

Report No. 2019-019  
September 2018

**STATE OF FLORIDA AUDITOR GENERAL**

Attestation Examination

**NASSAU 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, Dr. Kathy K. Burns served as Superintendent from 11-22-16, Dr. John L. Ruis served as Superintendent through 11-21-16, and the following individuals served as Board members:

	<u>District No.</u>
Donna Martin, Chair	1
Gail Galphin Cook, Vice Chair from 11-22-16	2
Demetrios Nicholas Deonas	3
Dr. Kimberly Joyce Fahlgren	4
Jonathan R. Petree from 11-22-16	5
Dr. Kathy K. Burns through 11-21-16	5

The team leader was Clayton G. Dyer, 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](mailto:davidhughes@aud.state.fl.us) or by telephone at (850) 412-2971.

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**NASSAU COUNTY DISTRICT SCHOOL BOARD**  
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# NASSAU COUNTY DISTRICT SCHOOL BOARD

## LIST OF ABBREVIATIONS

CMW	Class Minutes, Weekly
DEUSS	Date Entered United States School
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

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## SUMMARY OF ATTESTATION EXAMINATION

Except for the material noncompliance described below 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 students in ESOL, ESE Support Levels 4 and 5, Career Education 9-12, and student transportation, the Nassau 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

- 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 40 of the 45 students in our ESOL test, 5 of the 47 students in our ESE Support Levels 4 and 5 test, and 5 of the 48 students in our Career Education 9-12 test.
- Exceptions involving the reported ridership classification or eligibility for State transportation funding for 29 of the 254 students in our student transportation test, in addition to 17 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 the District's virtual instruction program. Noncompliance related to the reported FTE student enrollment resulted in 12 findings. The resulting proposed net adjustment to the District's reported, unweighted FTE totaled negative .8246 but has a potential impact on the District's weighted FTE of negative 9.0732. Noncompliance related to student transportation resulted in 6 findings and a proposed net adjustment of negative 23 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 \$37,750 (negative 9.0732 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 Nassau 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 Nassau 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 15 schools other than charter schools and 2 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 \$29.7 million was provided through the FEFP to the District for the District-reported 11,571.54 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
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### **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 \$2.8 million for student transportation as part of the State funding through the FEFP.

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Sherrill F. Norman, CPA  
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

### Report on Full-Time Equivalent Student Enrollment

We have examined the Nassau 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 students in our English for Speakers of Other Languages, Exceptional Student Education Support Levels 4 and 5, 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 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, Exceptional Student Education Support Levels 4 and 5, and Career Education 9-12, the Nassau 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 weaknesses<sup>1</sup> 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

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<sup>1</sup> 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.

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 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, Exceptional Student Education Support Levels 4 and 5, 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  
September 5, 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 Nassau County District School Board (District) reported to the DOE 11,571.54 unweighted FTE as recalibrated at 15 District schools and 2 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 (17) consisted of the total number of brick and mortar schools 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 (6,744) 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 40 of the 45 students in our ESOL test,<sup>2</sup> 5 of the 47 students in our ESE Support Levels 4 and 5 test,<sup>3</sup> and 5 of the 48 students in our Career Education 9-12 test.<sup>4</sup>

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	17	10	5,337	108	0	8,971.6200	92.2853	28.8810
Basic with ESE Services	17	10	1,181	71	0	2,049.7200	59.8540	1.0000
ESOL	10	6	108	45	40	98.0000	33.4426	(28.9544)
ESE Support Levels 4 and 5	10	6	54	47	5	53.1100	37.2486	(1.0000)
Career Education 9-12	4	2	<u>64</u>	<u>48</u>	<u>5</u>	<u>399.0900</u>	<u>12.5867</u>	<u>(.7512)</u>
All Programs	17	10	<u>6,744</u>	<u>319</u>	<u>50</u>	<u>11,571.5400</u>	<u>235.4172</u>	<u>(.8246)</u>

<sup>2</sup> For ESOL, the material noncompliance is composed of Findings 1, 2, 3, 4, and 11 on *SCHEDULE D*.

<sup>3</sup> For ESE Support Levels 4 and 5, the material noncompliance is composed of Findings 6, 7, and 10 on *SCHEDULE D*.

