

STATE OF FLORIDA AUDITOR GENERAL

Operational Audit

Report No. 2026-100
February 2026

LEE COUNTY DISTRICT SCHOOL BOARD



Sherrill F. Norman, CPA
Auditor General

Board Members and Superintendent

During the 2024-25 fiscal year, Dr. Denise M. Carlin served as Superintendent of the Lee County Schools from November 19, 2024, Dr. Kenneth A. Savage served as Interim Superintendent before that date, and the following individuals served as School Board Members:

	<u>District No.</u>
Samuel Fisher, Chair	1
Melisa W. Giovannelli	2
William F. Ribble from 11-19-24	3
Chris N. Patricca through 11-18-24	3
Debbie Jordan	4
Armor Persons	5
Jada Langford-Fleming, Vice Chair	6
Vanessa M. Chaviano from 11-19-24	7
Cathleen O'Daniel Morgan through 11-18-24	7

The Auditor General conducts audits of governmental entities to provide the Legislature, Florida's citizens, public entity management, and other stakeholders unbiased, timely, and relevant information for use in promoting government accountability and stewardship and improving government operations.

The team leader was Barbara S. Coleman, CPA, and the audit was supervised by Ramon L. Bover, CPA.

Please address inquiries regarding this report to Edward A. Waller, CPA, Audit Manager, by e-mail at tedwaller@aud.state.fl.us or by telephone at (850) 412-2887.

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LEE COUNTY DISTRICT SCHOOL BOARD

SUMMARY

This operational audit of the Lee County School District (District) focused on selected District processes and administrative activities and included a follow-up on findings noted in our report No. 2023-195. Our operational audit disclosed the following:

Finding 1: Contrary to State Board of Education (SBE) rules, the District did not timely report to the Florida Department of Education five persons deemed ineligible for employment, including four persons who were terminated from District employment for sexual misconduct with students and one person who pleaded guilty to possession of controlled substances.

Finding 2: Contrary to SBE rules, required affidavits of separation detailing the facts and reasons for employment separations due to termination for cause or resignation in lieu of termination were not always maintained.

Finding 3: District records did not always demonstrate compliance with SBE emergency drill requirements.

Finding 4: Industry certification funding was not always supported by District records demonstrating student attainment of eligible industry certifications.

Finding 5: District controls did not always ensure that temporarily increased purchasing card (P-card) purchasing dollar limits were promptly restored to original limits or that P-cards were promptly canceled when cardholders separated from District employment.

Finding 6: District procedures need enhancement to ensure that severance payments comply with State law.

Finding 7: As similarly noted in our report No. 2023-195, the District granted 19 employees unnecessary or inappropriate information technology user access privileges, increasing the risk for unauthorized disclosure, modification, or destruction of human resources and finance information.

BACKGROUND

The Lee County School District (District) is part of the State system of public education under the general direction of the Florida Department of Education and is governed by State law and State Board of Education rules. Geographic boundaries of the District correspond with those of Lee County. The governing body of the District is the Lee County District School Board (Board), which is composed of seven elected members. The elected Superintendent of Schools is the Executive Officer of the Board. During the 2024-25 fiscal year, the District operated 85 elementary, middle, and high schools, and 14 specialized schools; sponsored 22 charter schools; and reported 108,543 unweighted full-time equivalent students.

FINDINGS AND RECOMMENDATIONS

Finding 1: Alleged Misconduct Investigation Records and Reporting

State law¹ authorizes the Board to adopt policies that establish procedures for reporting alleged misconduct by other educational support employees, instructional or administrative personnel, and school officers which affects the health, safety, or welfare of a student, including misconduct that involves engaging in or soliciting sexual, romantic, or lewd conduct with a student. According to State law,² the Florida Department of Education (FDOE) is to maintain a disqualification list that includes, among other things, the identity of each person who is ineligible for employment pursuant to State law.³

