

**JACKSON COUNTY
DISTRICT SCHOOL BOARD**

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

For the Fiscal Year Ended
June 30, 2017



Sherrill F. Norman, CPA
Auditor General

Board Members and Superintendent

During the 2016-17 fiscal year, Steve R. Benton, Sr. served as Superintendent through 11-21-16, H. Larry Moore served as Superintendent from 11-22-16, and the following individuals served as Board members:

	<u>District No.</u>
Dr. Terry E. Nichols, Vice Chair from 11-22-16	1
Kenneth R. Griffin through 11-21-16	2
Tony Pumphrey from 11-22-16	2
Stacey B. Goodson, Chair from 11-22-16, Vice Chair through 11-21-16	3
Chris M. Johnson, Chair through 11-21-16	4
Charlotte M. Gardner	5

The team leader was Alice Pounds, CPA, and the examination was supervised by Aileen B. Peterson, CPA, CPM.

Please address inquiries regarding this report to J. David Hughes, CPA, Audit Manager, by e-mail at davidhughes@aud.state.fl.us or by telephone at (850) 412-2971.

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JACKSON COUNTY DISTRICT SCHOOL BOARD

LIST OF ABBREVIATIONS

CMW	Class Minutes, Weekly
DIT	Days in Term
DOE	Department of Education
ELL	English Language Learner
ESE	Exceptional Student Education
ESOL	English for Speakers of Other Languages
FAC	Florida Administrative Code
FEFP	Florida Education Finance Program
FTE	Full-Time Equivalent
IDEA	Individuals with Disabilities Education Act
IEP	Individual Educational Plan
OJT	On-the-Job Training
PK	Prekindergarten
SBE	State Board of Education

SUMMARY

SUMMARY OF ATTESTATION EXAMINATION

Except for the material noncompliance described below involving teachers and reporting errors or records that were not properly or accurately prepared or were not available at the time of our examination and could not be subsequently located for students in ESOL, Career Education 9-12, and student transportation, the Jackson County District School Board (District) complied, in all material respects, with State requirements relating to the classification, assignment, and verification of the full-time equivalent (FTE) student enrollment and student transportation as reported under the Florida Education Finance Program (FEFP) for the fiscal year ended June 30, 2017. Specifically, we noted:

- State requirements governing teacher certification, School Board approval of out-of-field teacher assignments, notification to parents regarding teachers' out-of-field status, the earning of college credits towards certification in the out-of-field subject areas, or the earning of required in-service training points in ESOL strategies were not met for 11 of the 85 teachers in our test.
- Exceptions involving reporting errors or records that were not properly or accurately prepared or were not available at the time of our examination and could not be subsequently located for 3 of the 27 students in our ESOL test and 22 of the 40 students in our Career Education 9-12 test.
- Exceptions involving the reported ridership classification or eligibility for State transportation funding for 47 of the 244 students in our student transportation test, in addition to 390 students identified in our general tests.

The District did not report any charter schools; therefore, all our tests relate to District schools other than charter schools and to the District's virtual instruction program. Noncompliance related to the reported FTE student enrollment resulted in 18 findings. The resulting proposed net adjustment to the District's reported, unweighted FTE totaled negative 6.8826 but has a potential impact on the District's weighted FTE of negative 20.3886. Noncompliance related to student transportation resulted in 10 findings and a proposed net adjustment of negative 429 students.

The weighted adjustments to the FTE student enrollment are presented in our report for illustrative purposes only. The weighted adjustments to the FTE student enrollment do not take special program caps and allocation factors into account and are not intended to indicate the weighted FTE used to compute the dollar value of adjustments. That computation is the responsibility of the Department of Education (DOE). However, the gross dollar effect of our proposed adjustments to the FTE may be estimated by multiplying the proposed net weighted adjustments to the FTE student enrollment by the base student allocation amount. The base student allocation for the fiscal year ended June 30, 2017, was \$4,160.71 per FTE. For the District, the estimated gross dollar effect of our proposed adjustments to the reported FTE student enrollment is negative \$84,831 (negative 20.3886 times \$4,160.71).

We have not presented an estimate of the potential dollar effect of our proposed adjustments to student transportation because there is no equivalent method for making such an estimate.

The ultimate resolution of our proposed adjustments to the FTE student enrollment and student transportation and the computation of their financial impact is the responsibility of the DOE.

THE DISTRICT

The District was established pursuant to Section 1001.30, Florida Statutes, to provide public educational services for the residents of Jackson County, Florida. Those services are provided primarily to PK through 12th-grade students and to adults seeking career education-type training. The District is part of the State system of public education under the general direction and control of the SBE. The geographic boundaries of the District are those of Jackson County.

The governing body of the District is the District School Board that is composed of five elected members. The executive officer of the Board is the elected Superintendent of Schools. The District had 16 schools, 3 cost centers, and 3 virtual education cost centers serving PK through 12th-grade students. The District did not report any charter schools.

For the fiscal year ended June 30, 2017, State funding totaling \$31.4 million was provided through the FEFP to the District for the District-reported 8,360.91 unweighted FTE as recalibrated. The primary sources of funding for the District are funds from the FEFP, local ad valorem taxes, and Federal grants and donations.

FEFP

FTE Student Enrollment

Florida school districts receive State funding through the FEFP to serve PK through 12th-grade students (adult education is not funded by the FEFP). The FEFP was established by the Florida Legislature in 1973 to guarantee to each student in the Florida public school system, including charter schools, the availability of programs and services appropriate to the student's educational needs that are substantially equal to those available to any similar student notwithstanding geographic differences and varying local economic factors. To provide equalization of educational opportunity in Florida, the FEFP formula recognizes: (1) varying local property tax bases, (2) varying program cost factors, (3) district cost differentials, and (4) differences in per-student costs for equivalent educational programs due to sparsity and dispersion of student population.

The funding provided by the FEFP is based on the numbers of individual students participating in particular educational programs. A numerical value is assigned to each student according to the student's hours and days of attendance in those programs. The individual student thus becomes equated to a numerical value known as an unweighted FTE student enrollment. For brick and mortar school students, one student would be reported as 1.0 FTE if the student was enrolled in six courses per day at 50 minutes per course for the full 180-day school year (i.e., six courses at 50 minutes each per day is 5 hours of class a day or 25 hours per week, which equates to 1.0 FTE). For virtual education students, one student would be reported as 1.0 FTE if the student has successfully completed six courses or credits or the prescribed level of content that counts toward promotion to the next grade. A student who completes less than six credits will be reported as a fraction of an FTE. Half-credit completions will be included in determining an FTE student enrollment. Credits completed by a student in excess of the minimum required for that student for graduation are not eligible for funding.

School districts report all FTE student enrollment regardless of the 1.0 FTE cap. The DOE combines all FTE student enrollment reported for the student by all school districts, including the Florida Virtual School.

The DOE then recalibrates all reported FTE student enrollment for each student to 1.0 FTE, if the total reported FTE for the student exceeds 1.0 FTE. The FTE student enrollment reported by the Department of Juvenile Justice for FTE student enrollment earned beyond the 180-day school year is not included in the recalibration to 1.0 FTE.

All FTE student enrollment is capped at 1.0 FTE except for the FTE student enrollment reported by the Department of Juvenile Justice for students beyond the 180-day school year. However, if a student only has FTE student enrollment reported in one survey of the 180-day school year (Survey 2 or Survey 3), the FTE student enrollment reported will be capped at .5000 FTE, even if FTE student enrollment is reported in Survey 1 or Survey 4, with the exception of FTE student enrollment reported by the Department of Juvenile Justice for students beyond the 180-day school year.

Student Transportation

Any student who is transported by the District must meet one or more of the following conditions in order to be eligible for State transportation funding: live 2 or more miles from school, be classified as a student with a disability under the IDEA, be a Career Education 9-12 or an ESE student who is transported from one school center to another where appropriate programs are provided, or be on a route that meets the criteria for hazardous walking conditions specified in Section 1006.23 Florida Statutes. Additionally, Section 1002.33(20)(c), Florida Statutes, provides that the governing board of the charter school may provide transportation through an agreement or contract with the district school board, a private provider, or parents. The charter school and the sponsor shall cooperate in making arrangements that ensure that transportation is not a barrier to equal access for all students residing within a reasonable distance of the charter school as determined in its charter. The District received \$1.6 million for student transportation as part of the State funding through the FEFP.

