during the 2012-2013 and/or 2013-2014 fiscal year(s), on the cash basis of accounting, depending on the school audited. At Natural Bridge Elementary, due to the conditions cited in the report, which include numerous errors associated with the recordkeeping of the internal funds of the school for the 2012-2013 and 2013-2014 fiscal years, as disclosed in the findings of the individual school audit report and in pages 32-35 of this report, the financial statements of the internal funds of the school do not fairly present the results of its operations, on the cash basis of accounting.

As of June 30, 2013, for 4 of the 37 schools reported herein, total combined receipts and disbursements amounted to \$2,132,156.62 and \$2,156,993.92, respectively; while total combined cash and investments amounted to \$342,519.96 (Page 10). As of June 30, 2014, for all 37 schools/centers reported herein, total combined receipts and disbursements amounted to \$8,109,663.86 and \$8,078,464.53, respectively; while total combined cash and investments amounted to \$1,820,953.83 (Pages 11-14).

Notwithstanding the conditions and findings reported herein, as of June 30, 2014, the internal control structure at 36 of 37 schools/centers generally functioned as designed by the District and implemented by the school administration, except for those conditions reported at the individual schools/centers. At Natural Bridge Elementary, for the 2012-2013 and 2013-2014 fiscal years, as disclosed in the findings of the individual school audit report, the internal control structure at the school was not generally functioning as designed by the school administration.

When conditions came to our attention that were deemed non-reportable, because they were immaterial or inconsequential, they were, nevertheless, discussed with management for their information and follow-up.

  
Maria T. Gonzalez, Certified Public Accountant  
Assistant Chief Auditor, School Audits Division  
Office of Management and Compliance Audits

## INTERNAL CONTROLS RATING

The internal controls rating of the eight schools/centers reported herein **with audit exceptions** are depicted as follows:

SCHOOLS/CENTERS	PROCESS & IT CONTROLS			POLICY & PROCEDURES COMPLIANCE			EFFECT
	SATISFACTORY	NEEDS IMPROVEMENT	INADEQUATE	SATISFACTORY	NEEDS IMPROVEMENT	INADEQUATE	
<u>North Region Office Schools/Centers</u>							
Natural Bridge Elementary			✓			✓	Impacted operations (Internal Funds).
Norwood Elementary		✓			✓		Likely to impact.
Palm Springs Elementary		✓			✓		Likely to impact.
Highland Oaks Middle		✓			✓		Likely to impact.
American Senior		✓			✓		Likely to impact.
<u>Central Region Office School/Center</u>							
Sweetwater Elementary			✓			✓	Impacted operations (Title I Program and Data Security).
<u>South Region Office Schools/Centers</u>							
West Homestead K-8 Center		✓			✓		Likely to impact.
Riviera Middle			✓			✓	Impacted operations (Property Management).

## INTERNAL CONTROLS RATING

The internal control ratings for the remaining 29 schools/centers reported herein **without audit exceptions** are depicted as follows:

SCHOOLS/CENTERS	PROCESS & IT CONTROLS			POLICY & PROCEDURES COMPLIANCE			EFFECT
	SATISFACTORY	NEEDS IMPROVEMENT	INADEQUATE	SATISFACTORY	NEEDS IMPROVEMENT	INADEQUATE	
<u>North Region Office Schools/Centers</u>							
Flamingo Elementary	✓			✓			Not Likely to impact.
Hialeah Gardens Elementary	✓			✓			Not Likely to impact.
Miami Gardens Elementary	✓			✓			Not Likely to impact.
Treasure Island Elementary	✓			✓			Not Likely to impact.
Bob Graham Education Center	✓			✓			Not Likely to impact.
Henry H. Filer Middle	✓			✓			Not Likely to impact.
Jan Mann Opportunity School	✓			✓			Not Likely to impact.
<u>Central Region Office School/Center</u>							
Toussaint L'Ouverture Elementary	✓			✓			Not Likely to impact.
<u>South Region Office Schools/Centers</u>							
Bel-Aire Elementary	✓			✓			Not Likely to impact.

## INTERNAL CONTROLS RATING

SCHOOLS/CENTERS	PROCESS & IT CONTROLS			POLICY & PROCEDURES COMPLIANCE			EFFECT
	SATISFACTORY	NEEDS IMPROVEMENT	INADEQUATE	SATISFACTORY	NEEDS IMPROVEMENT	INADEQUATE	
Colonial Drive Elementary	✓			✓			Not Likely to impact.
Cutler Ridge Elementary	✓			✓			Not Likely to impact.
Dr. Carlos J. Finlay Elementary	✓			✓			Not Likely to impact.
Florida City Elementary	✓			✓			Not Likely to impact.
Gloria Floyd Elementary	✓			✓			Not Likely to impact.
Greenglade Elementary	✓			✓			Not Likely to impact.
William Lehman Elementary	✓			✓			Not Likely to impact.
Palmetto Elementary	✓			✓			Not Likely to impact.
Tropical Elementary	✓			✓			Not Likely to impact.
Whispering Pines Elementary	✓			✓			Not Likely to impact.
Jane S. Roberts K-8 Center	✓			✓			Not Likely to impact.
Glades Middle	✓			✓			Not Likely to impact.
Medical Academy For Science And Technology Senior	✓			✓			Not Likely to impact.

## INTERNAL CONTROLS RATING

SCHOOLS/CENTERS	PROCESS & IT CONTROLS			POLICY & PROCEDURES COMPLIANCE			EFFECT
	SATISFACTORY	NEEDS IMPROVEMENT	INADEQUATE	SATISFACTORY	NEEDS IMPROVEMENT	INADEQUATE	
TERRA Environmental Research Institute	✓			✓			Not Likely to impact.
Miami MacArthur South Senior	✓			✓			Not Likely to impact.
Brucie Ball Educational Center	✓			✓			Not Likely to impact.
<u>Education Transformation Office (ETO) School/Center</u>							
Nathan B. Young Elementary	✓			✓			Not Likely to impact.
<u>Adult Education Centers/Technical Colleges</u>							
George T. Baker Aviation Technical College	✓			✓			Not Likely to impact.
South Dade Technical College	✓			✓			Not Likely to impact.
The English Center	✓			✓			Not Likely to impact.

## SUMMARY SCHEDULE OF AUDIT FINDINGS CURRENT AND PRIOR AUDIT PERIODS

Summary of findings of the eight schools/centers reported herein **with audit exceptions** are as follows:

WORK LOC. NO.	SCHOOLS/CENTERS	CURRENT YEAR FINDINGS		PRIOR YEAR FINDINGS	
		Total Per School	Area Of Findings	Total Per School	Area Of Findings
North Region Office Schools/Centers					
3661	Natural Bridge Elementary	1	▪ Bookkeeping	None	
4001	Norwood Elementary	1	▪ FTE-ESOL	None	
4261	Palm Springs Elementary	1	▪ School Site Data Security	None	
6241	Highland Oaks Middle	1	▪ Disbursements	None	
7011	American Senior <sup>(a)</sup>	3	▪ Athletics Fund ▪ Disposal of Property ▪ School Site Data Security	1	▪ Athletics Fund/ Account Deficit Balances
Central Region Office School/Center					
5431	Sweetwater Elementary	2	▪ Title I Personnel (Citizen's Complaint) ▪ Title I Budget, Title I Equipment (Utilization and Disposal )and School Site Data Security Issues	None	
South Region Office Schools/Centers					
5791	West Homestead K-8 Center <sup>(b)</sup>	1	▪ FTE-ESOL and SPED	None	
6801	Riviera Middle	2	▪ FTE-ESOL ▪ Management of Property	1	▪ Management of Property
TOTAL		12		2	

Notes:

(a) Change of Principal at this school. Findings took place under tenure of former and current school administration.

(b) Change of Principal at this school. Findings happened under tenure of former school administration.

## SUMMARY SCHEDULE OF AUDIT FINDINGS CURRENT AND PRIOR AUDIT PERIODS

Summary of findings of the remaining 29 schools/centers reported herein **without audit exceptions** are as follows:

WORK LOC. NO.	SCHOOLS/CENTERS	CURRENT YEAR FINDINGS		PRIOR YEAR FINDINGS	
		Total Per School	Area Of Findings	Total Per School	Area Of Findings
North Region Office Schools/Centers					
1921	Flamingo Elementary	None		None	
2111	Hialeah Gardens Elementary	None		None	
3241	Miami Gardens Elementary	None		None	
5481	Treasure Island Elementary	None		None	
0091	Bob Graham Education Center	None		None	
6171	Henry H. Filer Middle	None		None	
8101	Jan Mann Opportunity School	None		None	
Central Region Office School/Center					
3051	Toussaint L'Ouverture Elementary	None		None	
South Region Office Schools/Centers					
0261	Bel-Aire Elementary	None		None	

## SUMMARY SCHEDULE OF AUDIT FINDINGS CURRENT AND PRIOR AUDIT PERIODS

WORK LOC. NO.	SCHOOLS/CENTERS	CURRENT YEAR FINDINGS		PRIOR YEAR FINDINGS	
		Total Per School	Area Of Findings	Total Per School	Area Of Findings
0861	Colonial Drive Elementary	None		None	
1241	Cutler Ridge Elementary	None		None	
5061	Dr. Carlos J. Finlay Elementary	None		None	
2001	Florida City Elementary	None		None	
2021	Gloria Floyd Elementary	None		None	
2261	Greenglade Elementary	None		None	
2891	William Lehman Elementary	None		None	
4221	Palmetto Elementary	None		None	
5521	Tropical Elementary	None		None	
5951	Whispering Pines Elementary	None		None	
4691	Jane S. Roberts K-8 Center	None		None	
6211	Glades Middle	None		None	
7171	Medical Academy For Science And Technology Senior	None		None	
7029	TERRA Environmental Research Institute	None		None	
7631	Miami MacArthur South Senior	None		None	



## SUMMARY SCHEDULE OF AUDIT FINDINGS CURRENT AND PRIOR AUDIT PERIODS

WORK LOC. NO.	SCHOOLS/CENTERS	CURRENT YEAR FINDINGS		PRIOR YEAR FINDINGS	
		Total Per School	Area Of Findings	Total Per School	Area Of Findings
9732	Brucie Ball Educational Center	None		None	
<u>Education Transformation Office (ETO) School/Center</u>					
5971	Nathan B. Young Elementary	None		None	
<u>Adult Education Centers/Technical Colleges</u>					
7801	George T. Baker Aviation Technical College	None		None	
7702	South Dade Technical College	None		1	▪ Theft of Cash Collections
7841	The English Center	None		None	
TOTAL		None		1	

## LIST OF SCHOOL PRINCIPALS/ADMINISTRATORS

Listed below are the names of the former and current principals/administrators, as applicable for the eight schools/centers **with audit exceptions**. The **highlighted table cell represents the principal(s)/administrator(s) in charge of the school/center during the audit period and/or when audit exception(s) happened**. Refer to *Notes* below for additional information:

Work Loc. No.	Schools/Centers	Current Principal(s)/Administrator(s)	Former Principal(s)/Administrator(s)
<u>North Region Office Schools/Centers</u>			
3661	Natural Bridge Elementary	Mr. Frank V. MacBride, Jr.	N/A = No Change of Principal Since Prior Audit.
4001	Norwood Elementary	Dr. Kevin N. Williams	N/A = No Change of Principal Since Prior Audit.
4261	Palm Springs Elementary	Ms. Roxana D. Herrera	N/A = No Change of Principal Since Prior Audit.
6241	Highland Oaks Middle	Ms. Cheryl L. Kushi	N/A = No Change of Principal Since Prior Audit.
7011	American Senior <sup>(a)(b)</sup>	Mr. Francisco E. Garnica	Mr. Luis E. Diaz (Through June 2014; presently Administrative Director, School Operations).
<u>Central Region Office School/Center</u>			
5431	Sweetwater Elementary	Ms. Janet P. Olivera	N/A = No Change of Principal Since Prior Audit.
<u>South Region Office Schools/Centers</u>			
5791	West Homestead K-8 Center <sup>(a)(c)</sup>	Ms. Tammy S. Edouard	Dr. Columbus Williams, Jr. (Through February 2014; retired).
6801	Riviera Middle	Dr. Winston A. Whyte	N/A = No Change of Principal Since Prior Audit.

Notes:

(a) Change of Principal/Administrator at this school since prior audit (9 schools/centers).

(b) Findings happened under prior and current school administrations. For specific details, refer to individual school findings in this report on pages 45-54.

(c) Findings happened under prior school administration. For specific details, refer to individual school findings in this report on pages 72-76.

## LIST OF SCHOOL PRINCIPALS/ADMINISTRATORS

Listed below are the names of the former and current principals/administrators, as applicable for the remaining 29 schools/centers **without audit exceptions**. The **highlighted table cell** represents the **principal(s)/administrator(s) in charge of the school/center during the audit period**:

Work Loc. No.	Schools/Centers	Current Principal(s)/Administrator(s)	Former Principal(s)/Administrator(s)
<u>North Region Office Schools/Centers</u>			
1921	Flamingo Elementary <sup>(a)</sup>	Ms. Ileana R. Sotolongo	Ms. Claudia V. James (Through November 2014; deceased).
2111	Hialeah Gardens Elementary	Mr. Rouben J. Yaghdjian	N/A = No Change of Principal Since Prior Audit.
3241	Miami Gardens Elementary	Dr. Apryle L. Kirnes	N/A = No Change of Principal Since Prior Audit.
5481	Treasure Island Elementary <sup>(a)</sup>	Ms. Dalia Villar	Dr. Sherry L. Krubitch (Through September 2014; on leave).
0091	Bob Graham Education Center	Ms. Yecenia Martinez-Lopez	N/A = No Change of Principal Since Prior Audit.
6171	Henry H. Filer Middle	Ms. Emirce Ladaga	N/A = No Change of Principal Since Prior Audit.
8101	Jan Mann Opportunity School	Mr. Samuel L. Johnson	N/A = No Change of Principal Since Prior Audit.
<u>Central Region Office School/Center</u>			
3051	Toussaint L'Ouverture Elementary <sup>(a)</sup>	Ms. Marchel D. Woods	Dr. Liliane A. Delbor (Through November 2014; presently Instructional Supervisor-Language, Charter School Operations).
<u>South Region Office Schools/Centers</u>			
0261	Bel-Aire Elementary	Ms. Prudence Mingo	N/A = No Change of Principal Since Prior Audit.

Note:

(a) Change of Principal/Administrator at this school since prior audit (9 schools/centers).

## LIST OF SCHOOL PRINCIPALS/ADMINISTRATORS

Work Loc. No.	Schools/Centers	Current Principal(s)/Administrator(s)	Former Principal(s)/Administrator(s)
0861	Colonial Drive Elementary	Ms. Laura F. Tennant	N/A = No Change of Principal Since Prior Audit.
1241	Cutler Ridge Elementary	Ms. Adrienne L. Wright-Mullings	N/A = No Change of Principal Since Prior Audit.
5061	Dr. Carlos J. Finlay Elementary	Ms. Cecilia C. Sanchez	N/A = No Change of Principal Since Prior Audit.
2001	Florida City Elementary	Ms. Catherine T. Krtausch	N/A = No Change of Principal Since Prior Audit.
2021	Gloria Floyd Elementary	Mr. Todd W. Morrow	N/A = No Change of Principal Since Prior Audit.
2261	Greenglade Elementary	Dr. Maria V. Tercilla	N/A = No Change of Principal Since Prior Audit.
2891	William Lehman Elementary	Ms. Maria C. Cruz	N/A = No Change of Principal Since Prior Audit.
4221	Palmetto Elementary	Mr. Eric Torres	N/A = No Change of Principal Since Prior Audit.
5521	Tropical Elementary	Ms. Yubeda Miah	N/A = No Change of Principal Since Prior Audit.
5951	Whispering Pines Elementary	Ms. Tamela L. Brown	N/A = No Change of Principal Since Prior Audit.
4691	Jane S. Roberts K-8 Center	Ms. Ana C. Othon	N/A = No Change of Principal Since Prior Audit.
6211	Glades Middle	Ms. Cynthia Valdes-Garcia	N/A = No Change of Principal Since Prior Audit.
7171	Medical Academy For Science And Technology Senior	Ms. Lisa S. Noffo	N/A = No Change of Principal Since Prior Audit.
7029	TERRA Environmental Research Institute	Ms. Caridad H. Montano	N/A = No Change of Principal Since Prior Audit.
7631	Miami MacArthur South Senior	Mr. Gregory A. Beckford	N/A = No Change of Principal Since Prior Audit.

## LIST OF SCHOOL PRINCIPALS/ADMINISTRATORS

Work Loc. No.	Schools/Centers	Current Principal(s)/Administrator(s)	Former Principal(s)/Administrator(s)
9732	Brucie Ball Educational Center	Ms. Deborah C. Wehking	N/A = No Change of Principal Since Prior Audit.
<u>Education Transformation Office (ETO) School/Center</u>			
5971	Nathan B. Young Elementary <sup>(a)</sup>	Dr. Tonya S. Dillard	Mr. Raymond J. Sands (Through June 2014; presently Principal at North Glade Elementary School).
<u>Adult Education Centers/Technical Colleges</u>			
7801	George T. Baker Aviation Technical College <sup>(a)</sup>	Mr. René Mantilla	Dr. Sean E. Gallagan (Through February 2014; presently Principal at iTech @ Thomas A. Edison Educational Center).
7702	South Dade Technical College <sup>(a)</sup>	Dr. Susana Mauri	Mr. René Mantilla (Through February 2014; presently Principal at George T. Baker Aviation Technical College).
7841	The English Center <sup>(a)</sup>	Ms. Yamila M. Carballo	Mr. Richard Vidal (Through June 2014; retired).

Note:

(a) Change of Principal/Administrator at this school since prior audit (9 schools/centers).

## PROPERTY SCHEDULES

The results of the property inventories of the 40 schools/centers reported herein are as follows:

Work Location No.	Schools/Centers	CURRENT INVENTORY					PRIOR INVENTORY	
		Total Items	Dollar Value	Unlocated Items			No. Of Unloc. Items	Dollar Value
				No. Of Items	At Cost	At Deprec. Value		
North Region Office Schools/Centers								
1921	Flamingo Elementary	154	\$ 339,318	-	-	-	-	-
2111	Hialeah Gardens Elementary	148	293,913	-	-	-	-	-
3241	Miami Gardens Elementary	48	102,905	-	-	-	-	-
3661	Natural Bridge Elementary	175	352,781	-	-	-	-	-
4001	Norwood Elementary	135	297,801	-	-	-	-	-
4261	Palm Springs Elementary	251	555,077	-	-	-	-	-
5481	Treasure Island Elementary	95	200,317	-	-	-	-	-
0091	Bob Graham Education Center	246	595,808	-	-	-	-	-
6171	Henry H. Filer Middle	256	622,696	-	-	-	-	-
6241	Highland Oaks Middle	269	625,770	-	-	-	-	-
7011	American Senior	469	1,267,109	4	\$ 7,413	\$ 1,509	-	-
8101	Jan Mann Opportunity School	65	148,690	1	2,675	-	-	-
Central Region Office Schools/Centers								
3051	Toussaint L'Ouverture Elementary	117	253,862	-	-	-	-	-
5431	Sweetwater Elementary	222	498,525	-	-	-	-	-

## PROPERTY SCHEDULES

Work Location No.	Schools/Centers	CURRENT INVENTORY					PRIOR INVENTORY	
		Total Items	Dollar Value	Unlocated Items			No. Of Unloc. Items	Dollar Value
				No. Of Items	At Cost	At Deprec. Value		
South Region Office Schools/Centers								
0261	Bel-Aire Elementary	116	247,738	-	-	-	-	-
0861	Colonial Drive Elementary	143	319,327	-	-	-	-	-
1241	Cutler Ridge Elementary	374	682,105	-	-	-	2	\$ 2,868
5061	Dr. Carlos J. Finlay Elementary	142	395,880	-	-	-	-	-
2001	Florida City Elementary	149	290,568	-	-	-	-	-
2021	Gloria Floyd Elementary	156	309,444	2	\$ 2,429	\$ 1,055	-	-
2261	Greenglade Elementary	147	281,181	1	1,359	-	-	-
2891	William Lehman Elementary	124	278,614	-	-	-	1	1,486
3541	Robert Russa Moton Elementary <sup>(a)</sup>	189	404,451	-	-	-	-	-
4221	Palmetto Elementary	118	252,162	-	-	-	-	-
5521	Tropical Elementary	196	403,188	-	-	-	-	-
5951	Whispering Pines Elementary	147	319,276	-	-	-	-	-
4691	Jane S. Roberts K-8 Center	216	460,955	-	-	-	-	-
5791	West Homestead K-8 Center	191	376,183	2	2,152	-	-	-
6211	Glades Middle	220	546,792	-	-	-	-	-
6801	Riviera Middle <sup>(b)</sup>	508	1,000,792	5	7,622	1,669	7	13,442

Notes:

(a) Property results pending until now. School audit previously reported this fiscal year (3 schools/centers).

(b)"Unlocated" property over threshold two years in a row.

