

# Miami-Dade County Public Schools



## *Internal Audit Report Follow-Up On Two Performance Audits: District's Self-Insured Healthcare Program, and District's Procurement Operations: Solicitation, Selection, and Award Processes*



This report provides a current status on agreed-upon findings and recommendations from two performance audits issued in February and March 2019, respectively.

**MARCH 2020**

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

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**Superintendent of Schools**

Mr. Alberto M. Carvalho

**Office of Management and Compliance Audits**

Ms. Maria T. Gonzalez, CPA

Chief Auditor

**Contributors To This Report:**

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Mr. Jon Goodman, CPA, CFE





# Miami-Dade County Public Schools

*giving our students the world*

**Superintendent of Schools**  
Alberto M. Carvalho

**Chief Auditor**  
Maria T. Gonzalez, CPA

**Miami-Dade County School Board**  
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Dr. Lawrence S. Feldman  
Dr. Martin Karp  
Dr. Lubby Navarro  
Dr. Marta Pérez  
Mari Tere Rojas

March 2, 2020

Ladies and Gentlemen:

We performed this follow-up review in accordance with the approved 2019-20 Fiscal Year Audit Plan. The review followed-up on two performance audits conducted by our office as follows:

- Audit of the District's Self-Insured Healthcare Program (Healthcare), issued in February 2019; and
- Audit of the District's Procurement Operations: Solicitation, Selection, and Award Processes (Procurement), issued in March 2019.

Our follow-up testing of the Healthcare audit found that of the three agreed-upon recommendations/corrective actions, one has been fully implemented, one partially implemented, and one not implemented as of February 2020. The corrective actions not fully implemented relate to the contract for Administrative Services Only (ASO) not having been timely executed. Management indicated the cause of this non-implementation was a delay in the resolution of contract negotiations with various District bargaining units for salaries and benefits.

Regarding the Procurement audit, four of the five recommendations/corrective actions have been fully implemented and one has been partially implemented as of February 2020. Although the bidder experience and performance verification process was enhanced subsequent to our audit recommendations, during this follow-up, we found that the process was not always followed. This requires further attention from the Administration.

We would like to thank the management and staff of the Office of Risk and Benefits Management and Procurement Management Services for their cooperation and courtesies extended to our staff during this review.

Sincerely,

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



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## **EXECUTIVE SUMMARY**

The objective of this follow-up review was to determine the extent of implementation of agreed-upon recommendations/corrective actions from two performance audits that we conducted in Fiscal Year 2018-19.

The first of those audits, the Audit of the District's Self-Insured Healthcare Program (Healthcare) was issued by our Office in February 2019. The audit report's overall conclusion was: "In general, internal controls and safeguards are in place over most aspects of Office of Risk and Benefits Management (ORBM) operations related to the Self-Insured Healthcare Program, including its oversight of the third-party administrator, CIGNA. ORBM has implemented various cost-containment strategies in the Plan, and reporting requirements were timely met during the audit period."

Notwithstanding the Healthcare audit's overall conclusion above, the report contained two findings identifying the need for improvement in internal controls and three corresponding agreed-upon recommendations/corrective actions. Of the three recommendations, one has been fully implemented, one partially implemented, and one not implemented as of February 2020. The corrective actions not fully implemented relate to the contract for Administrative Services Only (ASO) not having been timely executed. Management indicated the cause of this non-implementation was a delay in the resolution of contract negotiations with various District bargaining units for salaries and benefits. (Refer to details on pages 4 through 6).

The second audit followed up on, the Audit of the District's Procurement Operations: Solicitation, Selection, and Award Processes (Procurement), was issued in March 2019, and contained four findings and five agreed-upon recommendations/corrective actions for needed improvements. As of February 2020, four of the five recommendations have been fully implemented and one has been partially implemented. Also, please note that the Chief Procurement Officer resigned and an Interim Chief began in September 2019. A permanent Chief Procurement Officer was hired and began in January 2020 (Refer to details on pages 7 through 11).