<sup>4</sup> For Career Education 9-12, the material noncompliance is composed of Findings 8, 9, and 12 on *SCHEDULE D*.

## **Teachers**

We also tested teacher qualifications as part of our examination procedures. (See NOTE B.) Specifically, the population of teachers (220) 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. From the population of teachers, we selected 86 and found no exceptions.

## **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.

## SCHEDULE B

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### 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	16.8696	1.103	18.6072
102 Basic 4-8	5.9864	1.000	5.9864
103 Basic 9-12	6.0250	1.001	6.0310
113 Grades 9-12 with ESE Services	1.0000	1.001	1.0010
130 ESOL	(28.9544)	1.194	(34.5716)
254 ESE Support Level 4	(.0004)	3.607	(.0014)
255 ESE Support Level 5	(.9996)	5.376	(5.3738)
300 Career Education 9-12	(.7512)	1.001	(.7520)
Total	(.8246)		(9.0732)

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

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### 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>#0071</u>	<u>#0081</u>	<u>#0121</u>	
101 Basic K-3	10.2028	4.4370	2.2298	16.8696
102 Basic 4-8	.....	3.9933	.....	3.9933
103 Basic 9-12	.....	.....	.....	.0000
113 Grades 9-12 with ESE Services	.....	.....	.....	.0000
130 ESOL	(10.2028)	(8.4303)	(2.2298)	(20.8629)
254 ESE Support Level 4	.....	.....	.....	.0000
255 ESE Support Level 5	.....	.....	.....	.0000
300 Career Education 9-12	<u>.....</u>	<u>.....</u>	<u>.....</u>	<u>.0000</u>
Total	<u>.0000</u>	<u>.0000</u>	<u>.0000</u>	<u>.0000</u>

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

<b>No.</b>	<b>Brought Forward</b>	<b><u>Proposed Adjustments (1)</u></b>				<b><u>Total</u></b>
		<b><u>#0221</u></b>	<b><u>#0231</u></b>	<b><u>#0271</u></b>	<b><u>#0291</u></b>	
101	16.8696	.....	.....	.....	.....	16.8696
102	3.9933	1.9931	.....	.....	.....	5.9864
103	.0000	.....	(.0734)	.....	6.0984	6.0250
113	.0000	.....	1.0000	.....	.....	1.0000
130	(20.8629)	(1.9931)	.....	.....	(6.0984)	(28.9544)
254	.0000	.....	(.5000)	.4996	.....	(.0004)
255	.0000	.....	(.5000)	(.4996)	.....	(.9996)
300	<u>.0000</u>	<u>.....</u>	<u>(.2458)</u>	<u>.....</u>	<u>(.5054)</u>	<u>(.7512)</u>
Total	<u>.0000</u>	<u>.0000</u>	<u>(.3192)</u>	<u>.0000</u>	<u>(.5054)</u>	<u>(.8246)</u>

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

# SCHEDULE D

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## FINDINGS AND PROPOSED ADJUSTMENTS FULL-TIME EQUIVALENT STUDENT ENROLLMENT

### Overview

Nassau County District School Board's (District's) 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)**

#### Southside Elementary School (#0071)

1. [Ref. 7101] The *ELL Student Plans (Plans)* for 12 ELL students were incomplete as the students' course schedules accompanying the *Plans* did not identify the classes that were to employ ESOL strategies. We propose the following adjustment:

101 Basic K-3	10.2028	
130 ESOL	<u>(10.2028)</u>	<u>.0000</u>
		<u>.0000</u>

#### Emma Love Hardee Elementary School (#0081)

2. [Ref. 8101] *The ELL Student Plans (Plans)* for ten ELL students were incomplete as the *Plans* did not include course schedules (four students) or the students' course schedules accompanying the *Plans* did not identify the courses that were to employ ESOL strategies (six students). We also noted that the ELL Committee meeting minutes for seven of these students, recommending continued ESOL placements beyond 3 years from each student's DEUSS, did not indicate participation of at least two School personnel and the date on which the meetings took place was not documented. In addition, the English language proficiency of one of the seven students was not assessed to determine the student's eligibility for continued ESOL placement beyond 3 years from the student's DEUSS. We propose the following adjustment:

**Proposed Net  
Adjustments  
(Unweighted FTE)**

**Findings**

**Emma Love Hardee Elementary School (#0081)** (Continued)

101 Basic K-3	4.4370	
102 Basic 4-8	3.9933	
130 ESOL	<u>(8.4303)</u>	<u>.0000</u>
		<u>.0000</u>

**Callahan Elementary School (#0121)**

3. [Ref. 12101] The *ELL Student Plans (Plans)* for three students were incomplete. The course schedules identifying the courses that would employ ESOL strategies were undated; therefore, School records did not evidence that the course schedules were reviewed at the time the *Plans* were prepared. We propose the following adjustment:

101 Basic K-3	2.2298	
130 ESOL	<u>(2.2298)</u>	<u>.0000</u>
		<u>.0000</u>

**Yulee Middle School (#0221)**

4. [Ref. 22101] *The ELL Student Plans (Plans)* for three ELL students were incomplete as the *Plans* did not include a course schedule (one student) or the students' course schedules accompanying the *Plans* did not identify the courses that were to employ ESOL strategies (two students). We propose the following adjustment:

102 Basic 4-8	1.9931	
130 ESOL	<u>(1.9931)</u>	<u>.0000</u>
		<u>.0000</u>

**Yulee High School (#0231)**

5. [Ref. 23105] Our examination disclosed that the course schedules for several students were incorrectly reported. The School's bell schedule supported 1,690 CMW and met the minimum reporting of CMW; however, the students' course schedules reported were not in agreement with the School's bell schedule. We noted differences ranging from 410 to 1,280 CMW. Student course schedules, which are necessary for the recalibration process to work appropriately, should reflect the number of instructional minutes established in the School's bell schedule. Since most of the students were reported at only one school for the entire school year and the reported FTE was recalibrated to 1.0, this incorrect reporting does not affect their ultimate funding level. We present this disclosure finding with no proposed adjustment.

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**Proposed Net  
Adjustments  
(Unweighted FTE)**

**Findings**

**Yulee High School (#0231)** (Continued)

6. [Ref. 23101] The course schedule for one student in our ESE Support Levels 4 and 5 test was incorrectly reported for on-campus instruction. The student stopped attending on-campus courses, was enrolled in the Hospital and Homebound Program, and received only homebound instruction during the October 2016 reporting survey period. We propose the following adjustment:

103 Basic 9-12	(.0734)	(.0734)
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7. [Ref. 23102] Three ESE students were not reported in accordance with the students' *Matrix of Services* forms. We recommend the following adjustment:

113 Grades 9-12 with ESE Services	1.0000	
254 ESE Support Level 4	(.5000)	
255 ESE Support Level 5	(.5000)	.0000

8. [Ref. 23103] More work hours were reported than was supported by the student's timecard for one Career Education 9-12 student who participated in OJT. We propose the following adjustment:

300 Career Education 9-12	(.1315)	(.1315)
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9. [Ref. 23104] The timecard for one Career Education 9-12 student who participated in OJT was not available at the time of our examination and could not be subsequently located. We propose the following adjustment:

300 Career Education 9-12	(.1143)	(.1143)
		(.3192)

**Yulee Primary School (#0271)**

10. [Ref. 27101] One ESE student was not reported in accordance with the student's *Matrix of Services* form. We recommend the following adjustment:

254 ESE Support Level 4	.4996	
255 ESE Support Level 5	(.4996)	.0000
		.0000

**Findings**

**Fernandina Beach High School (#0291)**

11. [Ref. 29101] *The ELL Student Plans (Plans)* for 12 ELL students were incomplete as the *Plans* did not include course schedules (2 students) or the course schedules accompanying the *Plans* did not identify the courses that were to employ ESOL strategies (10 students). We also noted that the ELL Committee meeting minutes for 2 of the students, recommending continued ESOL placements beyond 3 years from each student’s DEUSS, did not indicate the participation of at least two School personnel. In addition, the *Plans* for 2 of the students were dated after the applicable reporting survey period and 1 of the students was reported in the ESOL program beyond the maximum 6-year period allowed for State funding of ESOL. We propose the following adjustment:

103 Basic 9-12	6.0984	
130 ESOL	<u>(6.0984)</u>	.0000

12. [Ref. 29103] The timecards for three Career Education 9-12 students who participated in OJT were not available at the time of our examination and could not be subsequently located. We propose the following adjustment:

300 Career Education 9-12	<u>(.5054)</u>	<u>(.5054)</u>
		<u>(.5054)</u>

**Proposed Net Adjustment**

**(.8246)**

# SCHEDULE E

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## RECOMMENDATIONS AND REGULATORY CITATIONS FULL-TIME EQUIVALENT STUDENT ENROLLMENT

### RECOMMENDATIONS

We recommend that Nassau County District School Board (District) management exercise more care and take corrective action, as appropriate, to ensure that: (1) *ELL Student Plans* are timely prepared and include the students' instructional schedules identifying all of the courses that are to employ ESOL strategies; (2) the English language proficiency of students being considered for continuation of their ESOL placements beyond the 3-year base period is timely assessed, ELL Committees are timely convened subsequent to the assessments, and each Committee includes at least two school personnel; (3) the CMW in students' course schedules are reported in accordance with the school's bell schedule and the FTE is accurately calculated based on the number of instructional hours provided; (4) students enrolled solely in the Hospital and Homebound Program are reported only for the instruction that the students are provided; (5) ESE students are reported in accordance with the students' *Matrix of Services* forms that are dated, timely completed, and maintained in the students' files; (6) students in Career Education 9-12 who participate in OJT are reported in accordance with timecards that are accurately completed, signed, and retained in readily accessible files; and (7) ELL students are not reported in the ESOL Program for more than the maximum 6-year period allowed for State funding of ESOL.

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**

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<p style="text-align: center;">NOTE A – SUMMARY FULL-TIME EQUIVALENT STUDENT ENROLLMENT</p>
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A summary discussion of the significant features of the Nassau 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 Nassau 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 Nassau 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 15 schools other than charter schools and 2 virtual education cost centers serving PK through 12th-grade students.

For the fiscal year ended June 30, 2017, State funding totaling \$29.7 million was provided through the FEFP to the District for the District-reported 11,571.54 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 July 11 through 15, 2016; Survey 2 was performed October 10 through 14, 2016; Survey 3 was performed February 6 through 10, 2017; and Survey 4 was performed 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*

<b>NOTE B – TESTING FTE STUDENT ENROLLMENT</b>
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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. Southside Elementary School	1
2. Emma Love Hardee Elementary School	2
3. Callahan Elementary School	3
4. Bryceville Elementary School	NA
5. Yulee Middle School	4
6. Yulee High School	5 through 9
7. Yulee Primary School	10
8. Fernandina Beach High School	11 and 12
9. Nassau Virtual Instruction Program	NA
10. Nassau Virtual Franchise	NA



Sherrill F. Norman, CPA  
Auditor General

# AUDITOR GENERAL STATE OF FLORIDA

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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

### Report on Student Transportation

We have examined the Nassau 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 Nassau 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 weaknesses<sup>5</sup> 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*

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<sup>5</sup> 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  
September 5, 2018

## SCHEDULE F

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### POPULATIONS, TEST SELECTION, AND TEST RESULTS STUDENT TRANSPORTATION

Any student who is transported by the Nassau 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 (173) 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 (11,609) 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 Funded Students Transported</u>
Teenage Parents and Infants	2
IDEA – PK through Grade 12, Weighted	419
All Other FEFP Eligible Students	<u>11,188</u>
Total	<u>11,609</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 29 of 254 students in our student transportation test.<sup>6</sup>

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<sup>6</sup> For student transportation, the material noncompliance is composed of Findings 2, 3, 4, 5, and 6 on *SCHEDULE G*.

Our examination results are summarized below:

<u>Description</u>	<u>Buses</u>	<u>Students</u>	
	<u>Proposed Net Adjustment</u>	<u>With Exceptions</u>	<u>Proposed Net Adjustment</u>
We noted that the reported number of buses in operation was overstated.	(6)	-	-
Our tests included 254 of the 11,609 students reported as being transported by the District.	-	29	(22)
In conjunction with our general tests of student transportation we identified certain issues related to 17 additional students.	-	<u>17</u>	<u>(1)</u>
Total	<u>(6)</u>	<u>46</u>	<u>(23)</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