## PROPERTY SCHEDULES

Work Location No.	Schools/Centers	CURRENT INVENTORY					PRIOR INVENTORY	
		Total Items	Dollar Value	Unlocated Items			No. Of Unloc. Items	Dollar Value
				No. Of Items	At Cost	At Deprec. Value		
7171	Medical Academy For Science And Technology Senior	102	311,072	-	-	-	-	-
7029	TERRA Environmental Research Institute	408	1,652,565	-	-	-	-	-
7631	Miami MacArthur South Senior	191	515,723	-	-	-	-	-
9732	Brucie Ball Educational Center	100	227,396	-	-	-	-	-
<u>Education Transformation Office (ETO) School/Center</u>								
5971	Nathan B. Young Elementary	143	250,210	-	-	-	4	9,231
<u>Adult Education Centers/Technical Colleges</u>								
7801	George T. Baker Aviation Technical College	612	3,858,009	-	-	-	-	-
7432	Miami Palmetto Adult Education Center <sup>(a)</sup>	14	34,814	-	-	-	-	-
7532	Miami Sunset Adult Education Center <sup>(a)</sup>	20	55,867	-	-	-	-	-
7702	South Dade Technical College	187	641,790	-	-	-	-	-
7841	The English Center	221	480,210	-	-	-	-	-
TOTAL		7,784	\$ 20,750,884	15	\$ 23,650	\$ 4,233	14	\$ 27,027

Note:

(a) Property results pending until now. School audit previously reported this fiscal year (3 schools/centers).



## PROPERTY SCHEDULES

The following table is an analysis of Plant Security Reports. Those schools/centers reported herein that have not filed Plant Security Reports are excluded from this schedule:

Work Location No.	Schools/Centers	No. Of Plant Security Reports	Total Items	Total Amount At Cost	CATEGORY (AT COST)	Total Depreciated Value
					Computers	
<u>North Region Office School/Center</u>						
8101	Jan Mann Opportunity School	1	1	\$ 1,296	\$ 1,296	-
<u>South Region Office Schools/Centers</u>						
1241	Cutler Ridge Elementary School <sup>(a)</sup>	1	7	9,835	9,835	-
7029	TERRA Environmental Research Institute	1	1	1,550	1,550	-
		3	9	\$ 12,681	\$ 12,681	-

Note:

- (a) According to the Plant Security Report, the computers were located in the Principal's office awaiting disposal and were removed by unknown person(s).

## **FINDINGS AND RECOMMENDATIONS**

### **1. Inadequate Controls Over The Bookkeeping Function Resulted In Material Misstatement In The Financial Records Of The School *Natural Bridge Elementary School***

Pursuant to Section II, Chapter 2 of the *Manual of Internal Fund Accounting*, although the Principal is ultimately responsible for monitoring and administering the revenue generated from Internal Fund activities, the school Treasurer is the designated person for receiving, recording and depositing all funds collected, as well as maintaining records for internal fund transactions processed. Regarding specific bookkeeping procedures that Treasurers must follow, Section II, Chapter 7 establishes that, while a funds transfer is made to move funds from one account to another, a posting correction is required to correct an error in posting when revenues were initially recorded in the wrong account. The procedures further state that, when a recording error takes place, a transfer of money *must not be used in lieu of a posting correction to reverse the error*.

At this school, the Treasurer retired in February 2014. For both fiscal years under audit, our review of the financial activity posted to the internal funds of this school disclosed many instances where transactions were posted in the automated accounting system to the wrong account, and funds from various activities were commingled in one single account. Right before the closing of the 2013-2014 fiscal year, several corrections were made in the system to reverse the errors. However, for most corrections made, transfers of funds were used in lieu of posting corrections, which prevented the financial statements from reflecting with accuracy total receipts recorded for the year in the individual accounts. Details of the most predominant issues in 2013-2014 follow:

The school held several dances, and according to the application for fundraising activity on file, proceeds from the sale of admissions to the dances, or \$2,009 were to be used for the 5<sup>th</sup> Grade End of the Year activities. This activity consisted of a luncheon/dance held at a venue outside the school. Total associated expenditures included the cost of transportation, meals and musical entertainment totaling \$1,035. In addition to the dances, 5<sup>th</sup> Grade students participated on two field trips totaling \$6,400.

We found that collections from the field trip, proceeds from the dances and the expenditures associated with the fieldtrip and the end of the year luncheon/dance were comingled and misposted to several accounts, and there was an unexplained discrepancy in our revenue analysis for one of the field trips. Specifically, our revenue analysis for the out-of-county field trip disclosed a shortfall of \$340 between projected revenues of \$6,290 and collections posted to the account of \$5,950; however, the shortfall was covered with some of the dance proceeds. Similarly, an invoice for

transportation to the End of the Year luncheon/dance venue for \$340 was misposted to the 5<sup>th</sup> Grade field trip account instead of the 5<sup>th</sup> Grade Classes and Club account. All dance proceeds were misposted to the field trip account and later transferred to the Classes and Clubs account.

The school conducted a pencil sale to raise funds for the United Way. Several collections amounting to \$360 from the sale of pencils were similarly misposted to a Classes and Clubs account and the profits from this sale (\$200) were spent on school expenditures not associated with the United Way Campaign.

Several donations were misposted to several accounts during both fiscal years. Monies were transferred to the correct accounts before the closing of the year in 2013-2014 with the exception of two donations from a general department store for \$461 for the general use of the school that were erroneously transferred to the Special Purpose account instead of the General Fund-Donations account.

The school received two grants totaling \$750 for building mini-gardens and posted the funds to a Trust Fund-Grant account. Of this total, \$200 was transferred to a field trip account to cover a payment for top soil for the mini-gardens. Both transactions were account mispostings since none corresponded to the field trip account but to the grant account. The rest of the expenditures posted to the Grant account totaling \$416 were two reimbursements issued to an instructor; however, the disbursements were not documented with vendor receipts detailing what was purchased. According to the instructor responsible for this activity, vendor receipts were provided to the former Treasurer; however, the instructor did not maintain copies. In addition, grant budget documents were not on file. We were able to obtain these documents from the grantors during the audit.

*Similar comingling of funds regarding the 5<sup>th</sup> Grade End of the Year and field trip activities were noted in the 2012-2013 fiscal year.*

## **RECOMMENDATIONS**

- 1.1. The Principal should request assistance from the Division of Internal Funds Accounting to discuss the activities for the coming year and map out the accounts to be utilized for the different field trip and year-end activities to prevent the comingling of funds and numerous posting errors.**
- 1.2. The Principal and the new Treasurer would benefit from additional training in Internal Funds to improve bookkeeping procedures.**
- 1.3. The Principal should periodically review the internal funds records with the Treasurer to strengthen control over the bookkeeping of the funds and the financial records and resolve discrepancies in a timely manner.**

**1.4. The school should transfer \$461 from the Trust Fund-Special Purpose account to the General Fund-General Miscellaneous account.**

**Person(s) Responsible:**

**Principal and Treasurer**

**Management Response:**

The Principal reviewed bookkeeping procedures outlined in the Manual of the Internal Fund Accounting with the Treasurer to ensure understanding and awareness of the procedures that must be followed and the timelines that must be observed for processing transactions.

The Principal and the Treasurer established a year-long activities calendar to include field trips and year end activities to ensure adequate funds are dispersed to appropriate accounts.

The Principal instructed the Treasurer to ensure all transactions were posted to the correct account. Additionally, the Principal has created a monthly calendar to meet with the Treasurer to review the posting of all transactions.

The Treasurer will request assistance from the business manager from the Division of Internal Fund Accounting for additional guidance regarding the posting of transactions as needed. Also, the Principal requested, from the Division of Internal Fund Accounting, regular reviews of the school's accounts to ensure error free monthly statements.

Furthermore, the Principal has transferred \$461.00 from the Trust Fund – Special Purpose account to the General Fund – General Miscellaneous account.

**Person(s) Responsible:**

**North Region Office Administration**

**Management Response:**

The North Region Office Financial/Business Operations Director and the Principal established an organized plan for the Principal to implement and monitor with affected staff. The Principal will thoroughly review the bookkeeping procedures outlined in the Manual of the Internal Fund Accounting with the Treasurer. The Principal and the Treasurer will develop a systematic approach to ensure all transactions are posted to the correct account.

The Principal and the Treasurer have been instructed to attend additional training in Internal Funds to improve bookkeeping procedures and to seek assistance from the Division of Internal Fund Accounting as needed.

In addition, the Principal has been instructed to establish a year-long activities calendar with the Treasurer to ensure adequate funds are dispersed to appropriate accounts.

Furthermore, the North Region Office Financial/Business Operations Director has designed "In-House Review Teams" within each feeder pattern to assist with in-house reviews to ensure compliance in this area.

**Person(s) Responsible:**

**School Operations Administration**

**Management Response:**

School Operations has reviewed the audit exceptions cited in the 2013-2014 and/or 2014-2015 fiscal year(s) audit reports of the following schools reporting to the North and South Region Offices: American Senior High; Highland Oaks Middle School; Natural Bridge Elementary School; Norwood Elementary School; Palm Springs Elementary Schools; West Homestead K8 Center and Riviera Middle School. The following preventive actions will be taken through School Operations:

- Review reports submitted by the Region Office Financial/Business Operations Directors on mini-reviews conducted in selected areas of Property Management (including Disposal of Equipment), BID Requirements; Data Security Controls; ELL Student Records and Internal Funds. Discrepancies with the aforementioned areas will be investigated through the appropriate Region Office;
- Work collaboratively with the Region Offices and facilitate appropriate training and assistance from District Offices in all cited areas; and
- Coordinate and provide information to school site administrators and staff on best business practices, including related financial areas of concern through the Principals' Summer Institute Professional Development.
- School Operations will continue to work with principals to promote efficient fiscal practices.

**2. School Non-Compliant With Full-Time Equivalent (FTE) Student Records Resulted In Potential FTE Funding Disallowances  
*Norwood Elementary School***

For the 2014-2015 school year, guidelines and procedures for maintaining student information for *English Language Learners (ELL)*, also known as *English for Speakers of Other Languages (ESOL)*, were provided through the 2014-2015 Opening of School Year Information and Reminders, the Division of Bilingual Education and World Languages memoranda and the *District Plan For Services to English Language Learners*.

In those instances where a student has been enrolled over six semesters in the ESOL program, the student folder must hold evidence that the *Limited English Proficiency (LEP)* Committee convened annually to assess adequate progress, and include an evaluation of such assessment in writing. All meetings should take place and documentary evidence must be filed by the time that the Full-Time Equivalent (FTE) survey period arrives.

Our review of a sample of FTE records in 2014-2015 found discrepancies in the ESOL area. Based on our samples, the errors could have generated a funding disallowance to the District totaling approximately \$1,300. Details are as follows:

During the October 2014 FTE Survey<sup>2</sup> records, the school reported 15 students enrolled in the ESOL program. A review of a sample of ten ELL student folders disclosed the following discrepancies in seven student folders sampled (70%). The sample's high error rate requires immediate attention of the school administration for corrective action:

- 2.1. In seven instances, the folder did not have documentary evidence that a LEP Committee meeting had convened in a timely manner to consider a student's extended placement in the ESOL program. We noted that all meetings were held *after* the FTE survey period.

According to the Principal, the ESOL teacher responsible for this program is shared between five schools, and this situation made it difficult to schedule meetings with parents in a timely manner.

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<sup>2</sup> FTE Survey in October is otherwise referred to as FTE Survey Period 2.

## **RECOMMENDATION**

2. In order to ensure future compliance with District guidelines, in those instances where students are enrolled over six semesters in the ESOL program, improved efforts should be made by the school administration to ensure that upcoming meetings are identified with sufficient time to schedule them in a timely manner and before the FTE week.

**Person(s) Responsible:** Principal, Assistant Principal and Itinerant ESOL Teacher

### **Management Response:**

The Principal has reviewed the Opening of School Year Information, the Division of Bilingual Education and World Languages Memoranda, and the District Plan for Services to English Language Learners with the Assistant Principal, ESOL Staff, and the School Registrar to ensure understanding and responsibilities regarding the maintenance of FTE-ELL Student Records.

The Principal will monitor the proper and timely completion of LEP Committee meetings of students enrolled in the ESOL Program for six semesters or more to ensure that they are completed in a timely manner. Accordingly, the Principal will monitor the itinerant ESOL teacher's schedule on a regular basis to ensure that all meetings are planned and take place in a timely manner and before FTE week.

The Principal along with the Assistant Principal and itinerant ESOL teacher will request assistance from the Division of Bilingual Education and World Languages on an as-needed basis.

**Person(s) Responsible:** North Region Office Administration

### **Management Response:**

The North Region Office Financial/Business Operations Director and the Principal established an organized plan for the Principal to implement and monitor with affected staff. The Principal was instructed to thoroughly review the Division of Bilingual Education and World Languages Memoranda and the District Plan for Services to English Language Learners with the Assistant Principal, ESOL Staff, and the Registrar.

The Principal has been instructed to monitor the proper and timely completion of all documents on a regular basis in the ESOL Program Record folder, inclusive of Individual ELL/LEP Student Plans, and the printout of the students' schedules from the Integrated Student Information System (ISIS). Also, the Principal will monitor the Itinerant ESOL teacher's schedule on a regular basis to ensure that all meetings are planned and take place in a timely manner and before FTE Week.

In addition, the Region will coordinate District assistance from the Division of Bilingual Education for the Principal and staff on an as needed basis.

Furthermore, the North Region Office Financial/Business Operations Director has designed “In-House Review Teams” within each feeder pattern to assist with in-house reviews to ensure compliance in this area.

**Person(s) Responsible:**

**School Operations Administration**

**Management Response:**

Refer to page 35 of this report and page 121 in the report’s Appendix Section for School Operations administration’s comprehensive response addressing the recommendations to the school findings of Norwood Elementary School.



**3. Non-Compliance  
With Certain School Site  
Informational Technology  
Data Security Controls  
*Palm Springs Elementary School***

Every month, Information Technology Services (ITS) prints and electronically distributes to the schools a report titled *Authorized Applications For Employees By Locations*. This report provides a listing of employees with access to certain computer applications. According to the guidelines, principals are required to review this monthly report to ensure that access to the system is restricted and limited to staff as required by their job duties and as delineated by District policy.

Pursuant to *Weekly Briefing* (WB) No. 4483 (issued in July 2008) and No. 7784 (issued in April 2010), access to the Electronic Gradebook applications such as the Electronic Grade Book Attendance (WGBA) Manager is currently restricted to five staff approvers (namely, the Principal, Assistant Principal, Registrar, and staff performing duties of the Registrar or as determined by the Principal, not to exceed five approvers).

- 3.1. At this school, our review of the most current “*Authorized Applications for Employees by Locations*” report dated December 10, 2014 disclosed that *29 staff members had access to the system application for managing the Electronic Grade Book Attendance (WGBA)*. This number of employees exceeded the user threshold in effect for this application, which according to current policy, as stated above, *is limited to five staff approvers*.

In the report, we noted that most of the individuals listed with access to the WGBA-Attendance Manager application consisted of instructional staff. We brought this matter to the attention of the school administration for awareness and immediate corrective action. According to the school administration, it was misunderstood that instructional staff required access to this application in order to utilize the Electronic Gradebook.

During the audit, the school administration revoked the access for several staff members in order to satisfy computer access restriction thresholds and comply with District policy. However, our follow-up review of the report that was printed the following month on January 14, 2015 disclosed that six employees continued with access to WGBA-Attendance, some of which were questionable. We brought this matter to the attention of the school administration. According to the school administration, the employees in question remained with access due to an oversight in the report used to make the corrections. Ultimately, access for three of the six staff members was revoked.

Section V of the *Student Attendance Reporting Procedures* published by the District's Federal and State Compliance Office states that attendance eligibility for collecting Full-Time-Equivalent (FTE) is based on the official recording of the school attendance. This *Section* also states that the Electronic Gradebook is the source document for instructional staff to record student attendance. The Attendance Manager (designated by the Principal) is responsible for ensuring that student attendance is recorded in the Electronic Gradebook accurately and in compliance with attendance guidelines; for exporting the attendance information into the Integrated Student Information System<sup>3</sup>; as well as in charge of making attendance adjustments to the ISIS system.

Attendance procedures regarding substitute teachers are specific. According to the procedures, substitute teachers should not have access to the Electronic Gradebook to enter student attendance. Substitute teachers generally record the attendance manually in a paper roster that is given to the Attendance Manager for entering student attendance information into the system.

- 3.2. One of the employees previously noted with access to the WGBA-Attendance Manager application was hired as a substitute teacher during September-October 2014; and was given access to the application until the time of the audit. According to payroll records, he worked at the school several days during the September-October 2014 time period; however, payroll records also disclosed that this individual has not reported to this location in subsequent months.

## RECOMMENDATIONS

- 3.1. **Going forward, prior to granting system access to members of the school staff, the school administration should ensure that access is required to perform the staff member's duties and job responsibilities, and granting such access does not exceed user thresholds.**
- 3.2. **Review the monthly "Authorized Applications for Employee by Locations" report to ensure that employee access to computer system applications is restricted, and access is granted in compliance with current District guidelines.**

**Person(s) Responsible:**

**Principal**

**Management Response:**

The Principal has reviewed Weekly Briefing (WB) No. 4483 (issued in July 2008) and No. 7784 (issued in April 2010) to ensure compliance with personnel access to

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<sup>3</sup> ISIS is the official source document for the recording and submission of attendance data to the Department of Education. The Official Daily School Attendance must be exported daily from the Electronic Gradebook.

Electronic Grade Book Attendance (WGBA) Manager is restricted to five staff approvers (namely Principal, Assistant Principal, Attendance Clerk, Registrar and/or staff performing duties aligned with gradebook attendance).

The Principal is reviewing the “Authorized Applications for Employee by Locations” report on a monthly basis to ensure compliance with WGBA access procedures and to ensure that employee access is in compliance with current District guidelines and does not to exceed the user threshold.

The Principal has reviewed Section V of the Student Attendance Reporting Procedures, published by the District’s Federal and State Compliance. Access to substitute teachers is being monitored by the school administration to ensure compliance with recording student attendance in the Electronic Gradebook and to ensure that substitute teachers may not have access at any time.

**Person(s) Responsible:** **North Region Office Administration**

**Management Response:**

The North Region Office Financial/Business Operations Director and the Principal established an organized plan for the Principal to implement and monitor to ensure compliance. The plan encompasses thoroughly reviewing District Policy and Weekly Briefings (4483 and 7784) and Student Attendance Reporting Procedures for granting access to staff members to perform duties and job responsibilities.

In addition, the Principal has been instructed to review the “Authorized Applications for Employee by Locations” report on a monthly basis to ensure employee access in in compliance with District guidelines and does not exceed the user threshold.

Furthermore, the North Region Office Financial/Business Operations Director has designed “In-House Review Teams” within each feeder pattern to assist with in-house reviews to ensure compliance in this area.

**Person(s) Responsible:** **School Operations Administration**

**Management Response:**

Refer to page 35 of this report and page 121 in the report’s Appendix Section for School Operations administration’s comprehensive response addressing the recommendations to the school findings of Palm Springs Elementary School.

**4. Non-Compliance  
With Bid Requirements  
For Internal Fund  
Purchases  
*Highland Oaks Middle School***

*Similar conditions regarding vendor quotations were cited or discussed with the school administration during the prior two audits.*

Regarding internal fund purchases, pursuant to School Board Policy 6610 *Internal Accounts*, for purchases of \$1,000 or more but less than \$50,000, at least three (3) written quotations must be solicited. One of these quotations must be from a certified minority enterprise. The written quotations must be included as part of the ancillary documentation supporting the disbursement to show compliance with vendor selection requirements and lowest price selected. In addition, Section II, Chapter 4 of the *Manual of Internal Fund Accounting* requires that a purchase order [FM-1012] be issued and be posted to the system to document approval for making such a purchase, and to encumber the funds in the system.

Our sample of disbursements since the previous audit report signed in June 2013 up to the current year 2014-2015 (as of November 2014) continued to disclose similar discrepancies. Details are as follows:

- 4.1. In three instances, the school made an individual purchase of \$1,000 or more; however, there was no documentary evidence on file to demonstrate that the school had obtained three written quotations (including one from a certified minority enterprise) to justify the selection of the vendor and show that the lowest quotation was selected. Items or services purchased included field trips, ink toner, cartridges and agendas. In five other instances of disbursements associated with out-of-county/out-of-state field trips, three written quotations were filed and the lowest quotation was selected; however, none corresponded to a minority vendor certified with the District, and there was no documentation on file to indicate the reason for this omission.
- 4.2. The school did not complete, did not sign and did not post a purchase order in the automated system to denote approval for the purchase and encumber the funds. This condition is reflected in the majority of individual purchases posted to the system, or approximately 100 instances, of individual purchases of \$100 or more.

## RECOMMENDATIONS

- 4.1. Review the disbursement procedures with staff to ensure a proper understanding and awareness of the requirements.
- 4.2. Enforce vendor quotation requirements and direct staff to ensure that: 1) purchases are properly documented with the minimum of three written vendor quotations, one of which must be from a certified minority enterprise; and 2) the lowest quotation is selected.
- 4.3. Strengthen the oversight of the disbursement function to ensure compliance with the disbursement documentation requirements, including the preparation, approval and posting of purchase orders to the system.

**Person(s) Responsible:** Principal, Assistant Principal and Treasurer

### **Management Response:**

The Principal has reviewed the disbursement procedures with the Treasurer, Assistant Principals, and Activities Director to ensure that School Board Policy 6610 *Internal Accounts* is properly implemented so that any purchase over \$1,000.00 has the required three vendor quotations, one of which is from a certified minority enterprise, and will ensure that the lowest bid will be selected.

The Principal will meet with the Treasurer regularly to review and ensure compliance with vendor quotations and minority bids.

The Principal has reviewed with the Treasurer, Assistant Principals, and all staff members to ensure that Section II, Chapter 4 of the Manual of Internal Fund Accounting which requires that a purchase order (FM-1012) be issued and be posted to the system to document approval for making such a purchase, and to encumber the funds in the system.

The Principal will meet with the Treasurer regularly to review and ensure compliance with disbursements including the preparation, approval and posting of purchase orders.

**Person(s) Responsible:** North Region Office Administration

### **Management Response:**

The North Region Office Financial/Business Operations Director and the Principal established an organized plan for the Principal to implement and monitor with the Treasurer. The plan encompasses a thorough review of the guidelines and requirements as stated in the Manual of Internal Fund Accounting, and School Board Policy 6610, *Internal Accounts*.