According to State Board of Education (SBE) rules,⁴ the disqualification list serves as an employment screening resource for school districts, charter schools, and private scholarship schools. SBE rules set forth the criteria for placement on and removal from the list and establish the school district responsibilities for reporting persons for inclusion on the list using the FDOE online reporting tool. For example, the District is to:

- Issue a final order for a person to be included on the disqualification list. The final order must include a determination that the person is ineligible for employment with the District based upon a finding, supported by clear and convincing evidence or material, that the person committed either sexual misconduct with a student, or had been convicted of one of the crimes listed in State law.⁵ The final order must also disclose that the sexual misconduct or crime occurred on or after June 1, 2022, while the person was employed by the District in a covered position.
- Report a person for inclusion on the disqualification list within 48 hours of the final order date using the FDOE online reporting tool.

According to District personnel, the District Assistant Director, Professional Standards is responsible for providing information to the District Attorney for issuing final orders and for reporting persons for inclusion on the disqualification list. However, neither Board policies nor District procedures establish a time frame for issuing final orders and reporting persons for inclusion on the disqualification list or require appropriate follow-up to verify that final orders are promptly issued and applicable persons are timely reported.

During the 2024-25 fiscal year, the District completed investigations of misconduct cases for 55 employees and maintained records demonstrating the basis for not issuing final orders for 50 of those employees. However, we found that controls over compliance with the alleged misconduct records and reporting requirements could be improved. Specifically:

- The District issued final orders for 4 persons who had their District employment terminated for sexual misconduct with students but did not report the persons for inclusion on the disqualification list within 48 hours of the final order date. Specifically, for 1 person, the District issued a final order on August 25, 2025, but had not reported the person for inclusion on the disqualification list as of December 2025, and the District reported the 3 other persons for inclusion on the list 63, 55, and 50 days late.

¹ Section 1001.42(6), Florida Statutes.

² Section 1001.10(4)(b) and (d), Florida Statutes.

³ Section 1012.315, Florida Statutes.

⁴ SBE Rule 6A-10.084, Florida Administrative Code, *Disqualification List*.

⁵ Section 1012.315, Florida Statutes.

- Another District employee was arrested in July 2024, terminated from District employment in February 2025, and pleaded guilty at the conclusion of the trial in June 2025 to possession of controlled substances.⁶ However, as of December 2025, the District had not issued a final order for the person nor reported the person for inclusion on the disqualification list.

In response to our inquiry, District personnel indicated that the noncompliance and untimely reporting were due to management oversights. Absent effective controls for issuing final orders and timely reporting persons for inclusion on the disqualification list, there is an increased risk for noncompliance with State law and SBE-required procedures. In addition, school districts, charter schools, and private scholarship schools may lack the screening tools needed to properly evaluate applicants, increasing the risk of hiring persons with unsuitable backgrounds and jeopardizing student safety.

Recommendation: The District should improve efforts to ensure compliance with the alleged misconduct records and reporting requirements. Such efforts should include Board policy revisions to establish the time frame for issuing final orders and reporting persons for inclusion on the disqualification list and the implementation of effective procedures requiring appropriate follow-up to verify that final orders are promptly issued and persons are timely reported for inclusion on the disqualification list.

Finding 2: Affidavits of Separation

Pursuant to State law,⁷ the Board adopted policies⁸ requiring the investigation of all reports of alleged misconduct by educational support employees, instructional personnel, and administrative personnel, if the misconduct affects the health, safety, or welfare of a student, regardless of whether the person resigned or was terminated before the conclusion of the investigation. In addition, State law⁹ and SBE rules¹⁰ require school district personnel files be maintained and, for cases of separation due to termination for cause or resignation in lieu of termination, include an affidavit of separation on the FDOE-adopted form setting forth in detail the facts and reasons for such separation. The affidavit must expressly disclose when separation is due to a report of sexual misconduct with a student. However, Board policies did not require the District to prepare and maintain affidavits of separation for employees who are terminated for cause or resign in lieu of termination.