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Sherrill F. Norman, CPA
Auditor General

AUDITOR GENERAL STATE OF FLORIDA

Claude Denson Pepper Building, Suite G74
111 West Madison Street
Tallahassee, Florida 32399-1450



Phone: (850) 412-2722
Fax: (850) 488-6975

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

INDEPENDENT AUDITOR'S REPORT

Report on Full-Time Equivalent Student Enrollment

We have examined the Jackson County District School Board's (District's) compliance with State requirements relating to the classification, assignment, and verification of the full-time equivalent (FTE) student enrollment reported under the Florida Education Finance Program for the fiscal year ended June 30, 2017. 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 2016-17* issued by the Department of Education.

Management's Responsibility for Compliance

District management is responsible for the District's compliance with the aforementioned State requirements, including the design, implementation, and maintenance of internal control to prevent, or detect and correct, noncompliance due to fraud or error.

Auditor's Responsibility

Our responsibility is to express an opinion on the District's compliance with State requirements based on our examination. Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants and the standards applicable to attestation engagements contained in *Government Auditing Standards* issued by the Comptroller General of the United States. Those standards require that we plan and perform the examination to obtain reasonable assurance about whether the classification, assignment, and verification of the full-time equivalent student enrollment reported by the District under the Florida Education Finance Program complied with State requirements in all material respects.

An examination involves performing procedures to obtain evidence about whether the District complied with State requirements. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risks of material noncompliance, whether due to fraud or error. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for

our opinion. Our examination does not provide a legal determination on the District's compliance with State requirements. The legal determination of the District's compliance with these requirements is the responsibility of the Department of Education.

An examination by its nature does not include a review of all records and actions of District management and staff and, as a consequence cannot be relied upon to identify all instances of noncompliance, fraud, abuse, or inefficiency. Because of these limitations and the inherent limitations of internal control, an unavoidable risk exists that some material misstatements may not be detected, even though the examination is properly planned and performed in accordance with attestation standards.

Opinion

Our examination disclosed material noncompliance with State requirements relating to the classification, assignment, and verification of full-time equivalent student enrollment as reported under the Florida Education Finance Program for teachers and students in our English for Speakers of Other Languages and Career Education 9-12 tests involving reporting errors or records that were not properly or accurately prepared or were not available at the time of our examination and could not be subsequently located.

In our opinion, except for the material noncompliance with State requirements described in the preceding paragraph involving teachers and reporting errors or records that were not properly or accurately prepared or were not available at the time of our examination and could not be subsequently located for students in English for Speakers of Other Languages and Career Education 9-12, the Jackson County District School Board complied, in all material respects, with State requirements relating to the classification, assignment, and verification of the full-time equivalent student enrollment reported under the Florida Education Finance Program for the fiscal year ended June 30, 2017.

Other Reporting Required by Government Auditing Standards

In accordance with *Government Auditing Standards*, we are required to report all deficiencies that are considered to be significant deficiencies or material weaknesses¹ in internal control; fraud and noncompliance with provisions of laws or regulations that have a material effect on the District's compliance with State requirements; and any other instances that warrant the attention of those charged with governance; noncompliance with provisions of contracts or grant agreements that has a material effect on the District's compliance with State requirements; and abuse that has a material effect on the District's compliance with State requirements. We are also required to obtain and report the views of responsible officials concerning the findings, conclusions, and recommendations, as well as any planned corrective actions.

We performed our examination to express an opinion on the District's compliance with State requirements and not for the purpose of expressing an opinion on the District's related internal control over compliance with State requirements; accordingly, we express no such opinion. Because of its limited purpose, our examination would not necessarily identify all deficiencies in internal control over compliance that might be significant deficiencies or material weaknesses. However, the material noncompliance mentioned

¹ A significant deficiency is a deficiency or a combination of deficiencies in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance. A material weakness is a deficiency, or combination of deficiencies, in internal control such that there is a reasonable possibility that material noncompliance will not be prevented, or detected and corrected, on a timely basis.

above is indicative of significant deficiencies considered to be material weaknesses in the District's internal controls related to teacher certification and reporting errors or records that were not properly or accurately prepared or were not available at the time of our examination and could not be subsequently located for students in English for Speakers of Other Languages and Career Education 9-12. Our examination disclosed certain findings that are required to be reported under *Government Auditing Standards* and all findings, along with the views of responsible officials, are described in *SCHEDULE D* and *MANAGEMENT'S RESPONSE*, respectively. The impact of this noncompliance with State requirements on the District's reported full-time equivalent student enrollment is presented in *SCHEDULES A, B, C, and D*.

The District's written response to this examination has not been subjected to our examination procedures and, accordingly, we express no opinion on it.

Purpose of this Report

Pursuant to Section 11.45(4)(c), Florida Statutes, this report is a public record and its distribution is not limited. Attestation standards established by the American Institute of Certified Public Accountants require us to indicate that the purpose of this report is to provide an opinion on the District's compliance with State requirements. Accordingly, this communication is not suitable for any other purpose.

Respectfully submitted,



Sherrill F. Norman, CPA
Tallahassee, Florida
July 12, 2018

SCHEDULE A

POPULATIONS, TEST SELECTION, AND TEST RESULTS FULL-TIME EQUIVALENT STUDENT ENROLLMENT

Reported FTE Student Enrollment

The funding provided by the FEFP is based on the numbers of individual students participating in particular educational programs. The FEFP funds ten specific programs that are grouped under the following four general program titles: Basic, ESOL, ESE, and Career Education 9-12. The unweighted FTE represents the FTE prior to the application of the specific cost factor for each program. (See *SCHEDULE B* and NOTE A3., A4., and A5.) For the fiscal year ended June 30, 2017, the Jackson County District School Board (District) reported to the DOE 8,360.91 unweighted FTE as recalibrated at 16 District schools, 3 cost centers, and 3 virtual education cost centers. The District did not report any charter schools.

Schools and Students

As part of our examination procedures, we tested the FTE student enrollment reported to the DOE for schools and students for the fiscal year ended June 30, 2017. (See NOTE B.) The population of schools (22) consisted of the total number of brick and mortar schools and cost centers in the District that offered courses, as well as the virtual education cost centers in the District that offered virtual instruction in the FEFP-funded programs. The population of students (3,760) consisted of the total number of students in each program at the schools and cost centers in our tests. Our Career Education 9-12 student test data includes only those students who participated in OJT.

We noted the following material noncompliance: exceptions involving reporting errors or records that were not properly or accurately prepared or were not available at the time of our examination and could not be subsequently located for 3 of the 27 students in our ESOL test² and 22 of the 40 students in our Career Education 9-12 test.³

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

<u>Programs</u>	<u>Number of Schools</u>		<u>Number of Students at Schools Tested</u>		<u>Students With Exceptions</u>	<u>Recalibrated Unweighted FTE</u>		<u>Proposed Adjustments</u>
	<u>Population</u>	<u>Test</u>	<u>Population</u>	<u>Test</u>		<u>Population</u>	<u>Test</u>	
Basic	19	10	2,985	79	3	6,468.6400	58.4893	8.5868
Basic with ESE Services	19	9	575	42	2	1,395.7500	32.9256	.6650
ESOL	9	4	57	27	3	85.7400	19.5888	(5.0736)
ESE Support Levels 4 and 5	5	3	89	55	2	101.4800	47.4062	(4.8159)
Career Education 9-12	7	2	54	40	22	309.3000	10.0684	(6.2449)
All Programs	22	10	3,760	243	32	8,360.9100	168.4783	(6.8826)

² For ESOL, the material noncompliance is composed of Findings 4, 5, and 6 on *SCHEDULE D*.

³ For Career Education 9-12, the material noncompliance is composed of Findings 1 and 10 on *SCHEDULE D*.

Teachers

We also tested teacher qualifications as part of our examination procedures. (See NOTE B.) Specifically, the population of teachers (185) consisted of the total number of teachers at schools in our test who taught courses in ESE Support Levels 4 and 5, Career Education 9-12, or taught courses to ELL students, and of the total number of teachers reported under virtual education cost centers in our test who taught courses in Basic, Basic with ESE Services, ESE Support Levels 4 and 5, Career Education 9-12, or taught courses to ELL students.