The Principal has been instructed to strengthen the review process with the Treasurer to ensure compliance with three written vendor quotes are secured prior to making purchases, to include one from a certified minority.

In addition, the Principal will instruct all staff members to ensure that purchase orders are issued routinely and posted to the system to document approval for making a purchase and then encumber the funds in the system.

Furthermore, the North Region Office Financial/Business Operations Director has designed "In-House Review Teams" within each feeder pattern to assist with in-house reviews to ensure compliance in this area.

**Person(s) Responsible:** **School Operations Administration**

**Management Response:**

Refer to page 35 of this report and page 121 in the report's Appendix Section for School Operations administration's comprehensive response addressing the recommendations to the school findings of Highland Oaks Middle School.

**5. The Athletics Fund  
Operated With A  
Deficit  
*American Senior High School***

Pursuant to Section III, Chapter 1 of the *Manual of Internal Fund Accounting*, Athletics Fund balances must be monitored throughout the year to ensure that expenditures charged to the individual sport team and general accounts do not exceed the overall positive available balance. The guidelines also dictate that the school must not end the fiscal year with a negative overall balance in the Athletic Fund.

*Similar conditions were cited during the prior audit under the tenure of the former administration. There was a change of Principal in July 2014.*

Our review of the Athletics Fund disclosed the following:

- 5.1. During the previous audit (which we completed and discussed with the former school administration in October 2013), the school was cited for operating the Athletics Fund with a deficit. The former school administration provided an action plan to correct this issue; however, we found that the plan was not implemented as designed since the Athletics Fund continued operating with a deficit during subsequent months. The deficit ranged from a few hundred dollars up to approximately \$(13,000) in May 2014.

Before June 30, 2014, we visited the school to conduct preliminary audit fieldwork for the 2013-2014 fiscal year. This fieldwork consisted of the verification of the inventory of athletic tickets and game ticket sales<sup>4</sup>. During that visit, we noted a deficit in the Athletics Fund and brought it to the attention of administration in the Athletics Department and the new Principal for their information and corrective action. That same day, the school transferred funds totaling \$8,500 from a Trust Fund-Donation Three account to the Athletics Funds to clear the deficit. The Fund closed at June 30, 2014 with a balance of \$930.

Later in 2014, we visited the school to perform the rest of the audit. As a follow-up to the conditions noted in our previous visit, we reviewed the activity in the Athletics Fund from July 2014 up to the time of our visit in December 2014-February 2015, and similarly found that as of February 9, 2015, the Fund carried a deficit balance of approximately \$(2,570).

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<sup>4</sup> As part of the school audits, in senior high schools where there is a sports program, we selectively conduct verification of athletic ticket sales and game reports soon after all athletic activity is finalized for the fiscal year to verify amounts collected per tickets sold and in inventory.

Section III, Chapter I of the *Manual of Internal Fund Accounting* and the *Interscholastic Athletic Manual* provide the guidelines for maintaining the inventory of athletic tickets, the accounting of game activity and the preparation of the game reports. Our review of the athletic ticket inventory and game reports conducted in June 2014 disclosed that:

- 5.2. Net game proceeds from a senior high school totaling \$899 were owed to the school; however, funds had not been received, and the school had not followed up accordingly. In addition, we noted several instances where game tickets sales were posted to the wrong individual sports account, as well as a few instances where game reports contained errors in the tickets listed in those reports.

## RECOMMENDATIONS

- 5.1. The new school administration should direct staff from the Athletics Department responsible for overseeing the related financial activity to strengthen controls over the budgeting of available funds and projected expenditures to prevent excessive spending and deficit balances.
- 5.2. The new school administration should not be approving expenditures *unless sufficient funds are available in the Athletics Fund to cover expenditures*.
- 5.3. The new school administration should direct the Treasurer to bring to their attention any instances where expenditure in the Athletics Fund or other accounts result in a deficit balance, for discussion with appropriate staff and implementation of corrective measures.
- 5.4. Athletics Department staff should improve follow-up on the receipt of any outstanding remittances from other schools (from game proceeds due to the school).

Person(s) Responsible:

Principal, Assistant Principal,  
Athletic Director, Business Manager  
and Treasurer

Management Response:

The new school administration has met with the Athletic Director, Athletic Business Manager and Treasurer to review the guidelines for Internal Funds and Athletics Program as outlined in the *Manual of Internal Fund Accounting* in order to strengthen the existing procedures to monitor available funds and expenditures.

The new Principal has instructed the Athletic Business Manager and Treasurer to follow all accounting policies and procedures for financial transactions that must be accounted for in the Athletic Program within the school's Internal Fund to avoid the expenditure of nonexistent funds that would reflect a negative balance.



The new Principal has mapped out a calendar to meet on a weekly basis with the Assistant Principal, Athletic Director, Athletic Business Manager and Treasurer to ensure that there are sufficient Athletic funds for all upcoming events. The new Principal has instructed the Treasurer to inform him immediately should a deficit occur in the Athletic Fund. If a deficit should occur, the issuance of checks will be dismissed until adequate funds are accumulated for regular functions to continue.

Furthermore, the new Principal has instructed the Athletic Director and Athletic Business Manager to follow up in a timely manner on the receipt of any outstanding remittance from another school – proceeds that are due to the school. In particular, the new Principal has contacted the Principal from the other high school cited in the report, both in writing and by phone, to secure the reimbursement of \$ 899.39 to American Senior High School for the football game played on 10/17/13 at Traz Powell Stadium.

**Person(s) Responsible:**

**North Region Office Administration**

**Management Response:**

The North Region Office Financial/Business Operations Director and the Principal established an organized plan for the Principal to implement and monitor with affected staff. The Principal will thoroughly review the guidelines as stated in the Manual of Internal Fund Accounting with the Assistant Principal, Athletic Director, Athletic Business Manager, Activities Director and the Treasurer to ensure their understanding and responsibilities regarding Athletic Funds.

The Principal has been instructed to meet with the Assistant Principal and Secretary/Treasurer on a regular basis to review upcoming events, monetary needs and internal funds to support the implementation of these events and to ensure that the Athletic Fund holds sufficient funds prior to approving any expenditure or signing a check.

The Principal has been instructed to discontinue the practice of operating accounts in the negative and ensure that fees are properly calculated and that funds in positive accounts, other than General Miscellaneous, will be used to cover a deficit should the need occur. In addition, the Principal has been instructed to ensure that all outstanding remittances from game proceeds due to the school are followed up with in a timely manner.

Furthermore, the North Region Office Financial/Business Operations Director has designed “In-House Review Teams” within each feeder pattern to assist with in-house reviews to ensure compliance in this area.

**Person(s) Responsible:**

**School Operations Administration**

**Management Response:**

Refer to page 35 of this report and page 121 in the report's Appendix Section for School Operations administration's comprehensive response addressing the recommendations to the school findings of American Senior High School.

**6. School Site Procedures  
For The Disposal  
Of School Board-Owned  
Property Not Compliant With  
Board Policy  
*American Senior High School***

According to School Board Policy 7310 *Disposition of Surplus Property*, tangible property for disposal as junk or salvage shall be assigned to Stores and Mail Distribution (S&MD) warehouses which will be the sole processor of the disposal of said equipment/property.

During the 2013-2014 fiscal year, we found that the school did not follow established procedures for the disposal of School Board-owned property. The school had on file correspondence where it was stated that receipt of \$1,004 was a donation. Funds were recorded as a donation in the system in July 2013; however, based on explanations provided by staff from the Physical Education Department, the funds were not donated to the school. They were proceeds from the sale of scrap metal. The scrap was from the refurbishment of the school's gymnasium which took place in June 2013. Upon receipt of payment, the school deposited the funds in the internal funds of the school and posted the revenue to the Classes and Clubs-Physical Education Club account. Staff explained that the purpose of the sale was to raise funds for the Physical Education Department. We were unable to verify the market value of the scrap because it had already been removed by the vendor, and quotes from other potential vendors were not obtained.

Pursuant to current guidelines addressing the disposal of School Board owned property/equipment, this private sale does not comport with the School Board policy, *which requires the involvement of Stores and Mail Distribution (S&MD) in the disposal/sale of property/equipment*. The school was unable to provide any written approval for not having engaged S&MD in this transaction. We contacted the administration S&MD and received confirmation that they were not involved, notified or contacted regarding this sale.

## RECOMMENDATIONS

- 6.1. Ensure that staff and school administration, particularly those in charge of property management, understand and are fully aware of the procedures for accounting and disposing of property; and strengthen the management and controls over property belonging to the school.
- 6.2. Going forward, ensure that Stores and Mail Distribution is engaged when disposing of equipment no longer in use at the school and maintain on file appropriate documentation of approval/disposal.

**Person(s) Responsible:**

**Principal and Assistant Principal**

**Management Response:**

The Principal has reviewed the guidelines as stated in the Manual of Internal Fund Accounting and the Property Control Procedures Manual with the Assistant Principal and Secretary/Treasurer to ensure their understanding and responsibilities regarding the procedures for accounting and disposing of property.

The Principal will meet with the Assistant Principal overseeing property on a quarterly basis to verify that all property items assigned to the school are properly accounted for and will ensure that at least three in-house property reviews will be conducted yearly. This process is already in place. It was adopted at the beginning of the current school year.

The Principal will ensure that when the school desires to dispose of property that is obsolete or serves no useful function at the school, School Board Policy 7310 Disposition of Surplus Property will be followed and such equipment/property be assigned to Stores and Mail Distribution (S&MD) warehouses for disposal utilizing form # 1670.

**Person(s) Responsible:**

**North Region Office Administration**

**Management Response:**

The North Region Office Financial/Business Operations Director and the Principal established an organized plan for the Principal to implement and monitor with affected staff. The Principal will thoroughly review the guidelines as stated in the Property Control Procedures Manual with the Assistant Principal and Secretary/Treasurer.

The Principal has been instructed to meet with the Assistant Principal and Treasurer on a quarterly basis to verify that all property items assigned to the school are accounted for. The Principal will ensure that when the school desires to dispose of property that is obsolete or serves no useful function at the school, the school will contact the Region or

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Stores and Mail Distribution's Warehouse to assist in removing the property according to Board policy.

Furthermore, the North Region Office Financial/Business Operations Director has designed "In-House Review Teams" within each feeder pattern to assist with in-house reviews to ensure compliance in this area.

**Person(s) Responsible:**

**School Operations Administration**

**Management Response:**

Refer to page 35 of this report and page 121 in the report's Appendix Section for School Operations administration's comprehensive response addressing the recommendations to the school findings of American Senior High School.

**7. Non-Compliance  
With Certain School Site  
Informational Technology  
Data Security Controls  
*American Senior High School***

Every month, Information Technology Services (ITS) prints and electronically distributes to the schools a report titled *Authorized Applications For Employees By Locations*. This report provides a listing of employees with access to certain computer applications. According to the guidelines, principals are required to review this monthly report to ensure that access to the system is restricted and limited to staff as required by their job duties and as delineated by District policy.

Pursuant to *Weekly Briefing* (WB) No. 4483 (issued in July 2008) and No. 7784 (issued in April 2010), access to Grade Book applications such as the Electronic Grade Book Attendance (WGBA) is currently restricted to five staff approvers (namely, the Principal, Assistant Principal, Registrar, and staff performing duties of the Registrar or as determined by the Principal, not to exceed five approvers).

The Authorizing Administrators (Quad A) security access application is part of the security system designed by ITS which allows principals/administrators to establish employee access to the applications related to their job functions. This was designed to give a work site administrator control over the authorization of employees at that work location to the M-DCPS computer system by indicating which system each employee is authorized to use. *In simple terms, this application gives a user the ability to authorize or cancel authorizations from other users, based on the computer applications that the user already has.*

Regarding authorization to the *Quad A* security access application, according to ITS' *Quad A User Guide* (dated July 2008), *authorizing administrators have been defined as: all school principals, administrators at the director level in non-school site locations, and the highest ranking administrator of work sites not having a director or above.* The guide also states *that this responsibility cannot be delegated.*

Our review of the most current "*Authorized Applications for Employees by Locations*" report dated November 12, 2014 disclosed that:

- 7.1. Regarding the Electronic Grade Book Attendance (WGBA) application, we reviewed the report for several months (June 2014 to November 2014) and noted that the number of employee with access to this application ranged between 13 and 17 staff approvers; however, the user threshold is no more than five.
- 7.2. Similarly, regarding the Electronic Grade Book Manager (WGBM) application, the report listed up to seven employees that should not have access to the application. Similarly, the user threshold is no more than five.

- 7.3. The former principal continued to have access to several computer applications related to this school site. These included *Quad A* security access.

As result of the audit, with the exception of the former principal who continued with access to some of these applications, the new school administration revoked staff's access in order to satisfy computer user thresholds and comply with District policy.

## **RECOMMENDATION**

7. **Going forward, the school administration should carefully review the monthly report titled *Authorized Applications for Employees by Locations* Report to ensure that access to school site computer applications is adequately restricted, and any changes to staff's access to these applications remain compliant with current District guidelines. Also, former principal access to all applications at this location should be removed immediately.**

**Person(s) Responsible:**

**Principal**

**Management Response:**

The Principal has reviewed Weekly Briefing (WB) No. 4483 (issued in July 2008) and No. 7784 (issued in April 2010) to ensure compliance with personnel access to Electronic Grade Book Attendance (WGBA), and Electronic Grade Book Manager (WGBM), is restricted to five staff approvers.

The Principal will review the "Authorized Applications for Employee by Locations" report on a monthly basis to ensure that employee access is in compliance with current District guidelines. This process was instituted during the auditor's visit.

The Principal will ensure that access to school site computer applications is restricted and updated as soon as staff changes occur. The current principal has removed the former Principal's access to all applications at the school.

**Person(s) Responsible:**

**North Region Office Administration**

**Management Response:**

The North Region Office Financial/Business Operations Director and the Principal established an organized plan for the Principal to implement and monitor to ensure compliance. The plan encompasses thoroughly reviewing District Policy and Weekly Briefings (4483 and 7784) and ITS' Quad A User Guide for granting QUAD A and gradebook access to administration and staff members to perform duties and job responsibilities.

In addition, the Principal has been instructed to review the “Authorized Applications for Employee by Locations” report on a monthly basis to ensure employee access is in compliance with District guidelines and does not exceed the user threshold.

Furthermore, the North Region Office Financial/Business Operations Director has designed “In-House Review Teams” within each feeder pattern to assist with in-house reviews to ensure compliance in this area.

**Person(s) Responsible:**

**School Operations Administration**

**Management Response:**

Refer to page 35 of this report and page 121 in the report’s Appendix Section for School Operations administration’s comprehensive response addressing the recommendations to the school findings of American Senior High School.



**8. Allegations of  
Violation of Title I Policy,  
Payroll Misreporting,  
And PTA Issues Partly  
Substantiated  
*Sweetwater Elementary School***

On October 10, 2014, School Operations requested an audit of Title I Program funds at Sweetwater Elementary. The request was directly related to a citizen's complaint initially received by the Title I Administration Office on September 22, 2014, regarding an allegation of a violation of Title I policy at the school.

According to the specifics of the complaint, for the past five fiscal years effective 2009<sup>5</sup>, under the tenure of the current school administration, an employee who is one of the full-time Paraprofessionals at the school and whose salary was being paid with Title I funds had been assigned to work in the school's main office; and during that time period, it is purported that this employee had performed duties not related to her job under the Title I Program.

*Based on our interviews and observations and the records reviewed, we are of the opinion that this complaint (regarding the employee performing duties not related to her position) is substantiated. Our review disclosed that the employee in question, one of the full-time Paraprofessionals at the school had been assigned to work in the main office since 2008, under a previous administration. This working arrangement continued under the current administration up to the end of the 2013-2014 fiscal year. During all this time, we determined that this individual handled a myriad of clerical duties which were not aligned with the duties of a Paraprofessional, and whose position, in this particular case, was funded by the District with Title I funds.*

As stated in *Article XVII-Paraprofessional/Associate Educator/School Support Personnel* of the contract between Miami-Dade County Public Schools and the United Teachers of Dade (UTD), the *School Allocation Plan* published by the District's Office of Budget Management, and the *Title I Administration Handbook* published by the District's Title I Administration Office, a Paraprofessional *shall not perform office duties which are not directly related to classroom instruction*. In this particular case, the repercussion of the breach in the duties of the Paraprofessional became more significant since the position was funded with Title I Program funds; therefore, negatively impacting compliance with Title I policy. However, we were unable to determine the extent of non-compliance since specific documentation (such as logs, daily schedules or timesheets) describing the tasks performed during the day school program was not available to

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<sup>5</sup> This period includes the 2009-2010, 2010-2011, 2011-2012, 2012-2013 and 2013-2014 fiscal years.

calculate a percentage of participation, or to arrive at a firm conclusion as to the level of non-compliance with her duties and responsibilities.

During our audit, we met with the complainant, who is the spouse of a former Secretary at the school. At this meeting, the complainant expanded on his initial complaint by further stating that: 1) the Paraprofessional in question earned additional part-time compensation under the Principal Operated Before/After School Care Program (BSC/ASC Program); however, this individual was not working at the school during the after-school hours reported, but was compensated for her data input duties performed *during the day school program*; 2) this same individual was very involved with fundraising efforts of the Parent-Teacher Association (PTA) of the school; 3) another employee, a Security Monitor, was also inappropriately assigned to work in the main office, in lieu of clerical staff; 4) the District erroneously reported payroll for his wife at the location that she was transferred to after the closing of the 2013-2014 fiscal year, where she did not work, but received salary payments; and 5) the school eliminated his wife's position, not because of a decline in student membership or budgetary issues, but because the school had assigned alternate personnel in the main office to fulfill the duties normally conducted by secretarial staff.

*Regarding the five additional allegations enumerated above, we could only substantiate the matter of the Paraprofessional's direct involvement with PTA fundraisers and the payroll overpayment received by the complainant's wife. The remaining allegations are unsubstantiated.*

*Details are as follows:*

- 1) Regarding the Paraprofessional's part-time assignment, according to the Principal, the Paraprofessional worked on-campus the hours paid, and we could not find evidence in the payroll records or a witness attesting to the contrary. She received hourly compensation from the Before/After School Care (BSC/ASC) Program for morning (BSC) and afternoon (ASC) work. Regarding the BSC Program hours, as confirmed by the BSC/ASC Manager, the Paraprofessional worked those hours with the students and in direct support of the BSC Program. However, regarding the ASC Program hours, based on the results of our interviews and review of student attendance rosters, it appears that the majority of the time was invested in work related to the general day school program and not involved in activities directly supporting the After School Care Program.
- 2) The Paraprofessional was directly involved with PTA fundraisers, and she acknowledged selling merchandise at the school and collecting monies on behalf of the PTA; therefore, this allegation is substantiated. We discussed this matter with the current school administration and the Paraprofessional for their information and corrective action going forward.
- 3) Regarding the work of the Security Monitor, we were unable to substantiate the complainant's claim. We did find some evidence that she had performed some

- clerical duties; however, the evidence was insufficient and we could not find corroborating witnesses to arrive at a firm conclusion.
- 4) We were able to confirm that the District erroneously paid the complainant's wife for days that she did not work at the school location where she was assigned. This error has been corrected and all funds were returned by the recipient. According to District management, an action plan has been established to prevent recurrence of a similar type of payroll overpayments in the future.
  - 5) Regarding the matter of the reasons for eliminating the Secretary's position filled by the complainant's wife, nothing came to our attention to indicate that the action taken by the Principal was not within her expressed authority when making budgetary decisions based on her estimation of school needs, or that it was not compliant with District policy. According to the District administrators overseeing budgetary matters, the District provides principals flexibility when building their school-based budget and budgeting discretionary allocations<sup>6</sup>. Accordingly, a budget plan, in compliance with District policy, was executed by the Principal. The plan included those discretionary allocations which in the Principal's estimation would better suit the school needs, and eliminated a discretionary position (the Secretary's position) that the school could no longer afford.

In addition to the allegations noted above, the complainant made other allegations regarding employees at other work locations similarly not performing duties in alignment with their job descriptions. However, we decided not to address these allegations in this report, because not only are they outside of the scope of the school audit of Sweetwater Elementary; but the information was obtained from third parties, and some of this information could not be fully confirmed. In addition, the complainant alleged that the District violated the UTD contract when the Principal at Sweetwater Elementary informed his wife that she was being "surplused" at the end of the fiscal year, instead of "laid-off"; and that the District placed her at another work location without his wife's acceptance/consent. This issue, which deals with labor contracts and labor practices, is also outside the scope of the school audit report. We discussed this matter with representatives from Human Capital and Labor Relations for their consideration and response. According to them, the matter was handled following the provisions of the Labor Contract between the Miami-Dade County Public Schools and the United Teachers of Dade, Article XVIII, Section 6, Layoffs and Section 7, Recall Pool, and they consider the matter is closed.

*It is noteworthy that since the beginning of this fiscal year, the Paraprofessional identified in the complaint has been assigned to work in a classroom setting under the supervision of a teacher (as required by contract guidelines and job description), and as*

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<sup>6</sup> Discretionary budget allocations are those which can be converted by the Principal into other types of positions or into discretionary funds which could be expended at the school level. The Secretary's position was a discretionary allocation.

*an Activity Leader in the ASC Program in the afternoon hours after the day school program. Her work in the main office was discontinued.*

#### Background Of Complaint:

These complaints resulted from the school administration's reduction of office personnel at Sweetwater Elementary. This reduction was due to a decline in the student membership which accordingly reduced the school's 2014-2015 budget. Consequently, on May 2014, a 10-month Secretary<sup>7</sup> who worked in the main office was informed that her position would be eliminated and that she would no longer have a job at the school during the following fiscal year (2014-2015). This action was upsetting to the complainant, who did not want his wife transferred to another school, and who alleges that the District did not handle this employment matter as required by the UTD Contract.