Management's responses to the review's current status are incorporated in the tables beginning on pages 5 and 8, respectively, and in memorandum format as received by our office in Appendix A on page 12.





## **OBJECTIVE, SCOPE AND METHODOLOGY**

The objective of this follow-up review was to determine the extent of implementation of agreed-upon recommendations/corrective actions from two performance audits that we conducted in Fiscal Year 2018-19, specifically the:

- Audit of the District's Self-Insured Healthcare Program, issued in February 2019; and
- Audit of the District's Procurement Operations: Solicitation, Selection, and Award Processes, issued in March 2019.

This review covered actions by management subsequent to our original audit reports.

We performed the following procedures to satisfy our objective:

- Interviewed various staff of the Office of Risk and Benefits Management (ORBM), Procurement Management Services (PMS), and other applicable departments;
- Reviewed documentation evidencing progress towards corrective actions, including: Request for Proposals (RFPs), contracts, reconciliations, revised procedures manuals, master bid files, and various forms;
- Performed testing of various processes including: calculating receipts associated with a Performance Guarantee Agreement, determining compliance for receiving and opening Invitation to Bids (ITBs) and RFPs, and determining adequate certification and verification of awarded vendors;
- Observed the RFP opening process on an unannounced basis; and
- Performed various other procedures deemed necessary.

We conducted this follow-up review in accordance with generally accepted Government Auditing Standards issued by the Comptroller General of the United States of America. Those standards require that we plan and perform the review to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions, based on our objective. This follow-up review is intended to provide a current status on prior audit findings and recommendations. We believe the evidence obtained and reviewed provides a reasonable basis for our conclusions on the status of prior audit findings and recommendations.



## **TERMS USED TO DESCRIBE THE CURRENT STATUS OF RECOMMENDATIONS**

***Implemented*** – Indicates that management has acted upon the auditors' recommendation to satisfaction. The action taken may have included the specific recommendation or alternate action that satisfactorily addressed the condition(s) noted in the audit finding.

***Partially Implemented*** – Indicates that management has implemented some aspects of the auditors' recommendation or an alternate solution to some of the condition(s) noted in the audit finding but has not acted upon all aspects of the auditors' recommendation.

***Not Implemented*** – Indicates that management has not acted upon the auditors' recommendation to satisfaction.



## **FOLLOW-UP OF THE AUDIT OF THE DISTRICT'S SELF-INSURED HEALTHCARE PROGRAM**

### **Background and Context**

The District provides medical and health coverage benefits for its employees and eligible dependents through a Self-Insured Healthcare Benefit Plan (Plan). The Office of Risk and Benefits Management (ORBM) oversees the operations of the Plan. Premium revenues and operating expenses reported in the District's audited financial statements as of June 30, 2018, were \$357 million and \$343 million, respectively.

In September 2014, the School Board awarded CIGNA a contract to manage the Plan through a healthcare Administrative Services Only (ASO) agreement with a term of three years and two one-year extensions, expiring December 31, 2019. In July 2019, the School Board awarded the contract for the District Healthcare Benefits Program to CIGNA through RFP 18-058-MT for the period commencing January 1, 2020.

The Office of Management and Compliance Audit's (OMCA) subject performance audit issued in February 2019, concluded: "In general, internal controls and safeguards are in place over most aspects of ORBM operations related to the Self-Insured Healthcare Program, including its oversight of the third-party administrator, CIGNA. ORBM has implemented various cost-containment strategies in the Plan, and reporting requirements were timely met during the audit period."

Notwithstanding the above overall conclusion, the report contained two findings and three corresponding agreed-upon recommendations/corrective actions for which the current status is outlined in the following table.