We noted the following material noncompliance: State requirements governing teacher certification, School Board approval of out-of-field teacher assignments, notification to parents regarding teachers' out-of-field status, the earning of college credits towards certification in the out-of-field subject areas, or the earning of required in-service training points in ESOL strategies were not met for 11 of the 85 teachers in our test.⁴

Proposed Adjustments

Our proposed adjustments present the net effects of noncompliance disclosed by our examination procedures, including those related to our test of teacher qualifications. Our proposed adjustments generally reclassify the reported FTE to Basic education, except for noncompliance involving a student's enrollment or attendance in which case the reported FTE is taken to zero. (See *SCHEDULES B, C, and D.*)

The ultimate resolution of our proposed adjustments to the FTE student enrollment and the computation of their financial impact is the responsibility of the DOE.

⁴ For teachers, the material noncompliance is composed of Findings 2, 3, 7, 8, 9, 15, 17, and 18 on *SCHEDULE D.*

SCHEDULE B

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

<u>No. Program (1)</u>	<u>Proposed Net Adjustment (2)</u>	<u>Cost Factor</u>	<u>Weighted FTE (3)</u>
101 Basic K-3	.8665	1.103	.9557
102 Basic 4-8	6.0556	1.000	6.0556
103 Basic 9-12	1.6647	1.001	1.6664
111 Grades K-3 with ESE Services	(.4998)	1.103	(.5513)
112 Grades 4-8 with ESE Services	1.0000	1.000	1.0000
113 Grades 9-12 with ESE Services	.1648	1.001	.1650
130 ESOL	(5.0736)	1.194	(6.0579)
254 ESE Support Level 4	(4.8159)	3.607	(17.3710)
300 Career Education 9-12	<u>(6.2449)</u>	1.001	<u>(6.2511)</u>
Total	<u>(6.8826)</u>		<u>(20.3886)</u>

Notes: (1) See NOTE A7.

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

(3) Weighted adjustments to the FTE are presented for illustrative purposes only. The weighted adjustments to the FTE do not take special program caps or allocation factors into consideration and are not intended to indicate the FTE used to compute the dollar value of adjustments. That computation is the responsibility of the DOE. (See NOTE A5.)

SCHEDULE C

PROPOSED ADJUSTMENTS BY SCHOOL FULL-TIME EQUIVALENT STUDENT ENROLLMENT

<u>No.</u> <u>Program</u>	<u>Proposed Adjustments (1)</u>			<u>Balance Forward</u>
	<u>#0021</u>	<u>#0031</u>	<u>#0061</u>	
101 Basic K-386658665
102 Basic 4-8	4.0016	4.0016
103 Basic 9-12	.20552055
111 Grades K-3 with ESE Services0000
112 Grades 4-8 with ESE Services0000
113 Grades 9-12 with ESE Services0000
130 ESOL	(.2055)	(.8665)	(4.0016)	(5.0736)
254 ESE Support Level 40000
300 Career Education 9-12	<u>(.9609)</u>	<u>.....</u>	<u>.....</u>	<u>(.9609)</u>
Total	<u>(.9609)</u>	<u>.0000</u>	<u>.0000</u>	<u>(.9609)</u>

Note: (1) These proposed net adjustments are for unweighted FTE. (See NOTE A5.)

<u>No.</u>	<u>Brought Forward</u>	<u>Proposed Adjustments (1)</u>				<u>Balance Forward</u>
		<u>#0121</u>	<u>#0202</u>	<u>#0212</u>	<u>#7001</u>	
101	.86658665
102	4.0016	(.3677)	2.4217	6.0556
103	.2055	1.3938	(.1500)	1.4493
111	.0000	(.4998)	(.4998)
112	.0000	1.0000	1.0000
113	.000038023802
130	(5.0736)	(5.0736)
254	.0000	(4.8159)	(4.8159)
300	<u>(.9609)</u>	<u>(5.2840)</u>	<u>.....</u>	<u>.....</u>	<u>.....</u>	<u>(6.2449)</u>
Total	<u>(.9609)</u>	<u>(5.2840)</u>	<u>(.3677)</u>	<u>(.1200)</u>	<u>(.1500)</u>	<u>(6.8826)</u>

Note: (1) These proposed net adjustments are for unweighted FTE. (See NOTE A5.)

Proposed Adjustments (1)

<u>No. Program</u>	<u>Brought Forward</u>	<u>#7006</u>	<u>Total</u>
101 Basic K-3	.86658665
102 Basic 4-8	6.0556	6.0556
103 Basic 9-12	1.4493	.2154	1.6647
111 Grades K-3 with ESE Services	(.4998)	(.4998)
112 Grades 4-8 with ESE Services	1.0000	1.0000
113 Grades 9-12 with ESE Services	.3802	(.2154)	.1648
130 ESOL	(5.0736)	(5.0736)
254 ESE Support Level 4	(4.8159)	(4.8159)
300 Career Education 9-12	<u>(6.2449)</u>	<u>.....</u>	<u>(6.2449)</u>
Total	<u>(6.8826)</u>	<u>.0000</u>	<u>(6.8826)</u>

Note: (1) These proposed net adjustments are for unweighted FTE. (See NOTE A5.)

SCHEDULE D

FINDINGS AND PROPOSED ADJUSTMENTS FULL-TIME EQUIVALENT STUDENT ENROLLMENT

Overview

Management is responsible for determining that the FTE student enrollment as reported under the FEFP is in compliance with State requirements. These requirements are found primarily in Sections 1011.60, 1011.61, and 1011.62, Florida Statutes; SBE Rules, Chapter 6A-1, FAC; and the *FTE General Instructions 2016-17* issued by the DOE. All noncompliance disclosed by our examination procedures is discussed below and requires management’s attention and action as presented in *SCHEDULE E*.

Findings

Our examination included the July and October 2016 reporting survey periods and the February and June 2017 reporting survey periods (See NOTE A6.). Unless otherwise specifically stated, the Findings and Proposed Adjustments presented herein are for the October 2016 reporting survey period, the February 2017 reporting survey period, or both. Accordingly, our Findings do not mention specific reporting survey periods unless necessary for a complete understanding of the instances of noncompliance being disclosed.

**Proposed Net
Adjustments
(Unweighted FTE)**

Marianna High School (#0021)

1. [Ref. 2101] The timecards for six Career Education 9-12 students who participated in OJT were either not available at the time of our examination and could not be subsequently located (two students), indicated that the students did not work during the reporting survey period (two students), or were not signed by the students’ employers (two students). Additionally, one of the students was reported for more work hours than was supported by the student’s timecard. We propose the following adjustment:

300 Career Education 9-12	<u>(.9609)</u>	(.9609)
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2. [Ref. 2170/71] Two teachers taught English to classes that included ELL students but had earned only 120 of the 300 (Ref. 2170) or none of the 60 (Ref. 2171) in-service training points in ESOL strategies required by SBE Rule 6A-1.0503, FAC, and the teachers’ in-service training timelines. We propose the following adjustments:

<u>Ref. 2170</u>		
103 Basic 9-12	.1370	
130 ESOL	<u>(.1370)</u>	.0000
 <u>Ref. 2171</u>		
103 Basic 9-12	.0685	
130 ESOL	<u>(.0685)</u>	<u>.0000</u>
		<u>(.9609)</u>

Findings

Frank M. Golson Elementary School (#0031)

3. [Ref. 3170] One teacher taught Primary Language Arts to classes that included an ELL student but was not properly certified to teach ELL students and was not approved by the School Board to teach such students out of field. Since the student involved was cited in Finding 5 (Ref. 3102), we present this disclosure finding with no proposed adjustment.