In the interim, the District attempted to find an alternate job placement for the complainant's wife whose position had been eliminated. Accordingly, the District placed her at Irving & Beatrice Peskoe K-8 Center as a 12-month Secretary effective July 1, 2014. She did not accept the transfer and although she did not report to her newly assigned work location, she was nevertheless paid for 16 days at the new work location. The complainant brought this matter to the attention of management from the Office of Human Capital Management for their information and returned the monies paid.

Subsequent to the payroll incident and discussions between the complainant and District administration, the complainant's wife was placed at Sweetwater Elementary pending termination proceedings. She worked from August 7, 2014 until September 19, 2014. Her employment was terminated on September 25, 2014.

Details of our findings follow:

#### *The Work Performed In The Main Office*

During our interviews, the full-time Paraprofessional acknowledged and several staff members confirmed that the Paraprofessional spent a significant portion of her working schedule in the main office *since 2008*, when a school administrator preceding the current one had assigned this individual to work in the main office, in order to take over the duties of a Data Input staff member who retired and was not replaced.

According to the current school administration and several of the staff members interviewed, the clerical duties held by both individuals were different and not interchangeable, since the work of the Paraprofessional dealt with student testing, related student/classroom services including working with the *English for Speakers of*

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<sup>7</sup> This job is administered under contract guidelines of the United Teachers of Dade (UTD) Contract.

*Other Languages* (ESOL) Teacher and office personnel related work (which included, among others, backup for the Registrar, data input, answering phones, in charge of processing student's transmittal cards and lunch applications, and alternate check signer for the Treasurer). The Paraprofessional was stationed in the front of the main office, in an area that is accessible to the public; while the former Secretary (the complainant's wife) was stationed in a separate office within the main office, but with no direct access to the public. The complainant's wife was involved with the preparation/coordination of textbook inventories, registering volunteers, preparation of staff rosters, typing, the creation of calendars, and the organization of events at the school.

Part of our audit included a review of the duties of staff and administration working in the main office. During our inquiries, we found that the complainant's wife was hired and had been working at this school since the 1990s under another school Principal who was a close relative of the complainant's wife, namely her mother. However, this working arrangement was contrary to School Board policy, which prohibits the hiring and direct supervision of close relatives<sup>8</sup>.

#### *Before School Care and After School Care (BSC/ASC) Program Hourly Payroll*

We reviewed the matter of the Paraprofessional's hourly payroll; however, we could not find documentary evidence or a witness that could corroborate that the Paraprofessional was paid for hours when she was not present or not working at the school. We ascertained that the full-time Paraprofessional also received additional compensation from the Before/After School Care Program under the approval of a former school administrator. This hourly assignment continued during the current administration.

For the past five fiscal years starting with 2009, according to the current school administration, all hours paid were for hours worked on-campus and not due to any inappropriate working arrangement with the current school administration. We reviewed the hourly payroll records for the past five fiscal years up to August 2015, and noted that the Paraprofessional received compensation for hours reported under the BSC/ASC Program. Working hours were from 7:00 a.m. to 8:15 a.m. in the morning. The afternoon's hourly schedule varied; however, hours reported fluctuated, but were generally between 3:30 p.m. and 5:30 p.m., altogether representing approximately 20-50 hours per pay period. Summer hours were generally worked between 7:00 a.m. and 1:00 p.m.

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<sup>8</sup> During this time period, School Board Rule 6Gx13-4A-1.18 *Assignments—Members of the Same Family* (re-promulgated on December 11, 1974) clearly stated that administrative supervisors were not to employ or directly supervise relatives at the same work location. In May 2011, the School Board adopted Bylaws and School Board Policies which took the place of the former set of Board Rules. In the current Policy, Board Policy 3130 and 4130 *Assignments* provide similar guidelines regarding the employment of relatives.

We interviewed the BSC/ASC Program Manager who confirmed that the Paraprofessional was in charge of the student participants enrolled in the BSC (morning) Program; however, she also said that the Paraprofessional was not an Activity Leader assigned to an ASC (afternoon) Program class/student group or group activity.

According to the Manager, the Paraprofessional would assist in the afternoon when requested, if one of the ASC Activity Leaders was absent/late; however, for the most part, her work in the afternoon did not relate to the Program. The Manager could not state with certainty the work that the Paraprofessional performed in the afternoon hours during the time period of the allegation, nor attest as to the time in the afternoon hours that the Paraprofessional left the school. The Manager stated that her work confined her to the ASC Office; but, there were times where she would see the Paraprofessional in other parts of the building assisting other staff members or in the main office. Other staff members interviewed provided similar comments regarding the Paraprofessional's presence at the school in the afternoons.

We confirmed with the Division of Community Education and Before/After School Care Programs that staff hired under programs related to After School Care services *should be hired with the understanding that their services should be directly related to the safety, supervision or instruction of students in said program, that clerical and/or administrative responsibilities be associated with the proper implementation and oversight of said programming, that security should be specific to the programs hours of said program, or that any other need the Principal deems appropriate to the implementation of said program. We also confirmed with the Division that the program generated sufficient revenues to cover all associated expenditures.*

During our interviews, the Assistant Principal and the Principal claimed that the Paraprofessional was the person in charge of locking the front door, which would be closed between 4:00 p.m. and 4:30 pm. Furthermore, the current Principal and the Assistant Principal stated that the Paraprofessional was at the school during the afternoon hours doing school work. We interviewed the Paraprofessional who stated that she was working at the school, performing various tasks assigned by the Principal.

However, our payroll reviews for the five-year period noted several instances where the school reported hours worked under the BSC and ASC Programs for the Paraprofessional on a particular day where she would be reported out on personal/sick leave or temporary duty leave from the day school (full-time) program. Upon our inquiries, the Paraprofessional stated and the Principal confirmed in writing, that the hourly payroll reported for the Paraprofessional was correct, and that the employee was committed and fulfilled her part-time work responsibilities at the school on the days in question.

### *Work Conducted For The PTA In Conflict With District Policy*

As far as the PTA matter is concerned, *we corroborated the Paraprofessional's direct involvement in the financial/monetary/fundraising aspects of the PTA, which is not allowed by District policy*<sup>9</sup>.

During our investigation, we found that the Paraprofessional was involved with the PTA and obtained documentation where she was identified as the organization's Vice-Treasurer and the one who maintained custody of the organization's books. During her interview, she acknowledged her work with the PTA and stated that the reason for her involvement was to assist the school. We discussed these matters with the current administration and the Paraprofessional for their awareness and to ensure that this situation is discontinued in the future.

### *Part Of The Work Of The Security Monitor Was Conducted In The Main Office*

Concerning the work of the Security Monitor in question<sup>10</sup>, we interviewed various staff members including staff located in the Media Center. According to staff, the Security Monitors were assigned to areas of the school and this Security Monitor could be seen in various areas of the school during the day. Regarding work performed in the office, this individual received a salary supplement to coordinate the hiring of substitutes. Aside from the matter of locating substitutes, we found that the Security Monitor had access to various computer applications related to student services, one of them directly linked to student case management; and we were able to obtain some evidence that she inputted student case management information in the system. This assignment, although clerical in nature, appears appropriate since, according to her job description, tasks of a security monitor include performing any other duties set by the school principal or his/her designee.

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<sup>9</sup> According to Section II, Chapter II of the *Manual of Internal Fund Accounting*, all monies coming into direct custody of a school employee **must be** submitted to the school Treasurer for deposit into the school's Internal Fund checking account. Furthermore, Section IV, Chapter 12 of the same *Manual*, clarifies that faculty and other staff members of the school allied organization such as the PTA/PTSA should mainly act as liaisons between the organization and the school; however, may not be co-signers of the organization's checking account or be involved in the handling of monies or merchandise for the organization (as this was the case of the Paraprofessional at this school).

<sup>10</sup> There are two Security Monitors at the school. The complaint was specific to one of them.

### *Error With Payroll Reported At New Location*

Regarding the payroll overpayment, the complainant's wife was overpaid 16 days spanning three pay periods for a net overpayment of approximately \$1,900. Regarding this error, staff from both the Department of Human Capital and Irving & Beatrice Peskoe K-8 Center<sup>11</sup> processed transactions in the system which generated the overpayment.

As stated by management from the Office of Human Capital Management and confirmed by us, on July 17, 2014, personnel from the Office of Non-Instructional Staffing reassigned the complainant's wife to the new location on a retroactive basis effective July 1, 2014, and entered this retroactive change in the system. The payroll reporting system reports an employee present by default during a pay period; and requires that a transaction be processed in the system to reflect the employee's absence, temporary duty and similar payroll transactions. Consequently, the system misinterpreted the retroactive change as the employee being present at the new location, which in turn generated a payment for 13 working days spanning two pay periods. The rest of the overpayment, or three days of attendance, happened when school administration at Irving & Beatrice Peskoe K-8 Center approved a payroll which erroneously reported this individual as being present at the school site from July 18, 2014 to July 22, 2014 (her last day assigned to that location)<sup>12</sup>. We confirmed that the errors were corrected and funds have been recovered by the District.

Going forward, according to management from the Office of Human Capital Management, to prevent recurrence of similar overpayments related to retroactive changes of personnel, an action plan has been implemented that involves the daily distribution and review of a retroactive actions report. The chain of review includes four different departments from the Office of Human Capital Management, in addition to Payroll, Risk and Benefits Management, and Information Technology Services.

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<sup>11</sup> The complainant's wife was transferred to Irving & Beatrice Peskoe K-8 Center effective July 1, 2014.

<sup>12</sup> On July 23, 2014, the complainant's wife was reassigned to Sweetwater Elementary as a 10-month employee. She worked at the school from August 7, 2014 until September 19, 2014. Her employment with Miami-Dade County Public Schools was terminated on September 25, 2014.



### *The 10-Month Secretary Position Was Eliminated Due To A Budgetary Shortfall*

We interviewed administration from the District's Budget Management and the Central Region Office referenced by the complainant. Both administrators discussed Sweetwater Elementary School's budget for the 2013-2014 and 2014-2015 fiscal years with us and explained the discretion that the District affords all principals when deciding how to allocate their discretionary budget allocations; and that the elimination of the 10-Month Secretary Position was the result of a shortfall in the number of Full-Time Equivalent (FTE)<sup>13</sup> generated by the school membership for the 2014-2015 fiscal year. This shortfall (from 790 in 2013-2014 to 736 in 2014-2015) negatively impacted the level of discretionary funds<sup>14</sup> allocated to the school to pay for basic teachers, teaching supplements, substitute coverage and other discretionary positions established within the School Support Allocation Pool<sup>15</sup>. Consequently, and according to the explanations provided and the documents presented, not all positions funded in the previous year could be sustained with the 2014-2015 fiscal year's budgeted funds.

### **RECOMMENDATIONS:**

- 8.1. The District should self-report the instance of non-compliance with Title I policy to the Florida Department of Education as part of the complaint process under Title I administration guidelines.**

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<sup>13</sup> The School Allocation Plan is used to determine allocations to schools funded by the General Fund Budget. The FTE count is used in the Plan to drive the allocations. To arrive at FTE, a numerical value is assigned to each student according to the student's hours and days of attendance in the different school programs. An individual student is equated to a numerical value known as an unweighted FTE (full-time equivalent) student. For brick and mortar school students, one student would be reported as one FTE if the student was enrolled in six classes per day at 50 minutes per class for the full 180-day school year (i.e., six classes at 50 minutes each per day is 5 hours of class a day or 25 hours per week that equals one FTE).

<sup>14</sup> Budget allocations consist of two types: Discretionary and Non-Discretionary. Discretionary allocations are those which can be converted by the Principal into other types of positions or into discretionary funds which could be expended at the school level. Non-Discretionary allocations are specific for the purposes for which they are allocated to the individual school.

<sup>15</sup> Within the School Allocation Plan of each individual school, the School Support Allocation Pool combines the following discretionary allocations converted to dollars for the individual school: Assistant Principals, Media Specialists, Counselors, Custodians and Clerical Staff. The Principal has full discretion to establish the allocations within the School Support Allocation, provided that at a minimum, the school funds the position of Elementary Treasurer and the position of Elementary School Assistant.

**Person(s) Responsible:**

**Title I Administration**

**Management Response:**

The District will self-report the instance of non-compliance with Title I policy at Sweetwater Elementary School to the Florida Department of Education.

- 8.2. School administrators should be reminded to adhere to the Title I Program guidelines; and should be encouraged to contact the Title I Administration Office for guidance/advice when unclear as to utilization of staff paid with Title I funds or potential use(s) of Title I funds.**

**Person(s) Responsible:**

**Title I Administration**

**Management Response:**

A Weekly Briefing will be sent to Principals and Assistant Principals assigned to schools implementing the Title I Schoolwide Program to prompt them to review and adhere to all federal, state and local Title I guidelines. This Weekly Briefing will further advise school site administrators to contact Title I Administration when unclear about Title I guidelines, especially as they relate to the potential use of Title I funds and the utilization of staff paid with Title I funds.

It is expected that these actions will serve to strengthen schools' compliance with Title I Program guidelines.

- 8.3. Going forward, the school administration should ensure that staff is assigned to perform duties in alignment with their job description. In the case of paraprofessionals and similar staff, the job guidelines should be observed. A reminder should be disseminated by the District to other principals to prevent similar issues from occurring at other schools.**
- 8.4. At the school site level, discuss the issues and the applicable section of the *Manual of Internal Fund Accounting* with the PTSA/PTA to ensure understanding of the requirements regarding restrictions regarding the collection of funds and involvement of staff in fundraising activities of the PTA to prevent similar issues from recurring in the future.**
- 8.5. The school administration should contact the Division of Community Education and Before/After School Care Programs for guidance as to hourly payroll expenditures that are allowable under the BSC/ASC Program and ensure these guidelines are observed.**

**Person(s) Responsible:**

**Principal, Assistant Principal, Treasurer and  
After School Care Manager**

**Management Response:**

In order to prevent the recurrence of similar conditions in future audits with respect to utilization of Title I staff and funds, the Principal, Assistant Principal, and Treasurer, have reviewed the Title I Administration Manual and the District's Job Descriptions for each position funded with Title I monies. The Principal has verified that all employees currently funded by Title I grant monies are working in the appropriate capacity as defined by their job description. Moving forward, the Principal will ensure that all personnel hired with Title I funds occupy the position in the capacity in which they were hired. This review will occur each year that Title I funds are utilized for personnel.

In order to prevent a recurrence the Principal has printed the job descriptions for each of the Title I funded employees, met individually with each one and reviewed their responsibilities and had each employee sign acknowledgement of the meeting. These documents were then placed in the appropriate folder of the Title I documentation box, along with a copy of their work schedules. The principal has also created a link to the Title I School-Level Compliance Collaboration Site on her computer desktop and reviews the current information on a bi-weekly basis to ensure appropriate compliance. At any time a question should arise the Principal will contact Title I and/or Region Office as needed.

In regards to the issues with the PTA, the Principal, Assistant Principal, Treasurer and PTA President met February 7, 2015 and discussed the requirements regarding restrictions of the collection of funds and the involvement of staff in fundraising. The Principal reviewed this information with the entire staff at a faculty meeting to ensure school-wide compliance. At the start of each school year this meeting will be held with the new PTA board.

The Principal has reviewed all current employees of the BSC/ASC program to confirm that they are working within the guidelines of this program. On a bi-weekly basis the Principal will verify all hours worked by BSC/ASC employees were specifically for the program and review job assignments/schedules with the After-School/Before-School Care Program Manager. Any anomalies will be recorded, immediately corrected and submitted to the Region.

**Person(s) Responsible:**

**Central Region Office Administration**

**Management Response:**

- The affected Principal will be required to address specific fiscal management job targets on the Performance Planning and Assessment System Planning Form and provide progress points and evidence of progress to improve business and professional standards for effectiveness and efficiency.
- The Central Region Office Financial/Business Operations Administrative Director will review internal funds records periodically throughout the school year through Leadership Seminars with administrators to ensure compliance with the Manual of Internal Fund Accounting.
- The Central Region Office Financial/Business Operations Administrative Director will direct the Principal to provide evidence of job assignments correlated to the personnel purchased with Title I dollars during the school's budget conference to ensure that staff is assigned to perform duties in alignment with their job description.
- The Central Region Office Financial/Business Operations Administrative Director will in collaboration with the appropriate district office coordinate and facilitate training workshops for the affected Principal to help successfully monitor funds.
- The Central Region Office Financial/Business Operations Administrative Director in collaboration with the appropriate district office will coordinate a support system for the Principal and designee to ensure that Title I records are properly maintained and job assignments are in alignment to job descriptions.

**Person(s) Responsible:**

**School Operations Administration**

**Management Response:**

School Operations has reviewed the audit exceptions cited in the audit report of Sweetwater Elementary School and agrees with the recommendations in the report. The following preventive actions have been taken through School Operations to promote compliance with District policy:

- School Operations will disseminate to all Principals a Weekly Briefing directing Principals to ensure that all positions purchased through federal grants be assigned to perform duties in alignment with their job description and that documentation to support the certification of the Circular A-87 is acknowledged.

- Review reports submitted by the Region Office Financial/Business Operations Directors on a monthly basis in selected areas: Property Management (including Disposal of Equipment); Title I expenditures; Title I staff job descriptions vs. actual job assignments (Circular A-87); and the Authorized Applications for Employees by Locations.
- School Operations will include in the Opening of Schools/ Protocols specific to the PTSA/PTA requirements regarding restrictions in the collection of funds and involvement of staff in fundraising activities of the PTA in accordance with the Manual of Internal Fund Accounting to prevent similar issues from recurring in the future.
- Coordinate and provide information to school site administrators and staff on best business practices, including related financial areas of concern through the Principals' Summer Institute Professional Development and Weekly Briefings.

School Operations will continue to work with Principals to promote efficient fiscal practices.

**9. Non-Compliance Issues Related To  
Title I Program Administration  
And School-Site Data Security  
Were Corollary To The  
Investigation  
*Sweetwater Elementary School***

*The following non-compliant Title I and school-site data security matters were noted while conducting the investigation previously cited in this report:*

Schools that received Title I funds were generally those where a significant percentage of the student population originated from low-income families. The Title I Administration Office distributes Title I funds according to a formula based on student participation in the free and reduced meals program at the school sites which varies every year, depending on available funding.

The school should make every effort to plan expenditures accordingly, in a timely fashion and within established budgeted amounts. Resources not utilized by the end of the year cannot be recaptured for future use, as these cannot be rolled over and re-budgeted for the following year. While funds should not be spent unnecessarily as identified in Section B of the *Title I Administration Handbook* (the *Handbook*), good budget planning and continuous monitoring of account balances are essential to ensure that precious funding resources are used to their maximum intended purpose.

- 9.1. We reviewed the school's 2013-2014 Title I School-wide program budget, which amounted to \$210,860 (including fringe benefits) for Title I Program activities. Of this total, the school had initially budgeted approximately \$45,200 for the procurement of goods and services. However, as of June 30, 2014, \$6,870 of this total remained unspent and unable to be rolled over to the next year's activities.

Pursuant to guidelines in the *Handbook*, equipment purchased with Title I Program requires that it be identified by affixing Title I labels, regardless of the amount. Regarding the disposal of equipment purchased with Title I funds, according to Section C of the *Handbook*, the action requires that a written request for disposal be submitted to the Title I Administration Office for their review and approval.

- 9.2. In addition, our review of Title I purchases and observations during our audit visit in November 2014, disclosed that five out of 61 computers purchased with Title I funds in 2013-2014 and received by the school during March 2014 were not being utilized. We found that the computers were stored in unopened boxes in a storage closet in the computer lab. According to the school administration, the computers will be placed in the computer lab upon completion of wiring and electrical work. In addition, none of the 61 computers purchased displayed the

Title I label identifying them as Title I purchases. Following our request, labels were affixed to the computers in question.

- 9.3. Regarding procedures for the disposal of equipment purchased with Title I Program funds, our review of property equipment purchased with Title I funds disclosed that during the year, the school had disposed of several items purchased with Title I Program funds. Regarding these items, the school requested and received approval from the Title I Administration Office for the disposal of said property. We also found that in January 2014, the school had disposed of one laptop that was similarly purchased with Title I Program funds; however, for this particular item, there was no documentation on file at the school or submitted to the Title I Administration Office requesting approval to dispose of this equipment.

Pursuant to memoranda from School Operations and our office, and *Weekly Briefings* No. 4483 (issued in July 2008) and more recently, No. 15936 (issued in August 2014), school sites must observe certain precautions to ensure that network resources and data are properly safeguarded. According to current data security guidelines, access to the computer application for changing grades in the *Integrated Student Information System* (ISIS) should not be given to more than three employees: The Principal, the Assistant Principal and the Registrar.

- 9.4. At this school, the most current *Authorized Application for Employees by Location Report* dated October 15, 2014 disclosed that four staff members had access to the application for changing grades in ISIS. This number of employees with system access exceeded the user threshold in effect for this application. Just prior to our visit, on October 28, 2014, access to the application for one employee, the Paraprofessional cited in the previous finding, was revoked by the Principal.

We reviewed prior monthly reports corresponding to the 2013-2014 fiscal year and noted that the number of employees with access to this application similarly exceeded the threshold; and included both the Paraprofessional and the former Secretary (the complainant's wife) noted in the previous finding. The number of employees remained at four until changes were made in October 2014, as noted above.