**Follow-up of the Audit of the District's Self-Insured Healthcare Program**

Summary of Finding	Summary of Recommendation	Summary of Corrective Action Planned or Taken	Current Status
<p><b>Finding No 1: The Administrative Services Only (ASO) Agreements Not Executed Timely</b></p> <p>The Administrative Services Only (ASO) agreement between the School Board and CIGNA was signed 794 days (approximately two years and two months) after its effective date. According to ORBM management, the signing was delayed due to the prolonged negotiations with CIGNA. Also, Management disclosed that prior leadership believed that the RFP (along with vendors responses and the Board approved item) was the controlling document, not the contract. The absence of an executed contract could potentially increase the District's risk should there be a dispute.</p>	<p>1.1 Contracts should be executed prior to the start of the contract term.</p>	<p>Management agreed.</p> <p>Negotiating a Healthcare ASO contract can be time consuming and requires multiple reviews by staff, attorneys, for both parties, and the Board's benefits consultant. Management plans to bring a recommendation of award several months prior to the expiration of the existing contract. This will allow for enough time to negotiate the terms and conditions of the contract and have an executed contract in place by the effective date of the contract period.</p>	<p>Not Implemented –</p> <p>Risk and Benefits Management expect the ASO agreement to be fully executed sometime in March 2020.</p> <p>Management's Response –</p> <p>Staff from ORBM, the School Board Attorney's Office, the Board's Benefits Consultant, Aon Inc., and Cigna have been actively working on the completion of the new Administrative Services Only (ASO) and Pharmacy Benefits Management (PBM) contract with an effective date of January 1, 2020. Cigna's staff and attorneys are reviewing the District's final edits to the contract and we expect to have a fully executed contract by the March Audit Committee Meeting. Given the complexity of the contract, five months from award to start date is a very aggressive timeframe to complete all necessary negotiations; however, it is not our recommendation to award the next RFP too much earlier in the calendar year as it could harm that year's plan execution, especially if a transition in vendors will be taking place. Starting January 1, 2020, Cigna agreed to honor the lower pricing terms, including a waiver of \$3.7 Million in ASO fees, and all other provisions outlined in their RFP response. While not replacing the need for a contract, this commitment has been given in writing by Cigna.</p>





Follow-up of the Audit of the District's Self-Insured Healthcare Program			
Summary of Finding	Summary of Recommendation	Summary of Corrective Action Planned or Taken	Current Status
<p><b>Finding No 2: No Mechanism in Place to Monitor the Accuracy of Receipt of Payments Pursuant to the Performance Guarantee Agreement</b></p> <p>The District received five payments from CIGNA with a total value of \$1,223,000 based on the performance guarantee agreement. No supporting documentation was provided from the vendor or staff's verification or recalculation of these amounts. In addition, staff was not comparing actual performance results to performance standards and therefore could not determine the accuracy of these payments. There is an increased risk that the District is not receiving all receipts for which it is entitled.</p> <p>Also, the PGA was not signed by the Office of Risk &amp; Benefits Management.</p>	<p>2.1 We recommend staff independently calculate the monies expected from the non-compliance of each unmet performance measure. Staff's calculation should be reconciled with the vendor's analysis.</p> <p>2.2 Ensure that the PGA is signed in a timely manner.</p>	<p>Management agreed.</p> <p>Some of the current Performance Standards and Guarantees (PS&amp;G's) are based on the ASO provider's national book of business which makes some of the unmet PS&amp;G's difficult to verify, therefore, management is going to include language in the new ASO contract which will allow a third-party such as the Board's benefit consultant to audit the PS&amp;G's to reconcile the calculations provided by the ASO provider.</p> <p>The PGA agreement will be simultaneously executed with the master contract.</p>	<p>Implemented –</p> <p>Our review of supporting documentation for payments received in July and October 2019, shows that the third-party consultant has independently reviewed such payments and found them to be reasonable.</p> <p>Partially Implemented -</p> <p>In discussions with ORBM, there will be no separate PGA agreement. We were provided with a draft ASO agreement which incorporates the Request for Proposal # 18-058-MT- District Healthcare Benefits Program approved by the School Board on July 24, 2019. The ASO details approximately 80 performance measures categorized into 11 areas: Implementation; Account Management; Network Maintenance; Member Services; Claims Administration; Data Reporting and Analysis; Medical Management; Disease Management; Wellness; Implementation Guarantees; and Ongoing Services.</p> <p>Management's Response –</p> <p>The Performance Guarantees are incorporated by reference in the ASO and PBM Contract and will become part of the fully executed contract.</p>



