

ESCAMBIA COUNTY DISTRICT SCHOOL BOARD

FLORIDA EDUCATION FINANCE PROGRAM (FEFP) FULL-TIME EQUIVALENT (FTE) STUDENTS

AND

STUDENT TRANSPORTATION

For the Fiscal Year Ended June 30, 2006

The governing body of the District is the District School Board, which is composed of five elected members. The executive officer of the Board is the elected Superintendent of Schools. The Board members and Superintendent of Schools who served during the examination period were: Gary L. Bergosh, Chairman; Patricia Hightower, Vice Chair; Pete Gindl, Sr.; Dr. Charles E. Glover, Sr.; Cary Stidham; and Jim Paul, Superintendent.

This examination was conducted by Alice Pounds, CPA, and supervised by J. David Hughes, CPA. Please address inquiries regarding this report to Joseph L. Williams, CPA, Audit Manager, via e-mail at joewilliams@aud.state.fl.us or by telephone at (850) 414-9941.

This report, as well as other audit reports prepared by the Auditor General, can be obtained on our Web site (<u>http://www.state.fl.us/audgen</u>); by telephone at (850) 487-9024; or by mail at G74 Claude Pepper Building, 111 West Madison Street, Tallahassee, Florida 32399-1450.

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Escambia County District School Board Full-Time Equivalent (FTE) Students and Student Transportation **LIST OF ABBREVIATIONS** For the Fiscal Year Ended June 30, 2006

IEP – Individual Educational Plan

EP – Educational Plan

ESE – Exceptional Student Education

LEP - Limited English Proficient

FES – Fluent English Speaking

ESOL - English for Speakers of Other Languages

 \mathbf{PK} – Prekindergarten

OJT - On-the-Job Training

IDEA - Individuals with Disabilities Education Act



WILLIAM O. MONROE, CPA AUDITOR GENERAL

AUDITOR GENERAL

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The President of the Senate, the Speaker of the House of Representatives, and the Legislative Auditing Committee

INDEPENDENT AUDITOR'S REPORT ESCAMBIA COUNTY DISTRICT SCHOOL BOARD FULL-TIME EQUIVALENT (FTE) STUDENTS

We have examined management's assertion, included in its representation letter dated January 22, 2007, that the Escambia County District School Board complied with the State requirements governing the determination and reporting of the number of full-time equivalent (FTE) students under the Florida Education Finance Program (FEFP) for the fiscal year ended June 30, 2006. These requirements are found primarily in Sections 1011.60, 1011.61, and 1011.62, Florida Statutes; State Board of Education Rules, Chapter 6A-1, Florida Administrative Code; and the *FTE General Instructions* issued by the Department of Education. As discussed in the representation letter, management is responsible for the District's compliance with State requirements. Our responsibility is to express an opinion on the District's compliance based on our examination.

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants and the standards applicable to attestation engagements contained in *Government Auditing Standards* issued by the Comptroller General of the United States and, accordingly, included examining, on a test basis, evidence about the District's compliance with the aforementioned State requirements and performing such other procedures as we considered necessary in the circumstances. We believe that our examination provides a reasonable basis for our opinion. The legal determination of the District's compliance with these requirements is, however, ultimately the responsibility of the Department of Education.

Our examination disclosed instances of material noncompliance involving students in ESOL, ESE Support Levels 4 and 5, and Career Education OJT, as follows: 23 of the 88 students in our ESOL sample, 23 of the 219 students in our sample for ESE Support Levels 4 and 5, and 11 of the 81 students in our Career Education OJT sample had exceptions involving reporting errors and records that were not properly and accurately prepared or were missing and could not be located. (See SCHEDULE D: for ESOL, finding Nos. 3, 11, 12, 13, and 16; for ESE Support Levels 4 and 5, finding Nos. 2, 8, 21, 22, 25, 27, 28, 31, 33, 41, and 42; and for Career Education OJT, finding Nos. 14, 19, 37, 39, and 44.)

In our opinion, except for the instances of material noncompliance mentioned above involving the reporting of, and the preparation and maintenance of supporting documentation for, students in ESOL, ESE Support Levels 4 and 5, and Career Education OJT, the Escambia County District School Board complied, in all material respects, with State requirements governing the determination and reporting of the number of full-time equivalent (FTE) students under the Florida Education Finance Program (FEFP) for the fiscal year ended June 30, 2006.

The results of our examination disclosed other instances of noncompliance with the State requirements mentioned above. We considered these instances of noncompliance in forming our opinion regarding management's assertion and these items did not affect our opinion as stated above. All of the instances of noncompliance disclosed by our examination procedures are discussed in SCHEDULE D. The impact of those instances of noncompliance on the District's reported number of full-time equivalent (FTE) students is presented in SCHEDULE A, SCHEDULE B, SCHEDULE C, and SCHEDULE D.

In accordance with *Government Auditing Standards*, we are required to report deficiencies in internal control that are material to management's assertion. The instances of material noncompliance mentioned above are indicative of such deficiencies in the District's internal controls related to the reporting of, and the preparation and maintenance of supporting documentation for, students in ESOL, ESE Support Levels 4 and 5, Career Education OJT. The relevant populations, samples, and exception totals that pertain to these instances of noncompliance are presented in SCHEDULE A herein. We performed our examination to express an opinion on the District's compliance with the State requirements previously mentioned and not for the purpose of expressing an opinion on the District's related internal controls; accordingly, we express no such opinion.

This report is intended for the information of the Legislative Auditing Committee, members of the Florida Senate and the Florida House of Representatives, the State Board of Education, the Department of Education, and the Escambia County District School Board. Copies of this report are available pursuant to Section 11.45(4)(c), Florida Statutes, and its distribution is not limited.

Respectfully submitted,

William O. Momore

William O. Monroe, CPA June 4, 2007

SCHEDULE A

Escambia County District School Board Full-Time Equivalent (FTE) Students **POPULATIONS, SAMPLES, AND TEST RESULTS** For the Fiscal Year Ended June 30, 2006

Description ¹	Number of <u>Schools</u>	% of <u>Pop. (</u>	Number of Students w/Exceptions)	% of Pop. <u>(Sample)</u>	Number of <u>Un</u> weighted <u>FTE</u> ²	% of Pop. <u>(Sample)</u>
1. Basic						
Population ³	74	100.00%	15,274	100.00%	31,181.0100	100.00%
Sample Size	23	31.08%	515	3.37%	427.8976	1.37%
Students w/Exce		-	(10)	(1.94%)	-	-
Net Audit Adjust		-	-	-	59.5765	-
2. <u>Basic with ESE S</u>						
Population ³	76	100.00%	4,301	100.00%	9,168.4500	100.00%
Sample Size ⁴	. 24	31.58%	384	8.93%	335.2511	3.66%
Students w/Excep		-	(22)	(5.73%)	-	-
Net Audit Adjust	ments ⁵ -	-	-	-	(23.3812)	-
3. <u>ESOL</u>						
Population ³	8	100.00%	300	100.00%	246.2300	100.00%
Sample Size₄	6	75.00%	88	29.33%	53.4400	21.70%
Students w/Exce	ptions -	-	(23)	(26.14%)	-	-
Net Audit Adjust	ments ⁵ -	-	-	-	(11.9050)	-
A ESE Service and Lee	1- 4 1 5					
4. <u>ESE Support Lev</u> Population ³	27	100.00%	414	100.00%	419.1700	100.00%
Sample Size	27 14	51.85%	219	52.90%	184.4800	44.01%
Students w/Exce			(23)	(10.50%)		
Net Audit Adjust		-	(23)	(10.50%)	- (9.4800)	-
Thet Audit Aujust	-	-	-	-	(9.4600)	-
5. Career Education	<u>n 9-12</u>					
Population ³	15	100.00%	314	100.00%	1,653.6300	100.00%
Sample Size₄	6	40.00%	81	25.80%	22.0895	1.34%
Students w/Exce	ptions -	-	(11)	(13.58%)	-	-
Net Audit Adjust	ments ⁵ -	-	-	-	(25.3117)	-
<u>All Programs</u>						
Population ³	78	100.00%	20,603	100.00%	42,668.4900	100.00%
Sample Size₄	25	32.05%	1,287	6.25%	1,023.1582	2.40%
Students w/Exce		-	(89)	(6.92%)	-	-
Net Audit Adjust	ments ⁵ -	-	-	-	(10.5014)	-

Escambia County District School Board Full-Time Equivalent (FTE) Students POPULATIONS, SAMPLES, AND TEST RESULTS

For the Fiscal Year Ended June 30, 2006

Description ¹	Number	%	Number	% of
	of	of	of Teachers	Pop.
	<u>Schools</u>	<u>Pop.</u>	<u>(w/Exceptions)</u>	<u>(Sample)</u>
<u>Teachers</u> Population ³ Sample Size ⁴ Teachers w/Exceptions	78 25	100.00% 32.05%	471 196 (9)	100.00% 41.61% (4.59%)

¹ See NOTE A6.

- ² Unweighted full-time equivalent (FTE) students represents FTE prior to the application of the applicable cost factor for each program. (See SCHEDULE B and NOTE A4.)
- ³ The population shown for the number of schools is the total number of schools in the District which offered the courses in the program specified (i.e., Basic, ESOL, ESE, and Career Education). The population shown for the number of students is the total number of students in each program at the schools in our sample. Our Career Education sample was limited to those students who participated in OJT. The population shown for full-time equivalent (FTE) students is the total FTE for all of the District's schools (sample schools plus nonsample schools) as reported for each survey conducted for the fiscal year ended June 30, 2006. The population shown for teachers is the total number of teachers at our sample schools who taught courses in ESE or Career education or taught courses to LEP students. (See NOTE A5.)