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## FINDINGS AND PROPOSED ADJUSTMENTS STUDENT TRANSPORTATION

### Overview

Nassau County District School Board's (District's) 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] The number of DIT for 20 students was incorrectly reported. The students were reported for 16 and 60 DIT; however, they should have been reported for 12 and 90 DIT as supported by the District's instructional calendars. In addition, the IEP for 1 student, who was reported in the IDEA - PK through Grade 12, Weighted ridership category, did not evidence that the student met one of the five criteria required for reporting in a weighted ridership category. We propose the following adjustments:

#### **October 2016 Survey**

##### 90 Days in Term

IDEA - PK through Grade 12, Weighted	1
All Other FEFP Eligible Students	3

##### 60 Days in Term

All Other FEFP Eligible Students	(1)
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##### 16 Days in Term

IDEA - PK through Grade 12, Weighted	(1)
All Other FEFP Eligible Students	(2)

**Students  
Transported  
Proposed Net  
Adjustments**

**Findings**

**February 2017 Survey**

90 Days in Term

All Other FEFP Eligible Students 2

16 Days in Term

All Other FEFP Eligible Students (2)

**June 2017 Survey**

16 Days in Term

IDEA - PK through Grade 12, Weighted (10)

All Other FEFP Eligible Students (4)

12 Days in Term

IDEA - PK through Grade 12, Weighted 9

All Other FEFP Eligible Students 5 0

2. [Ref. 52] Three students in our test were not listed on the supporting bus driver's report. We propose the following adjustment:

**June 2017 Survey**

16 Days in Term

IDEA - PK through Grade 12, Weighted (1)

All Other FEFP Eligible Students (2) (3)

3. [Ref. 53/54/55] Our general tests disclosed that the reported number of buses in operation in the October 2016, February 2017, and June 2017 reporting survey periods were overstated by a total of seven buses. The bus drivers' reports for three of the buses (Ref. 53 – No. 327 and Ref. 54 – Nos. 410 and 442 ) in the February 2017 reporting survey period were not available at the time of our examination and could not be subsequently located and two reported bus numbers in both the October 2016 and February 2017 reporting survey periods (Ref. 55 - Nos. 122 and 126) were District-owned passenger vans, not buses. The reported ridership count of one student on bus No. 327 and two students (in our test) on bus No. 442 were not adequately supported. In addition, our general tests disclosed that 15 students were incorrectly reported in the IDEA – PK through Grade 12, Weighted ridership category. The students were transported in District-owned passenger vans as noted above; consequently, the students were not eligible to be reported in a weighted ridership category (Ref. 53/55). We propose the following adjustments:

**Ref. 53**

**February 2017 Survey**

Number of Buses in Operation (1)

Findings		Students Transported	Proposed Net Adjustments
<u>90 Days in Term</u>			
All Other FEFP Eligible Students		(1)	(1)
<b>Ref. 54</b>			
<b>June 2017 Survey</b>			
Number of Buses in Operation	(2)		
<u>16 Days in Term</u>			
IDEA - PK through Grade 12, Weighted		(1)	
All Other FEFP Eligible Students		(1)	(2)
<b>Ref. 55</b>			
<b>October 2016 Survey</b>			
Number of Buses in Operation	(2)		
<u>90 Days in Term</u>			
IDEA - PK through Grade 12, Weighted		(3)	
All Other FEFP Eligible Students		3	
<b>February 2017 Survey</b>			
Number of Buses in Operation	(2)		
	(7)		
<u>90 Days in Term</u>			
IDEA - PK through Grade 12, Weighted		(12)	
All Other FEFP Eligible Students		12	0
<p>4. [Ref. 56/57] Nine students in our test were either not listed on the bus drivers' reports (six students) or were not marked as riding the assigned buses (three students) during the applicable reporting survey periods. Also, three of the students (Ref. 57) were not IDEA and were not enrolled in a nonresidential Department of Juvenile Justice Program and, as such, were not eligible to be reported in the June 2017 reporting survey period. In addition, Transportation records did not demonstrate that one of the students (Ref. 56) met at least one of the five criteria required for reporting in a weighted ridership category. We propose the following adjustments:</p>			
<b>Ref. 56</b>			
<b>October 2016 Survey</b>			
<u>90 Days in Term</u>			
All Other FEFP Eligible Students		(2)	