## **FOLLOW-UP OF THE AUDIT OF THE DISTRICT'S PROCUREMENT OPERATIONS: SOLICITATION, SELECTION, AND AWARD PROCESSES**

### **Background and Context**

The department of Procurement Management Services (PMS) is the centralized purchasing system and is responsible for providing procurement services to the School Board. During FY 2017-18, the District created 16,823 non-construction purchase orders with a total value of \$386 million.

The objective of the audit was to determine whether the District's processes of solicitation, selection and awarding firms to supply goods and services, complies with applicable School Board Policies, Florida Statutes and best practices.

The subject performance audit report, issued in March 2019, contained four findings and five corresponding agreed-upon recommendations/corrective actions for which the current status is outlined in the following table. Also, please note that the Chief Procurement Officer resigned and an Interim Chief began in September 2019. A permanent Chief Procurement Officer was hired and began in January 2020.



Follow-up of the Audit of the District's Procurement Operations: Solicitation, Selection, and Award Processes			
Summary of Finding	Summary of Recommendation	Summary of Corrective Action Planned or Taken	Current Status
<b>Finding No 1: Update Written Procedures for the Procurement Function</b>			
<p>The Procurement Management Services (PMS) Procedures Manual was last updated in November 2013. Many of the written procedures are outdated.</p> <p>According to Senior Management of the department, prior and current management had been awaiting the completion of the Phase 2 Disparity Study Report to update its procurement procedures, since the study's recommendations would impact applicable procurement procedures.</p>	<p>1.1 The PMS procedures manual should be revised and updated to align with School Board Policies 6320 - Purchasing and 6320.02 - Small/Micro, Minority/ Women-owned, and Veteran Business Enterprise Programs. The Procedures Manual is designed as a "living document" and should be periodically updated to reflect, for example, the most current procedures and any future use of further automation or the addition of an electronic bidding system. Also, staff from PMS should consult with the Office of Economic Opportunity (OEO) in the updating and development of their respective procedures manuals.</p>	<p>PMS is in agreement.</p> <p>PMS' procedures manual has been updated to reflect current procedures, any necessary changes resulting from changes in Board Policy 6320, as well as incorporated procedural recommendations from the Phase 2 Disparity Study.</p>	<p>Implemented -</p> <p>The PMS procedures manual has been updated. According to the PMS Administration, additional revisions are planned.</p>



Follow-up of the Audit of the District's Procurement Operations: Solicitation, Selection, and Award Processes			
Summary of Finding	Summary of Recommendation	Summary of Corrective Action Planned or Taken	Current Status
<b>Finding No. 2: Reinforce the Process of Receiving and Opening Bids</b>			
<p>School Board Policy 6320 requires that "all purchasing bids will be recorded at the time they are received, showing the bid number, bid title, and the names of the bidders submitting bid forms", and that three staff members from PMS or the District participate in the bid opening meeting where the bids are opened and minutes are taken. Our testing disclosed significant non-compliance with these two stated requirements in Board Policy. Forty-eight of the 51 bids reviewed did not provide evidence of the date and time of their submission; while nine (9) of 12 bid openings reviewed or observed disclosed that less than the three-required number of district staff members participated during the bid opening process.</p>	<p>2.1 PMS staff should enforce the mechanism or process to record and evidence the date and time each bid is submitted and should adhere to School Board Policy regarding the number of staff members required to facilitate the bid opening. The use of an electronic bid system may help address some of these concerns.</p>	<p>PMS' current manual process ensures that all bids are received prior to the bid opening at the deadline of each procurement, and that date and time of receipt are noted if not stamped on the cover of each bid. Board Policy 6320, Purchasing, has been updated to reflect the staff requirements for bid openings that is both proper and manageable given updated Procurement staffing levels. Moving forward PMS is in agreement that 1) bids will always be recorded with date/time received, and 2) two Procurement staff members will be present at each bid opening.</p> <p>Additionally, PMS is beginning the process of implementing a procurement lifecycle system, BidSync, which will be completed in Fall 2019. Along with allowing PMS to track procurement data throughout the lifecycle of each bid, this system will automatically record the date/time of submission for all online bid submissions.</p>	<p>Implemented -</p> <p>We tested 12 bid submittals corresponding to three ITBs and one RFP and found that all had evidence of a time/date stamp.</p> <p>Current Board Policy 6320 requires that at least two PMS staff be assigned to facilitate the public bid opening.</p> <p>We tested four bid solicitations and based on the bid opening documents provided, two PMS staff members were present at each bid opening. In addition, we attended unannounced a bid opening in February 2020, and more than two PMS employees were present.</p>