As part of our audit, we requested for examination affidavits of separation for the 18 individuals who, during the period July 2023 through April 2025, were terminated for cause from District employment or resigned in lieu of termination. While affidavits were available for 14 of the individuals, the District did not complete 4 affidavits for 2 instructional and 2 educational support employees because, according to District personnel, these individuals were not in positions that met the definition of covered positions required for reporting for inclusion on the disqualification list. Notwithstanding, affidavits of separation are required for all cases of separation due to termination for cause or resignation in lieu of termination.

Absent compliance with the State law and SBE-required procedures, District records lack required information for educational entities to screen job applicants, elevating the risk to student safety. In

⁶ Possession of controlled substances is one of the crimes listed in State law requiring issuance of a final order.

⁷ Section 1001.42(7)(b)3., Florida Statutes.

⁸ Board Policy 8141, *Mandatory Reporting of Misconduct*.

⁹ Section 1012.31, Florida Statutes.

¹⁰ SBE Rule 6A-10.084, Florida Administrative Code, *Disqualification List*.

October 2025, subsequent to our inquiries, the District completed one of the affidavits for an instructional employee who was terminated for cause; however, 7 months had elapsed since the District terminated the person's employment and 16, 15, and 12 months, respectively, had elapsed since the District terminated the employment of the other three persons.

Recommendation: The Board and District should ensure compliance with State law and SBE rules by revising policies and implementing effective procedures requiring the completion and maintenance of affidavits of separation for all employment separations due to termination for cause or resignation in lieu of termination.

Finding 3: Emergency Drills

To provide for proper attention to the health, safety, and welfare of students and District staff, State law¹¹ requires the Board to formulate and prescribe policies and procedures associated with, but not limited to, fires, natural disasters, active assailant and hostage situations, and bomb threats. SBE rules¹² require that each school conduct six emergency drills every school year that are nonconcurrent with fire drills. Four of the six emergency drills must address active threats¹³ and the remaining two must address other emergencies, such as severe weather, natural disasters, hazardous materials, or reunification.¹⁴

The District was required to conduct a total of 642 emergency drills (428 active threat emergency drills and 214 other emergency drills) for the 2024-25 school year. As part of our audit, we requested for examination District records supporting those drills at all 107 schools (85 District schools and 22 charter schools). District records supported 535 active threat emergency drills (the required 428 active threat emergency drills and 107 bomb threat drills) but only 107 of the 214 required other emergency drills. According to District personnel, they mistakenly believed that bomb threat drills could fulfill one of the two other-emergency drill requirements and, as a result, all 107 District and District-sponsored charter schools conducted only one of the two required other-emergency drills.

Absent effective controls over emergency drills, the District cannot demonstrate compliance with SBE rule requirements or appropriate preparedness for emergencies such as severe weather, natural disasters, hazardous materials, or reunification.

Recommendation: The District should enhance procedures to ensure that school personnel understand and comply with all emergency drill requirements, including the conduct of two drills for severe weather, natural disasters, hazardous materials, or reunification every school year.

Finding 4: Workforce Education Program Industry Certifications

State law¹⁵ provides performance funding for industry certifications for school district workforce education programs contingent upon specific appropriation in the General Appropriations Act. General

¹¹ Section 1006.07(4), Florida Statutes.

¹² SBE Rule 6A-1.0018(16), Florida Administrative Code.

¹³ An active threat is any situation that presents an immediate and ongoing danger to the safety of students, staff and visitors, such as active assailant, hostage situation, or bomb threat.

¹⁴ Reunification involves reuniting students and employees with their families in the event that a school is closed or unexpectedly evacuated due to a natural or manmade disaster.

¹⁵ Section 1011.80(7)(b), Florida Statutes.