⁴ See NOTE B.

⁵ Our audit adjustments present the net effects of the instances of noncompliance disclosed by our examination procedures, including those related to our tests of teacher certification. Our audit adjustments generally reclassify reported FTE to Basic education, except for noncompliance involving a student's enrollment or attendance, in which case the audit adjustments take the reported FTE to zero.

SCHEDULE B

Escambia County District School Board Full-Time Equivalent (FTE) Students EFFECT OF AUDIT ADJUSTMENTS ON WEIGHTED FTE (For Illustrative Purposes Only)

For the Fiscal Year Ended June 30, 2006

No. Program ¹	Net Audit <u>Adjustment</u> ²	Cost <u>Factor</u>	Weighted <u>FTE</u> ³
101 Basic K-3	3.6000	1.018	3.6648
102 Basic 4-8	20.6386	1.000	20.6386
103 Basic 9-12	35.3379	1.113	39.3311
111 Grades K-3 with ESE Services	(2.5784)	1.018	(2.6248)
112 Grades 4-8 with ESE Services	(7.1763)	1.000	(7.1763)
113 Grades 9-12 with ESE Services	(13.6265)	1.113	(15.1663)
130 ESOL	(11.9050)	1.318	(15.6908)
254 ESE Support Level 4	(4.0000)	3.818	(15.2720)
255 ESE Support Level 5	(5.4800)	5.190	(28.4412)
300 Career Education 9-12	<u>(25.3117</u>)	1.193	<u>(30.1969</u>)
Total	<u>(10.5014</u>)		<u>(50.9338</u>)

¹ See NOTE A6.

² These adjustments are for <u>un</u>weighted FTE. (See SCHEDULE C.)

³ Weighted FTE adjustments are presented for illustrative purposes only; they do not take special program caps or allocation factors into consideration and are not intended to indicate the FTE used to compute the dollar value of audit adjustments. That computation is the responsibility of the Department of Education. (See NOTE A4.)

SCHEDULE C

Escambia County District School Board Full-Time Equivalent (FTE) Students **AUDIT ADJUSTMENTS BY SCHOOL** For the Fiscal Year Ended June 30, 2006

Audit Adjustments1 District-Balance Wide No. Program #0151 <u>#0211</u> Forward 101 Basic K-3 .0000 102 Basic 4-8 (.4480)5.9854 2.0000 7.5374 103 Basic 9-12 (.1680)(.1680)..... 111 Grades K-3 with ESE Services .0000 ••••• ••••• ••••• 112 Grades 4-8 with ESE Services (.1456)1.5000 (2.0000)(.6456)113 Grades 9-12 with ESE Services (.0336)(.0336)••••• 130 ESOL (5.9854)(5.9854)..... 254 ESE Support Level 4 (1.5000)(1.5000)..... 255 ESE Support Level 5 .0000 300 Career Education 9-12 .0000 <u>....</u> <u>....</u> <u>....</u> .0000 Total (.7952) .0000 (.7952)

Escambia County District School Board Full-Time Equivalent (FTE) Students AUDIT ADJUSTMENTS BY SCHOOL For the Fiscal Year Ended June 30, 2006

Audit Adjustments1 Program Brought Balance <u>#0281</u> <u>No.</u> Forward <u>#0221</u> #0301 <u>#0381</u> Forward 101 .0000 1.0000 1.0000 102 7.5374 5.9408 14.9782 .5000 1.0000..... 103 (.1680)1.0000 .8320 111 .0000 (.0200)(.0200)..... 112 (.5000)(.6456)(4.9408)(6.0864)..... 113 (.0336)(1.0000)(1.0336)..... 130 (5.9854)(2.0000)(7.9854)..... 254 (1.5000)(1.0000)(2.5000)..... 255 .0000 .0000 300 .0000 .0000 <u>.....</u> <u>.....</u> <u>.....</u> <u>....</u> Total <u>(.7952</u>) .0000 .0000 .0000 (.0200)(.8152)

Escambia County District School Board Full-Time Equivalent (FTE) Students AUDIT ADJUSTMENTS BY SCHOOL For the Fiscal Year Ended June 30, 2006

Audit Adjustments1 Program Brought Balance No. Forward <u>#0411</u> #0461 <u>#0471</u> #0521 Forward 101 1.0000 .5000 1.5000 102 14.9782 .4998 15.4780 103 10.9150 .8320 5.5830 4.5000 111 (.0200)(.5200)(.5400)..... 112 (6.0864)(6.0864)••••• ••••• ••••• 113 (4.5000)(1.0336)(3.9984)(9.5320)..... 130 (7.9854)(1.5846)(.4998)(10.0698)..... 254 (2.5000)(2.5000)..... 255 .0000 .0000 300 .0000 <u>(.0830</u>) <u>(.0132</u>) <u>(.0962</u>) <u>....</u> <u>....</u> Total (.8152) (.0830).0000 (.0200)<u>(.0132</u>) (.9314)

Escambia County District School Board Full-Time Equivalent (FTE) Students AUDIT ADJUSTMENTS BY SCHOOL For the Fiscal Year Ended June 30, 2006

Audit Adjustments1 Program Brought Balance <u>No.</u> Forward <u>#0551</u> <u>#0581</u> #0601 #0602 Forward 101 1.5000 1.6000 .5000 3.6000 102 15.4780 3.7334 .6272 19.8386 103 10.9150 10.9150 ••••• 111 (.5400).4900 .4500 1.5000(1.0000)..... 112 2.6080 (6.0864)(3.3034)(.5000)(7.2818)..... 113 (9.5320)(9.5320)..... 130 (10.0698)(1.6000)(11.9050)(.2352)..... 254 (2.5000)(1.5000)1.0000(3.0000).0000 (6.0000)255 .0000 (.4800)(.5000)(.9800)..... 300 <u>(.0962</u>) (.0962) <u>.....</u> <u>.....</u> <u>.....</u> <u>.....</u> Total (.0500)<u>(.9314</u>) .0000 .0000 (.0100) <u>(.9914</u>)

Escambia County District School Board Full-Time Equivalent (FTE) Students AUDIT ADJUSTMENTS BY SCHOOL For the Fiscal Year Ended June 30, 2006

Audit Adjustments1 Program Brought Balance No. Forward <u>#0791</u> #0851 #0862 #0922 Forward 101 3.6000 3.6000 102 19.8386 19.8386 ••••• 103 10.9150 .5838 .5000 (1.5830)10.4158 111 .4500 (3.0284)(2.5784)..... 112 (7.2818)1.0000(6.2818)..... ••••• 113 (9.5320)(.5000)(1.5000)(11.5320)..... 130 (11.9050)(11.9050)..... 254 (6.0000)(1.0000).5000 (6.5000)..... 255 (.9800)(1.5000)(2.4800)..... 300 <u>(.0962</u>) (.3328) (1.0989) (.5838) (2.1117) <u>.....</u> Total <u>(.9914</u>) (4.0284)(.3328) (4.1819) .0000 (9.5345)

Escambia County District School Board Full-Time Equivalent (FTE) Students AUDIT ADJUSTMENTS BY SCHOOL For the Fiscal Year Ended June 30, 2006

Audit Adjustments1 Program Brought <u>No.</u> Forward <u>#0924</u> <u>#1251</u> #2019 <u>Total</u> 101 3.6000 3.6000 102 19.8386 20.6386 .8000 103 10.4158 1.2221 35.3379 23.7000 111 (2.5784)(2.5784)..... 112 (6.2818)(.8945)(7.1763)..... 113 (11.5320).5000 (.5000)(2.0945)(13.6265)130 (11.9050)(11.9050)..... 254 (6.5000)2.5000 (4.0000)..... 255 (2.4800)(3.0000)(5.4800)..... 300 (2.1117) (23.2000) (25.3117) <u>.....</u> <u>.....</u> Total <u>(9.5345</u>) .0000 .0000 <u>(.9669</u>) (10.5014)

SCHEDULE D

Escambia County District School Board Full-Time Equivalent (FTE) Students FINDINGS AND AUDIT ADJUSTMENTS For the Fiscal Year Ended June 30, 2006

Overview

Management is responsible for determining and reporting the number of full-time equivalent (FTE) students under the Florida Education Finance Program (FEFP) in compliance with State requirements. These requirements are found primarily in Sections 1011.60, 1011.61, and 1011.62, Florida Statutes; State Board of Education Rules, Chapter 6A-1, Florida Administrative Code; and the *FTE General Instructions* issued by the Department of Education. Except for instances of material noncompliance involving students in ESOL, ESE Support Levels 4 and 5, and Career Education OJT, the Escambia County District School Board complied, in all material respects, with State requirements governing the determination and reporting of FTE for the fiscal year ended June 30, 2006. All of the instances of noncompliance disclosed by our examination procedures are discussed below and require management's attention and action, as recommended on page 29.

Net Audit Adjustments (Unweighted FTE)

Findings

Our examination included the July and October 2005 surveys and the February and June 2006 surveys. (See NOTE A5.) Unless otherwise specifically stated, the findings and audit adjustments presented herein are for the October 2005 survey or the February 2006 survey or both. Accordingly, our findings do not mention specific surveys unless necessary for a complete understanding of the instances of noncompliance being disclosed.