Follow-up of the Audit of the District's Procurement Operations: Solicitation, Selection, and Award Processes			
Summary of Finding	Summary of Recommendation	Summary of Corrective Action Planned or Taken	Current Status
<b>Finding No. 3: Improve Documentation and Verification in the Award Process</b>			
<p>We found some instances where documentation supporting bidders' qualifications to meet the bid specifications was not located in the master bid file or otherwise provided. From our tests, we determined that the process for verifying and evidencing a bidder's experience and past performance could be improved. We recommend that Exhibit 5 (Bidder Experience), a form included in the bid package, include sections evidencing that the applicable PMS staff initiated that they communicated with the referenced bidder client and verified the accuracy of experience and performance shown on the form.</p>	<p>3.1 PMS staff involved in the bid solicitation process should exercise necessary diligence and review to ensure evidence and proper documentation of the bidder's references, certifications, licenses and other required items are obtained, reviewed and in good order prior to recommending awarding the bid.</p> <p>3.2 Include sections on Exhibit 5 (Bidder Experience) requiring applicable PMS staffs' initials evidencing that they communicated with the referenced client to verify the accuracy of the experience and past performance.</p>	<p>In addition to tightening of existing approvals and adherence to the updated procedures manual - on which all staff will get training - PMS' shift to Bid Sync will ensure no deviation from documentation lapses and automatic capture of necessary data elements.</p> <p>PMS will continue to verify Bidder Experience, Exhibit 5, as part of the bid review process, and agrees with the recommendation to have a sign-off (including staff initials and date/time of verification) on the Exhibit form to ensure possible external verification. The Exhibit has already been updated to reflect this change.</p>	<p>Implemented -</p> <p>We tested 12 bid submittals corresponding to three ITBs and one RFP and found the documentation supporting bidders qualifications to be complete.</p> <p>Partially implemented -</p> <p>Exhibit 5 (Bidder Experience Form) has been changed to include a section where PMS staff signs and dates the form to verify the bidder's experience &amp; past performance.</p> <p>A review of PMS bidders experience verification process for the 12 bidders tested disclosed that in most cases PMS staff signed off on Exhibit 5. In three instances, attempts to contact a reference were made by PMS staff but the reference was not reached or PMS staff received no response from an email, however, no further follow-up was evident. This resulted in one out of three references not verified for one bidder and two out of three references not verified for another bidder for the same solicitation. This requires further attention from the Administration.</p>