Appropriations Act¹⁶ proviso language provided funding for workforce education programs for industry certifications attained by students during the 2023-24 academic year in certain occupational areas, such as certified nursing assistant, welding technology, pharmacy technician, and heating, ventilation, and air conditioning technicians.

The General Appropriations Act proviso language further provided that school districts should maintain documentation for student attainment of industry certifications that are eligible for performance funding and, if a school district is unable to comply, the school district should refund the performance funding to the State (i.e., the Florida Department of Education). To encourage compliance with the industry certification funding requirements, a list of certifications eligible for funding is maintained on the FDOE Web site. In addition, the Auditor General must verify compliance with these requirements during scheduled operational audits of the District.

The District reported to the FDOE that 692 students had attained a total of 741 eligible industry certifications during the 2023-24 academic year, which generated performance funding of \$622,520 for the 2024-25 fiscal year. As part of our audit, we requested for examination District records supporting 30 selected industry certifications for 30 students. We found that 8 of the 30 industry certifications were not included on the 2023-24 certification funding list maintained by the FDOE, causing the District to be overfunded by \$8,000 for those certifications. In response to our inquiry, District personnel indicated that they were aware of the FDOE-maintained eligibility list but submitted all industry certifications to the FDOE regardless of funding eligibility.

Absent controls to ensure the proper maintenance of documentation for student attainment of industry certifications that are eligible for performance funding and that only eligible industry certifications attained are reported to the FDOE, the District cannot demonstrate compliance with the industry certification requirements. District records and reporting that do not support the number of eligible industry certifications attained increases the amount of performance funding the District must refund to the State.

Recommendation: The District should strengthen procedures to ensure that only eligible industry certifications are reported for performance funding. Such procedures should include documented, independent verification that reportable industry certifications are consistent with the FDOE-maintained list of eligible certifications before certifications are reported, and appropriate training for District personnel. In addition, District personnel should compare industry certifications reported to the FDOE for the 2023-24 fiscal year with the FDOE-maintained list of eligible certifications and refund the amount received for ineligible industry certifications, including the \$8,000 identified on audit.

Finding 5: Purchasing Cards

The District uses purchasing cards (P-cards) to expedite and simplify the purchase of selected goods and services. While P-card purchases are not subject to the routine purchase order process, the purchases are subject to the *Purchasing Card Program Policy and Procedure Guide (Manual)*. The *Manual* establishes P-card single purchase and total monthly purchasing dollar limits of \$4,999 and \$12,500, respectively, unless advance authorization is obtained using a completed and approved P-card Threshold Exception Request Form (form). An approved form authorizes a temporary limit increase and

¹⁶ Chapter 2024-231, Laws of Florida, General Appropriations Act, Specific Appropriation 117.

identifies the anticipated statement period that the increased limit is needed. Once purchases for the specified period are posted, the Purchasing Services Department is to notify the bank to restore the original purchasing limits.

Additionally, the *Manual* requires department heads to notify the P-card Administrator to cancel P-cards when cardholders separate from District employment. Timely cancellation of P-cards upon cardholder employment separation is important to avoid misuse of the cards and because the financial institution that administers the District P-card program allows a limited time to dispute charges.

During the 2024-25 fiscal year, the District reported P-card expenditures totaling \$6.9 million and approved ten employees for temporarily increased single or monthly P-card purchasing dollar limits. Additionally, during the period May 2024 through May 2025, nine cardholders separated from District employment. Our examination of District records and inquiry with District personnel disclosed that controls over P-card purchasing dollar limit increases and cancellations could be improved. Specifically:

- The temporarily increased purchasing dollar limits for three employees remained in effect 4 to 10 months beyond the time period specified on the approved form. In response to our inquiry, District personnel indicated that the increased limits were not restored to the original limits due to oversights. Subsequent to our inquiry in June 2025, the District restored the limits for the three employees. However, the purchases made by two employees exceeded the *Manual's* required monthly limits by \$11,095 and \$2,873, respectively, after the authorized increase limit periods ended. By not promptly restoring increased purchasing dollar limits to the original limits, there is a risk for purchases to exceed District budgetary thresholds.
- The District did not cancel the P-cards for four of the nine employees who separated from District employment until 12 to 101 days or an average of 44 days after the cardholders' employment separation dates. Although we requested, District personnel did not provide the reason for the late cancellations. While our procedures disclosed that the persons did not use the P-cards after separating from District employment, without prompt cancellation of assigned P-cards, there is an increased risk that unauthorized P-card use may occur, and the District's ability to satisfactorily resolve disputed charges may be limited.