.0000

4. [Ref. 3101] The *ELL Student Plan (Plan)* for one ELL student was incomplete as the *Plan* did not include the student’s instructional schedule. In addition, the file did not evidence that the parents of the student were notified of the student’s placement in the ESOL Program. We propose the following adjustment:

101 Basic K-3	.4332	
130 ESOL	<u>(.4332)</u>	.0000

5. [Ref. 3102] The file for one ELL student did not contain documentation to support the student’s initial ESOL placement. The 2nd-grade student was assessed as Fluent English Speaking and an ELL Committee did not document other criteria to support the student’s continued ESOL placement pursuant to SBE Rule 6A-6.09022(3), FAC. We propose the following adjustment:

101 Basic K-3	.4333	
130 ESOL	<u>(.4333)</u>	.0000
		<u>.0000</u>

Marianna Middle School (#0061)

6. [Ref. 6101] One ELL student’s English language proficiency was not assessed prior to placing the student in the ESOL Program. An ELL Committee convened but did not document any criteria to support the student’s ESOL placement pursuant to SBE Rule 6A-6.09022(3), FAC. We propose the following adjustment:

102 Basic 4-8	1.0000	
130 ESOL	<u>(1.0000)</u>	.0000

7. [Ref. 6170] One teacher taught a Basic subject area class that included ELL students but had earned none of the 60 in-service training points in ESOL strategies required by SBE Rule 6A-6.0907, FAC, and the teacher’s in-service training timeline. We propose the following adjustment:

102 Basic 4-8	.2792	
130 ESOL	<u>(.2792)</u>	.0000

**Proposed Net
Adjustments
(Unweighted FTE)**

Findings

Marianna Middle School (#0061) (Continued)

8. [Ref. 6171/72] Two teachers taught Language Arts to classes that included ELL students but had earned only 180 (by taking 9 hours of college credit - Ref. 6171) or 60 (Ref. 6172) of the 300 in-service training points in ESOL strategies required by SBE Rule 6A-1.0503, FAC, and the teachers' in-service training timelines. We propose the following adjustments:

<u>Ref. 6171</u>		
102 Basic 4-8	.1392	
130 ESOL	<u>(.1392)</u>	.0000
<u>Ref. 6172</u>		
102 Basic 4-8	.4412	
130 ESOL	<u>(.4412)</u>	.0000

9. [Ref. 6173] One teacher was not properly certified and was not eligible to be approved by the School Board to teach various courses out of field. Since the School Board had approved the teacher to teach out of field in prior years, the teacher was required to earn college credits toward certification in the out-of-field subject areas but did not. Consequently, the teacher should not have been approved to continue to teach out of field. We propose the following adjustment:

102 Basic 4-8	2.1420	
130 ESOL	<u>(2.1420)</u>	<u>.0000</u>
		<u>.0000</u>

Malone School (#0121)

10. [Ref. 12101] Timecards did not reflect the time worked for 16 Career Education 9-12 students who participated in OJT. School management indicated that time recorded on the timecards only represented time that the students were not on campus; consequently, School records did not evidence that the students worked while not on campus. We propose the following adjustment:

300 Career Education 9-12	<u>(5.2840)</u>	<u>(5.2840)</u>
		<u>(5.2840)</u>

Hope School (#0202)

11. [Ref. 20201] Our review of schedules for ten Basic students in Grade 5 (two students were in our test) disclosed that the students were taking credit recovery courses and were provided 290 instructional minutes per day (or 1,450 CMW) for 179 school
(Finding Continues on Next Page)

Findings

Hope School (#0202) (Continued)

days based on the School’s bell schedule and District calendar, or approximately 865 net instructional hours. However, the students were reported for 1,575 CMW recalibrated down to the maximum 1,500 CMW for 180 days, or 900 instructional hours, resulting in an overstatement of the FTE for the ten students. We propose the following adjustment:

102 Basic 4-8	(.3677)	(.3677)
		(.3677)

Jackson Alternative School (#0212)

12. [Ref. 21202] The IEPs for two ESE students were not accompanied by *Matrix of Services* forms to support the students’ reporting in Program No. 254 (ESE Support Level 4) and the students’ prior *Matrix of Services* forms did not evidence that they were reviewed when the students’ new IEPs were developed. We propose the following adjustment:

112 Grades 4-8 with ESE Services	1.0000	
113 Grades 9-12 with ESE Services	.5002	
254 ESE Support Level 4	(<u>1.5002</u>)	.0000

13. [Ref. 21203] One ESE student in our Basic with ESE Services test was not reported in accordance with the student’s *Matrix of Services* form. We propose the following adjustment:

111 Grades K-3 with ESE Services	(.4998)	
254 ESE Support Level 4	(<u>.4998</u>)	.0000

14. [Ref. 21204] An attendance record was not available to support the reporting of one ESE student. We propose the following adjustment:

113 Grades 9-12 with ESE Services	(<u>.1200</u>)	(.1200)
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15. [Ref. 21270/71] Two teachers were not properly certified and were not eligible to be approved by the School Board to teach various courses out of field. Since the School Board had approved the teachers to teach out of field in prior years, the teachers were required to earn college credits toward certification in the out-of-field subject areas but did not. Consequently, the teachers should not have been approved to continue to teach out of field. We also noted that the parents were not notified of the teachers’ out-of-field status in English, Math, Physical Education, Science, and Social Science (Ref. 21270) or Elementary Education (Ref. 21271). We propose the following adjustments:

		Proposed Net Adjustments (Unweighted FTE)	
<u>Findings</u>			
<u>Jackson Alternative School (#0212)</u> (Continued)			
<u>Ref. 21270</u>			
103 Basic 9-12	1.3938		
254 ESE Support Level 4	<u>(1.3938)</u>		.0000
<u>Ref. 21271</u>			
102 Basic 4-8	2.4217		
254 ESE Support Level 4	<u>(2.4217)</u>		<u>.0000</u>
			<u>(.1200)</u>
<u>Jackson Virtual Instruction Program (#7001)</u>			
16. [Ref. 700101] One Basic virtual education student was not enrolled in virtual courses until after the February 2017 reporting survey period and did not complete the courses until July 5, 2017, which was after the end of the 180-day school year. Consequently, the courses were not eligible to be reported for FEFP funding. We propose the following adjustment:			
103 Basic 9-12	<u>(.1500)</u>		<u>(.1500)</u>
			<u>(.1500)</u>
<u>Jackson Virtual Instruction Course Offerings (#7006)</u>			
17. [Ref. 700671] One teacher was not properly certified and was not approved by the School Board to teach out of field until January 17, 2017, which was after the October 2016 reporting survey period. The teacher was certified in Exceptional Student Education and Primary Education but taught courses that required certification in English or Social Science. In addition, the parents of the student were not notified of the teacher's out-of-field status. Since the student's courses were reported for only Basic funding, we present this disclosure finding with no proposed adjustment.			
			.0000
18. [Ref. 700670] One teacher was not properly certified and was not approved by the School Board to teach out of field. The teacher held certification in Biology, General Science, and Elementary Education but taught a course that required certification in Health Education. In addition, the parents of the students were not notified of the teacher's out-of-field status. We propose the following adjustment:			
103 Basic 9-12	.2154		
113 Grades 9-12 with ESE Services	<u>(.2154)</u>		<u>.0000</u>
			<u>.0000</u>
Proposed Net Adjustment			<u>(6.8826)</u>

SCHEDULE E

RECOMMENDATIONS AND REGULATORY CITATIONS FULL-TIME EQUIVALENT STUDENT ENROLLMENT

RECOMMENDATIONS

We recommend that Jackson County District School Board (District) management exercise more care and take corrective action, as appropriate, to ensure that: (1) only students who are documented as in membership and in attendance at least 1 day during the 11-day reporting survey period are reported for FEFP funding; (2) the CMW in students' course schedules are reported in accordance with the schools' bell schedules and FTE is accurately calculated based on the number of instructional hours provided; (3) ESE students are reported in accordance with the students' *Matrix of Services* forms; (4) there is evidence that the *Matrix of Services* forms have been reviewed and updated as necessary when students' IEPs are reviewed or updated to ensure that the *Matrix of Services* forms accurately reflect the IEP services in effect during the reporting survey period; (5) documentation is maintained on file that supports ELL Committees' consideration of the criteria specified by SBE Rule 6A-6.09022(3), FAC, to support students' ESOL placements and students' English language proficiency is assessed prior to being placed in the ESOL Program; (6) parents are timely notified of their children's ESOL placements; (7) *ELL Student Plans* include the students' course schedules; (8) students in Career Education 9-12 who participate in OJT are reported in accordance with timecards reflecting time worked that are accurately completed, signed, and retained in readily accessible files; (9) virtual courses completed after the end of the school year are not reported for FEFP funding if the students were not enrolled in the courses during the October or February reporting survey periods; (10) teachers are appropriately certified or, if teaching out of field, are timely approved by the School Board to teach out of field; (11) Basic subject area teachers of ELL students earn the number of in-service training points required by SBE Rule 6A-6.0907, FAC, and out-of-field teachers earn the college credit or in-service training points required by SBE Rule 6A-1.0503, FAC, and in accordance with the teachers' in-service training timelines; and (12) parents are appropriately notified when their children are assigned to teachers teaching out of field.