## **RECOMMENDATIONS:**

- 9.1. **Develop appropriate spending plans for Title I program funds *early in the year* in order to maximize their use and periodically monitor the spending of Title I Program funds to ensure funds are spent accordingly.**

- 9.2. Carefully plan purchases of equipment and timelines for deploying equipment to instructional areas, to prevent underutilization and the possibility that equipment may be misplaced or damaged during storage.
- 9.3. Discuss the procedures with staff in charge of the management of property to ensure future compliance with District policy.
- 9.4. Review the monthly “Authorized Applications for Employee by Locations” report to ensure that employee access to computer system applications is restricted, and access is granted in compliance with current District guidelines.

**Person(s) Responsible:** Principal, Assistant Principal and Treasurer

**Management Response:**

In order to prevent the recurrence of similar conditions in future audits with respect to utilization of Title I program funds, the Principal, Assistant Principal and Treasurer met on January 14, 2015, to review the total balance of funds available in the supply account. Prior to making a purchase, the Principal verified that the proposed usage was appropriate with the Title I Budget Specialist. In addition, order status will be monitored to ensure that delivery of items ordered comply with the timelines set by the Title I district office.

In order to prevent a reoccurrence of having the use of technology ordered through the Title I Program delayed, the Principal, Assistant Principal and ITS Technician have developed a plan to assess the infrastructural needs that will be implemented prior to any technological purchases. All necessary infrastructure needs will be requested prior to the purchase of technology. In the case that the infrastructure is not completed prior to the purchase, technology will be deployed in an area where it can be immediately used, and then moved into a new location once it has been upgraded to accommodate the new technology.

In regards to the disposal of Title I property the Principal and Assistant Principal will create and monitor a log of all equipment purchased with Title I funds. As equipment becomes obsolete, the log will be reviewed by the Principal, or the Assistant Principal, to ensure that the appropriate documentation is filed with the Title I office for those items that were purchased with said funds. Once the equipment is going to be removed from the building a cross check will be completed by at least two individuals, with one being an administrator, to ensure that all items are appropriately accounted. Furthermore, the Principal will review these procedures with staff in charge of property management to ensure future compliance with District policy.

In regards to the “Authorized Applications for Employee by Locations”, the Principal has reviewed the district policy for monitoring application authorizations and has created a



reminder on Outlook for the last business day of each month to print and review the document. Any anomalies on the report will be corrected immediately and in accordance with district policy.

**Person(s) Responsible:**

**Central Region Office Administration**

**Management Response:**

- The affected Principal will be required to address specific fiscal management job targets on the Performance Planning and Assessment System Planning Form and provide progress points and evidence of progress to improve business and professional standards for effectiveness and efficiency.
- The Central Region Office Financial/Business Operations Administrative Director will request mini-reviews to ensure compliance with the monitoring of property.
- The Central Region Office Financial/Business Operations Administrative Director in collaboration with the appropriate district office will coordinate a support system for the Principal and designee to ensure that property records are properly maintained, data security protocols and authorizations are assigned properly, and Title I funds are utilized in a timely manner.

**Person(s) Responsible:**

**School Operations Administration**

**Management Response:**

Refer to pages 66-67 of this report and pages 122 in the report's Appendix Section for School Operations administration's comprehensive response addressing the recommendations to the school findings of Sweetwater Elementary School.

**10. School Non-Compliant With Full-Time Equivalent (FTE) Student Records Resulted In Potential FTE Funding Disallowances  
*West Homestead K-8 Center***

For the 2014-2015 school year, guidelines and procedures for maintaining student information for *English Language Learners (ELL)*, also known as *English for Speakers of Other Languages (ESOL)*, were provided through the 2014-2015 Opening of School Year Information and Reminders, the Division of Bilingual Education and World Languages memoranda and the *District Plan For Services to English Language Learners*.

According to the guidelines, all sections of the Individual *English Language Learners/Limited English Proficiency (ELL/LEP)* Student Plan [FM-4650] must be appropriately initiated and/or updated in a timely manner and maintained in the student's cumulative folder. A Web-based ELL/LEP Plan (WLEP) must be completed for *all* ELL students.

For secondary schools, a student schedule printed from the Integrated Student Information System (ISIS) database for the current school year must be included in the folder and *must be dated prior to the corresponding FTE survey period*.

In those instances where a student has been enrolled over six semesters in the ESOL program, the student folder must hold evidence that the LEP Committee convened annually to assess adequate progress, and include an evaluation of such assessment in writing. Pursuant to State Rule 6A-6.09022 *Extension of Services in English for Speakers of Other Languages (ESOL) Program*, the ELL Committee's consideration as to whether a student is an *English Language Learner* or not must be similarly documented based on a minimum of two criteria or rationale, which is specified in this rule.

During the February 2014 FTE Survey<sup>16</sup> records, the school reported 323 students enrolled in the ESOL program.

Our review of a sample of FTE records in 2013-2014 found several discrepancies in the *ESOL* and *ESE* areas. Based on our samples, non-compliance issues identified in the *ESOL* area could have generated a funding disallowance to the District totaling approximately \$2,200. In the case of the non-compliance issues identified in the *SPED* area, the errors would not have resulted in potential funding disallowances, because

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<sup>16</sup> FTE Survey in February is otherwise referred to as FTE Survey Period 3. FTE Survey Period 3 happened during the week of February 10-14, 2014.

they would not have required changes in the level of funding of the individual students. Nevertheless, these errors represent lapses in compliance with District policy and similarly require the attention of the school administration and staff responsible for maintaining/overseeing these records. Details are as follows:

#### *Result of Review of ESOL Records*

A review of a sample of 32 ELL student folders disclosed errors/discrepancies in all 32 student folders (100%).

- 10.1. In 28 instances, the Individual ELL/LEP Student Plan [FM-4649] and [FM-4650] was not properly completed. Specifically, the Program Participation section was not completed for the 2013-2014 fiscal year.
- 10.2. Of 11 students enrolled in the ESOL program for more than six semesters, we identified three instances where a LEP Committee meeting was not conducted to assess the student's progress; and eight instances where the required Rationale for Recommendations was not indicated, or only one of the minimum of two rationale or criteria was indicated.
- 10.3. In six instances, we noted inconsistencies regarding the dates documented in the student assessment and the test reports, or the required documentation was not on file. Specifically, we noted one instance where the date in the test material did not agree with the assessment date in the ELL/LEP Student Plan; four instances where there was no evidence of the 2013 *Florida Comprehensive English Language Learning Assessment (CELLA)* Test Report in the student file; and one instance where a student was not assessed for the 2013-2014 school year.
- 10.4. In nine instances, the *Notice to Parents/Guardians of Limited English Proficient (LEP) Students* [FM-6576] or [FM-6577] was not properly completed, or a copy was not evident in the files. In those instances where a *Notice* was on file, we noted it did not include the Principal's signature.
- 10.5. In four instances, the Individual ELL/LEP Student Plan [FM-4649] was not evident in the files. In one other instance, the academic student schedule was not evident.

#### *Result of Review of Special Education (SPED) Records*

The *Matrix of Services* form (referred to as a *Matrix*) is used to determine the cost factor for exceptional education students. The cost factor calculation in the *Matrix* is based on the decisions made by the Individual Education Plan Committee, which are documented on the *Individual Education Plan (IEP)*. Procedures also require that IEP meetings be notified to parent(s)/guardian(s) using the *Notification of Meeting Form* [FM-4851]. The same procedures apply if the parent(s)/guardian(s) requested the meeting.

The school reported 57 SPED students during the February 2014 FTE Survey Period. Our review of a sample of ten SPED records, of which seven were Exceptional Education and three were Gifted student folders disclosed non-compliance with District policy in seven of the ten student folders sampled (70%). We found that:

- 10.6. In two instances, the *Notification of Meeting Form* was not evident.
- 10.7. In two instances, the *Individual Education Plan (IEP)* or the *Educational Plan (EP)* did not have the required professional signatures.
- 10.8. In two other instances, the program eligibility noted in the student's IEP and *Matrix of Services Form* did not agree.
- 10.9. In two instances, a *Matrix of Services Form* was not evident in the student file for an interim IEP.

## **RECOMMENDATIONS**

- 10.1. The Principal or administrative designee should assess the ESOL area to ensure that appropriate staff is identified for completing the LEP Plans.**
- 10.2. To reduce the probability of potential losses in funding and other non-compliance issues regarding ESOL criteria, ESOL staff and administration should review ESOL Program Record Folders to make certain that the information is accurate and that all pertinent forms are completed and filed in the folders immediately after the information is entered into ISIS.**
- 10.3. To reduce the probability of potential losses in funding and other non-compliance issues regarding SPED criteria, the Principal or administrative designee should monitor the SPED area and student folders on a regular basis to ensure that IEP and EP conferences are properly and accurately documented in the student cumulative folders and in SPED-EMS; and all necessary records are properly completed, signed and filed.**

**Person(s) Responsible:** Principal, Assistant Principal, ELL Chairperson, ESOL Teachers, SPED Chairperson, SPED Teachers, Counselor and Registrar

## **Management Response:**

The Principal identified the Assistant Principal as the primary designee to oversee the ELL program. The Assistant Principal will work in tandem with the ESOL Chairperson who has been identified to serve as the person responsible for completing the LEP Plans. The Assistant Principal and the ESOL Chairperson attended the ESOL Compliance Training on February 17, 2015.

On January 5, 2015, the Principal, Assistant Principal and the newly appointed ELL Chairperson convened a meeting to review compliance of ESOL guidelines established by the State of Florida, Department of Education, and the District. The *Notice to Parents/Guardians of Limited English Proficient (LEP) Students* (FM-6576 or FM-6577) was also reviewed to make sure all members understand how to properly complete the form and ensure evidence of the form is in the files. The principal also reviewed the ESOL Program Implementation information she received during the meeting that was conducted for administrators.

It has been established that the Registrar is responsible for the input of the student schedules and the printout of student schedules (middle school) prior to the FTE survey dates. The registrar will give a copy of the middle school schedules to the ELL Department Chairperson to place in the appropriate student file.

The LEP Committee meeting guidelines have been reviewed as a team. It was determined that the Assistant Principal will convene LEP meetings, monitor completion of documentation, and provide appropriate recommendations that are in compliance with State Rule 6A-6.09022. Additionally, the Assistant Principal will review all files, including the Individual ELL/LEP Student Plan (FM-4649 or FM-4650) to ensure that all documentation is properly completed, the required proper signatures of the members are on the form and that the completed file is properly secured. The Principal met with the Assistant Principal, the ELL Department Chairperson and the Registrar and Data Input Specialist to review expectation that all incoming or new registrations are assessed immediately upon registration as needed.

The Assistant Principal has been directed to lead the team in a review of all LEP Folders to ensure that the specified documents are on file and aligned with ISIS, including: the original Home Language Survey Form (FM-5196), Annual WLEP with appropriate signatures/dates, Copy of all Annual Letters of participation (FM-6576 or FM-6577), ELL Committee Notifications and purpose for meeting clearly stated on LEP Plan.

The Principal directed the team to regularly conduct mini self-reviews of randomly selected cumulative folders and records for ELL students to assure compliance utilizing the Division of Bilingual Education and World Languages Procedures Manual.

The Principal contacted the appropriate District Supervisor following the audit and requested assistance and guidance.

The Principal met with the Assistant Principal, SPED Chairperson and District and ETO SPED Curriculum Support Specialists on January 29, 2015 to review the recordkeeping requirements of SPED records and the Matrix of Services. The Principal instructed the team to pay specific attention to the documentation that corresponds to the funding of SPED students at levels 254 and 255.

The Principal will request a report of students with Matrix 254 and 255 prior to each FTE period and will review the information on ISIS and the Matrix of Services with the SPED Chairperson to make sure it is correct. DECO amendments will be made, when necessary to correct any identified issues and to realign funding with the services. This report is available to all schools through the Employee Portal. The Principal will share report with the SPED Chairperson to confirm that the information reported on the Matrix of Services, ISIS and the Cumulative Record are all correct according to the actual services the student receives. Any necessary DECO Amendments will be made within the reporting timelines.

Additionally, the Principal met with the new School Counselor and discussed procedures to ensure Gifted Student Educational Plans (EPs) are complete and not missing signatures. The Principal sent the Counselor to another school to work with a veteran Counselor to review paperwork, conduct meetings, and review documentation related to gifted services.

As IEP and EPs are completed, the Assistant Principal will review all documents for necessary signatures, completion, and compliance.

**Person(s) Responsible:**

**South Region Office Administration**

**Management Response:**

The South Region Office Financial/Business Operations Director will solicit assistance from the SPED and the Office of Bilingual Education and World Languages to conduct mini-reviews each semester for compliance in selected areas of SPED and ELL Program, respectively. Results from the District's mini-reviews will be submitted to the South Region Office Administrative Director. Discrepancies will be discussed with the Principal and corrections will be made accordingly.

**Person(s) Responsible:**

**School Operations Administration**

**Management Response:**

Refer to page 35 of this report and page 121 in the report's Appendix Section for School Operations administration's comprehensive response addressing the recommendations to the school findings of West Homestead K-8 Center.

**11. School Non-Compliant With Full-Time Equivalent (FTE) Student Records Resulted In Potential FTE Funding Disallowances  
*Riviera Middle School***

For the 2014-2015 school year, guidelines and procedures for maintaining student information for *English Language Learners (ELL)*, also known as *English for Speakers of Other Languages (ESOL)*, were provided through the 2014-2015 Opening of School Year Information and Reminders, the Division of Bilingual Education and World Languages memoranda and the *District Plan For Services to English Language Learners*.

According to the guidelines, all sections of the Individual *English Language Learners/Limited English Proficiency (ELL/LEP)* Student Plan [FM-4650] must be appropriately initiated and/or updated in a timely manner and maintained in the student's cumulative folder. A Web-based ELL/LEP Plan (WLEP) must be completed for *all* ELL students. In addition, the *Home Language Survey* [FM-5196] and copies of the *Notice to Parents/Guardians of Limited English Proficient (LEP) Students* [FM-6576] must be properly completed and filed in the ESOL Program Record Folder.

In those instances where a student has been enrolled over six semesters in the ESOL program, the student folder must hold evidence that the LEP Committee convened annually to assess adequate progress, and include an evaluation of such assessment in writing. Pursuant to State Rule 6A-6.09022 *Extension of Services in English for Speakers of Other Languages (ESOL) Program*, the ELL Committee's consideration as to whether a student is an *English Language Learner* or not must be similarly documented based on a minimum of two criteria or rationale, which is specified in this rule.

For secondary schools, a student schedule printed from the Integrated Student Information System (ISIS) database for the current school year must be included in the folder and must be dated *prior to the corresponding FTE survey period*.

During the October 2015 FTE Survey<sup>17</sup>, the school reported 86 students enrolled in the ESOL program.

A review of a sample of ten ELL student folders disclosed the following discrepancies in all ten student folders sampled (100%). Based on our samples, non-compliance issues

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<sup>17</sup> FTE Survey in October is otherwise referred to as FTE Survey Period 2.

identified in the ESOL area could have generated a funding disallowance to the District totaling approximately \$2,700. Details are as follows:

- 11.1. In ten instances, the *Notice to Parents/Guardians of Limited English Proficient (LEP) Students* [FM-6576] was not evident in the files.
- 11.2. In eight instances, the *ELL/LEP Student Plan* [FM-4650] was not prepared. In another two instances, the LEP Plan's program entry date was prior to the assessment date.
- 11.3. In eight instances, the printout of the student schedule was not evident in the files.
- 11.4. In four instances, a student was enrolled in the ESOL program for more than six semesters; however, the school did not have documentation on file to demonstrate that a LEP Committee meeting had been convened to consider the student's extended placement in the ESOL program.
- 11.5. In one instance, the *Florida Comprehensive English Language Learning Assessment (CELLA)* Test Report was not evident in the file; while in one other instance, the *Home Language Survey* [FM-5196] was not properly completed.

## **RECOMMENDATIONS**

- 11.1. **The Principal or administrative designee should assess the ESOL area to ensure that appropriate staff is identified for completing the LEP Plans.**
- 11.2. **To reduce the probability of potential losses in funding and other non-compliance issues regarding ESOL criteria, ESOL staff and administration should review ESOL Program Record Folders to make certain that the information is accurate and that all pertinent forms are completed and filed in the folders immediately after the information is entered into ISIS.**

**Person(s) Responsible:** Principal, ESOL Department Chairperson,  
and ESOL Staff

### **Management Response:**

The Principal held an ELL compliance meeting on February 18, 2015 with the new Assistant Principal, newly appointed ESOL Chairperson, the ESOL Teachers, and the Registrar communicating the new requirements to ensure full compliance with ESOL guidelines established by the State of Florida, Department of Education, and the District. All ELL folders will be reviewed and corrected and all front pages will reflect protocols as required. Files will be reviewed by the Assistant Principal and Principal to ensure completion of corrective actions by March 20, 2015. The ESOL team was



directed to review all ELL program record folders to ensure that the specified documents are on file and aligned with ISIS, including: the original Home Language Survey Form (FM-5196), Annual WLEP with appropriate signatures/dates, Copy of all Annual Letters of participation (FM-6577), ELL Committee Notifications and purpose for meeting clearly stated on LEP Plan. The Principal directed the ESOL team to continue to conduct mini self-reviews of randomly selected cumulative folders and records for ELL students to assure compliance utilizing the Division of Bilingual and World Languages Procedures Manual. The Principal will request a subsequent review of the ELL records from the Division of Bilingual Education and World Languages.

On February 18, 2015, the Principal directed ESOL team members comprised of the new Assistant Principal, the newly appointed ESOL Chairperson, and the Registrar, to immediately review all incoming or new registrations to ensure compliance with ELL program guidelines. Specific procedures were delineated to meet the specifications of ISIS as well as Home Language Survey Form (FM-5196) to ensure that they are properly completed and maintained in folders. The team was instructed to ensure that the purpose for convening LEP Committees is properly documented and detailed on the LEP Plan. The team will continue to work on a quarterly basis to review cumulative records with focused attention on accuracy.

**Person(s) Responsible:**

**South Region Office Administration**

**Management Response:**

The South Region Office Financial/Business Operations Director will solicit assistance from the Office of Bilingual Education and World Languages to conduct mini-reviews each semester for compliance in selected areas of the ELL Program. Results from the District's mini-reviews will be submitted to the South Region Office Administrative Director. Discrepancies will be discussed with the Principal and corrections will be made accordingly.

**Person(s) Responsible:**

**School Operations Administration**

**Management Response:**

Refer to page 35 of this report and page 121 in the report's Appendix Section for School Operations administration's comprehensive response addressing the recommendations to the school findings of Riviera Middle School.

**12. Inadequate Controls Over  
Property Inventory Result  
In Loss Of Equipment  
Riviera Middle School**

The *Manual of Property Control Procedures* establishes the guidelines for recording and managing property. According to Section 4 and pursuant to Chapter 10.400 of the Auditor General, State of Florida, an inventory of all property shall be taken once every fiscal year. Items on record which cannot be found will be listed as “unlocated” and reported accordingly. Furthermore, the Florida Department of Financial Services, Rule Chapter 69I-73 establishes that “all property with a value or cost of \$1,000 or more and a projected useful life of one year or more shall be recorded in the local government’s financial system as property for inventory purposes”.

*A similar matter regarding “unlocated” property was identified at this school during the prior property inventory and discussed with the school administration for corrective action. As a result, the Principal provided a corrective action plan on November 5, 2013, which we published in the Internal Audit Report-Selected Schools of December 2013.*

At this school, our most recent property inventory, which we conducted in January 2015, consisted of the physical verification of 508 property items with an individual cost of \$1,000 or more, for a total acquisition cost of \$1,000,792.

Our physical verification of the property disclosed that of the 508 inventoried items, 5 items with an aggregate depreciated value of \$1,669 and an acquisition cost of \$7,622 could not be accounted for and are reported as “unlocated”. The missing items are as follows:

Type of Equipment	Qty.	Year Acquired	Acquisition Cost	Depreciated Value
Computers	1	2010	\$ 1,720	\$ 263
Audio visual equipment	1	2004	1,498	0
Other equipment <sup>18</sup>	3	2001-2012	4,404	1,406
Total	5		\$ 7,622	\$ 1,669

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<sup>18</sup> “Other equipment consists of a portable partition, a gait trainer and a mounting system. According to the school administration, the last two items were assigned to the Exceptional Student Education area.

*Based on these results, it is evident that the school was not conducting periodic inventories, and monitoring the movement of equipment, as proposed in the action plan submitted to our office in the prior audit, was not taking place.*

## **RECOMMENDATIONS**

- 12.1. The school administration should devise and implement an effective action plan for the safeguarding of assets and the management of property, and designate staff to carry out the plan.**
- 12.2. The school administration should ensure that the entire school staff, especially those in charge of property management, understand and are fully aware of the procedures for safeguarding and maintaining control over property.**
- 12.3. The monitoring and accounting of property should be strengthened by conducting in-house property inventories periodically to identify discrepancies and resolve them in a timely manner.**
- 12.4. The equipment should be assessed periodically to ensure that equipment deemed obsolete is properly and timely removed from the inventory.**

**Person(s) Responsible:**

**Principal, Assistant Principal, Treasurer,  
Head Custodian and  
Property Management Staff**

**Management Response:**

The Principal assigned the Treasurer, a 12 month employee, to be the Designated Site Person (DSP) for inventory to monitor all deliveries and maintain a log of inventory of all items entering or leaving the building will be accounted by her utilizing the log. The Head Custodian will monitor and assist with all deliveries coordinating this with the DSP.

The Principal addressed the issues of Property Management with all staff members at a faculty meeting on January 13, 2015. This involved the understanding of procedures for safeguarding and maintaining control over property entering and leaving the building. The DSP and new Assistant Principal will conduct quarterly in house property reviews to identify discrepancies and resolve them. The findings will be reported to the Principal and will be forwarded to the Financial/Business Director for the South Region Office.