900 Instructional Hours Not Provided

1. [Ref. 149] Two schools, O.J. Semmes Elementary School (#0471) and Sid	
Nelson Learning Center (#0791), did not make up instructional time that was lost due to	
Hurricane Katrina; consequently, the schools provided only 881 and 895 hours of annual	
instruction, respectively, rather than the required 900 hours. We made the following	
audit adjustment:	
402 D : 40	

102 Basic 4-8	(.4480)	
103 Basic 9-12	(.1680)	
112 Grades 4-8 with ESE Services	(.1456)	
113 Grades 9-12 with ESE Services	<u>(.0336</u>)	<u>(.7952</u>)

(.7952)

Escambia County District School Board Full-Time Equivalent (FTE) Students FINDINGS AND AUDIT ADJUSTMENTS For the Fiscal Year Ended June 30, 2006

Findings

Brownsville Middle School (#0151)

2. [Ref. 15101] <u>We noted exceptions involving two ESE students</u>. One student was not reported in accordance with the student's *Matrix of Services* form, and the *Matrix* form for the other student was not updated for changes to the ESE services authorized by the student's IEP. We made the following audit adjustment:

112 Grades 4-8 with ESE Services	1.5000
254 ESE Support Level 4	<u>(1.5000</u>)

3. [Ref. 15102/03] <u>The reported number of instructional minutes for certain class</u> periods in the course schedules of 12 LEP students did not agree with the minutes designated for those class periods by the School's bell schedule. The effect of this reporting error resulted in the students being over-reported in program No. 130 (ESOL) and under-reported in program No. 102 (Basic 4-8) (Ref. 15102). We also noted the following exceptions for 7 of these 12 students (Ref. 15103):

- a. <u>The files for two students were missing and could not be located.</u>
- b. The parents of one student were not notified of their child's placement in ESOL.
- c. <u>Three students were beyond the six-year period allowed for State funding of</u> <u>ESOL</u>. We also noted that the file for one of these students did not contain documentation supporting the student's continued placement in ESOL.
- d. <u>One student's LEP Student Plan</u> was not reviewed and updated for the 2005-06 school year.

We made the following audit adjustments:

_ _ . _ . . .

<u>Ref. 15102</u>		
102 Basic 4-8	.1036	
130 ESOL	<u>(.1036</u>)	.0000

The accompanying notes are an integral part of this schedule.

Net Audit Adjustments (Unweighted FTE)

.0000.

Escambia County District School Board Full-Time Equivalent (FTE) Students **FINDINGS AND AUDIT ADJUSTMENTS** For the Fiscal Year Ended June 30, 2006

Findings	Net Audit Adjustments <u>(Unweighted FTE)</u>
Brownsville Middle School (#0151) (Continued)	
Ref. 15103 2.3474 102 Basic 4-8 2.3474 130 ESOL (2.3474)	.0000
4. [Ref. 15171] One teacher was not properly certified and was not approved by	
the School Board to teach out-of-field. We also noted that parents of the students	
taught by this teacher were not notified of the teacher's out-of-field status. We made the	
following audit adjustment:	
102 Basic 4-8 3.5344 130 ESOL (3.5344)	<u>.0000</u>
	.0000
A. V. Clubbs Center (#0211)	
5. [Ref. 21101] Four Gifted ESE students in program No. 112 (Grades 4-8 with ESE Services) were not provided Gifted instruction. We made the following audit adjustment:	
102 Basic 4-8 2.0000 112 Grades 4-8 with ESE Services (2.0000)	<u>.0000</u>
	.0000
Ransom Middle School (#0221)	
6. [Ref. 22101] The file for one ESE student did not contain an IEP that covered	
the reporting survey. We made the following audit adjustment:	
102 Basic 4-8 .5000 112 Grades 4-8 with ESE Services (.5000)	<u>.0000</u> .0000
	.0000

Escambia County District School Board Full-Time Equivalent (FTE) Students FINDINGS AND AUDIT ADJUSTMENTS For the Fiscal Year Ended June 30, 2006

<u>Findings</u>	Net Audit Adjustments <u>(Unweighted FTE)</u>
Escambia High School (#0281)	
7. [Ref. 28101] <u>One student was reported as Gifted, but had been dismissed from</u> the Gifted program in the prior school year. We made the following audit adjustment:	
103 Basic 9-12 1.0000 113 Grades 9-12 with ESE Services (1.0000)	<u>.0000</u>
<u>Ferry Pass Middle School (#0301)</u>	<u>.0000</u>
8. [Ref. 30101] <u>One ESE student was not reported in accordance with the</u> student's <i>Matrix of Services</i> form. We made the following audit adjustment:	
112 Grades 4-8 with ESE Services 1.0000 254 ESE Support Level 4 (1.0000)	.0000
9. [Ref. 30171] <u>One teacher was not properly certified and was not approved by</u> the School Board to teach out-of-field. We also noted that the parents of the students concerned were not notified of the teacher's out-of-field status. We made the following <u>audit adjustment</u> :	
102 Basic 4-8 5.9408 112 Grades 4-8 with ESE Services (5.9408)	<u>.0000</u> .0000
Navy Point Elementary School (#0381)	
10.[Ref. 38101] One part-time ESE student, who was scheduled only for SpeechTherapy, did not attend school during the 11-day survey window and should not havebeen reported with the survey's results. We made the following audit adjustment:111 Grades K-3 with ESE Services(.0200)	(0200)
111 Grades K-3 with ESE Services (.0200)	(.0200)

Escambia County District School Board Full-Time Equivalent (FTE) Students **FINDINGS AND AUDIT ADJUSTMENTS** For the Fiscal Year Ended June 30, 2006

<u>Findin</u>	<u>gs</u>	Net Audit Adjustments <u>(Unweighted FTE)</u>
<u>Navy I</u>	Point Elementary School (#0381) (Continued)	
	[Ref. 38102] <u>The LEP Committee for one LEP student did not consider at least</u> the ESOL-placement criteria specified by State Board of Education Rule 6A- 2)(a)3., Florida Administrative Code. We made the following audit adjustment:	
	102 Basic 4-8 1.0000 130 ESOL (1.0000)	.0000
12.	[Ref. 38103] The LEP file for one LEP student was missing and could not be	
located	. We made the following audit adjustment:	
	101 Basic K-3 1.0000 130 ESOL (1.0000)	<u>.0000</u> (.0200)
Pensad	cola High School (#0411)	
13. <u>ESOL</u> :	[Ref. 41101] We noted the following exceptions involving four students in	
a.	Two students should not have been reported in ESOL because they were FES and competent readers and writers. We also noted that one of the students was beyond the six-year period allowed for State funding of ESOL.	
b.	The LEP Committee Meeting Form authorizing one student's continued placement in ESOL was signed by only one of the three District personnel required.	
c.	The parents of one student in the October 2005 survey were not notified of their child's ESOL-placement until November 22, 2005.	
<u>We ma</u>	de the following audit adjustment:	
	103 Basic 9-121.5846130 ESOL(1.5846)	.0000

Escambia County District School Board Full-Time Equivalent (FTE) Students FINDINGS AND AUDIT ADJUSTMENTS For the Fiscal Year Ended June 30, 2006

<u>Findings</u>	Net Audit Adjustments <u>(Unweighted FTE)</u>
Pensacola High School (#0411) (Continued)	
14. [Ref. 41102] The timecard for one Career Education student in OJT was	
missing and could not be located. We made the following audit adjustment:	
300 Career Education 9-12 (.0830)	(.0830)
15. [Ref. 41171] The parents of the students taught by one out-of-field teacher	
during the school term covered by the October 2005 survey were not notified of the	
teacher's out-of-field status until February 2, 2006. We made the following audit	
adjustment:	
103 Basic 9-12 3.9984 113 Grades 9-12 with ESE Services (3.9984)	<u>.0000</u>
	<u>(.0830</u>)
Scenic Heights Elementary School (#0461)	
16. [Ref. 46101] The Basic subject area courses taken by five LEP students were	
incorrectly reported in ESOL. None of the courses concerned was ESOL-eligible. We	
made the following audit adjustment:	
102 Basic 4-8 .4998 130 ESOL (.4998)	.0000
	<u>.0000</u>
O. J. Semmes Montessori Academy (#0471)	
17. [Ref. 47101] The file for one ESE student did not contain an IEP covering the	
reporting survey. We made the following audit adjustment:	
101 Basic K-3 .5000 111 Grades K-3 with ESE Services (.5000)	.0000

Escambia County District School Board Full-Time Equivalent (FTE) Students **FINDINGS AND AUDIT ADJUSTMENTS** For the Fiscal Year Ended June 30, 2006

<u>Findings</u>	Net Audit Adjustments <u>(Unweighted FTE)</u>
O. J. Semmes Montessori Academy (#0471) (Continued)	
18. [Ref. 47102] <u>One part-time ESE student, who was enrolled for one hour of</u> Speech Therapy per week, was not provided therapy during the 11-day window of the reporting survey. We made the following audit adjustment:	
111 Grades K-3 with ESE Services (.0200)	<u>(.0200</u>)
	<u>(.0200</u>)
J. M. Tate Senior High School (#0521)	
19. [Ref. 52101] <u>One student in OJT was reported for more OJT time than was</u> supported by the student's timecard. We made the following audit adjustment:	
300 Career Education 9-12 (.0132)	(.0132)
20. [Ref. 52102] The files for five ESE students did not contain evidence that the students' general education teachers had participated in the development of the students' IEPs. We made the following audit adjustment:	
103 Basic 9-12 4.5000 113 Grades 9-12 with ESE Services (4.5000)	<u>.0000</u>
	<u>(.0132</u>)