Recommendation: The District should continue efforts to ensure that effective controls are employed over P-card use. Such controls should include restoration of original purchasing dollar limits by the date specified in the approved P-card Threshold Exception Request Form and prompt cancellation of P-cards upon a cardholders' separation from District employment.

Finding 6: Superintendent's Severance Pay

According to State law,¹⁷ the Board may enter into a contract or employment agreement, or renewal or renegotiation of an existing contract or employment agreement, that contains a provision for severance pay that may not exceed an amount greater than 20 weeks of compensation. In addition, an officer, agent, employee, or contractor may receive severance pay¹⁸ that is not provided for in a contract or employment agreement if the severance pay represents the settlement of an employment dispute and

¹⁷ Section 215.425, Florida Statutes.

¹⁸ Severance pay represents the actual or constructive compensation, including salary, benefits, or perquisites, for employment services yet to be rendered which is provided to an employee who has recently been or is about to be terminated.

does not exceed an amount greater than 6 weeks of compensation. State law¹⁹ also provides that the law does not create an entitlement to severance pay in the absence of authorization.

On March 8, 2022, the Board approved an employment agreement with the Superintendent for the period May 16, 2022, through November 6, 2024. The agreement did not include a severance pay provision. On April 8, 2024, the Superintendent voluntarily resigned and, according to District records, the Board did not intend to terminate the Superintendent's employment.

On April 9, 2024, the Board and the former Superintendent entered into a separation agreement that provided the former Superintendent with 20 weeks of compensation at his current rate of pay. Under the agreement:

- The former Superintendent would serve as an advisor to the interim Superintendent during the 20-week period.
- The Board would continue making the required 20 percent contribution to his retirement investment account, Florida Retirement System contributions, and long-term disability and life insurance payments.
- If the former Superintendent secured other employment as a school board superintendent within the 20 weeks, all District obligations under the separation agreement, including salary pay, retirement contributions, and insurance payments, would cease immediately.

According to District personnel, the separation agreement superseded all prior oral or written agreements, arrangements, employment contracts, or understanding between the Board and the former Superintendent. However, although we requested, District records were not provided to demonstrate any advisory services by the former Superintendent.

On July 1, 2024, the former Superintendent became the Superintendent of another school board. For the period April 9, 2024, through June 15, 2024, the District made payments under the separation agreement totaling \$78,110 and equaling approximately 9 weeks of the former Superintendent's salary (\$52,238), retirement investment account contributions (\$12,518), Florida Retirement System contributions (\$12,854), and insurance (\$500). In response to our inquiry, District personnel indicated that the Superintendent had resigned as a result of an employment dispute and that the separation agreement was a renegotiation of an existing contract. However, District records did not evidence an employment dispute or renegotiated contract with the former Superintendent, the Board entered the separation agreement after he voluntarily resigned, and District records did not evidence the public purpose or District benefit of the severance pay totaling \$78,110.

Recommendation: The District should ensure that severance pay is only provided to an employee who has recently been or is about to be terminated and that such pay is limited to the amount allowed in State law. In addition, District records should demonstrate compliance with the statutory severance pay provisions or the Board should take appropriate action to recover the severance payments totaling \$78,110.

¹⁹ Section 215.425(4)(c), Florida Statutes.