The DSP and new Assistant Principal have assessed the inventory and identified obsolete inventory to be removed. The Outgoing Controlled Equipment forms have been delivered to S&D. Richards Warehouse has confirmed they will be picking up the obsolete inventory within the next two weeks. An assessment will be conducted on a quarterly basis upon completion of the quarterly Property Audit Reports.

**Person(s) Responsible:**

**South Region Office Administration**

**Management Response:**

The Financial/Business Operations Director instructed the Principal to thoroughly review Section 4 of the Manual of Property Control Procedures regarding the procedures for recording and managing property, as well as, for the disposal of property.

The Financial/Business Operations Director instructed the Principal to develop a systematic written process for accounting for and disposing of property.

The Financial/Business Operations Director instructed the Principal to meet with the school's staff to review the aforementioned procedures for property control, the procedures for the disposition of property.

The Financial/Business Operations Director instructed the Principal to conduct quarterly reviews of property and to submit the findings to the South Region Office immediately upon completion.

Principals will participate in the Summer Institute Program.

**Person(s) Responsible:**

**School Operations Administration**

**Management Response:**

Refer to page 35 of this report and page 121 in the report's Appendix Section for School Operations administration's comprehensive response addressing the recommendations to the school findings of Riviera Middle School.

## OBJECTIVES, SCOPE AND METHODOLOGY

The objectives of our audits were to:

- express an opinion on the internal fund financial statements of the schools/centers for the fiscal year ended June 30, 2013 and/or June 30, 2014, depending on the school audited, on the cash basis of accounting;
- evaluate compliance by the schools/centers with the policies and procedures prescribed in the *Manual of Internal Fund Accounting*;
- provide assurances regarding compliance with *current payroll procedures*, as well as compliance with *current purchasing credit card program procedures*; and *certain information technology controls*;
- verify compliance by the schools/centers with the policies and procedures prescribed by the *Manual of Property Control Procedures*, and determine the adequacy of controls over the safeguarding of property items with an individual cost of \$1,000 or more;
- evaluate compliance with the policies and procedures set forth by the *No Child Left Behind Act of 2001, Title I Program*, and the *Title I Administration Handbook*; and
- ascertain compliance with State law, State Board of Education Rules, School Board Rules, manuals, directives and FTE reporting documentation procedures as they relate to student attendance, Special Education, English Language Learners, Cooperative Education and Teacher Certification.

While the scope of our audits generally covered operations during the period of July 1, 2012 through June 30, 2013 and/or July 1, 2013 through June 30, 2014 (depending on whether the audit scope was one or two-year audit at the individual school being audited), payroll, purchasing credit card transactions, and information technology controls included current periods. The scope of the Title I Program audit was the 2013-2014 fiscal year for financial reporting purposes. In addition, we reviewed selected records from the Title I Program for the past five fiscal years comprising 2009-2010, 2010-2011, 2011-2012, 2012-2013 and 2013-2014 fiscal years as part of a special audit investigation. FTE audits covered the February 2014 survey period (2013-2014 survey period 3) or the October 2014 survey period (2014-2015 survey period 2), depending on the school audited.

Our procedures were as follows:

- reviewed written policies, procedures, and School Board Rules;
- interviewed school staff and performed analytical analysis of account balances;
- examined, on a sample basis, transactions, processes, supporting documentation and records;
- performed current physical inventories of property items with an individual cost of \$1,000 or more;
- follow-up on prior audit recommendations; and
- performed various other audit procedures as deemed necessary.

We conducted our audits in accordance with generally accepted government auditing standards (GAGAS) issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

An audit includes examining, on a test basis, evidence supporting the amounts and disclosures herein. An audit also includes assessing the accounting principles used and significant estimates made by the administration, if any. We believe that our audits provide reasonable basis for our opinion. The results of the property audits reported herein were in all material respects similarly conducted in accordance with GAGAS, with the exception of the continuing professional education requirement not followed by our property auditors.

### **Internal Control Matters**

Our audits also included an assessment of applicable internal controls and compliance with the requirements of School Board rules and related policies and procedures that would satisfy our audit objectives. In accordance with GAGAS, we are required to disclose and communicate to management control deficiencies identified during our audits. Other matters found not significant within the context of the audit objectives were communicated orally and/or in writing to management.

## BACKGROUND

### INTERNAL FUNDS

Section 1011.07, Florida Statutes, and State Board of Education Rule 6A-1.087, require annual audits of internal funds.

Internal funds are monies collected and expended within a school which are used for financing activities not otherwise financed by the School Board. These monies are collected in connection with school athletic events, fund-raising activities, various student activities and class field trips, after school care and Community School programs, gifts and contributions made by the band or athletic booster clubs, civic organizations, parent-teacher organizations, commercial agencies and all other similar monies, properties or benefits.

Each school administers their internal funds separately through an operational checking account, following District guidelines as established in the *Manual of Internal Fund Accounting*.

Prior to spending internal funds, schools/centers invest their cash in designated depositories. Funds not used in the daily operations may be invested in the MDCPS-Money Market Pool Fund. The Fund's interest rate as of June 30, 2013 and June 30, 2014 was 0.50% and 0.62%, respectively.

Various fund-raising activities are conducted by independent, school-related organizations such as booster clubs, parent-teacher associations, etc. If these fund-raising activities are conducted entirely by these organizations and no board employee handles or keeps custody of the funds or merchandise, these activities are not recorded in the schools/centers' internal funds and consequently are not audited by us.

- ◆ Annual audits of internal funds are required by Section 1011.07, Florida Statutes, and State Board of Education Rule 6A-1.087
- ◆ Internal Funds are revenues generated from student activities at the school level which are not part of the school's budget process
- ◆ Each school administers its internal funds separately through an operational checking account, following District guidelines as established in the *Manual of Internal Fund Accounting*
- ◆ Banks for school funds must be approved by the School Board and certified by the State Treasurer
- ◆ Idle funds in the operational account may be invested to yield interest revenue in a savings account, certificate of deposit or in the MDCPS-Money Market Pool Fund
- ◆ At June 30, 2013 and June 30, 2014, the MDCPS-Money Market Pool Fund's interest rate was 0.50% and 0.62%, respectively.



## PAYROLL

All payroll transactions must be processed following the *Payroll Processing Procedures Manual*, which establishes the guidelines for the recordkeeping, reporting, and maintenance of payroll and payroll records.

At M-DCPS, the Systems Applications and Products in Data Processing (SAP) Time, Payroll and Benefits module replaced the mainframe Payroll Absence Reporting System previously used by the school system to process the payroll. The changeover to the SAP module became effective on October 28, 2011 and the first pay date under SAP Time, Payroll and Benefits was November 18, 2011. At present, although the 'behind-the-scenes' system processes are significantly different and updated, the payroll procedures for documenting employees' time and attendance at the school sites have not changed when compared to the former system.

**Each school processes its own biweekly payrolls.** Timekeeping personnel enter the employees' time and attendance data on a centralized information system. After the information is entered into the system, it is approved by the principal on-line. Subsequently, the payroll department reviews the information and processes the payroll.

The process for distributing payroll checks and checks advices at the sites changed in 2009 in an effort to eliminate paper checks and paper advices. Employees who received paper checks at the sites were requested to enroll in direct deposit for all payroll-related payments, and were directed to the Employee Portal located in the District's website to access their payroll information and print the payroll check advices. Although payroll check distribution at the sites has been greatly minimized, sites are still required to maintain controls over the distribution of payroll checks for those employees who have not signed for direct deposit at this time.

## PROPERTY

At M-DCPS, the management of property items must comply with the guidelines established in the *Manual of Property Control Procedures*. According to Chapter 274.02 of the Florida Statutes, a complete physical inventory of all property shall be taken annually, be compared with the property record, and discrepancies must be identified and reconciled. Furthermore, the Florida Department of Financial Services, Rule Chapter 69I-73 establishes that "all property with a value or cost of \$1,000 or more and a projected useful life of one year or more shall be recorded in the local government's financial system as property for inventory purposes".

Our office conducts yearly inventories at each school of all property items with an original cost of \$1,000 or more. These inventories are customarily scheduled and performed at the sites **after the first day of school and before the end of the school year**. Consequently, the property inventories of schools/centers audited during the summer months of July and August are customarily conducted at a later date, unless staff is available at the schools/centers and time permits. Inventories pending at year-end will be conducted and reported for the next fiscal year.

## PURCHASING CARD (P-CARD) PROGRAM

At the schools/centers, principals administer the purchasing credit card program, which must comply with the guidelines established in the *Purchasing Card Program Policies and Procedures Manual*. The P-card program was designed to streamline the acquisition process by enabling employees at the schools/centers to make small dollar purchases (less than \$3,000 per individual transaction) for materials and supplies. The program is currently managed by the Accounts Payable Department.

- *The P-Card Program enables schools to make small purchases of less than \$3,000 per individual transaction for materials and supplies*
- *It expedites the procurement process at the schools.*

## TITLE I PROGRAM

Schools/centers implementing Title I Programs are required to meet the requirements of the *No Child Left Behind Act of 2001*. Each year, an *Economic Survey* is conducted by the District to rank schools/centers from highest to lowest, based on the percentage of participating students from low income families, and to allocate Title I funds to those eligible schools/centers in rank order. The cut-off point for eligibility is based on the Title I allocation received from the State and other program components.



Schools/centers follow specific criteria for the use of Title I funds as delineated in the *Title I Administration Handbook*. Purchases of supplies and equipment are processed through regular district channels or via use of the P-Card Program, depending on the amount. Salary expenditures must comply with budgetary requirements and must be directly related to activities associated with the grant.

At the schools/centers, principals administer Title I programs with oversight from the Regional Centers, under the overall direction of Title I Administration Office.

To promote schoolwide compliance with Federal, State, and District regulations and guidelines, and ensure that appropriate evidence sources document compliance, the Office of Management and Compliance Audits incorporated the audit of this program into the school audits at selected schools/centers effective February 2007.

## FULL-TIME EQUIVALENT (FTE)

Miami-Dade County Public Schools/centers receives a significant portion of its revenue from State funding through the Florida Education Finance Program (FEFP).

The funding provided by FEFP is based upon the number 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. FEFP funds are primarily generated by multiplying the number of FTE students in each of the funded educational programs by a cost factor to obtain weighted FTEs.

**Section 1010.305, Florida Statutes** vests the Auditor General with the authority to periodically examine the records of school districts, determine compliance with State law and State Board of Education rules relating to the classification, assignment, and verification of full-time equivalent student enrollment and student transportation reported under FEFP. Generally, these audits are conducted every three years.

Schools/centers are responsible for verifying student membership data submitted to the Florida Department of Education (FDOE) for funding purposes. This is accomplished through the FTE survey process. The results of these surveys are FTE reports which allow schools/centers to verify the data and make corrections as needed. Once this process is completed, the district transmits the information to the FDOE. During the 2013-2014 and 2014-2015 fiscal years, months selected by the FDOE for these surveys are as follows:

Survey Period No.	Time Period of Survey
1	July (Summer School only)
2	October
3	February
4	June (Summer School only)

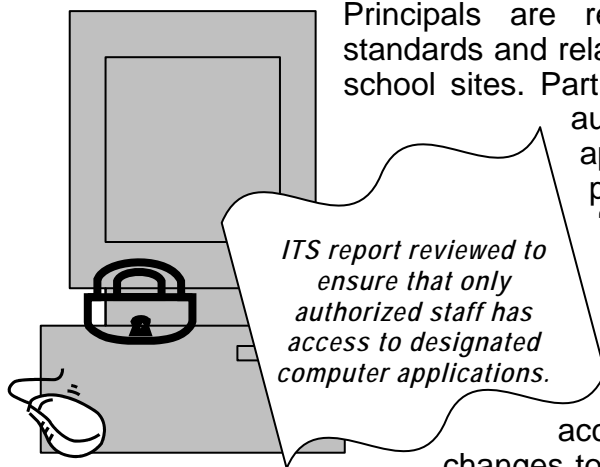
Schools/centers are also responsible for maintaining an audit trail to ascertain compliance with State law, State Board of Education and School Board Rules as they relate to student attendance, Special Education, English Language Learners, Cooperative Education and Teacher Certification.

Incomplete/inaccurate student records which do not adequately support/justify funding levels may give rise to losses in funding. Similarly, teacher certification is closely linked to FTE funding and must be monitored on an ongoing basis to prevent similar losses in

funding to the District. Aside from the monetary losses, non-compliance issues are closely reviewed by the Auditor General and included in their reports.

As of the 2007-2008 fiscal year, FTE audits have been incorporated as part of the school audits routinely performed by the Office of Management and Compliance Audits. FTE audits are conducted at selected schools/centers based on audit criteria developed by this office.

## DATA SECURITY MANAGEMENT REPORT



Principals are responsible for ensuring that network security standards and related security procedures are being observed at the school sites. Part of their responsibility includes ensuring that only authorized staff has access to designated applications. Information Technology Services (ITS) produces a monthly report for each location titled "Authorized Applications for Employees by Locations Report". Principals are responsible for reviewing this report to determine the appropriateness of applications approved for each employee, as to whether they are required for his or her assigned duties; and to ensure that

access to the computer application that allows for changes to students' academic grades is limited to a specific and restricted number of authorized personnel. For selected schools/centers in this report, we reviewed this area as a follow up to conditions noted in the prior audit. In such cases, our purpose was to ensure that corrective action was implemented by the principals, and access to these computer applications was fully compliant with the guidelines.

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    S[SUPERINTENDENT OF SCHOOLS  
Mr. Alberto M. Carvalho]
    C[CHIEF ACADEMICS OFFICER  
OFFICE OF ACADEMICS AND TRANSFORMATION  
Ms. Maria L. Izquierdo]
    A[ASSOCIATE SUPERINTENDENT  
EDUCATION TRANSFORMATION OFFICE  
Dr. Pablo G. Ortiz]
    D[DEPUTY SUPERINTENDENT/CHIEF OPERATING OFFICER  
SCHOOL OPERATIONS  
Mrs. Valtena G. Brown]
    AS[ASSISTANT SUPERINTENDENT  
OFFICE OF ACAD. SUPPORT  
Dr. David K. Moore]
    ADSE[ADMIN. DIRECTOR  
EXCEP. STUDENT ED.  
Ms. Ava Goldman]
    TCEP[THENA C. CROWDER  
EARLY CHILDHOOD  
DIAG. & SPEC. ED.  
CTR. PRINCIPAL]
    ETO[Education Transformation Office]
    ASAC[ASSISTANT SUPERINTENDENT  
Mr. Robert G. Gornio]
    RSO[REGION SUPERINTENDENT  
Ms. Vivian M. Santisteban-Pardo]
    RSP[REGION SUPERINTENDENT  
Dr. Albert Payne, Jr.]
    RSM[REGION SUPERINTENDENT  
Ms. Barbara A. Mendizabal]
    AD[ADMIN. DIRECTOR  
Ms. Melba Brito]
    LAD[LEAD ADMIN. DIRECTOR  
Ms. Martha H. Montiel]
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## **APPENDIX MANAGEMENT'S RESPONSES**

**MEMORANDUM**

February 12, 2015

**TO:** Ms. Vivian M. Santiesteban-Pardo, Region Superintendent  
North Region Office

**FROM:** Frank V. MacBride Jr., Principal   
Natural Bridge Elementary School

**SUBJECT:** **ADMINISTRATIVE RESPONSE OF INTERNAL AUDIT  
REPORT OF NATURAL BRIDGE ELEMENTARY SCHOOL FOR  
2012-2013 AND 2013-2014 FISCAL YEARS**

The following is submitted in response to the Audit Report of Natural Bridge Elementary School for the 2012-2013 and 2013-2014 fiscal years.

The audit findings have been carefully reviewed by the new principal. As a result, the new Principal has implemented the following corrective measures in order to prevent the recurrence of similar conditions and ensure strict compliance is maintained with Board policies and procedures.

**FINDING**

1. **Inadequate Controls Over the Bookkeeping Function Resulted in Material Misstatement in the Financial Records of the School**

**RECOMMENDATIONS**

- 1.1 The Principal should request assistance from the Division of Internal Funds Accounting to discuss the activities for the coming year and map out the accounts to be utilized for the different field trips and year-end activities to prevent the comingling of funds and numerous posting errors.
- 1.2 The Principal and the new Treasurer would benefit from additional training in Internal Funds to improve bookkeeping procedures.
- 1.3 The Principal should periodically review the internal funds records with the Treasurer to strengthen control over the bookkeeping of the funds and the financial records and resolve discrepancies in a timely manner.
- 1.4 The school should transfer \$461 from the Trust Fund-Special Purpose account to the General Fund – General Miscellaneous account.

**PERSON(s) RESPONSIBLE:** Principal and Treasurer



#### MANAGEMENT RESPONSE:

The Principal reviewed bookkeeping procedures outlined in the Manual of the Internal Fund Accounting with the Treasurer to ensure understanding and awareness of the procedures that must be followed and the timelines that must be observed for processing transactions.

The Principal and the Treasurer established a year-long activities calendar to include field trips and year end activities to ensure adequate funds are dispersed to appropriate accounts.

The Principal instructed the Treasurer to ensure all transactions were posted to the correct account. Additionally, the Principal has created a monthly calendar to meet with the Treasurer to review the posting of all transactions

The Treasurer will request assistance from the business manager from the Division of Internal Funds Accounting for additional guidance regarding the posting of transactions as needed. Also, the Principal requested, from the Division of Internal Fund Accounting, regular reviews of the school's accounts to ensure error free monthly statements.


Furthermore, the Principal has transferred \$461.00 from the Trust Fund – Special Purpose account to the General Fund – General Miscellaneous account.

cc: Ms. Cynthia Gracia  
Ms. Sally J. Alayon

**MEMORANDUM**

February 12, 2015

**TO:** Ms. Vivian M. Santiesteban-Pardo, Region Superintendent  
North Region Office

**FROM:** Kevin N. Williams, Principal   
Norwood Elementary School

**SUBJECT: ADMINISTRATIVE RESPONSE OF INTERNAL AUDIT REPORT OF  
NORWOOD ELEMENTARY SCHOOL FOR JULY 1, 2013 - JUNE 30, 2014  
AND 2014-2015 FTE SURVEY PERIOD 2**

The following is submitted in response to the Audit Report of Norwood Elementary School for the 2013-2014 fiscal years and 2014-2014 FTE Survey Period 2.

The audit findings have been carefully reviewed by the Principal. As a result, the Principal has implemented the following corrective measures in order to prevent the recurrence of similar conditions and ensure strict compliance is maintained with Board policies and procedures.

**FINDINGS**

1. **School Non-Compliant with Full-Time Equivalent (FTE) Student Records Resulted in Potential FTE Funding Disallowances**

**RECOMMENDATIONS**

1. **In order to ensure future compliance with District Guidelines, in those instances where students are enrolled over six semesters in the ESOL program, improved efforts should be made by the school administration to ensure that upcoming meetings are identified with sufficient time to schedule them in a timely manner and before FTE week.**

**PERSON(S) RESPONSIBLE:** Principal, Assistant Principal, Itinerant ESOL Teacher

**MANAGEMENT RESPONSE:**

The Principal has reviewed the Opening of School Year Information, the Division of Bilingual Education and World Languages Memoranda, and the District Plan for Services to English Language Learners with the Assistant Principal, ESOL Staff, and the School Registrar to ensure understanding and responsibilities regarding the maintenance of FTE-ELL Student Records.

The Principal will monitor the proper and timely completion of LEP Committee meetings of students enrolled in the ESOL Program for six semesters or more to ensure that they are completed in a timely manner. Accordingly, the Principal will monitor the itinerant ESOL

teacher's schedule on a regular basis to ensure that all meetings are planned and take place in a timely manner and before FTE week.


The Principal along with the Assistant Principal and itinerant ESOL teacher will request assistance from the Division of Bilingual Education and World Languages on an as-needed basis.

cc: Ms. Cynthia Gracia  
Ms. Sally J. Alayon

**MEMORANDUM**

February 12, 2015

**TO:** Ms. Vivian M. Santiesteban-Pardo, Region Superintendent  
North Region Office

**FROM:** Roxana D. Herrera, Principal  
Palm Springs Elementary School 

**SUBJECT:** ADMINISTRATIVE RESPONSE OF INTERNAL AUDIT REPORT OF  
PALM SPRINGS ELEMENTARY FOR JULY 1, 2013 – JUNE 30, 2014 AND  
2013-2014 FTE SURVEY PERIOD 3

The following is submitted in response to the findings in the Audit Report for Palm Spring Elementary School for the 2013-2014 fiscal years and 2013-2014 FTE Survey Period 3.

The audit findings have been carefully reviewed by the Principal. As a result, the Principal has implemented the following corrective measures in order to prevent the recurrence of similar conditions and ensure strict compliance is maintained with Board policies and procedures.

**FINDINGS**

1. Non-Compliance with Certain School Site Informational Data Security Controls

**RECOMMENDATIONS**

- 1.1 Going forward, prior to granting system access to members of the school staff, the school administration should ensure that access is required to perform the staff member's duties and job responsibilities, and granting such access does not exceed user thresholds.
- 1.2 Review the monthly "Authorized Applications for Employee by Locations" report to ensure that employee access to computer system applications is restricted, and access is granted in compliance with current District guidelines.

**Responsible Person(s):** Principal

**Management Response:**

The Principal has reviewed Weekly Briefing (WB) No. 4483 (issued in July 2008) and No. 7784 (issued in April 2010) to ensure compliance with personnel access to Electronic Grade Book Attendance (WGBA) Manager is restricted to five staff approvers (namely Principal, Assistant Principal, Attendance Clerk, Registrar and/or staff performing duties aligned with gradebook attendance.