Warrington Elementary School (#0551)

21. [Ref. 55102] <u>One part-time ESE student in the Hospital and Homebound</u> program was reported incorrectly in program No. 255 (ESE Support Level 5) for both the student's on-campus instruction and the student's intermittent homebound instruction. According to the student's *Matrix of Services* form, only the student's intermittent homebound instruction should have been reported in program No. 255. We made the following audit adjustment:

Escambia County District School Board Full-Time Equivalent (FTE) Students FINDINGS AND AUDIT ADJUSTMENTS For the Fiscal Year Ended June 30, 2006

<u>Findings</u>	Net Audit Adjustments <u>(Unweighted FTE)</u>
Warrington Elementary School (#0551) (Continued)	
112 Grades 4-8 with ESE Services .4300 255 ESE Support Level 5 (.4800)	(.0500)
22. [Ref. 55103] We noted exceptions involving two ESE students. The Matrix of	
Services form for one student had been changed to show increased scores for two	
Domains; however, no specific services were indicated in those Domains and the	
increased scores were not supported by explanatory notes, and were not initialed and	
dated. The Matrix form for the second student was incorrectly totaled to 18 points. It	
should have been totaled to 15 points. We made the following audit adjustment:	
111 Grades K-3 with ESE Services 1.5000 254 ESE Support Level 4 (1.5000)	.0000
23. [Ref. 55171] <u>One teacher did not hold a Florida teaching certificate. We made</u> the following audit adjustment:	
102 Basic 4-8 3.7334 112 Grades 4-8 with ESE Services (3.7334)	.0000
24. [Ref. 55172] One teacher did not earn the 60 in-service training points required	
in ESOL strategies pursuant to the teacher's in-service training timeline. We made the	
following audit adjustment:	
101 Basic K-3 1.6000 130 ESOL (1.6000)	<u>.0000</u>
	<u>(.0500</u>)

West Pensacola Elementary School (#0581)

25. [Ref. 58101] <u>Two ESE students were not reported in accordance with their</u> <u>Matrix of Services forms.</u> We made the following audit adjustment:

Escambia County District School Board Full-Time Equivalent (FTE) Students **FINDINGS AND AUDIT ADJUSTMENTS** For the Fiscal Year Ended June 30, 2006

<u>Findings</u>	Net Audit Adjustments <u>(Unweighted FTE)</u>	
West Pensacola Elementary School (#0581) (Continued)		
111 Grades K-3 with ESE Services (.5000) 254 ESE Support Level 4 1.0000 255 ESE Support Level 5 (.5000)	.0000	
26. [Ref. 58102] The file for one ESE student did not contain an IEP covering the		
reporting survey. We made the following audit adjustment:		
101 Basic K-3 .5000 111 Grades K-3 with ESE Services (.5000)	<u>.0000</u>	
	.0000	
J. H. Workman Middle School (#0601)		
27. [Ref. 60102] The Matrix of Services forms for two ESE students were not		
reviewed and updated when the students' new IEPs were developed. We made the		
following audit adjustment:		
112 Grades 4-8 with ESE Services 2.0000 254 ESE Support Level 4 (2.0000)	.0000	
28. [Ref. 60103] One ESE student was not reported in accordance with the		
student's Matrix of Services form. We made the following audit adjustment:		
112 Grades 4-8 with ESE Services 1.0000 254 ESE Support Level 4 (1.0000)	.0000	
29. [Ref. 60104] Our examination procedures included an automated comparison of		
the course numbers reported in program No. 130 (ESOL) to the course numbers		
designated as eligible for that program by the Department of Education. The results of		
the tests disclosed that two courses were reported incorrectly in ESOL. We made the		
following audit adjustment:		

Escambia County District School Board Full-Time Equivalent (FTE) Students FINDINGS AND AUDIT ADJUSTMENTS For the Fiscal Year Ended June 30, 2006

<u>Findin</u>	<u>gs</u>	Net Audit Adjustments <u>(Unweighted FTE)</u>
<u>J. H. V</u>	Vorkman Middle School (#0601) (Continued)	
	102 Basic 4-8 .2352 130 ESOL (.2352)	.0000
30.	[Ref. 60171] One teacher was not properly certified and was not approved by	
<u>the Sch</u>	ool Board to teach out-of-field. We made the following audit adjustment:	
	102 Basic 4-8 .3920 112 Grades 4-8 with ESE Services (.3920)	<u>.0000</u> .0000
<u>Reinh</u>	ardt Holm Elementary School (#0602)	
31.	[Ref. 60201] Two ESE students were not reported in accordance with their	
<u>Matrix</u>	of Services forms. We made the following audit adjustment:	
	111Grades K-3 with ESE Services.5000112Grades 4-8 with ESE Services(.5000)254ESE Support Level 4.5000254ESE Support Level 4(.5000)	.0000
32.	[Ref. 60202] One ESE student in the October survey was reported incorrectly	
<u>for 90 </u>	minutes of instruction. The student should have been reported for 60 minutes of	
instruct	tion. We made the following audit adjustment:	
	111 Grades K-3 with ESE Services (.0100)	<u>(.0100)</u> <u>(.0100</u>)
Sid Nelson Community Learning Center (#0791)		
33.	[Ref. 79101] We noted exceptions involving three ESE students, as follows:	
a.	The Matrix of Services form for one full-time student in program No. 254 (ESE	
	Support I avail (1) was not reviewed and undered when the student's new IED	

Support Level 4) was not reviewed and updated when the student's new IEP was developed.

Escambia County District School Board Full-Time Equivalent (FTE) Students FINDINGS AND AUDIT ADJUSTMENTS For the Fiscal Year Ended June 30, 2006

<u>Findings</u>	Net Audit Adjustments <u>(Unweighted FTE)</u>
Sid Nelson Community Learning Center (#0791) (Continued)	
b. <u>One student was enrolled on a part-time basis for Speech Therapy two days a</u> week, but did not receive any therapy during the 11-day window of the reporting survey.	
c. The course schedule for one part-time student was overstated. The student was reported for 90 minutes of instruction per week, but was provided only 45 minutes.	
We made the following audit adjustment:	
111 Grades K-3 with ESE Services .9716 254 ESE Support Level 4 (1.0000)	(.0284)
34. [Ref. 79171] One teacher was not properly certified and was not approved by	
the School Board to teach out-of-field. We also noted that the parents of the students	
taught by this teacher were not notified of the teacher's out-of-field status. We made the	
following audit adjustment:	
103 Basic 9-12 .5838 300 Career Education 9-12 (.5838)	.0000
35. [Ref. 79172] The parents of the students taught by one out-of-field teacher were	
not notified of the teacher's out-of-field status. We made the following audit	
adjustment:	
111 Grades K-3 with ESE Services (4.0000)	<u>(4.0000</u>)
	<u>(4.0284</u>)
W. J. Woodham High School (#0851)	

36. [Ref. 85101] <u>The file for one ESE student did not contain an IEP covering the</u> reporting survey. We made the following audit adjustment:

Escambia County District School Board Full-Time Equivalent (FTE) Students FINDINGS AND AUDIT ADJUSTMENTS For the Fiscal Year Ended June 30, 2006

Findir	<u>ıgs</u>		Net Audit Adjustments <u>(Unweighted FTE)</u>
<u>W. J. V</u>	Woodham High School (#0851) (Continued)		
	103 Basic 9-12113 Grades 9-12 with ESE Services	.5000 <u>(.5000</u>)	.0000
37.	[Ref. 85102] The timecards for two students in OJT were not signed	<u>by the</u>	
studen	ts' employers; consequently, the students' OJT time was not adequately supp	ported.	
<u>We ma</u>	de the following audit adjustment:		
	300 Career Education 9-12	<u>(.3328</u>)	<u>(.3328</u>)
			<u>(.3328</u>)
Pine Forest High School (#0862)			
38.	[Ref. 86201] The file for one ESE Gifted student did not contain an E	EP that	
was va	lid for the reporting survey. We made the following audit adjustment:		
		1.0000 <u>1.0000</u>)	.0000
39.	[Ref. 86202] We noted the following exceptions for four students in OJT:		
a.	The timecards for two students were not signed by the students' supervise	ors.	
b.	The timecards for two students in the October survey indicated the students did not work during that survey. We also noted that the time covering the February survey for one of the students was missing and combe located.	mecard	
<u>We ma</u>	de the following audit adjustment:		
	300 Career Education 9-12	<u>(.6819</u>)	(.6819)

Escambia County District School Board Full-Time Equivalent (FTE) Students FINDINGS AND AUDIT ADJUSTMENTS For the Fiscal Year Ended June 30, 2006

Findings

Pine Forest High School (#0862) (Continued)

40. [Ref. 86203] District policy required that all schools prepare and maintain attendance source documents signed and dated by the teachers concerned. Pine Forest High School (#0862) did not comply with this policy, but instead used an automated system that required each teacher to take and input student attendance directly on-line using the teacher's classroom computer. However, there were no procedures in place to ensure that each teacher did this on a daily basis and, if a teacher did not take attendance, the system showed each student in that teacher's classroom as being present for that particular class period.

We noted that seven late-arriving students were shown in the automated system as present for one or more class periods during a school day in the 11-day survey window, but were not shown on the manually prepared check-in lists used to document latearriving students. Given the lack of attendance source documents and assurance that student attendance was consistently taken on a daily basis by each teacher, as discussed above, we concluded that the attendance of these seven students was not adequately supported.