<b>Findings</b>	<b>Students Transported Proposed Net Adjustments</b>
<b>February 2017 Survey</b>	
<u>90 Days in Term</u>	
IDEA - PK through Grade 12, Weighted	(2)
All Other FEFP Eligible Students	<u>(2)</u> (6)
<b>Ref. 57</b>	
<b>June 2017 Survey</b>	
<u>16 Days in Term</u>	
All Other FEFP Eligible Students	<u>(3)</u> (3)
5. [Ref. 58] Eight students in our test were incorrectly reported in the IDEA – PK through Grade 12, Weighted ridership category. The IEPs for seven of the students did not indicate that that the students met at least one of the five criteria required for reporting in a weighted ridership category and the IEP for one student was not available at the time of our examination and could not be subsequently located. However, we determined that seven of the students lived 2 miles or more from the students’ assigned schools and were otherwise eligible to be reported in the All Other FEFP Eligible Students ridership category. The remaining student was not otherwise eligible for State transportation funding. We propose the following adjustments:	
<b>October 2016 Survey</b>	
<u>90 Days in Term</u>	
IDEA - PK through Grade 12, Weighted	(4)
All Other FEFP Eligible Students	4
<b>February 2017 Survey</b>	
<u>90 Days in Term</u>	
IDEA - PK through Grade 12, Weighted	(4)
All Other FEFP Eligible Students	<u>3</u> (1)
6. [Ref. 59] Seven 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:	
<b>October 2016 Survey</b>	
<u>90 Days in Term</u>	
All Other FEFP Eligible Students	(2)
<b>February 2017 Survey</b>	
<u>90 Days in Term</u>	
All Other FEFP Eligible Students	<u>(5)</u> (7)
<b>Proposed Net Adjustment</b>	<b><u>(23)</u></b>

## SCHEDULE H

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### RECOMMENDATIONS AND REGULATORY CITATIONS STUDENT TRANSPORTATION

#### RECOMMENDATIONS

We recommend that Nassau County District School Board (District) management exercise more care and take corrective action, as appropriate, to ensure that: (1) the number of DIT is accurately reported; (2) the number of buses in operation is accurately reported and supported by bus driver reports; (3) only those students who are in membership and are documented as having been transported at least 1 day during the 11-day reporting survey period are reported for State transportation funding; (4) students transported in passenger vans are not reported in a weighted ridership category; (5) students reported in the IDEA-PK through Grade 12, Weighted ridership category are documented as having met one of the five criteria required for reporting in a weighted ridership category as noted on the students' IEPs that are maintained in readily accessible files; (6) only students classified as IDEA and whose IEPs authorize extended school year services or students attending nonresidential Department of Juvenile Justice Programs are reported during the summer reporting survey periods; and (7) the distance from home to school is verified prior to reporting students in the All Other FEFP Eligible Students ridership category based on living 2 or more miles from their assigned schools or otherwise meeting the eligibility criteria.

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

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<b>NOTE A - SUMMARY STUDENT TRANSPORTATION</b>
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A summary discussion of the significant features of the Nassau 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 Nassau County

For the fiscal year ended June 30, 2017, the District received \$2.8 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 Funded Students</u>	<u>Number of Courtesy Riders</u>
July 2016	3	-	12
October 2016	78	5,812	426
February 2017	79	5,775	429
June 2017	<u>13</u>	<u>22</u>	<u>53</u>
Totals	<u>173</u>	<u>11,609</u>	<u>920</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*

<b>NOTE B – TESTING STUDENT TRANSPORTATION</b>
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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

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Kathy K. Burns, Ed.D.  
Superintendent of Schools

## *The Nassau County School District*

1201 Atlantic Avenue  
Fernandina Beach, Florida 32034

(904) 491-9900  
Fax (904) 277-9042  
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September 5, 2018

Ms. Sherrill F. Norman, Auditor General  
Office of the Auditor General  
111 West Madison Street  
Tallahassee, Florida 32399-1450

Dear Ms. Norman:

Nassau County School Board has received the preliminary and tentative report on the findings which arose out of your recent audit of the full-time equivalent student enrollment and student transportation as reported under the Florida Education Finance Program for the fiscal year ended June 30, 2017.

Full Time Equivalent Student Enrollment Findings:

### 1. **ESOL Issues:**

A. Student ELL Plans were considered incomplete due to student course schedules **accompanying** the paper Plans did not identify the classes that were to employ ESOL strategies.