The absence of statements in this report regarding practices and procedures followed by the District should not be construed as acceptance, approval, or endorsement of those practices and procedures. Additionally, the specific nature of this report does not limit or lessen the District's obligation to comply with all State requirements relating to the classification, assignment, and verification of the FTE student enrollment as reported under the FEFP.

REGULATORY CITATIONS

Reporting

Section 1007.271(21), Florida Statutes, *Dual Enrollment Programs*

Section 1011.60, Florida Statutes, *Minimum Requirements of the Florida Education Finance Program*

Section 1011.61, Florida Statutes, *Definitions*

Section 1011.62, Florida Statutes, *Funds for Operation of Schools*

SBE Rule 6A-1.0451, FAC, *Florida Education Finance Program Student Membership Surveys*

SBE Rule 6A-1.045111, FAC, *Hourly Equivalent to 180-Day School Year*

SBE Rule 6A-1.04513, FAC, *Maintaining Auditable FTE Records*

FTE General Instructions 2016-17

Attendance

Section 1003.23, Florida Statutes, *Attendance Records and Reports*

SBE Rule 6A-1.044(3) and (6)(c), FAC, *Pupil Attendance Records*

SBE Rule 6A-1.04513, FAC, *Maintaining Auditable FTE Records*

FTE General Instructions 2016-17

Comprehensive Management Information System: Automated Student Attendance Recordkeeping System Handbook

ESOL

Section 1003.56, Florida Statutes, *English Language Instruction for Limited English Proficient Students*

Section 1011.62(1)(g), Florida Statutes, *Education for Speakers of Other Languages*

SBE Rule 6A-6.0901, FAC, *Definitions Which Apply to Programs for English Language Learners*

SBE Rule 6A-6.0902, FAC, *Requirements for Identification, Eligibility, and Programmatic Assessments of English Language Learners*

SBE Rule 6A-6.09021, FAC, *Annual English Language Proficiency Assessment for English Language Learners (ELLs)*

SBE Rule 6A-6.09022, FAC, *Extension of Services in English for Speakers of Other Languages (ESOL) Program*

SBE Rule 6A-6.0903, FAC, *Requirements for Exiting English Language Learners from the English for Speakers of Other Languages Program*

SBE Rule 6A-6.09031, FAC, *Post Reclassification of English Language Learners (ELLs)*

SBE Rule 6A-6.0904, FAC, *Equal Access to Appropriate Instruction for English Language Learners*

Career Education On-The-Job Attendance

SBE Rule 6A-1.044(6)(c), FAC, *Pupil Attendance Records*

Career Education On-The-Job Funding Hours

FTE General Instructions 2016-17

Exceptional Education

Section 1003.57, Florida Statutes, *Exceptional Students Instruction*

Section 1011.62, Florida Statutes, *Funds for Operation of Schools*

Section 1011.62(1)(e), Florida Statutes, *Funding Model for Exceptional Student Education Programs*
SBE Rule 6A-6.03028, FAC, *Provision of Free Appropriate Public Education (FAPE) and Development of Individual Educational Plans for Students with Disabilities*
SBE Rule 6A-6.03029, FAC, *Development of Individualized Family Support Plans for Children with Disabilities Ages Birth Through Five Years*
SBE Rule 6A-6.0331, FAC, *General Education Intervention Procedures, Evaluation, Determination of Eligibility, Reevaluation and the Provision of Exceptional Student Education Services*
SBE Rule 6A-6.0334, FAC, *Individual Educational Plans (IEPs) and Educational Plans (EPs) for Transferring Exceptional Students*
SBE Rule 6A-6.03411, FAC, *Definitions, ESE Policies and Procedures, and ESE Administrators*
SBE Rule 6A-6.0361, FAC, *Contractual Agreements with Nonpublic Schools and Residential Facilities*
Matrix of Services Handbook (2015 Edition)

Teacher Certification

Section 1012.42(2), Florida Statutes, *Teacher Teaching Out-of-Field; Notification Requirements*
Section 1012.55, Florida Statutes, *Positions for Which Certificates Required*
SBE Rule 6A-1.0502, FAC, *Non-certificated Instructional Personnel*
SBE Rule 6A-1.0503, FAC, *Definition of Qualified Instructional Personnel*
SBE Rule 6A-4.001, FAC, *Instructional Personnel Certification*
SBE Rule 6A-6.0907, FAC, *Inservice Requirements for Personnel of Limited English Proficient Students*

Virtual Education

Section 1002.321, Florida Statutes, *Digital Learning*
Section 1002.37, Florida Statutes, *The Florida Virtual School*
Section 1002.45, Florida Statutes, *Virtual Instruction Programs*
Section 1002.455, Florida Statutes, *Student Eligibility for K-12 Virtual Instruction*
Section 1003.498, Florida Statutes, *School District Virtual Course Offerings*

Charter Schools

Section 1002.33, Florida Statutes, *Charter Schools*

NOTES TO SCHEDULES

NOTE A – SUMMARY FULL-TIME EQUIVALENT STUDENT ENROLLMENT

A summary discussion of the significant features of the Jackson County District School Board (District), the FEFP, the FTE, and related areas is provided below.

1. The District

The District was established pursuant to Section 1001.30, Florida Statutes, to provide public educational services for the residents of Jackson County, Florida. Those services are provided primarily to PK through 12th-grade students and to adults seeking career education-type training. The District is part of the State system of public education under the general direction and control of the SBE. The geographic boundaries of the District are those of Jackson County.

The governing body of the District is the District School Board that is composed of five elected members. The executive officer of the Board is the elected Superintendent of Schools. The District had 16 schools, 3 cost centers, and 3 virtual education cost centers serving PK through 12th-grade students. The District did not report any charter schools.

For the fiscal year ended June 30, 2017, State funding totaling \$31.4 million was provided through the FEFP to the District for the District-reported 8,360.91 unweighted FTE as recalibrated. The primary sources of funding for the District are funds from the FEFP, local ad valorem taxes, and Federal grants and donations.

2. FEFP

Florida school districts receive State funding through the FEFP to serve PK through 12th-grade students (adult education is not funded by the FEFP). The FEFP was established by the Florida Legislature in 1973 to guarantee to each student in the Florida public school system, including charter schools, the availability of programs and services appropriate to the student's educational needs that are substantially equal to those available to any similar student notwithstanding geographic differences and varying local economic factors. To provide equalization of educational opportunity in Florida, the FEFP formula recognizes: (1) varying local property tax bases, (2) varying program cost factors, (3) district cost differentials, and (4) differences in per-student cost for equivalent educational programs due to sparsity and dispersion of student population.

3. FTE Student Enrollment

The funding provided by the FEFP is based on the numbers of individual students participating in particular educational programs. A numerical value is assigned to each student according to the student's hours and days of attendance in those programs. The individual student thus becomes equated to a numerical value known as an unweighted FTE student enrollment. For example, for PK through 3rd grade, 1.0 FTE is defined as one student in membership in a program or a group of programs for 20 hours per week for 180 days; for grade levels 4 through 12, 1.0 FTE is defined as one student in membership in a program or a group of programs for 25 hours per week for 180 days. For brick and mortar school

students, one student would be reported as 1.0 FTE if the student was enrolled in six courses per day at 50 minutes per course for the full 180-day school year (i.e., six courses at 50 minutes each per day is 5 hours of class a day or 25 hours per week, which equates to 1.0 FTE). For virtual education students, one student would be reported as 1.0 FTE if the student has successfully completed six courses or credits or the prescribed level of content that counts toward promotion to the next grade. A student who completes less than six credits will be reported as a fraction of an FTE. Half-credit completions will be included in determining an FTE student enrollment. Credits completed by a student in excess of the minimum required for that student for graduation are not eligible for funding.