We made the following audit adjustment:

103 Basic 9-12	(2.5830)
113 Grades 9-12 with ESE Services	(.5000)
300 Career Education 9-12	<u>(.4170</u>)

Escambia Westgate Center (#0922)

41. [Ref. 92201] <u>We noted exceptions involving two ESE students.</u> One student was not reported in accordance with the student's *Matrix of Services* form. The other student had two conflicting *Matrix* forms, each dated August 2, 2005: one supported ESE Support Level 4 and the other supported ESE Support Level 5. We were unable to determine which *Matrix* form was correct. We made the following audit adjustment:

> *The accompanying notes are an integral part of this schedule.* -25

Net Audit Adjustments (Unweighted FTE)

> <u>(3.5000</u>) <u>(4.1819</u>)

Escambia County District School Board Full-Time Equivalent (FTE) Students FINDINGS AND AUDIT ADJUSTMENTS For the Fiscal Year Ended June 30, 2006

Net Audit Adjustments **Findings** (Unweighted FTE) Escambia Westgate Center (#0922) (Continued) 112 Grades 4-8 with ESE Services 1.0000 254 ESE Support Level 4 .5000 255 ESE Support Level 5 (1.5000).0000 .0000 Lakeview Special Education (#0924) [Ref. 92401] We noted the following exceptions for seven ESE students in the 42. October and February surveys: One student in the October survey was not reported in accordance with the a. student's Matrix of Services form. b. The Matrix of Services forms for five students in the February survey incorrectly included one Special Considerations point designated for students with a Level 5 rating in four Domains. These five students had a Level 5 rating in only three Domains. We also noted that one of five students, who was also in the October

survey, was not reported in accordance with the student's Matrix form covering that survey.

The file for one student in the February survey did not contain a Matrix form c. covering that survey.

We made the following audit adjustment:

.5000	
2.5000	
<u>(3.0000</u>)	<u>.0000</u>
	2.5000

W. Florida High School of Advanced Tech. (#1251)

43.	[Ref. 125101] The file for one ESE student did not contain an EP covering the
<u>reportir</u>	ng survey. We made the following audit adjustment:

103 Basic 9-12	.5000	
113 Grades 9-12 with ESE Services	<u>(.5000</u>)	.0000
The accompanying notes are an integral p	part of this schedule.	

.0000

-26-

Escambia County District School Board Full-Time Equivalent (FTE) Students FINDINGS AND AUDIT ADJUSTMENTS For the Fiscal Year Ended June 30, 2006

Findings	Net Audit Adjustments <u>(Unweighted FTE)</u>
W. Florida High School of Advanced Tech. (#1251) (Continued)	
44. [Ref. 125102] <u>The reported course schedules for 242 students (3 of whom were</u> in our Career Education OJT sample) incorrectly listed a 150-minute non-credit study	
hall in program No. 300 (Career Education). The study hall minutes should have been	
reported in program No. 103 (Basic 9-12) using a study hall course number. We made	
the following audit adjustment:	
103 Basic 9-12 23.2000 300 Career Education 9-12 (23.2000)	<u>.0000</u>
	.0000
Escambia Bay Marine Institute (#2019)	
45. [Ref. 201902] Five students (one in July, one in October, and three in June) were	
either not in membership (one student) during the reporting survey or not in attendance	
(four students) during the 11-day survey window and should not have been reported.	
We made the following audit adjustment:	
103 Basic 9-12 (.7779) 112 Grades 4-8 with ESE Services (.0945) 113 Grades 9-12 with ESE Services (.0945)	(.9669)
46. [Ref. 201971] We noted the following exceptions involving one out-of-field	
ESE teacher in the February survey: (1) the teacher, who held certification in Business	

ESE teacher in the February survey: (1) the teacher, who held certification in Business Education, was not approved by the Charter School Board to teach ESE out-of-field; and (2) the parents of the ESE students concerned were not notified of the teacher's out-of-field status. We noted that the teacher was issued ESE certification on February 16, 2006; however, since this was six days after the end of the February survey, the certification was not effective at that time. We made the following audit adjustment:

Escambia County District School Board Full-Time Equivalent (FTE) Students FINDINGS AND AUDIT ADJUSTMENTS For the Fiscal Year Ended June 30, 2006

FindingsNet Audit
Adjustments
(Unweighted FTE)Escambia Bay Marine Institute (#2019)
102 Basic 4-8(Continued)102 Basic 4-8.8000103 Basic 9-122.0000112 Grades 4-8 with ESE Services(.8000)113 Grades 9-12 with ESE Services(.2000)(.9669)

(10.5014)

<u>SCHEDULE E</u>

Escambia County District School Board Full-Time Equivalent (FTE) Students **RECOMMENDATIONS AND REGULATORY CITATIONS** For the Fiscal Year Ended June 30, 2006

Recommendations

We recommend that management exercise more care and take corrective action, as appropriate, to ensure that: (1) student course schedules are reported in accordance with each school's bell schedule; (2) only eligible courses are reported for funding in ESOL; (3) FTE is correctly calculated for all reported students, particularly with regard to students in the Hospital and Homebound program who were provided both on-campus instruction and homebound instruction; (4) only enrolled students who were in attendance at least one day during the 11-day survey window are reported for FEFP-funding; (5) timecards for students in OJT are properly completed and retained in readily accessible files and the course schedules for those students are accurately reported; (6) students are reported in the proper funding categories and have adequate documentation to support that reporting, particularly with regard to students in ESOL and ESE; (7) teachers are properly certified or, if out-of-field, have appropriate School Board approval and parental notification; and (8) teachers earn the number of in-service training points required in ESOL strategies, pursuant to their in-service training timelines.

The absence of statements in this report regarding practices and procedures followed by the District should not be construed as acceptance, approval, or endorsement of those practices and procedures. Additionally, the specific nature of this report does not limit or lessen the District's obligation to comply with all State requirements governing full-time equivalent (FTE) students and the Florida Education Finance Program (FEFP).

Regulatory Citations

<u>Attendance</u>

Section 1003.23, F.S.Attendance Records and Reports Rules 6A-1.044(3)&(6)(c), F.A.C. ..Pupil Attendance Records

<u>SCHEDULE E</u> (Continued)

Escambia County District School Board Full-Time Equivalent (FTE) Students **RECOMMENDATIONS AND REGULATORY CITATIONS** For the Fiscal Year Ended June 30, 2006

Regulatory Citations (Continued)

Attendance (Continued)

Rule 6A-1.04513, F.A.C. Maintaining Auditable FTE Records

FTE General Instructions 2005-2006

Comprehensive Management Information System: Automated Student Attendance Recordkeeping System

English for Speakers of Other Languages (ESOL)

Section 1003.56, F.S. English Language Instruction for Limited English Proficient Students

Section 1011.62(1)(g), F.S. Education for Speakers of Other Languages

Rule 6A-6.0901, F.A.C. Definitions Which Apply to Programs for Limited English Proficient Students

Rule 6A-6.0904, F.A.C. Equal Access to Appropriate Programming for Limited English Proficient Students

Career Education On-the-Job Attendance

Rule 6A-1.044(6)(c), F.A.C.Pupil Attendance Records

Exceptional Education

Section 1003.57(5), F.S	Exceptional Students Instruction
Section 1011.62, F.S	Funds for Operation of Schools
Section 1011.62(1)(e), F.S	Funding Model for Exceptional Student Education Programs
Rule 6A-6.03028, F.A.C	Development of Individual Educational Plans for Students with Disabilities
Rule 6A-6.03029, F.A.C Birth through Five Years	Development of Family Support Plans for Children with Disabilities Ages
Rule 6A-6.0312, F.A.C	Course Modification for Exceptional Students
Rule 6A-6.0331, F.A.C Specially Designed Instruction	Identification and Determination of Eligibility of Exceptional Students for
Rule 6A-6.0334, F.A.C	Temporary Assignment of Transferring Exceptional Students
Rule 6A-6.03411, F.A.C and Related Services for Exce	Policies and Procedures for the Provision of Specially Designed Instruction ptional Students

Matrix of Services Handbook

<u>SCHEDULE E</u> (Continued)

Escambia County District School Board Full-Time Equivalent (FTE) Students **RECOMMENDATIONS AND REGULATORY CITATIONS** For the Fiscal Year Ended June 30, 2006

Regulatory Citations (Continued)

Teacher Certification

Career Education On-the-Job Funding Hours

Rule 6A-6.055(3), F.A.C.Definitions of Terms Used in Vocational Education and Adult Programs FTE General Instructions 2005-2006

SCHEDULE F

Escambia County District School Board Full-Time Equivalent (FTE) Students SUMMARY OF MANAGEMENT'S RESPONSE For the Fiscal Year Ended June 30, 2006

Management agreed with our findings and recommendations.

A copy of management's response may be found on page 53 of this report.

Escambia County District School Board Full-Time Equivalent (FTE) Students **NOTES TO SCHEDULES** For the Fiscal Year Ended June 30, 2006

NOTE A - SUMMARY

A summary discussion of the significant features of the District, the Florida Education Finance Program (FEFP), full-time equivalent (FTE) students, and related areas follows:

1. <u>School District of Escambia County</u>

The District was established pursuant to Section 1001.30, Florida Statutes, to provide public educational services for the residents of Escambia County, Florida. Those services are provided primarily to students attending kindergarten through high school, but also to adults seeking career education-type training. The District is part of the State system of public education under the general direction and control of the State Board of Education. The geographic boundaries of the District are those of Escambia County. For the fiscal year ended June 30, 2006, the District operated 78 schools, reported 42,668.49 unweighted full-time equivalent (FTE) students, and received approximately \$140 million in State funding under the Florida Education Finance Program (FEFP) for those FTE. The primary sources of funding for the District are funds from FEFP, local ad valorem taxes, and Federal grants and donations.