The Principal is reviewing the "Authorized Applications for Employee by Locations" report on a monthly basis to ensure compliance with WGBA access procedures and to ensure that employee access is in compliance with current District guidelines and does not to exceed the user threshold.

The Principal has reviewed Section V of the Student Attendance Reporting Procedures, published by the District's Federal and State Compliance. Access to substitute teachers is being monitored by the school administration to ensure compliance with recording student attendance in the Electronic Gradebook and to ensure that substitute teachers may not have access at any time.


cc: Ms. Cynthia Gracia  
Ms. Sally J. Alayon



## MEMORANDUM

February 12, 2015

**TO:** Ms. Vivian M. Santiesteban-Pardo, Region Superintendent  
North Region Office

**FROM:** Cheryl Kushi, Principal   
Highland Oaks Middle School

**SUBJECT:** ADMINISTRATIVE RESPONSE OF INTERNAL AUDIT REPORT OF  
HIGHLAND OAKS MIDDLE SCHOOL FOR 2012-2013 AND 2013-2014 FISCAL  
YEARS

The following is submitted in response to the findings in the Audit Report for Highland Oaks Middle School for the 2012-2013 and 2013-2014 fiscal years.

The audit findings have been carefully reviewed by the Principal. As a result, the Principal has implemented the following corrective measures in order to prevent the recurrence of similar conditions and ensure strict compliance is maintained with Board policies and procedures.

### FINDING

#### 1. Non-Compliance with Bid Requirements for Internal Fund Purchases

### RECOMMENDATIONS

- 1.1 Review the disbursement procedures with staff to ensure a proper understanding and awareness of the requirements.
- 1.2 Enforce vendor quotation requirements and direct staff to ensure that: 1) purchases are properly documented with the minimum of three written vendor quotations, one of which must be from a certified minority enterprise; and 2) the lowest quotation is selected.
- 1.3 Strengthen the oversight of the disbursement function to ensure compliance with the disbursement documentation requirements, including the preparation, approval and positing of purchase orders to the system.

**Responsible Person(s):** Principal, Assistant Principal, Treasurer

### Management Response:

The Principal has reviewed the disbursement procedures with the Treasurer, Assistant Principals, and Activities Director to ensure that School Board Policy 6610 *Internal Accounts* is

properly implemented so that any purchase over \$1,000.00 has the required three vendor quotations, one of which is from a certified minority enterprise, and will ensure that the lowest bid will be selected.

The Principal will meet with the Treasurer regularly to review and ensure compliance with vendor quotations and minority bids.

The Principal has reviewed with the Treasurer, Assistant Principals, and all staff members to ensure that Section II, Chapter 4 of the Manual of Internal Fund Accounting which requires that a purchase order (FM-1012) be issued and be posted to the system to document approval for making such a purchase, and to encumber the funds in the system.

The Principal will meet with the Treasurer regularly to review and ensure compliance with disbursements including the preparation, approval and posting of purchase orders.

cc: Ms. Cynthia Gracia  
Ms. Sally J. Alayon

**MEMORANDUM**

February 12, 2015

**TO:** Ms. Vivian M. Santiesteban-Pardo, Region Superintendent  
North Region Office

**FROM:** Francisco Garnica, Principal *FG*  
American Senior High School

**SUBJECT:** ADMINISTRATIVE RESPONSE OF INTERNAL AUDIT REPORT OF  
AMERICAN SENIOR HIGH FOR JULY 1, 2013 – JUNE 30, 2014 AND  
2013-2014 FTE SURVEY PERIOD 3

The following is submitted in response to the findings in the Audit Report for American Senior High for the 2013-2014 fiscal years and 2013-2014 FTE Survey Period 3.

The audit findings have been carefully reviewed by the Principal. As a result, the Principal has implemented the following corrective measures in order to prevent the recurrence of similar conditions and ensure strict compliance is maintained with Board policies and procedures

**FINDINGS**

**1. The Athletics Funds Operated with a Deficit**

**RECOMMENDATIONS**

- 1.1. The new school administration should direct staff from the Athletics Department responsible for overseeing the related financial activity to strengthen controls over the budgeting of available funds and projected expenditures to prevent excessive spending and deficit balances.
- 1.2. The new school administration should not be approving expenditures unless sufficient funds are available in the Athletics Fund to cover expenditures.
- 1.3. The new school administration should direct the Treasurer to bring to their attention any instances where expenditure in the Athletics Fund or other accounts result in a deficit balance, for discussion with appropriate staff and implementation of corrective measures.
- 1.4. Athletics Department staff should improve follow-up on the receipt of any outstanding remittances from other schools (from game proceeds due to the school).

**Responsible Person(s):** Principal, Assistant Principal Athletic Director, Business Manager, Treasurer



**Management Response:**

The new school administration has met with the Athletic Director, Athletic Business Manager and Treasurer to review the guidelines for Internal Funds and Athletics Program as outlined in the Manual of Internal Fund Accounting in order to strengthen the existing procedures to monitor available funds and expenditures.

The new Principal has instructed the Athletic Business Manager and Treasurer to follow all accounting policies and procedures for financial transactions that must be accounted for in the Athletic Program within the school's Internal Fund to avoid the expenditure of nonexistent funds that would reflect a negative balance.

The new Principal has mapped out a calendar to meet on a weekly basis with the Assistant Principal, Athletic Director, Athletic Business Manager and Treasurer to ensure that there are sufficient Athletic funds for all upcoming events. The new Principal has instructed the Treasurer to inform him immediately should a deficit occur in the Athletic Fund. If a deficit should occur, the issuance of checks will be dismissed until adequate funds are accumulated for regular functions to continue.

Furthermore, the new Principal has instructed the Athletic Director and Athletic Business Manager to follow up in a timely manner on the receipt of any outstanding remittance from another school – proceeds that are due to the school. In particular, the new Principal has contacted the Principal from the other high school cited in the report, both in writing and by phone, to secure the reimbursement of \$ 899.39 to American Senior High School for the football game played on 10/17/13 at Traz Powell Stadium.

**FINDINGS**

2. **School Site Procedures for the Disposal of School Board-Owned Property Not Compliant with Board Policy**

**RECOMMENDATIONS**

- 2.1. Ensure that staff and school administration, particularly those in charge of property management, understand and are fully aware of the procedures for accounting and disposing of property; and strengthen the management and controls over property belonging to the school.
- 2.2. Going forward, ensure that Stores and Mail Distribution is engaged when disposing of equipment no longer in use at the school and maintain on file appropriate documentation of approval/disposal.

**Responsible Person(s):** Principal, Assistant Principal

**Management Response:**

The Principal has reviewed the guidelines as stated in the Manual of Internal Fund Accounting and the Property Control Procedures Manual with the Assistant Principal and

Secretary/Treasurer to ensure their understanding and responsibilities regarding the procedures for accounting and disposing of property.

The Principal will meet with the Assistant Principal overseeing property on a quarterly basis to verify that all property items assigned to the school are properly accounted for and will ensure that at least three in-house property reviews will be conducted yearly. This process is already in place. It was adopted at the beginning of the current school year.

The Principal will ensure that when the school desires to dispose of property that is obsolete or serves no useful function at the school, School Board Policy 7310 Disposition of Surplus Property will be followed and such equipment/property be assigned to Stores and Mail Distribution (S&MD) warehouses for disposal utilizing form # 1670.

#### **FINDINGS**

##### **3. Non-Compliance with Certain School Site Technology (IT) Data Security Controls**

#### **RECOMMENDATIONS**

- 3.1** Going forward, the school administration should carefully review the monthly report titled "Authorized Applications for Employees by Locations" Report to ensure that access to school site computer applications is adequately restricted, and any changes to staff's access to these applications remain compliant with current District guidelines. Also, former principal access to all applications at this location should be removed immediately.

**Responsible Person(s): Principal**

#### **Management Response:**

The Principal has reviewed Weekly Briefing (WB) No. 4483. (Issued in July 2008) and No. 7784 (issued in April 2010) to ensure compliance with personnel access to Electronic Grade Book Attendance (WGBA), and Electronic Grade Book Manager (WGBM), is restricted to five staff approvers.

The Principal will review the "Authorized Applications for Employee by Locations" report on a monthly basis to ensure that employee access is in compliance with current District guidelines. This process was instituted during the auditor's visit.


The Principal will ensure that access to school site computer applications is restricted and updated as soon as staff changes occur. The current principal has removed the former Principal's access to all applications at the school.

cc: Cynthia Gracia  
Sally J. Alayon

**MEMORANDUM**

February 12, 2015

**TO:** Dr. Albert Payne, Region Superintendent  
Central Region Office

**FROM:** Janet P. Olivera, Principal   
Sweetwater Elementary School

**SUBJECT:** ADMINISTRATIVE RESPONSE OF INTERNAL AUDIT REPORT OF  
SWEETWATER ELEMENTARY SCHOOL FOR THE 2013-2014 FISCAL YEAR

The following documentation is submitted in response to the Internal Audit Report of Sweetwater Elementary for 2013-2014 fiscal year. The audit findings were carefully reviewed by the Principal and as a result corrective actions were implemented to prevent recurrences.

**RECOMMENDATIONS:**

- 1.2. Going forward, the school administration should ensure that staff is assigned to perform duties in alignment with their job description. In the case of paraprofessionals and similar staff, the job guidelines should be observed. A reminder should be disseminated by the District to other principals to prevent similar issues from occurring at other schools.
- 1.3. School administrators should be reminded to adhere to the guidelines imparted during the training sessions offered by the Title I Administration Office for utilizing Title I Program funds; and should be encouraged to contact that Office for guidance/advice when unclear as to utilization of staff paid with Title I funds or potential use(s) of Title I funds.
- 1.4. At the school site level, discuss the issues and applicable section of the Manual of Internal Fund Accounting with the PTSA/PTA to ensure the understanding of the requirements regarding restrictions regarding the collection of funds and involvement of staff in fundraising activities of the PTA to prevent similar issues from recurring in the future.
- 1.5. The school administration should contact the Division of Community Education and Before/After School Care Program for guidance as to hourly payroll expenditures that are allowable under the BSC/ASC program and ensure these guidelines are observed.

**Person(s) Responsible**

Principal, Assistant Principal, Treasurer, and  
After School Care Manager

**Management Response:**

In order to prevent the recurrence of similar conditions in future audits with respect to utilization of Title I staff and funds, the Principal, Assistant Principal, and Treasurer, have reviewed the Title I Administration Manual and the District's Job Descriptions for each position funded with Title I

monies. The Principal has verified that all employees currently funded by Title I grant monies are working in the appropriate capacity as defined by their job description. Moving forward, the Principal will ensure that all personnel hired with Title I funds occupy the position in the capacity in which they were hired. This review will occur each year that Title I funds are utilized for personnel.

In order to prevent a recurrence the Principal has printed the job descriptions for each of the Title I funded employees, met individually with each one and reviewed their responsibilities and had each employee sign acknowledgement of the meeting. These documents were then placed in the appropriate folder of the Title I documentation box, along with a copy of their work schedules. The principal has also created a link to the Title I School-Level Compliance Collaboration Site on her computer desktop and reviews the current information on a bi-weekly basis to ensure appropriate compliance. At any time a question should arise the Principal will contact Title I and/or Region Office as needed.

In regards to the issues with the PTA, the Principal, Assistant Principal, Treasurer and PTA President met February 7, 2015 and discussed the requirements regarding restrictions of the collection of funds and the involvement of staff in fundraising. The Principal reviewed this information with the entire staff at a faculty meeting to ensure school-wide compliance. At the start of each school year this meeting will be held with the new PTA board.

The Principal has reviewed all current employees of the BSC/ASC program to confirm that they are working within the guidelines of this program. On a bi-weekly basis the Principal will verify all hours worked by BSC/ASC employees were specifically for the program and review job assignments/schedules with the After-School/Before-School Care Program Manager. Any anomalies will be recorded, immediately corrected and submitted to the Region.

#### **RECOMMENDATIONS:**

- 2.1. Develop appropriate spending plans for Title I program funds *early in the year* in order to maximize their use and periodically monitor the spending of the Title I Program funds to ensure funds are spent accordingly.**
- 2.2. Carefully plan purchases of equipment and timelines for deploying equipment to instructional areas to prevent underutilization and the possibility that equipment may be misplaced or damaged during storage.**
- 2.3. Discuss the procedures with staff in charge of the management of property to ensure future compliance with District policy.**
- 2.4. Review the monthly "Authorized Applications for Employees by Locations" report to ensure that employee access to computer system applications is restricted, and access is granted in compliance with current District guidelines.**



**Person(s) Responsible**

**Principal, Assistant Principal, and Treasurer**

**Management Response:**

In order to prevent the recurrence of similar conditions in future audits with respect to utilization of Title I program funds, the Principal, Assistant Principal and Treasurer met on January 14, 2015, to review the total balance of funds available in the supply account. Prior to making a purchase, the Principal verified that the proposed usage was appropriate with the Title I Budget Specialist. In addition, order status will be monitored to ensure that delivery of items ordered comply with the timelines set by the Title I district office.

In order to prevent a reoccurrence of having the use of technology ordered through the Title I Program delayed, the Principal, Assistant Principal and ITS Technician have developed a plan to assess the infrastructural needs that will be implemented prior to any technological purchases. All necessary infrastructure needs will be requested prior to the purchase of technology. In the case that the infrastructure is not completed prior to the purchase, technology will be deployed in an area where it can be immediately used, and then moved into a new location once it has been upgraded to accommodate the new technology.

In regards to the disposal of Title I property the Principal and Assistant Principal will create and monitor a log of all equipment purchased with Title I funds. As equipment becomes obsolete, the log will be reviewed by the Principal, or the Assistant Principal, to ensure that the appropriate documentation is filed with the Title I office for those items that were purchased with said funds. Once the equipment is going to be removed from the building a cross check will be completed by at least two individuals, with one being an administrator, to ensure that all items are appropriately accounted. Furthermore, the Principal will review these procedures with staff in charge of property management to ensure future compliance with District policy.


In regards to the "Authorized Applications for Employee by Locations", the Principal has reviewed the district policy for monitoring application authorizations and has created a reminder on Outlook for the last business day of each month to print and review the document. Any anomalies on the report will be corrected immediately and in accordance with district policy.

cc: Dr. Jacques Y. Bentolila  
Dr. Janice Cruse-Sanchez

## MEMORANDUM

February 25, 2015

**TO:** Ms. Barbara A. Mendizábal, Regional Superintendent  
South Region Office

**FROM:** Mrs. Tammy S. Edouard, Principal   
West Homestead K-8 Center

**SUBJECT:** SCHOOL SITE AUDIT CORRECTIVE ACTION PLAN - RESPONSE TO  
SCHOOL SITE AUDIT REPORT – WEST HOMESTEAD K-8 CENTER - 5791

The following is a response to the audit findings for West Homestead K-8 Center Audit Report for the 2013-2014 Fiscal Year. The audit findings have been carefully reviewed by the Principal. As a result, the following corrective actions have been established to prevent recurrence.

### RECOMMENDATIONS

- 1.1 The Principal or administrative designee should assess the ESOL area to ensure that appropriate staff is identified for completing the LEP Plans.
- 1.2 To reduce the probability of potential losses in funding and other non-compliance issues regarding ESOL criteria, ESOL staff and administration should review ESOL Program Record Folders to make certain that the information is accurate and that all pertinent forms are completed and filed in folders immediately after the information is entered into ISIS.
- 1.3 To reduce the probability of potential losses in funding and other non-compliance issues regarding SPED criteria, the Principal or administrative designee should monitor the SPED area and student folders on a regular basis to ensure that IEP and EP conferences are properly and accurately documented in the student cumulative folders and in SPED-EMS: and all necessary records are properly completed, signed and filed.

**Responsible Person(s):** Principal, Assistant Principal, ELL Chairperson, ESOL Teachers, SPED Chairperson, SPED teachers, Counselor, Registrar

### MANAGEMENT RESPONSE

The Principal identified the Assistant Principal as the primary designee to oversee the ELL program. The Assistant Principal will work in tandem with the ESOL Chairperson who has been identified to serve as the person responsible for completing the LEP Plans. The Assistant Principal and the ESOL Chairperson attended the ESOL Compliance Training on February 17, 2015.

On January 5, 2015, the Principal, Assistant Principal and the newly appointed ELL Chairperson convened a meeting to review compliance of ESOL guidelines established by the State of Florida, Department of Education, and the District. The *Notice to Parents/Guardians of Limited English Proficient (LEP) Students* (FM-6576 or FM-6577) was also reviewed to make sure all members understand how to properly complete the form and ensure evidence of the form is in the files. The principal also reviewed the ESOL Program Implementation information she received during the meeting that was conducted for administrators.

It has been established that the Registrar is responsible for the input of the student schedules and the printout of student schedules (middle school) prior to the FTE survey dates. The registrar will give a copy of the middle school schedules to the ELL Department Chairperson to place in the appropriate student file.

The LEP Committee meeting guidelines have been reviewed as a team. It was determined that the Assistant Principal will convene LEP meetings, monitor completion of documentation, and provide appropriate recommendations that are in compliance with State Rule 6A-6.09022. Additionally, the Assistant Principal will review all files, including the Individual ELL/LEP Student Plan (FM-4649 or FM-4650) to ensure that all documentation is properly completed, the required proper signatures of the members are on the form and that the completed file is properly secured. The Principal met with the Assistant Principal, the ELL Department Chairperson and the Registrar and Data Input Specialist to review expectation that all incoming or new registrations are assessed immediately upon registration as needed.

The Assistant Principal has been directed to lead the team in a review of all LEP Folders to ensure that the specified documents are on file and aligned with ISIS, including: the original Home Language Survey Form (FM-5196), Annual WLEP with appropriate signatures/dates, Copy of all Annual Letters of participation (FM-6576 or FM-6577), ELL Committee Notifications and purpose for meeting clearly stated on LEP Plan.

The Principal directed the team to regularly conduct mini self-reviews of randomly selected cumulative folders and records for ELL students to assure compliance utilizing the Division of Bilingual Education and World Languages Procedures Manual.

The Principal contacted the appropriate District Supervisor following the audit and requested assistance and guidance.

The Principal met with the Assistant Principal, SPED Chairperson and District and ETO SPED Curriculum Support Specialists on January 29, 2015 to review the recordkeeping requirements of SPED records and the Matrix of Services. The Principal instructed the team to pay specific attention to the documentation that corresponds to the funding of SPED students at levels 254 and 255.

The Principal will request a report of students with Matrix 254 and 255 prior to each FTE period and will review the information on ISIS and the Matrix of Services with the SPED Chairperson to make sure it is correct. DECO amendments will be made, when necessary to correct any identified issues and to realign funding with the services. This report is available to all schools through the Employee Portal. The Principal will share report with the SPED Chairperson to confirm that the information reported on the Matrix of Services, ISIS and the Cumulative Record

are all correct according to the actual services the student receives. Any necessary DECO Amendments will be made within the reporting timelines.

Additionally, the Principal met with the new School Counselor and discussed procedures to ensure Gifted Student Educational Plans (EPs) are complete and not missing signatures. The Principal sent the Counselor to another school to work with a veteran Counselor to review paperwork, conduct meetings, and review documentation related to gifted services.

As IEP and EPs are completed, the Assistant Principal will review all documents for necessary signatures, completion, and compliance.

If you have any further questions or concerns regarding these matters, please feel free to contact me at (305) 248-0812.


cc: Ms. Cynthia Gracia  
Ms. Lucy Iturrey



**MEMORANDUM**

February 18, 2015

**TO:** Ms. Barbara A. Mendizabal, Region Superintendent  
South Region Office

**FROM:** Dr. Winston A. Whyte, Principal   
Riviera Middle School

**SUBJECT: ADMINISTRATIVE RESPONSE OF INTERNAL AUDIT REPORT OF  
RIVIERA MIDDLE SCHOOL FOR THE 2013-2014 FISCAL YEAR AND  
2014-2015 FTE SURVEY PERIOD 2**

The following is a response to the findings of the Internal Audit Report of Riviera Middle School for the 2013-2014 fiscal year and 2014-2015 FTE Survey Period 2. The audit findings have been carefully reviewed by the Principal and, as a result, the following corrective actions have been established to prevent recurrence.

**RECOMMENDATIONS**

- 1.1 The Principal or administrative designee should assess the ESOL area to ensure that appropriate staff is identified for completing the LEP plans.**
- 1.2 To reduce the probability of potential losses in funding and other non-compliance issues regarding ESOL criteria, ESOL staff and administration should review ESOL Program Record Folders to make certain that the information is accurate and that all pertinent forms are completed and filed in the folders immediately after the information is entered into ISIS.**

**Responsible Person(s):** Principal, ESOL Department Chairperson,  
Registrar, and ESOL Staff

**Management Response:**

The Principal held an ELL compliance meeting on February 18, 2015 with the new Assistant Principal, newly appointed ESOL Chairperson, the ESOL Teachers, and the Registrar communicating the new requirements to ensure full compliance with ESOL

Page 1 of 3

guidelines established by the State of Florida, Department of Education, and the District. All ELL folders will be reviewed and corrected and all front pages will reflect protocols as required. Files will be reviewed by the Assistant Principal and Principal to ensure completion of corrective actions by March 20, 2015. The ESOL team was directed to review all ELL program record folders to ensure that the specified documents are on file and aligned with ISIS, including: the original Home Language Survey Form (FM-5196), Annual WLEP with appropriate signatures/dates, Copy of all Annual Letters of participation (FM-6577), ELL Committee Notifications and purpose for meeting clearly stated on LEP Plan. The Principal directed the ESOL team to continue to conduct mini self-reviews of randomly selected cumulative folders and records for ELL students to assure compliance utilizing the Division of Bilingual and World Languages Procedures Manual. The Principal will request a subsequent review of the ELL records from the Division of Bilingual Education and World Languages.