4. Recalibration of FTE to 1.0

School districts report all FTE student enrollment regardless of the 1.0 FTE cap. The DOE combines all FTE student enrollment reported for the student by all school districts, including the Florida Virtual School. If the combined reported FTE for the student exceeds 1.0 FTE, the DOE recalibrates the reported FTE student enrollment for each student to 1.0 FTE. The FTE student enrollment reported by the Department of Juvenile Justice for FTE student enrollment earned beyond the 180-day school year is not included in the recalibration to 1.0 FTE.

All FTE student enrollment is capped at 1.0 FTE except for the FTE student enrollment reported by the Department of Juvenile Justice for students beyond the 180-day school year. However, if a student only has FTE student enrollment reported in one survey of the 180-day school year (Survey 2 or Survey 3), the FTE student enrollment reported will be capped at .5000 FTE, even if FTE student enrollment is reported in Survey 1 or Survey 4, with the exception of FTE student enrollment reported by the Department of Juvenile Justice for students beyond the 180-day school year.

5. Calculation of FEFP Funds

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

6. FTE Reporting Survey Periods

The FTE is determined and reported during the school year by means of four FTE membership survey periods that are conducted under the direction of district and school management. Each survey period is a testing of the FTE membership for a period of 1 week. The survey periods for the 2016-17 school year were conducted during and for the following weeks: Survey 1 was performed from July 11 through 15, 2016; Survey 2 was performed from October 10 through 14, 2016; Survey 3 was performed from February 6 through 10, 2017; and Survey 4 was performed from June 12 through 16, 2017.

7. Educational Programs

The FEFP funds ten specific programs under which instruction may be provided as authorized by the Florida Legislature. The general program titles under which these specific programs fall are: (1) Basic, (2) ESOL, (3) ESE, and (4) Career Education 9-12.

8. Statutes and Rules

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

Chapter 1000, Florida Statutes, *K-20 General Provisions*

Chapter 1001, Florida Statutes, *K-20 Governance*

Chapter 1002, Florida Statutes, *Student and Parental Rights and Educational Choices*

Chapter 1003, Florida Statutes, *Public K-12 Education*

Chapter 1006, Florida Statutes, *Support for Learning*

Chapter 1007, Florida Statutes, *Articulation and Access*

Chapter 1010, Florida Statutes, *Financial Matters*

Chapter 1011, Florida Statutes, *Planning and Budgeting*

Chapter 1012, Florida Statutes, *Personnel*

SBE Rules, Chapter 6A-1, FAC, *Finance and Administration*

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

SBE Rules, Chapter 6A-6, FAC, *Special Programs I*

NOTE B – TESTING FTE STUDENT ENROLLMENT
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Our examination procedures for testing provided for the selection of schools, students, and teachers using judgmental methods for testing the FTE student enrollment as reported under the FEFP to the DOE for the fiscal year ended June 30, 2017. Our testing process was designed to facilitate the performance of appropriate examination procedures to test the District's compliance with State requirements relating to the classification, assignment, and verification of the FTE student enrollment as reported under the FEFP. The following schools were selected for testing:

<u>School</u>	<u>Findings</u>
1. Marianna High School	1 and 2
2. Frank M. Golson Elementary School	3 through 5
3. Marianna Middle School	6 through 9
4. Malone School	10
5. Hope School	11
6. Jackson Alternative School	12 through 15
7. Cottondale High School	NA
8. Jackson Virtual Instruction Program	16
9. Jackson Virtual Franchise	NA
10. Jackson Virtual Instruction Course Offerings	17 and 18



Sherrill F. Norman, CPA
Auditor General

AUDITOR GENERAL STATE OF FLORIDA

Claude Denson Pepper Building, Suite G74
111 West Madison Street
Tallahassee, Florida 32399-1450



Phone: (850) 412-2722
Fax: (850) 488-6975

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

INDEPENDENT AUDITOR'S REPORT

Report on Student Transportation

We have examined the Jackson County District School Board's (District's) compliance with State requirements relating to the classification, assignment, and verification of student transportation as reported under the Florida Education Finance Program for the fiscal year ended June 30, 2017. 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 2016-17* issued by the Department of Education.

Management's Responsibility for Compliance

District management is responsible for the District's compliance with the aforementioned State requirements, including the design, implementation, and maintenance of internal control to prevent, or detect and correct, noncompliance due to fraud or error.

Auditor's Responsibility

Our responsibility is to express an opinion on the District's compliance with State requirements based on our examination. Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants and the standards applicable to attestation engagements contained in *Government Auditing Standards* issued by the Comptroller General of the United States. Those standards require that we plan and perform the examination to obtain reasonable assurance about whether the classification, assignment, and verification of student transportation reported by the District under the Florida Education Finance Program complied with State requirements in all material respects.

An examination involves performing procedures to obtain evidence about whether the District complied with State requirements. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risks of material noncompliance, whether due to fraud or error. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for

our opinion. Our examination does not provide a legal determination on the District's compliance with State requirements. The legal determination of the District's compliance with these requirements is, however, ultimately the responsibility of the Department of Education.

An examination by its nature does not include a review of all records and actions of District management and staff and, as a consequence cannot be relied upon to identify all instances of noncompliance, fraud, abuse, or inefficiency. Because of these limitations and the inherent limitations of internal control, an unavoidable risk exists that some material misstatements may not be detected, even though the examination is properly planned and performed in accordance with attestation standards.

Opinion

Our examination disclosed material noncompliance with State requirements relating to the classification, assignment, and verification of student transportation as reported under the Florida Education Finance Program involving the students' reported ridership classification or eligibility for State transportation funding.

In our opinion, except for the material noncompliance with State requirements described in the preceding paragraph involving the students' reported ridership classification or eligibility for State transportation funding, the Jackson County District School Board complied, in all material respects, with State requirements relating to the classification, assignment, and verification of student transportation as reported under the Florida Education Finance Program for the fiscal year ended June 30, 2017.

Other Reporting Required by *Government Auditing Standards*

In accordance with attestation standards established by *Government Auditing Standards*, we are required to report all deficiencies that are considered to be significant deficiencies or material weaknesses⁵ in internal control; fraud and noncompliance with provisions of laws or regulations that have a material effect on the District's compliance with State requirements; and any other instances that warrant the attention of those charged with governance; noncompliance with provisions of contracts or grant agreements that has a material effect on the District's compliance with State requirements; and abuse that has a material effect on the District's compliance with State requirements. We are also required to obtain and report the views of responsible officials concerning the findings, conclusions, and recommendations, as well as any planned corrective actions.

We performed our examination to express an opinion on the District's compliance with State requirements and not for the purpose of expressing an opinion on the District's related internal control over compliance with State requirements; accordingly, we express no such opinion. Because of its limited purpose, our examination would not necessarily identify all deficiencies in internal control over compliance that might be significant deficiencies or material weaknesses. However, the material noncompliance mentioned above is indicative of significant deficiencies considered to be material weaknesses in the District's internal controls related to students' reported ridership classification or eligibility for State transportation funding. Our examination disclosed certain findings that are required to be reported under *Government*

⁵ A significant deficiency is a deficiency or a combination of deficiencies in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance. A material weakness is a deficiency, or combination of deficiencies, in internal control such that there is a reasonable possibility that material noncompliance will not be prevented, or detected and corrected, on a timely basis.

Auditing Standards and all findings, along with the views of responsible officials, are described in *SCHEDULE G* and *MANAGEMENT'S RESPONSE*, respectively. The impact of this noncompliance with State requirements on the District's reported student transportation is presented in *SCHEDULES F* and *G*.

The District's written response to this examination has not been subjected to our examination procedures and, accordingly, we express no opinion on it.

Purpose of this Report

Pursuant to Section 11.45(4)(c), Florida Statutes, this report is a public record and its distribution is not limited. Attestation standards established by the American Institute of Certified Public Accountants require us to indicate that the purpose of this report is to provide an opinion on the District's compliance with State requirements. Accordingly, this communication is not suitable for any other purpose.