2. Florida Education Finance Program (FEFP)

Florida school districts receive State funding through the Florida Education Finance Program (FEFP), which was established by the Florida Legislature in 1973. It is the intent of the law "to guarantee to each student in the Florida public school system the availability of programs and services appropriate to his educational needs which are substantially equal to those available to any similar student notwithstanding geographic differences and varying local economic factors." To provide equalization of educational opportunity in Florida, the FEFP formula recognizes (1) varying local property tax bases, (2) varying program cost factors, (3) district cost differentials, and (4) differences in per student cost for equivalent educational programs due to sparsity and dispersion of student population.

Escambia County District School Board Full-Time Equivalent (FTE) Students **NOTES TO SCHEDULES** For the Fiscal Year Ended June 30, 2006

NOTE A - SUMMARY (Continued)

3. Full-Time Equivalent (FTE) Students

The funding provided by FEFP is based upon the numbers of individual students participating in particular educational programs. A numerical value is assigned to each student according to the student's hours and days of attendance in those programs. The individual student thus becomes equated to a numerical value known as an FTE (full-time equivalent) student. For example, for kindergarten through third grade, one FTE is defined as one student in membership in a program or a group of programs for 20 hours per week for 180 days; for grade levels four through twelve, one FTE is defined as one student in membership in a program for 25 hours per week for 180 days.

4. <u>Calculation of FEFP Funds</u>

The amount of State and local FEFP funds is calculated by the Department of Education by multiplying the number of unweighted full-time equivalent (FTE) students in each educational program by the specific cost factor of each program to obtain weighted FTEs. Weighted FTEs are multiplied by the base student allocation amount and that product is multiplied by the appropriate cost differential factor. Various adjustments are then added to this product to obtain the total State and local FEFP dollars. All cost factors, the base student allocation amount, cost differential factors, and various adjustment figures are established by the Florida Legislature.

5. FTE Surveys

FTE is determined and reported during the school year by means of four FTE membership surveys, which are conducted under the direction of district and school management. Each survey is a sampling of FTE membership for a period of one week. The surveys for the 2005-2006 school year were conducted during and for the following weeks: survey one was performed for July 11-15, 2005; survey two was performed for October 10-14, 2005; survey three was performed for February 6-10, 2006; and survey four was performed for June 12-16, 2006.

Escambia County District School Board Full-Time Equivalent (FTE) Students **NOTES TO SCHEDULES** For the Fiscal Year Ended June 30, 2006

NOTE A - SUMMARY (Continued)

6. Educational Programs

The Florida Education Finance Program (FEFP) funds ten specific programs under which instruction may be provided as authorized by the Florida Legislature. The general program titles under which these specific programs fall are as follows: (1) Basic; (2) English for Speakers of Other Languages (ESOL); (3) Exceptional; and (4) Career Education (9-12).

7. <u>Statutes and Rules</u>

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

Chapter 1000, F.S	K-20 General Provisions
Chapter 1001, F.S	K-20 Governance
Chapter 1002, F.S	Student and Parental Rights and Educational Choices
Chapter 1003, F.S	Public K-12 Education
Chapter 1006, F.S	Support for Learning
Chapter 1007, F.S	Articulation and Access
Chapter 1010, F.S.	Financial Matters
Chapter 1011, F.S.	Planning and Budgeting
Chapter 1012, F.S	Personnel
Chapter 6A-1, F.A.C.	Finance and Administration
Chapter 6A-4, F.A.C.	Certification
Chapter 6A-6, F.A.C.	Special Programs I

NOTE B - SAMPLING

Our examination procedures provided for the selection of samples of schools, students, and teachers, using statistical and judgmental methods, for testing FTE reported to the Department of Education for the fiscal year ended June 30, 2006. Our sampling process was designed to facilitate the performance of appropriate examination procedures to test the District's compliance with State requirements governing FTE and the Florida Education Finance Program (FEFP). The following schools were in our sample:

Escambia County District School Board Full-Time Equivalent (FTE) Students NOTES TO SCHEDULES

For the Fiscal Year Ended June 30, 2006

NOTE B - SAMPLING (Continued)

School Name/Description	Finding Number(s)
- 900 Instructional Hours Not Provided	1
1. Bratt Elementary School	NA
2. Brownsville Middle School	2 through 4
3. A. V. Clubbs Center	5
4. Ransom Middle School	6
5. Escambia High School	7
6. Ferry Pass Middle School	8 and 9
7. Navy Point Elementary School	10 through 12
8. Pensacola High School	13 through 15
9. Scenic Heights Elementary School	16
10. O. J. Semmes Montessori Academy	17 and 18
11. J. M. Tate Senior High School	19 and 20
12. Ernest Ward Middle School	NA
13. Warrington Elementary School	21 through 24
14. C. A. Weis Elementary School	NA
15. West Pensacola Elementary School	25 and 26
16. J. H. Workman Middle School	27 through 30
17. Reinhardt Holm Elementary School	31 and 32
18. Sid Nelson Community Learning Center	33 through 35
19. W. J. Woodham High School	36 and 37
20. Pine Forest High School	38 through 40
21. Escambia Westgate Center	41
22. Lakeview Special Education	42
23. W. Florida High School of Advanced Tech.	43 and 44
24. Escambia Bay Marine Institute	45 and 46
25. Pensacola Beach Charter School	NA



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AUDITOR GENERAL

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The President of the Senate, the Speaker of the House of Representatives, and the Legislative Auditing Committee

INDEPENDENT AUDITOR'S REPORT ESCAMBIA COUNTY DISTRICT SCHOOL BOARD STUDENT TRANSPORTATION

We have examined management's assertion, included in its representation letter dated January 22, 2007, that the Escambia County District School Board complied with State requirements governing the determination and reporting of the number of students transported for the fiscal year ended June 30, 2006. These requirements are found primarily in Chapter 1006, Part I, E., and Section 1011.68, Florida Statutes; State Board of Education Rules, Chapter 6A-3, Florida Administrative Code; and the *Student Transportation General Instructions* issued by the Department of Education. As discussed in the representation letter, management is responsible for the District's compliance with State requirements. Our responsibility is to express an opinion on the District's compliance based on our examination.

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants and the standards applicable to attestation engagements contained in *Government Auditing Standards* issued by the Comptroller General of the United States and, accordingly, included examining, on a test basis, evidence about the District's compliance with the aforementioned State requirements and performing such other procedures as we considered necessary in the circumstances. We believe that our examination provides a reasonable basis for our opinion. The legal determination of the District's compliance with these requirements is, however, ultimately the responsibility of the Department of Education.

Our examination procedures disclosed instances of material noncompliance involving the District's determination and reporting of its number of students transported, as follows: 89 of the 519 students in our student sample had exceptions involving their reported ridership category or eligibility for ridership. (See SCHEDULE B, finding Nos. 2, 6, 7, 8, 9, and 10.)

In our opinion, except for the instances of material noncompliance mentioned above involving the classification and reporting of transported students, the Escambia County District School Board complied, in all material respects, with State requirements governing the determination and reporting of the number of students transported for the fiscal year ended June 30, 2006.

The results of our examination disclosed other instances of noncompliance with the State requirements mentioned above. We considered these other instances of noncompliance in forming our opinion regarding management's assertion and these items did not affect our opinion as stated above. All of the instances of noncompliance disclosed by our examination procedures are discussed in SCHEDULE B. The impact of those instances of noncompliance on the District's reported number of transported students is presented in SCHEDULE A and SCHEDULE B.

In accordance with *Government Auditing Standards*, we are required to report deficiencies in internal control that are material to management's assertion. The instances of material noncompliance mentioned above, and identified by finding number, are indicative of such deficiencies in the District's internal controls over the classification and reporting of transported students. The relevant populations, samples, and exception totals that pertain to these instances of noncompliance are presented in SCHEDULE A herein. We performed our examination to express an opinion on the District's compliance with the FEFP requirements previously mentioned and not for the purpose of expressing an opinion on the District's related internal controls; accordingly, we express no such opinion.

This report is intended for the information of the Legislative Auditing Committee, members of the Florida Senate and the Florida House of Representatives, the State Board of Education, the Department of Education, and the Escambia County District School Board. Copies of this report are available pursuant to Section 11.45(4)(c), Florida Statutes, and its distribution is not limited.

Respectfully submitted,

William O. Momore

William O. Monroe, CPA June 4, 2007

SCHEDULE A

Escambia County District School Board Student Transportation POPULATIONS, SAMPLES, AND TEST RESULTS

For the Fiscal Year Ended June 30, 2006

Description	Number of <u>Vehicles</u>	% of <u>Pop.</u>	No. of Students <u>Transp.</u>	% of Pop. <u>(Sample)</u>
Population ¹ Sample ²	804	- 100.00%	51,246 519	100.00% 1.01%
<u>Test Results - Sample Students</u> Students w/ Exceptions Net Audit Adjustments	- -	- -	89 (52)	(17.15%) (10.02%)
<u>Test Results - Non-Sample Students</u> Net Audit Adjustments	-	-	(1,000)	1.95%
<u>Test Results – Sample and Non-Sample Stud</u> Net Audit Adjustments	<u>ents</u>	-	(1,052)	2.05%

¹ The population figures for students are the totals of the figures reported for each survey conducted for the fiscal year ended June 30, 2006. The District reported 51,246 students in the following ridership categories: 2,797 in IDEA (K-12), Weighted; 18 in IDEA (K-12), Unweighted; 346 in IDEA (PK), Weighted; 69 in IDEA (PK), Unweighted; 159 in Teenage Parents and Infants; 12,608 in Hazardous Walking; 35,075 in Two Miles or More; Weighted; 90 in Center to Center (IDEA), Unweighted; and 84 in Center to Center (Vocational). The District also reported operating a total of 804 buses. (IDEA stands for Individuals with Disabilities Education Act.)