Follow-up of the Audit of the District's Procurement Operations: Solicitation, Selection, and Award Processes			
Summary of Finding	Summary of Recommendation	Summary of Corrective Action Planned or Taken	Current Status
			<p>Management's Response –</p> <p>In order to further improve the effectiveness of reference process, the procedure will now require for bidders to return completed forms by companies identified as references, as part of their solicitation submittal. Procurement staff will randomly select a vendor form to verify validity of at least one reference.</p>
Finding No. 4: Enhance the Process of Identifying Bidders that Have Been Convicted of a Public Entity Crime			
<p>PMS utilizes "Exhibit 4 - Florida Statutes On Public Entity Crimes", which is a notarized self-declaration document attesting that the bidder has not been convicted of a public entity crime in Florida for a period of 36 months. The pre-award checklist and award process does not currently include PMS staff reviewing the State of Florida Department of Management Services (DMS) website that provides a list of convicted vendors that have committed a public entity crime.</p> <p>Although no award bidder from our sample was on the current DMS list as of the audit fieldwork, absent a routine process of verifying that bidders/proposers are not on the said list, there is an increased risk that the District could award a vendor in violation of the subject Florida Statute.</p>	<p>4.1 Include in the pre-award checklist a step or procedure to verify that no bidders are listed on the DMS website as having been convicted of a public entity crime in Florida for a period of 36 months.</p>	<p>PMS agrees with both the recommendation and that the current process has ensured that the District has never awarded any firm listed on the DMS website. PMS will continue to require bidders to complete, sign and notarize Exhibit 4, Florida Statutes On Public Entity Crimes. PMS has updated its procedures and pre-award review to include the review of the DMS website for convicted / suspended vendors, which is updated quarterly.</p>	<p>Implemented -</p> <p>The pre-award checklist includes a step that states "Copies of DMS convicted /suspended vendor list". On the four solicitations tested we found evidence of review of the DMS website.</p>




**APPENDIX A**  
**Management's Response**



**MEMORANDUM**

**March 2, 2020**

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

**FROM:** Ron Y. Steiger, Chief Financial Officer   
Financial Services

**SUBJECT: Follow-up Audits of the Offices of Risk & Benefits Management and Procurement Management Services**

Below are management's responses regarding the recommendations contained in the follow-up audits of Risk & Benefits Management and Procurement Management.

**Recommendation - ORBM**

1.1 Contracts should be executed prior to the start of the contract term.

**Management Response:**

Staff from ORBM, the School Board Attorney's Office, the Board's Benefits Consultant, Aon Inc., and Cigna have been actively working on the completion of the new Administrative Services Only (ASO) and Pharmacy Benefits Management (PBM) contract with an effective date of January 1, 2020. Cigna's staff and attorneys are reviewing the District's final edits to the contract and we expect to have a fully executed contract by the March Audit Committee Meeting. Given the complexity of the contract, five months from award to start date is a very aggressive timeframe to complete all necessary negotiations; however, it is not our recommendation to award the next RFP too much earlier in the calendar year as it could harm that year's plan execution, especially if a transition in vendors will be taking place. Starting January 1, 2020, Cigna agreed to honor the lower pricing terms, including a waiver of \$3.7 Million in ASO fees, and all other provisions outlined in their RFP response. While not replacing the need for a contract, this commitment has been given in writing by Cigna.

**Recommendation - ORBM**

2.2 Ensure that the PGA is signed in a timely manner.

**Management Response:**

The Performance Guarantees are incorporated by reference in the ASO and PBM Contract and will become part of the fully executed contract





**Recommendation - PMS**

- 3.2 Include sections on Exhibit 5 (Bidder Experience) requiring applicable PMS staffs' initials evidencing that they communicated with the referenced client to verify the accuracy of the experience and past performance.

**Management Response:**

In order to further improve the effectiveness of reference process, the procedure will now require for bidders to return completed forms by companies identified as references, as part of their solicitation submittal. Procurement staff will randomly select a vendor form to verify validity of at least one reference.

RYS

cc: Mr. Mario De Barros  
Mr. Michael Fox  
Mr. Joseph A. Gomez  
Ms. Charisma Montfort



## Anti-Discrimination Policy

### Federal and State Laws

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

#### **In Addition:**

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

For additional information contact:

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

Miami-Dade County Public Schools



*Internal Audit Report*

*Internal Audit Report  
Follow-Up On Two Performance Audits:  
District's Self-Insured Healthcare Program,  
and District's Procurement Operations:  
Solicitation, Selection, and Award Processes*

**MARCH 2020**

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