Finding 7: Information Technology User Access Privileges

Access controls are intended to protect data and information technology (IT) resources from unauthorized disclosure, modification, or destruction. Effective access controls provide IT users with access to IT resources based on demonstrated need to view, change, or delete data, restrict users from performing incompatible functions or functions outside their areas of responsibility, and provide for documented periodic evaluations of IT user access privileges. According to District records, the most recent evaluation of access privileges was completed in 2022.

As part of our audit, we examined District records and identified 99 employees with update access to the critical HR and finance modules within the District business application. Our evaluation of selected access privileges granted to 30 of these employees disclosed some unnecessary access privileges that permitted certain employees to perform incompatible functions. Specifically, we found that:

- 15 employees²⁰ had HR module access privileges that were unnecessary for the performance of their assigned job responsibilities and allowed for the performance of incompatible functions. For example, one accountant had access privileges that allowed for the incompatible functions of updating time worked, performing payroll adjustments, modifying direct deposits, and creating manual checks. Subsequent to our inquiries, in November 2025 the unnecessary access privileges were removed.
- 4 employees²¹ had finance module access privileges that allowed payments to be approved and executed without independent authorization and verification. Subsequent to our inquiries, the District removed the unnecessary access in September 2025.

While District controls (e.g., monitoring of budgets and payroll and expenditure processing controls) mitigate the unnecessary access privileges, the existence of such access increases the risk that unauthorized transactions or modifications to District data may occur without timely detection. Absent periodic evaluations of assigned IT access privileges, the District lacks assurance that the assigned access privileges remain appropriate and necessary for the performance of assigned job responsibilities. Similar findings were included in our audit report Nos. 2023-195 and 2020-201.

Recommendation: The District should continue efforts to ensure that IT resource access privileges are limited to those necessary for the performance of the user's assigned responsibilities. Such efforts should include documented periodic evaluations of user access privileges and the prompt removal of any unnecessary or inappropriate access privileges identified.

PRIOR AUDIT FOLLOW-UP

The District had taken corrective actions for findings included in our report No. 2023-195, except that Finding 7 was also reported as Finding 9 in that report and as Finding 5 in our report No. 2020-201.

²⁰ The 15 employees includes 8 payroll staff, 3 HR staff, 2 accountants, and 2 directors of HR.

²¹ Chief Financial Officer, Director Financial Services, Executive Director of Business Services, and Supervisor Accounting.

OBJECTIVES, SCOPE, AND METHODOLOGY

The Auditor General conducts operational audits of governmental entities to provide the Legislature, Florida's citizens, public entity management, and other stakeholders unbiased, timely, and relevant information for use in promoting government accountability and stewardship and improving government operations.

We conducted this operational audit from March 2025 through December 2025 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

This operational audit focused on selected District processes and administrative activities. For those areas, our audit objectives were to:

- Evaluate management's performance in establishing and maintaining internal controls, including controls designed to prevent and detect fraud, waste, and abuse, and in administering assigned responsibilities in accordance with applicable laws, rules, regulations, contracts, grant agreements, and other guidelines.
- Examine internal controls designed and placed in operation to promote and encourage the achievement of management's control objectives in the categories of compliance, economic and efficient operations, reliability of records and reports, and safeguarding of assets, and identify weaknesses in those controls.
- Determine whether management had taken corrective actions for findings included in our report No. 2023-195.
- Identify statutory and fiscal changes that may be recommended to the Legislature pursuant to Section 11.45(7)(h), Florida Statutes.

This audit was designed to identify, for those areas included within the scope of the audit, weaknesses in management's internal controls significant to our audit objectives; instances of noncompliance with applicable laws, rules, regulations, contracts, grant agreements, and other guidelines; and instances of inefficient or ineffective operational policies, procedures, or practices. The focus of this audit was to identify problems so that they may be corrected in such a way as to improve government accountability and efficiency and the stewardship of management. Professional judgment has been used in determining significance and audit risk and in selecting the particular transactions, legal compliance matters, records, and controls considered.