² See NOTE B.

SCHEDULE B

Escambia County District School Board Student Transportation FINDINGS AND AUDIT ADJUSTMENTS For the Fiscal Year Ended June 30, 2006

Overview

Management is responsible for determining and reporting the number of students transported in compliance with State requirements. These requirements are found primarily in Chapter 1006, Part I, E., and Section 1011.68, Florida Statutes; State Board of Education Rules, Chapter 6A-3, Florida Administrative Code; and the *Student Transportation General Instructions* issued by the Department of Education. Except for instances of material noncompliance involving the classification and reporting of transported students, the Escambia County District School Board complied, in all material respects, with State requirements governing the determination and reporting of students transported for the fiscal year ended June 30, 2006. All of the instances of noncompliance disclosed by our examination procedures are discussed below and require management's attention and action, as recommended on page 49.

Students Transported Net Audit <u>Adjustments</u>

Findings

Our examination procedures included both general tests and detailed tests. Our general tests included inquiries concerning the District's transportation of students and verification that a bus driver's report existed for each bus reported in a survey. Our general tests disclosed the instances of noncompliance discussed in finding Nos. 1 through 5. Our detailed tests checked the accuracy of the reported ridership categories for students sampled from the July, October, February, and June surveys. Our detailed tests disclosed the instances of noncompliance discussed in finding Nos. 6 through 10. Audit adjustments from our general tests affect non-sample students and audit adjustments from our detailed tests affect sample students, unless otherwise noted.

General Tests

1. [Ref. 51] <u>The reported number of buses was over-stated by 30 (6 in July, 14 in</u> October, and 10 in February). We also noted exceptions involving 908 students, as follows:

a. Two hundred and six students were reported in ridership categories for which they were not eligible, as follows: 187 middle and high school students (134 in October and 53 in February) were reported in Hazardous Walking, a category limited to students in elementary school, and 19 students in K-12 grade levels (18 in October and 1 in February) were reported as PK students in IDEA (PK), Unweighted.

Escambia County District School Board Student Transportation FINDINGS AND AUDIT ADJUSTMENTS For the Fiscal Year Ended June 30, 2006

Findings

a.

Students Transported Net Audit Adjustments

General Tests (Continued)

- b. The bus drivers' reports for 514 students (264 in October, and 250 in February) did not adequately support the students' ridership. We noted instances of conflicting dates (i.e., 2005 and 2006 marked on the same report) and extreme variances between the students listed on a report and the students reported for the bus concerned; consequently, it was not clear that the reports were for surveys covering the 2005-06 school year, and we concluded that the reports could not be relied upon.
- c. <u>The bus drivers' reports for 30 students in Two Miles or More in the February</u> <u>survey did not support the students' reported ridership.</u> The students were <u>either not listed on the reports or the reports indicated that the students did not</u> <u>ride the bus during the reporting survey.</u>
- d. <u>The bus drivers' reports for seven buses with a reported ridership of 158</u> <u>students (69 in July, 38 in October, and 51 in February) were missing and could</u> <u>not be located.</u>

We made the following audit adjustments:

July 2005 Survey Number of buses operated	(6)	
<u>October 2005 Survey</u> Number of buses operated	(14)	
<u>February 2006 Survey</u> Number of buses operated	(10)	
<u>October 2005 Survey</u> <u>90 Days-in-Term</u> IDEA (PK), Unweighted Hazardous Walking		(18) (134)

The accompanying notes are an integral part of this schedule.

<u>SCHEDULE B</u> (Continued)

Escambia County District School Board Student Transportation **FINDINGS AND AUDIT ADJUSTMENTS** For the Fiscal Year Ended June 30, 2006

<u>Findi</u>	<u>ngs</u>		Students Transported Net Audit <u>Adjustments</u>
Gener	ral Tests (Continued)		
	<u>February 2006 Survey</u> <u>90 Days-in-Term</u> IDEA (PK), Unweighted Hazardous Walking	(1) <u>(53</u>)	(206)
b.	<u>October 2005 Survey</u> <u>90 Days-in-Term</u> IDEA (K-12), Weighted	(264)	
	<u>February 2006 Survey</u> <u>90 Days-in-Term</u> IDEA (K-12), Weighted Two Miles or More	(249) <u>(1</u>)	(514)
c.	<u>February 2006 Survey</u> <u>90 Days-in-Term</u> Two Miles or More	<u>(30</u>)	(30)
d.	July 2005 Survey 5 Days-in-Term Hazardous Walking Two Miles or More	(29) (40)	
	October 2005 Survey 90 Days-in-Term IDEA (K-12), Weighted	(38)	
	<u>February 2006 Survey</u> <u>90 Days-in-Term</u> IDEA (K-12), Weighted Two Miles or More	(29) <u>(22</u>)	<u>(158)</u> <u>(908</u>)

Escambia County District School Board Student Transportation FINDINGS AND AUDIT ADJUSTMENTS For the Fiscal Year Ended June 30, 2006

General Tests (Continued) 2. [Ref. 54] Forty-one PK students (13 of whom were in our sample) were reported incorrectly in IDEA (PK), Unweighted (21 in the October survey and 20 in the February survey). The students were not IDEA or enrolled in a Teenage Parents and Infants program and, thus, were not eligible for State transportation funding. We made the following audit adjustments: October 2005 Survey 90 Days-in-Term IDEA (PK), Unweighted - Sample Students (7)IDEA (PK), Unweighted - Non-Sample Students (14)February 2006 Survey 00 Dava T [Ref. 56] One bus that transported 91 students was inadvertently omitted from **October 2005 Survey** 90 Days-in-Term Hazardous Walking 31 Two Miles or More 60 91 4. [Ref. 57] Eighty-five Gifted students (22 in October and 63 in February) were incorrectly reported for 90 days-in-term. They should have been reported for 18 daysin-term. We made the following audit adjustments: October 2005 Survey 18 Days-in-Term Center to Center (IDEA), Unweighted 22 90 Days-in-Term Center to Center (IDEA), Unweighted (22)

The accompanying notes are an integral part of this schedule.

<u>90 Days-in-Term</u>		
IDEA (PK), Unweighted - Sample Students	(6)	
IDEA (PK), Unweighted - Non-Sample Students	<u>(14</u>)	(41)

3.

the October survey reporting. We made the following audit adjustment:

Students Transported Net Audit Adjustments

Findings

Escambia County District School Board Student Transportation FINDINGS AND AUDIT ADJUSTMENTS For the Fiscal Year Ended June 30, 2006

<u>Findings</u>		Students Transported Net Audit <u>Adjustments</u>
General Tests (Continued)		
<u>February 2006 Survey</u> <u>18 Days-in-Term</u> Center to Center (IDEA), Unweighted	63	
<u>90 Days-in-Term</u> Center to Center (IDEA), Unweighted	<u>(63</u>)	0
5. [Ref. 58] One hundred fifty-five students (77 in October and 78 in Febr	<u>ruary)</u>	
were incorrectly reported in Two Miles or More. These students lived less than	<u>n two</u>	
miles from their assigned school and should not have been reported for	<u>State</u>	
transportation funding. We made the following audit adjustments:		
October 2005 Survey 90 Days-in-Term Two Miles or More	(77)	
<u>February 2006 Survey</u> <u>90 Days-in-Term</u> Two Miles or More	<u>(78</u>)	<u>(155</u>)
Net Audit Adjustments from General Tests		<u>(1,013</u>)
Sample Students (See finding No. 2.) Non-Sample Students		(13) (1000)
Net Audit Adjustments from General Tests		<u>(1,013</u>)

Detailed Tests

6. [Ref. 52] <u>During the October survey, we noted the following exceptions</u> involving 20 students:

 <u>One student in IDEA (K-12)</u>, Weighted did not meet at least one of the five criteria required for weighted classification. However, the student lived more than two miles from school and was eligible to be reported in Two Miles or <u>More</u>.

The accompanying notes are an integral part of this schedule.

Escambia County District School Board Student Transportation FINDINGS AND AUDIT ADJUSTMENTS For the Fiscal Year Ended June 30, 2006

Findings

Detailed Tests (Continued)

- b. <u>Eight students in Hazardous Walking were not eligible to be reported in this category.</u> Six of the students lived more than two miles from school and should have been reported in Two Miles or More. The remaining two students did not have to cross a designated hazard to reach school and were not otherwise eligible for State transportation funding.
- c. <u>Six students in Two Miles or More did not live two miles or more from school.</u> <u>However, one of the students was eligible for reporting in Hazardous Walking.</u> <u>The remaining five were not eligible for State transportation funding.</u>
- d. <u>Five students were reported incorrectly in Center to Center (IDEA)</u>, <u>Unweighted.</u> The students were enrolled in a Vocational education program and should have been reported in Center to Center (Vocational).