Respectfully submitted,



Sherrill F. Norman, CPA
Tallahassee, Florida
July 12, 2018

SCHEDULE F

POPULATIONS, TEST SELECTION, AND TEST RESULTS STUDENT TRANSPORTATION

Any student who is transported by the Jackson County District School Board (District) must meet one or more of the following conditions in order to be eligible for State transportation funding: live 2 or more miles from school, be classified as a student with a disability under the IDEA, be a Career Education 9-12 or an ESE student who is transported from one school center to another where appropriate programs are provided, or be on a route that meets the criteria for hazardous walking conditions specified in Section 1006.23(2), Florida Statutes. (See NOTE A1.)

As part of our examination procedures, we tested student transportation as reported to the DOE for the fiscal year ended June 30, 2017. (See NOTE B.) The population of vehicles (160) consisted of the total number of vehicles (buses, vans, or passenger cars) reported by the District for all reporting survey periods. For example, a vehicle that transported students during the July and October 2016 and February and June 2017 reporting survey periods would be counted in the population as four vehicles. Similarly, the population of students (6,499) consisted of the total number of students reported by the District as having been transported for all reporting survey periods. (See NOTE A2.) The District reported students in the following ridership categories:

<u>Ridership Category</u>	<u>Number of Students Transported</u>
IDEA – PK through Grade 12, Weighted	384
All Other FEFP Eligible Students	<u>6,115</u>
Total	<u>6,499</u>

Students with exceptions are students with exceptions affecting their ridership category. Students cited only for incorrect reporting of DIT, if any, are not included in our error-rate determination.

We noted the following material noncompliance: exceptions involving the reported ridership classification or eligibility for State transportation funding for 47 of 244 students in our student transportation test.⁶

⁶ For student transportation, the material noncompliance is composed of Findings 1, 2, 4, 6, 7, 9, and 10 on SCHEDULE G.

Our examination results are summarized below:

<u>Description</u>	<u>Students</u>	
	<u>With Exceptions</u>	<u>Proposed Net Adjustment</u>
Our tests included 244 of the 6,499 students reported as being transported by the District.	47	(45)
In conjunction with our general tests of student transportation we identified certain issues related to 390 additional students.	<u>390</u>	<u>(384)</u>
Total	<u>437</u>	<u>(429)</u>

Our proposed net adjustment presents the net effect of noncompliance disclosed by our examination procedures. (See *SCHEDULE G.*)

The ultimate resolution of our proposed net adjustment and the computation of its financial impact is the responsibility of the DOE.

SCHEDULE G

FINDINGS AND PROPOSED ADJUSTMENTS STUDENT TRANSPORTATION

Overview

Management is responsible for determining that student transportation as reported under the FEFP is in compliance with State requirements. These requirements are found primarily in Chapter 1006, Part I, E. and Section 1011.68, Florida Statutes; SBE Rules, Chapter 6A-3, FAC; and the *Student Transportation General Instructions 2016-17* issued by the DOE. All noncompliance disclosed by our examination procedures is discussed below and requires management’s attention and action as presented in *SCHEDULE H*.

Findings

Students Transported Proposed Net Adjustments

Our examination procedures included both general tests and detailed tests. Our general tests included inquiries concerning the District’s transportation of students and verification that a bus driver’s report existed for each bus reported in a survey period. Our detailed tests involved verification of the specific ridership categories reported for students in our tests from the July and October 2016 reporting survey periods and the February and June 2017 reporting survey periods. Adjusted students who were in more than one reporting survey period are accounted for by reporting survey period. For example, a student included in our tests twice (e.g., once for the October 2016 reporting survey period and once for the February 2017 reporting survey period) will be presented in our Findings as two test students.

1. [Ref. 51] Eight PK students (one student was in our test) were not eligible to be reported for State transportation funding. The students were not classified as IDEA students and were not enrolled in a Teenage Parent Program. We propose the following adjustments:

October 2016 Survey

85 Days in Term

All Other FEFP Eligible Students (4)

February 2017 Survey

94 Days in Term

All Other FEFP Eligible Students (4) (8)

2. [Ref. 52] Seventeen students (14 students were in our test) were incorrectly reported for State transportation funding in the June 2017 reporting survey period. The students were transported to a 3rd-grade summer reading camp and were not otherwise eligible for State transportation funding. We propose the following adjustment:

**Students
Transported
Proposed Net
Adjustments**

Findings

June 2017 Survey

15 Days in Term

All Other FEFP Eligible Students	(17)	(17)
----------------------------------	------	------

3. [Ref. 53] One student enrolled in the Gifted Program was incorrectly reported in the IDEA - PK through Grade 12, Weighted ridership category; however, the student lived more than 2 miles from school and was eligible for reporting in the All Other FEFP Eligible Students ridership category. We propose the following adjustment:

October 2016 Survey

85 Days in Term

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

4. [Ref. 54] Four students (one student was in our test) were incorrectly reported for State transportation funding. The students were either enrolled in the Jackson Virtual Instruction Program (three students) or enrolled in a McKay Scholarship Program (one student) and were not receiving transportation services. We propose the following adjustment:

February 2017 Survey

94 Days in Term

IDEA - PK through Grade 12, Weighted	(2)	
All Other FEFP Eligible Students	<u>(2)</u>	(4)

5. [Ref. 55] Our general tests disclosed that five students were either not marked as riding the bus on the bus drivers' reports (three students) or were not listed on the bus drivers' reports (two students). We propose the following adjustments:

October 2016 Survey

85 Days in Term

All Other FEFP Eligible Students	(3)	
----------------------------------	-----	--

February 2017 Survey

94 Days in Term

All Other FEFP Eligible Students	<u>(2)</u>	(5)
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6. [Ref. 56] Our review of the bus drivers' reports disclosed that ten of the reports were not signed by the bus drivers and one other report was signed prior to the reporting survey period. Consequently, the ridership of the 290 students (18 students were in our test) reported on these buses could not be validated. In addition, 2 of the test students were either not listed on the bus driver's report (1 student) or were not marked as riding the bus (1 student). We propose the following adjustments:

<u>Findings</u>	<u>Students Transported</u>	<u>Proposed Net Adjustments</u>
October 2016 Survey		
<u>85 Days in Term</u>		
All Other FEFP Eligible Students	(106)	
February 2017 Survey		
<u>94 Days in Term</u>		
All Other FEFP Eligible Students	<u>(184)</u>	(290)
7. [Ref. 57] Our general tests disclosed that 88 students enrolled in the Gifted Program (2 students were in our test) were incorrectly reported for State transportation funding. One student was not listed on the bus driver’s report and the remaining 87 students were provided transportation from their assigned school to another school (i.e., center-to-center) to attend a Gifted Program. Only ESE students with disabilities who are classified under the IDEA when transported from one school center to another are eligible for State transportation funding. ESE students enrolled in the Gifted Program are not considered students with disabilities unless they are disabled. We propose the following adjustments:		
October 2016 Survey		
<u>18 Days in Term</u>		
All Other FEFP Eligible Students	(50)	
February 2017 Survey		
<u>94 Days in Term</u>		
All Other FEFP Eligible Students	<u>(38)</u>	(88)
8. [Ref. 58] Our general tests disclosed that 13 students were incorrectly reported. Eight of the students were not listed on the bus drivers’ reports. In addition, 2 students in the October 2016 reporting survey period were reported for 11 or 15 DIT rather than 85 DIT, and 3 students in the February 2017 reporting survey period were reported for 94 DIT rather than 36 DIT, in accordance with the District’s instructional calendar. We propose the following adjustments:		
October 2016 Survey		
<u>85 Days in Term</u>		
All Other FEFP Eligible Students	2	
<u>18 Days in Term</u>		
All Other FEFP Eligible Students	(1)	
<u>15 Days in Term</u>		
All Other FEFP Eligible Students	(1)	