We understand the technicality of the requirement was not met in that the paper documentation included a paper schedule which did not include the required FEFP code and instructional strategies. However, we do feel we met the substantive requirement in that the Student Database did include the documentation of the FEFP funding code for each class and the instructional strategy to be provided to the student.

B. Other ESOL Issues: The audit has identified several other areas of concern in the supporting documentation for ESOL services to students. We acknowledge that there were errors made in preparing the supporting documentation and that procedures need to be reviewed to ensure that all staff are aware of their responsibilities in supporting and documenting the services provided to our students.

### **ESOL Corrective Action Plan:**

A. A meeting was held with Guidance Counselors on August 24, 2018 in which the audit criticisms were shared with them. Direction was provided as to the proper procedures and documentation which must be in place to earn FTE for these students.

B. On September 18, 2018 the monthly Principal's meeting will include a presentation on the FTE audit and the issues which arose. Proper procedures and associated instruction on documentation will be provided to principals at that time.

***Our mission is to develop each student as an inspired life-long learner and problem-solver with the strength of character to serve as a productive member of society.***

The Nassau County School District does not discriminate on the basis of race, color, national origin, gender, age, disability or marital status in its educational programs, services or activities, or in its hiring or employment practices.

September 5, 2018  
FTE Response

**2. ESE Issues:** Students were not reported in accordance with their Matrix of Services forms. After the previous FTE audit, we had implemented new procedures to ensure the proper reporting of these high cost programs. While this audit disclosed that these procedures have greatly improved we still have some issues. We discovered that there were timing issues in when information was flowing to the district office personnel assigned with tracking these students.

**ESE Corrective Action Plan:**

- A. On September 18, 2018 the monthly Principal's meeting will include a presentation of the FTE audit and issues which arose. Proper procedures and associated instruction on documentation will be provided to principals at the time.
- B. New categories will be added to the Principal's FTE Certification Checklist to ensure that the most recent documentation is reviewed and the Student Database updated during the survey periods.
- C. District staff will continue to be an integral part of ensure the proper reporting of these high cost students.

**3. OJT Issues:** FTE earned was not supported by the documentation of the student's work time. Procedures were implemented after the last FTE audit and we seem to have made improvements in this area. Documentation is very important to earning FTE in this category and that has been recognized by the district staff prior to this audit.

**OJT Corrective Action Plan:**

Starting with the 17-18 school year, the District hired a district wide staff person to work with school level personnel. This position is to ensure the proper documentation was received for each student, review of the documentation to ensure the proper FTE reporting of time and follow up on any issues which arose. Principals will again be reminded of the areas of concern with earning FTE for this classification at the September 18, 2018 meeting.

**4. School Bell Schedule Issues:** Student course schedules where not in agreement with the school's bell schedule.

**School Bell Schedule Corrective Action Plan:**

- A. This item has been added to the Principal's FTE checklist to ensure that this item is reviewed during the FTE process.
- B. On September 18, 2018 the monthly Principal's meeting will include a presentation of the FTE audit and issues which arose. Proper procedures and associated instruction on documentation will be provided to principals at the time.

**5. Transportation Issues:** Overstatement of buses used, exceptions in reporting the category earned by the rider, and proper documentation to support the earning of FTE. The staff responsible for the management of the FTE reporting completely turned over during the 16-17 school year. This audit served as a lesson to the new staff in the need for proper documentation and the identification of ridership for the new staff.

September 5, 2018  
FTE Response

**Transportation Corrective Action Plan:**

- A. During the preplanning meeting with the drivers and staff, procedures were reviewed to ensure the proper training of staff in FTE procedures.
- B. New forms were developed for use in the FTE process to make the tracking process easier for bus drivers.
- C. Checklists were developed for the use of district level staff responsible for reporting of FTE to ensure documentation is available to support the FTE claimed.
- D. A new computerized routing system has been implemented for 1819 which tracks and provides reports for improved tracking of transportation FTE.
- E. The audit brought the issue of days in term to the attention of the staff and will be reviewed as part of the overall process to ensure it is reported accurately.

If you have additional question or concerns please do not hesitate to contact me or Susan Farmer, Executive Director of Business Services. We look forward to working with you staff on the next FEFP/FTE Audit.

Sincerely,



Kathy K. Burns, Ed.D.  
Superintendent of Schools  
904-491-9900