We made the following audit adjustment:

October 2005 Survey

<u>90 Days-in-Term</u>	
IDEA (K-12), Weighted	(1)
Hazardous Walking	(8)
Two Miles or More	(6)
Center to Center (IDEA), Unweighted	(5)
Hazardous Walking	1
Two Miles or More	7
Center to Center (Vocational)	<u>5</u>
Two Miles or More	1 7 <u>5</u>

7. [Ref. 53] <u>Fourteen students (three in July, four in October, and seven in</u> <u>February) did not ride a bus during the surveys concerned; consequently, they should</u> <u>not have been reported. We made the following audit adjustments:</u>

July 2005 Survey	
<u>5 Days-in-Term</u>	
Two Miles or More	(3)

The accompanying notes are an integral part of this schedule.

Students Transported Net Audit <u>Adjustments</u>

Escambia County District School Board Student Transportation FINDINGS AND AUDIT ADJUSTMENTS For the Fiscal Year Ended June 30, 2006

<u>Findings</u>		Students Transported Net Audit <u>Adjustments</u>
Detailed Tests (Continued)		
October 2005 Survey		
<u>90 Days-in-Term</u>		
IDEA (K-12), Weighted	(1)	
IDEA (PK), Unweighted	(1)	
Hazardous Walking	(1)	
Two Miles or More	(1)	
February 2006 Survey		
<u>90 Days-in-Term</u>		
IDEA (K-12), Weighted	(4)	
IDEA (PK), Weighted	(1)	
Center to Center (IDEA), Unweighted	(1)	
Center to Center (Vocational)	<u>(1</u>)	(14)

8. [Ref. 55] <u>During the February survey, we noted the following exceptions</u> involving 27 students:

- a. Five students in IDEA (K-12), Weighted did not meet at least one of the five criteria required for weighted classification. Four of the five students were eligible to be reported in other categories: one in Hazardous Walking, one in IDEA (K-12), Unweighted, and two in Two Miles or More.
- b. <u>Three students in Hazardous Walking were not eligible to be reported in that</u> <u>category because they lived more than two miles from school.</u> The students <u>should have been reported in Two Miles or More</u>.
- c. <u>Sixteen students were reported incorrectly in Two Miles or More. The students lived less than two miles from school.</u> However, six of the students were eligible for reporting in Hazardous Walking. The remaining ten were not eligible for State transportation funding.
- d. Three students were reported in Center to Center (Vocational) for a 90 day term; however, the students were enrolled in a program for gifted students for 1-day a week and should have been reported in Center to Center (IDEA), Unweighted for an 18 day term.

The accompanying notes are an integral part of this schedule.

<u>SCHEDULE B</u> (Continued)

Escambia County District School Board Student Transportation **FINDINGS AND AUDIT ADJUSTMENTS** For the Fiscal Year Ended June 30, 2006

Findings		Students Transported Net Audit <u>Adjustments</u>
<u>T monigs</u>		Adjustitients
Detailed Tests (Continued)		
We made the following audit adjustment:		
February 2006 Survey		
<u>90 Days-in-Term</u>		
IDEA (K-12), Weighted Hazardous Walking	(5) (3)	
Two Miles or More	(16)	
Center to Center (Vocational)	(3)	
90 Days-in-Term		
IDEA (K-12), Unweighted	1	
Hazardous Walking	7	
Two Miles or More	5	
18 Days-in-Term		
Center to Center (IDEA), Unweighted	<u>3</u>	(11)
9. [Ref. 59] Seven students in the July survey were reported incorre	<u>ctly in</u>	
Hazardous Walking. Two of the students lived more than two miles from scho		
should have been reported in Two Miles or More. We made the following		
adjustment:	<u> - ttaart</u>	
<u>aujustment</u> .		
July 2005 Survey		
5 Days-in-Term		
Hazardous Walking Two Miles or More	(/) <u>2</u>	(5)
I wo miles of more	<u>4</u>	(3)
10. [Ref. 60] During the June survey, we noted the following exceptions inv	volving	
eight students:		
a. Three students were reported incorrectly in IDEA (K-12), Unweighted.	They	
lived more than two miles from school and should have been reported i	n Two	
Miles or More. We also noted that two of these three students were not	IDEA	
students.		
<u>statem</u> .		

The accompanying notes are an integral part of this schedule.

<u>SCHEDULE B</u> (Continued)

Escambia County District School Board Student Transportation FINDINGS AND AUDIT ADJUSTMENTS For the Fiscal Year Ended June 30, 2006

<u>Findings</u>	Students Transported Net Audit <u>Adjustments</u>
Detailed Tests (Continued)	
b. <u>Five students were reported incorrectly in Two Miles or More.</u> The students <u>lived less than two miles from school</u> . Three of the five students were eligible to be reported in Hazardous Walking.	
We made the following audit adjustment:	
June 2006 Survey24 Days-in-TermIDEA (K-12), UnweightedTwo Miles or More(3)	
Hazardous Walking3Two Miles or More3	<u>(2</u>)
Net Audit Adjustments from Detailed Tests	<u>(39</u>)
Sample Students Non-Sample Students	(39) <u>0</u>
Net Audit Adjustments from Detailed Tests	<u>(39</u>)

Fine

SCHEDULE C

Escambia County District School Board Student Transportation **RECOMMENDATIONS AND REGULATORY CITATIONS** For the Fiscal Year Ended June 30, 2006

Recommendations

<u>We recommend</u> that management exercise more care and take corrective action, as appropriate, to ensure that: (1) bus driver reports are accessible to support reported students; (2) students are reported in the proper ridership category and have documentation to support that reporting; (3) Gifted students are reported for the correct number of days-in-term; and (4) only eligible students who were transported during the 11-day window of a survey period are reported with that survey's results.

The absence of statements in this report regarding practices and procedures followed by the District should not be construed as acceptance, approval, or endorsement of those practices and procedures. Additionally, the specific nature of this report does not limit or lessen the District's obligation to comply with all State requirements governing student transportation.

Regulatory Citations

Chapter 1006, Part I, E., F.S.Transportation of Public K-12 Students Section 1011.68, F.S.Funds for Student Transportation Chapter 6A-3, F.A.C.Transportation Student Transportation General Instructions

SCHEDULE D

Escambia County District School Board Student Transportation SUMMARY OF MANAGEMENT'S RESPONSE For the Fiscal Year Ended June 30, 2006

Management agreed with our findings and recommendations.

A copy of management's response may be found on page 53 of this report.

Escambia County District School Board Student Transportation **NOTES TO SCHEDULES** For the Fiscal Year Ended June 30, 2006

NOTE A - SUMMARY

A summary discussion of the significant features of student transportation and related areas follows:

1. <u>Student Eligibility</u>

Any student who is transported by bus must meet one or more of the following conditions in order to be eligible for State transportation funding: live two or more miles from school, be physically handicapped, be a Career Education or Exceptional student who is transported from one school center to another where appropriate programs are provided, or meet the criteria for hazardous walking specified in Section 1006.23(4), Florida Statutes.

2. <u>Transportation in Escambia County</u>

For the fiscal year ended June 30, 2006, the District received approximately \$11.4 million in State transportation funding. The District's transportation reporting by survey was as follows:

Survey	No. of	No. of
<u>Period</u>	<u>Vehicles</u>	<u>Students</u>
July 2005	58	874
October 2005	350	24,977
February 2006	354	24,938
June 2006	<u>42</u>	<u>457</u>
Total	<u>804</u>	<u>51,246</u>

3. <u>Statutes and Rules</u>

The following statutes and rules are of significance to the District's administration of student transportation:

Chapter 1006, Part I, E., F.S.Transportation of Public K-12 Students Section 1011.68, F.S.Funds for Student Transportation Chapter 6A-3, F.A.C.Transportation

Escambia County District School Board Student Transportation **NOTES TO SCHEDULES** For the Fiscal Year Ended June 30, 2006

NOTE B - SAMPLING

Our examination procedures provided for the selection of samples of buses and students, using statistical and judgmental methods, for testing the number of students transported as reported to the Department of Education for the fiscal year ended June 30, 2006. Our sampling process was designed to facilitate the performance of appropriate examination procedures to test the District's compliance with State requirements governing students transported.

MANAGEMENT'S RESPONSE



THE SCHOOL DISTRICT OF ESCAMBIA COUNTY

215 WEST GARDEN STREET, PENSACOLA, FL 32502 PHONE 850/432-6121, FAX 850/469-6379 http://www.escambia.k12.fl.us JIM PAUL, SUPERINTENDENT

June 28, 2007

Mr. William O. Monroe, Auditor General Office of the Auditor General Claude Pepper Building, Room 412C 111 West Madison Street Tallahassee, Florida 32399-1450

Attention: Mr. Joseph L. Williams, Section 321

Dear Mr. Monroe:

The Escambia County School District concurs with the findings of the Auditor General as contained in the report on full-time equivalent (FTE) students and student transportation for the fiscal year ended June 30, 2006.

As corrective actions for these findings, the District will: (1) provide inservice training to ensure that ESOL eligibility and record keeping requirements are followed; (2) advise ESE personnel regarding the need for accurate matrix preparation and record keeping; and (3) provide inservice training to school based OJT coordinators to further emphasize the importance of accurate preparation and retention of time cards.

Student Transportation

The District's Transportation Department will provide inservice training to emphasize the eligibility requirements for each ridership category and the need for more accurate record keeping and retention of bus driver reports.

Sincerely,

Re Jim Paul

JP:MJ:jb

Affirmative action/equal opportunity employer