		Students Transported Proposed Net Adjustments
Findings		
October 2016 Survey (Continued)		
<u>11 Days in Term</u>		
All Other FEFP Eligible Students	(1)	
February 2017 Survey		
<u>94 Days in Term</u>		
All Other FEFP Eligible Students	(7)	
<u>86 Days in Term</u>		
All Other FEFP Eligible Students	(3)	
<u>36 Days in Term</u>		
All Other FEFP Eligible Students	<u>3</u>	(8)
9.	[Ref. 59] Nine students in our test were incorrectly reported in the All Other FEFP Eligible Students ridership category. The students lived less than 2 miles from their assigned schools and were not otherwise eligible for State transportation funding. We propose the following adjustments:	
October 2016 Survey		
<u>85 Days in Term</u>		
All Other FEFP Eligible Students	(6)	
February 2017 Survey		
<u>94 Days in Term</u>		
All Other FEFP Eligible Students	<u>(3)</u>	(9)
10.	[Ref. 60] Two students in our test were incorrectly reported in the IDEA - PK through Grade 12, Weighted ridership category. The students' IEPs did not indicate that the students met at least one of the five criteria required for reporting in a weighted ridership category. However, we determined that the students lived 2 miles or more from their assigned schools and were eligible to be reported in the All Other FEFP Eligible Students ridership category. We propose the following adjustments:	
October 2016 Survey		
<u>85 Days in Term</u>		
IDEA - PK through Grade 12, Weighted	(1)	
All Other FEFP Eligible Students	1	
February 2017 Survey		
<u>94 Days in Term</u>		
IDEA - PK through Grade 12, Weighted	(1)	
All Other FEFP Eligible Students	<u>1</u>	<u>0</u>
Proposed Net Adjustment		<u>(429)</u>

SCHEDULE H

RECOMMENDATIONS AND REGULATORY CITATIONS STUDENT TRANSPORTATION

RECOMMENDATIONS

We recommend that Jackson County District School Board (District) management exercise more care and take corrective action, as appropriate, to ensure that: (1) all bus drivers' reports documenting student ridership during the reporting survey periods are signed and timely dated by the bus drivers who provided the transportation; (2) students are reported in the correct ridership category and only those students who are receiving transportation services and are documented as enrolled in school during the survey period and recorded on bus drivers' reports as having been transported by the District at least 1 day during the reporting survey period are reported for State transportation funding; (3) students reported in IDEA - PK through Grade 12, Weighted ridership category are IDEA students documented as meeting at least one of the five criteria required for reporting in a weighted ridership category as noted on the students' IEPs; (4) the number of DIT is accurately reported; (5) the distance from home to school is verified as being 2 miles or more prior to reporting students in the All Other FEFP Eligible Students ridership category; (6) ESE students who are transported from center to center to attend Gifted Programs are not reported for State transportation funding; (7) only ESE students classified as students with disabilities under the IDEA attending extended school year programs or students attending a nonresidential Department of Juvenile Justice Program are reported for State transportation funding during the summer reporting surveys; and (8) only PK students who are IDEA students or are children of students enrolled in a Teenage Parent Program are reported for State transportation funding.

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

REGULATORY CITATIONS

Section 1002.33, Florida Statutes, *Charter Schools*
Chapter 1006, Part I, E., Florida Statutes, *Transportation of Public K-12 Students*
Section 1011.68, Florida Statutes, *Funds for Student Transportation*
SBE Rules, Chapter 6A-3, FAC, *Transportation*
Student Transportation General Instructions 2016-17

NOTES TO SCHEDULES

NOTE A - SUMMARY STUDENT TRANSPORTATION
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A summary discussion of the significant features of the Jackson County District School Board (District) student transportation and related areas is provided below.

1. Student Eligibility

Any student who is transported by the District must meet one or more of the following conditions in order to be eligible for State transportation funding: live 2 or more miles from school, be classified as a student with a disability under the IDEA, be a Career Education 9-12 or an ESE student who is transported from one school center to another where appropriate programs are provided, or be on a route that meets the criteria for hazardous walking conditions specified in Section 1006.23(2), Florida Statutes.

2. Transportation in Jackson County

For the fiscal year ended June 30, 2017, the District received \$1.6 million for student transportation as part of the State funding through the FEFP. The District's student transportation reported by survey period was as follows:

<u>Survey Period</u>	<u>Number of Vehicles</u>	<u>Number of Students</u>
July 2016	0	0
October 2016	77	3,251
February 2017	77	3,231
June 2017	<u>6</u>	<u>17</u>
Totals	<u>160</u>	<u>6,499</u>

3. Statutes and Rules

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

Section 1002.33, Florida Statutes, *Charter Schools*

Chapter 1006, Part I, E., Florida Statutes, *Transportation of Public K-12 Students*

Section 1011.68, Florida Statutes, *Funds for Student Transportation*

SBE Rules, Chapter 6A-3, FAC, *Transportation*

NOTE B – TESTING STUDENT TRANSPORTATION
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Our examination procedures for testing provided for the selection of students using judgmental methods for testing student transportation as reported to the DOE for the fiscal year ended June 30, 2017. Our testing process was designed to facilitate the performance of appropriate examination procedures to test the District's compliance with State requirements relating to the classification, assignment, and verification of student transportation as reported under the FEFP.

MANAGEMENT'S RESPONSE

THE SCHOOL BOARD OF JACKSON COUNTY



H. Larry Moore
Superintendent of Schools

2903 Jefferson Street
P.O. Box 5958
Marianna, Florida 32447
Telephone 850-482-1200
Fax 850-482-1299

July 12, 2018

Auditor General, Ms. Sherrill F. Norman, CPA
G74 Claude Pepper Building
111 West Madison Street
Tallahassee, Florida 32399-1450

Ms. Norman,

The Jackson County School Board is in receipt of the preliminary and tentative report of the *State of Florida Auditor General Attestation Examination for FEFP, FTE, and Student Transportation Fiscal Year ending June 2017*. It is the express desire of the Jackson County School Board to comply with all state Statutes and mandates regarding accurately reporting the District's Full-Time Equivalent (FTE) data. All diligence is used to ensure that the data reported is reported accurately. It was a pleasure to have your office review our data reporting process, and we offer the following responses to your preliminary findings.

In reference to findings for Full-Time Equivalent Student Enrollment, Jackson County will take the following corrective action measures to ensure accurate reporting:

Finding 1: The District will make it a priority to cross check time cards within the school setting between students and vocational teachers assigned to OJT courses. The CTE Director for the District will conduct random internal audits to ensure reporting processes and procedures are consistent and accurate throughout the District.

Findings 2, 3, 4, 5, 6, 7, and 8: The District has implemented a process to enable the tracking and on-going monitoring of ESOL points obtained and Professional Development provided for teachers. The District has initiated a connection between the Student Information System (Focus) and teacher certification to generate more accurate ELL reporting.

Findings 9, 15, 17, and 18: The District is initiating a connection between the Student Information System (Focus), currently employed teacher demographics, and teacher schedules to generate more accurate certification reporting based on data housed within the system.

Finding 11: The District will review and approve all master schedules prior to the first day of school. All schools will be required to have a published bell schedule for all individual programs housed on their campuses.

Findings 12 and 13: The District ESE Department will conduct random internal audits to ensure that ESE reporting processes are being followed. Schools will randomly conduct internal audits to ensure all Individual Educational Plans reflect accurate information.

Terry E. Nichols
District 1

Tony Pumphrey
District 2

Stacey B. Goodson
District 3

Chris M. Johnson
District 4

Charlotte M. Gardner
District 5

An Equal Opportunity Employer

Finding 16: The District will ensure that any student that is enrolled in a virtual class and has been reported for FTE will have the course completed prior to the last instructional day of the school calendar.

Finding 10 and 14: The District acknowledges the findings, but reserves the right to appeal.

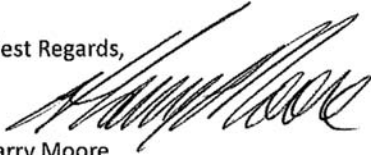
In reference to findings for Student Transportation, Jackson County will take the following corrective action measures to ensure accurate reporting:

Findings 1, 2, 3, 4, 5, 7, 8, 9, and 10: The District Transportation department will add measures to reporting procedures that require a sign off for all data entry entered into the Student Management System for reporting and auditing purposes. The department will also have multiple layers to check and balances within their office to ensure more accurate reporting. The District will incorporate the use of Versa trans software to more accurately identify addresses within a 2-mile radius of the school to prevent initial reporting.

Finding 6: The District acknowledges the findings, but reserves the right to appeal.

Again, be assured that the Jackson County School Board will work diligently to ensure that all recommendations in the Auditor General's draft report are corrected. Our staff is dedicated to providing quality education to all students residing in Jackson County.

Kindest Regards,



H. Larry Moore
Superintendent of Schools