On February 18, 2015, the Principal directed ESOL team members comprised of the new Assistant Principal, the newly appointed ESOL Chairperson, and the Registrar, to immediately review all incoming or new registrations to ensure compliance with ELL program guidelines. Specific procedures were delineated to meet the specifications of ISIS as well as Home Language Survey Form (FM-5196) to ensure that they are properly completed and maintained in folders. The team was instructed to ensure that the purpose for convening LEP Committees is properly documented and detailed on the LEP Plan. The team will continue to work on a quarterly basis to review cumulative records with focused attention on accuracy.

## **RECOMMENDATIONS**

- 2.1 The school administration should devise and implement an effective action plan for the safeguarding of assets and the management of property, and designate staff to carry out the plan.**
- 2.2 The school administration should ensure that the entire school staff, especially those in charge of property management, understand and are fully aware of the procedures for safeguarding and maintaining control over property.**
- 2.3 The monitoring and accounting of property should be strengthened by conducting in-house property inventories periodically to identify discrepancies and resolve them in a timely manner.**

**2.4 The equipment should be assessed periodically to ensure that equipment deemed obsolete is properly and timely removed from the inventory.**

**Responsible Person(s):** Principal, Assistant Principal, Treasurer, Head Custodian and Property Management Staff

**Management Response:**

The Principal assigned the Treasurer, a 12 month employee, to be the Designated Site Person (DSP) for inventory to monitor all deliveries and maintain a log of inventory of all items entering or leaving the building will be accounted by her utilizing the log. The Head Custodian will monitor and assist with all deliveries coordinating this with the DSP.

The Principal addressed the issues of Property Management with all staff members at a faculty meeting on January 13, 2015. This involved the understanding of procedures for safeguarding and maintaining control over property entering and leaving the building. The DSP and new Assistant Principal will conduct quarterly in house property reviews to identify discrepancies and resolve them. The findings will be reported to the Principal and will be forwarded to the Financial/Business Director for the South Region Office.

The DSP and new Assistant Principal have assessed the inventory and identified obsolete inventory to be removed. The Outgoing Controlled Equipment forms have been delivered to S&D. Richards Warehouse has confirmed they will be picking up the obsolete inventory within the next two weeks. An assessment will be conducted on a quarterly basis upon completion of the quarterly Property Audit Reports.

If you have any further questions or need any additional information, please contact me at 305-226-4286.

cc: Ms. Cynthia Gracia  
Ms. Lucy Iturrey



**MEMORANDUM**

February 13, 2015  
VSP#069/2014-2015  
(305) 572-2800

TO: Ms. Valtena G. Brown, Deputy Superintendent/Chief Operating Officer  
School Operations

FROM: Vivian M. Santiesteban-Pardo,  Region Superintendent  
North Region Office

SUBJECT: **RESPONSES TO AUDIT REPORT OF NORTH REGION OFFICE SCHOOLS**

Attached please find the responses to the audit findings for the 2012-2013 and 2013-2014 fiscal years for Palm Springs Elementary School, Highland Oaks Middle School, Natural Bridge Elementary School, Norwood Elementary School, and American Senior High School. The North Region Office has reviewed the exceptions cited. The following support activities will be implemented at the Region level.

**Palm Springs Elementary School**

**1. Non-Compliance with Certain School Site Informational Data Security Controls**

The North Region Office Financial/Business Operations Director and the Principal established an organized plan for the Principal to implement and monitor to ensure compliance. The plan encompasses thoroughly reviewing District Policy and Weekly Briefings (4483 and 7784) and Student Attendance Reporting Procedures for granting QUAD A access to staff members to perform duties and job responsibilities.

In addition, the Principal has been instructed to review the "Authorized Applications for Employee by Locations" report on a monthly basis to ensure employee access in compliance with District guidelines and does not exceed the user threshold.

Furthermore, the North Region Office Financial/Business Operations Director has designed "In-House Review Teams" within each feeder pattern to assist with in-house reviews to ensure compliance in this area.

**Highland Oaks Middle School**

**1. Non-Compliance with Bid Requirements for Internal Fund Purchases**

The North Region Office Financial/Business Operations Director and the Principal established an organized plan for the Principal to implement and monitor with the Treasurer. The plan encompasses a thorough review of the guidelines and requirements as stated in the Manual of Internal Fund Accounting, and School Board Policy 6610, Internal Accounts.

The Principal has been instructed to strengthen the review process with the Treasurer to ensure compliance with three written vendor quotes are secured prior to making purchases, to include one from a certified minority.

In addition, the Principal will instruct all staff members to ensure that purchase orders are issued routinely and posted to the system to document approval for making a purchase and then encumber the funds in the system.

Furthermore, the North Region Office Financial/Business Operations Director has designed "In-House Review Teams" within each feeder pattern to assist with in-house reviews to ensure compliance in this area.

#### **Natural Bridge Elementary School**

##### **1. Inadequate Controls Over the Bookkeeping Function Resulted in Material Misstatement in the Financial Records of the School**

The North Region Office Financial/Business Operations Director and the Principal established an organized plan for the Principal to implement and monitor with affected staff. The Principal will thoroughly review the the bookkeeping procedures outlined in the *Manual of the Internal Funds Accounting* with the Treasurer. The Principal and the Treasurer will develop a systematic approach to ensure all transactions are posted to the correct account.

The Principal and the Treasurer have been instructed to attend additional training in Internal Funds to improve bookkeeping procedures and to seek assistance from the Division of Internal Funds Accounting as needed.

In addition, the Principal has been instructed to establish a year-long activities calendar with the Treasurer to ensure adequate funds are dispersed to appropriate accounts.

Furthermore, the North Region Office Financial/Business Operations Director has designed "In-House Review Teams" within each feeder pattern to assist with in-house reviews to ensure compliance in this area.

#### **Norwood Elementary School**

##### **1. School Non-Compliant with Full-Time Equivalent (FTE) Student Records Resulted in Potential FTE Funding Disallowances.**

The North Region Office Financial/Business Operations Director and the Principal established an organized plan for the Principal to implement and monitor with affected staff. The Principal was instructed to thoroughly review the Division of Bilingual Education and World Languages Memoranda and the District Plan for Services to English Language Learners with the Assistant Principal, ESOL Staff, and the Registrar.

The Principal has been instructed to monitor the proper and timely completion of all documents on a regular basis in the ESOL Program Record folder, inclusive of Individual ELL/LEP Student Plans, and the printout of the students' schedules from the Integrated Student Information System (ISIS). Also, the Principal will monitor the Itinerant ESOL

teacher's schedule on a regular basis to ensure that all meetings are planned and take place in a timely manner and before FTE Week.

In addition, the Region will coordinate District assistance from the Division of Bilingual Education for the Principal and staff on an as needed basis.

Furthermore, the North Region Office Financial/Business Operations Director has designed "In-House Review Teams" within each feeder pattern to assist with in-house reviews to ensure compliance in this area.

### **American Senior High School**

#### **1. The Athletics Funds Operated with a Deficit**

The North Region Office Financial/Business Operations Director and the Principal established an organized plan for the Principal to implement and monitor with affected staff. The Principal will thoroughly review the guidelines as stated in the *Manual of Internal Fund Accounting* with the Assistant Principal, Athletic Director, Athletic Business Manager, Activities Director and the Treasurer to ensure their understanding and responsibilities regarding Athletic Funds.

The Principal has been instructed to meet with the Assistant Principal and Secretary/Treasurer on a regular basis to review upcoming events, monetary needs and internal funds to support the implementation of these events and to ensure that the Athletic Fund holds sufficient funds prior to approving any expenditure or signing a check.

The Principal has been instructed to discontinue the practice of operating accounts in the negative and ensure that fees are properly calculated and that funds in positive accounts, other than General Miscellaneous, will be used to cover a deficit should the need occur. In addition, the Principal has been instructed to ensure that all outstanding remittances from game proceeds due to the school are followed up with in a timely manner.

Furthermore, the North Region Office Financial/Business Operations Director has designed "In-House Review Teams" within each feeder pattern to assist with in-house reviews to ensure compliance in this area.

#### **2. School Site Procedures for the Disposal of School Board-Owned Property Not Compliant with Board Policy**

The North Region Office Financial/Business Operations Director and the Principal established an organized plan for the Principal to implement and monitor with affected staff. The Principal will thoroughly review the guidelines as stated in the Property Control Procedures Manual with the Assistant Principal and Secretary/Treasurer.



The Principal has been instructed to meet with the Assistant Principal and Treasurer on a quarterly basis to verify that all property items assigned to the school are accounted for. The Principal will ensure that when the school desires to dispose of property that is obsolete or serves no useful function at the school, the school will contact the Region or Stores and Mail Distribution's Warehouse to assist in removing the property according to Board policy.

Furthermore, the North Region Office Financial/Business Operations Director has designed "In-House Review Teams" within each feeder pattern to assist with in-house reviews to ensure compliance in this area

### **3. Non-Compliance with Certain School Site Technology (IT) Data Security Controls**

The North Region Office Financial/Business Operations Director and the Principal established an organized plan for the Principal to implement and monitor to ensure compliance. The plan encompasses thoroughly reviewing District Policy and Weekly Briefings (4483 and 7784) and ITS' Quad A User Guide for granting QUAD A and gradebook access to administration and staff members to perform duties and job responsibilities.

In addition, the Principal has been instructed to review the "Authorized Applications for Employee by Locations" report on a monthly basis to ensure employee access is in compliance with District guidelines and does not exceed the user threshold.

Furthermore, the North Region Office Financial/Business Operations Director has designed "In-House Review Teams" within each feeder pattern to assist with in-house reviews to ensure compliance in this area.

Should you need additional information, please contact me at (305) 572-2800.

VSP/SA

cc: Mr. Jose L. Dotres  
Ms. Cynthia Gracia  
Ms. Sally J. Alayon

**MEMORANDUM**

February 12, 2015  
AP#077/2014-15

**TO:** Mrs. Valtena G. Brown, Deputy Superintendent/Chief Operating Officer  
School Operations

**FROM:** Albert Payne, Region Superintendent  
Central Region Office

**SUBJECT:** CENTRAL REGION OFFICE RESPONSE TO INTERNAL REPORT FOR  
SWEETWATER ELEMENTARY SCHOOL

The following is a response to relevant findings in the school's audit reports.

Central Region Office has reviewed the audit response for the above-mentioned school.

**SWEETWATER ELEMENTARY  
RECOMMENDATIONS:**

- 1.2. Going forward, the school administration should ensure that staff is assigned to perform duties in alignment with their job description. In the case of paraprofessionals and similar staff, the job guidelines should be observed. A reminder should be disseminated by the District to other principals to prevent similar issues from occurring at other schools.
- 1.4. At the school site level, discuss the issues and applicable section of the Manual of Internal Fund Accounting with the PTSA/PTA to ensure the understanding of the requirements regarding restrictions regarding the collection of funds and involvement of staff in fundraising activities of the PTA to prevent similar issues from recurring in the future.
- 1.5. The school administration should contact the Division of Community Education and Before/After School Care Program for guidance as to hourly payroll expenditures that are allowable under the BSC/ASC program and ensure these guidelines are observed.

As a result of the audit findings, the following support activities will be implemented at the Region level:

- The affected Principal will be required to address specific fiscal management job targets on the Performance Planning and Assessment System Planning Form and provide progress points and evidence of progress to improve business and professional standards for effectiveness and efficiency.
- The Central Region Office Financial/Business Operations Administrative Director will review internal funds records periodically throughout the school year through Leadership Seminars with administrators to ensure compliance with the Manual of Internal Fund Accounting.
- The Central Region Office Financial/Business Operations Administrative Director will direct the Principal to provide evidence of job assignments correlated to the personnel purchased



with Title I dollars during the school's budget conference to ensure that staff is assigned to perform duties in alignment with their job description.

- The Central Region Office Financial/Business Operations Administrative Director will in collaboration with the appropriate district office coordinate and facilitate training workshops for the affected Principal to help successfully monitor funds.
- The Central Region Office Financial/Business Operations Administrative Director in collaboration with the appropriate district office will coordinate a support system for the Principal and designee to ensure that Title I records are properly maintained and job assignments are in alignment to job descriptions.

#### **RECOMMENDATIONS:**

- 2.1. Develop appropriate spending plans for Title I program funds *early in the year* in order to maximize their use and periodically monitor the spending of the Title I Program funds to ensure funds are spent accordingly.**
- 2.2. Carefully plan purchases of equipment and timelines for deploying equipment to instructional areas to prevent underutilization and the possibility that equipment may be misplaced or damaged during storage.**
- 2.3. Discuss the procedures with staff in charge of the management of property to ensure future compliance with District policy.**
- 2.4. Review the monthly "Authorized Applications for Employees by Locations" report to ensure that employee access to computer system applications is restricted, and access is granted in compliance with current District guidelines.**

As a result of the audit findings, the following support activities will be implemented at the Region level:

- The affected Principal will be required to address specific fiscal management job targets on the Performance Planning and Assessment System Planning Form and provide progress points and evidence of progress to improve business and professional standards for effectiveness and efficiency.
- The Central Region Office Financial/Business Operations Administrative Director will request mini-reviews to ensure compliance with the monitoring of property.
- The Central Region Office Financial/Business Operations Administrative Director in collaboration with the appropriate district office will coordinate a support system for the Principal and designee to ensure that property records are properly maintained, data security protocols and authorizations are assigned properly, and Title I funds are utilized in a timely manner.

If there are any additional questions, please contact me. Thank you for your assistance and cooperation.

cc: Dr. Jacques Bentolila  
Ms. Cynthia Gracia

**MEMORANDUM**

February 18, 2015

**TO:** Mrs. Valtena G. Brown, Deputy Superintendent/Chief Operating Officer  
School Operations

**FROM:** Barbara A. Mendizábal, Region Superintendent  
South Region Office

**SUBJECT: RESPONSES TO AUDIT REPORT OF SOUTH REGION OFFICE  
SCHOOLS**

Please find attached the responses to the audit finding for the 2013-2014 fiscal year for West Homestead K-8 Center, and the results of the 2014-2015 FTE Survey Period 2 and property inventory at Riviera Middle School. The South Region Office has reviewed the exceptions cited. The following support activities will be implemented at the Region level.

**West Homestead K-8 Center**

**1. School Non-Compliant With FTE Student Records Resulted in Potential FTE Funding Disallowances**

The South Region Office Financial/Business Operations Director will solicit assistance from the SPED and the Office of Bilingual Education and World Languages to conduct mini-reviews each semester for compliance in selected areas of SPED and ELL Program, respectively. Results from the District's mini-reviews will be submitted to the South Region Office Administrative Director. Discrepancies will be discussed with the Principal and corrections will be made accordingly.

**Riviera Middle School**

**1. School Non-Compliant With FTE Student Records Resulted in Potential FTE Funding Disallowances**

The South Region Office Financial/Business Operations Director will solicit assistance from the Office of Bilingual Education and World Languages to conduct mini-reviews each semester for compliance in selected areas of the ELL Program. Results from the District's mini-reviews will be submitted to the South Region Office Administrative Director. Discrepancies will be discussed with the Principal and corrections will be made accordingly.

## **2. Inadequate Controls Over Property Inventory Resulted in Loss of Equipment**

The Financial/Business Operations Director instructed the Principal to thoroughly review Section 4 of the Manual of Property Control Procedures regarding the procedures for recording and managing property, as well as, for the disposal of property.

The Financial/Business Operations Director instructed the Principal to develop a systematic written process for accounting for and disposing of property.

The Financial/Business Operations Director instructed the Principal to meet with the school's staff to review the aforementioned procedures for property control, the procedures for the disposition of property.

The Financial/Business Operations Director instructed the Principal to conduct quarterly reviews of property and to submit the findings to the South Region Office immediately upon completion.

Principals will participate in the Summer Institute Program.

Should you need additional information, please contact me at (305) 595-7022.

BAM:LI  
M#70


Attachments

cc: Ms. Cynthia Gracia  
Ms. Lucy Iturrey

**MEMORANDUM**

**February 25, 2015**

**TO:** Mr. Jose Montes de Oca, Chief Auditor  
Office of Management and Compliance Audits

**FROM:** Marie Izquierdo, Chief Academic Officer   
Office of Academics and Transformation

**SUBJECT: ADMINISTRATIVE RESPONSE TO RECOMMENDATIONS 1.1 AND 1.3,  
SCHOOL AUDIT REPORT OF SWEETWATER ELEMENTARY SCHOOL**

This memorandum is written in response to recommendations 1.1 and 1.3 in the School Audit Report of Sweetwater Elementary School (W.L. 5431) for the 2013-2014 fiscal year.

**RECOMMENDATIONS**

- 1.1. The District should self-report the instance of non-compliance with Title I policy to the Florida Department of Education as part of the complaint process under Title I administration guidelines.

Response Person (s): Title I Administration

**Management Response:**

The District will self-report the instance of non-compliance with Title I policy at Sweetwater Elementary School to the Florida Department of Education.

- 1.3. School administrators should be reminded to adhere to the Title I Program guidelines and should be encouraged to contact the Title I Administration Office for guidance/advice when unclear as to utilization of staff paid with Title I funds or potential use(s) of Title I funds.

Responsible Person(s): Title I Administration

**Management Response:**

A Weekly Briefing will be sent to Principals and Assistant Principals assigned to schools implementing the Title I Schoolwide Program to prompt them to review and adhere to all federal, state and local Title I guidelines. This Weekly Briefing will further advise school site administrators to contact Title I Administration when unclear about Title I guidelines, especially as they relate to the potential use of Title I funds and the utilization of staff paid with Title I funds.

It is expected that these actions will serve to strengthen schools' compliance with Title I Program guidelines. If you require additional information, please contact Dr. Magaly C. Abrahante, Assistant Superintendent, Division of Early Childhood Programs, Title I Administration and Summer Services at 305 995-1253.


MI:sr  
M040

cc: Dr. Magaly C. Abrahante

**MEMORANDUM**

**February 25, 2015**

**TO:** Jose Montes de Oca, Chief Auditor  
Office of Management and Compliance Audits

**FROM:** Valtena G. Brown, Deputy Superintendent/ Chief Operating Officer   
School Operations

**SUBJECT: SCHOOL OPERATIONS RESPONSE TO SCHOOL AUDITS OF  
SELECTED SCHOOLS IN THE NORTH AND SOUTH REGION  
OFFICES**

School Operations has reviewed the audit exceptions cited in the 2013-2014 and/or 2014-2015 fiscal year(s) audit reports of the following schools reporting to the North and South Region Offices: American Senior High; Highland Oaks Middle School; Natural Bridge Elementary School; Norwood Elementary School; Palm Springs Elementary Schools; West Homestead K8 Center; Riviera Middle School; The following preventive actions will be taken through School Operations:

- Review reports submitted by the Region Office Financial/Business Operations Directors on mini-reviews conducted in selected areas of Property Management (including Disposal of Equipment), BID Requirements; Data Security Controls; ELL Student Records and Internal Funds; Discrepancies with the aforementioned areas will be investigated through the appropriate Region Office;
- Work collaboratively with the Region Offices and facilitate appropriate training and assistance from District Offices in all cited areas; and
- Coordinate and provide information to school site administrators and staff on best business practices, including related financial areas of concern through the Principals' Summer Institute Professional Development.

School Operations will continue to work with principals to promote efficient fiscal practices. If you have any questions, please contact me at 305 995-2938.


VGB:cg  
M68

cc: Jose Dotres  
Region Superintendents  
Region Financial/Business Operations Directors

**MEMORANDUM**

February 25, 2015

**TO:** Jose Montes de Oca, Chief Auditor  
Office of Management and Compliance Audits

**FROM:** Valtena G. Brown, Deputy Superintendent/ Chief Operating Officer   
School Operations

**SUBJECT: SCHOOL OPERATIONS RESPONSE TO AUDIT OF SWEETWATER  
ELEMENTARY SCHOOL**

School Operations has reviewed the audit exceptions cited in the audit report of Sweetwater Elementary School and agrees with the recommendations in the report. The following preventive actions have been taken through School Operations to promote compliance with District policy:

- School Operations will disseminate to all Principals a Weekly Briefing directing Principals to ensure that all positions purchased through federal grants be assigned to perform duties in alignment with their job description and that documentation to support the certification of the Circular A-87 is acknowledged.
- Review reports submitted by the Region Office Financial/Business Operations Directors on a monthly basis in selected areas: Property Management (including Disposal of Equipment); Title I expenditures; Title I staff job descriptions vs. actual job assignments (Circular A-87); and the Authorized Applications for Employees by Locations.
- School Operations will include in the Opening of Schools/ Protocols specific to the PTSA/PTA requirements regarding restrictions in the collection of funds and involvement of staff in fundraising activities of the PTA in accordance with the Manual of Internal Fund Accounting to prevent similar issues from recurring in the future.
- Coordinate and provide information to school site administrators and staff on best business practices, including related financial areas of concern through the Principals' Summer Institute Professional Development and Weekly Briefings.

School Operations will continue to work with Principals to promote efficient fiscal practices. If you have any questions, please contact me at 305 995-2938.

VGB:cg  
M69

cc: Jose Dotres  
Region Superintendent  
Region Financial/Business Operations Directors



## 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, and any other legally prohibited basis. Retaliation for engaging in a protected activity is also prohibited.

# **MIAMI-DADE COUNTY PUBLIC SCHOOLS**



## ***INTERNAL AUDIT REPORT SELECTED SCHOOLS/CENTERS MARCH 2015***

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**Office of Management and Compliance Audits  
1450 N. E. 2nd Avenue, Room 415  
Miami, Florida 33132  
Tel: (305) 995-1318 • Fax: (305) 995-1331  
<http://mca.dadeschools.net>**