As described in more detail below, for those programs, activities, and functions included within the scope of our audit, our audit work included, but was not limited to, communicating to management and those charged with governance the scope, objectives, timing, overall methodology, and reporting of our audit; obtaining an understanding of the program, activity, or function; identifying and evaluating internal controls significant to our audit objectives; exercising professional judgment in considering significance and audit risk in the design and execution of the research, interviews, tests, analyses, and other procedures included in the audit methodology; obtaining reasonable assurance of the overall sufficiency

and appropriateness of the evidence gathered in support of our audit findings and conclusions; and reporting on the results of the audit as required by governing laws and auditing standards.

Our audit included the selection and examination of transactions and records, as well as events and conditions, occurring during the 2024-25 fiscal year audit period, and selected District actions taken prior and subsequent thereto. Unless otherwise indicated in this report, these records and transactions were not selected with the intent of statistically projecting the results, although we have presented for perspective, where practicable, information concerning relevant population value or size and quantifications relative to the items selected for examination.

An audit by its nature does not include a review of all records and actions of management, staff, and vendors, and as a consequence, cannot be relied upon to identify all instances of noncompliance, fraud, waste, abuse, or inefficiency.

In conducting our audit, we:

- Reviewed applicable State laws, State Board of Education (SBE) rules, Board policies, District procedures, and other guidelines, and interviewed District personnel to obtain an understanding of applicable processes and administrative activities and the related requirements.
- Evaluated District procedures for maintaining and reviewing employee access to IT data and resources. We examined selected user access privileges to the finance and human resources (HR) modules in the District business application to determine the appropriateness and necessity of the access privileges based on employee job duties and user account functions and whether the access privileges prevented the performance of incompatible duties. Specifically, we examined District records supporting selected user access privileges for 30 of the 99 users who had update access privileges to the finance and HR modules.
- Evaluated District procedures to prohibit former employee access to electronic data files. Specifically, we examined District records supporting selected user access privileges for 30 of the 1,984 employees who separated from District employment during the period July 2024 through April 2025 to determine whether the access privileges were promptly deactivated.
- Inquired whether the District had expenditures or entered into any contracts under the authority granted by a state of emergency declared or renewed during the audit period. From the population of expenditures totaling \$15 million for the period July 2024 through March 2025, examined District records supporting selected expenditures totaling \$7.1 million to evaluate the reasonableness of District actions, including District compliance with applicable State laws, SBE rules, contract terms, and Board policies.
- Examined Board, committee, and advisory board meeting minutes during the audit period to determine whether District records evidenced compliance with Sunshine Law requirements (i.e., proper notice of meetings, meetings readily accessible to the public, and properly maintained meeting minutes).
- From the population of \$7.9 million total expenditures from workforce education program funds for the period July 2024 through March 2025, selected 30 expenditures totaling \$628,000 and examined supporting documentation to determine whether the District used the funds for authorized purposes (i.e., not used to support K-12 programs or District K-12 administrative costs).
- From the population of 741 industry certifications, generating performance funding of \$622,520 for the audit period, examined 30 selected certifications and related support to determine whether the District maintained documentation for student attainment of the industry certifications.

- Examined District records supporting 2,524 reported contact hours for 30 selected students from the population of 178,915 contact hours reported for 1,853 adult general education instructional students during the Fall 2024 Semester to determine whether the District reported the instructional contact hours in accordance with SBE Rule 6A-10.0381, Florida Administrative Code.
- From the population of 48 bank reconciliations for the audit period, selected and examined 12 reconciliations and supporting documentation to determine whether the reconciliations were timely performed, reviewed, and approved.
- Examined the District Web site to determine whether the proposed, tentative, and official budgets for the audit period were prominently posted pursuant to Section 1011.035(2), Florida Statutes. In addition, we determined whether the District Web site contained, for each public school within the District and for the District, the required graphical representations of summary financial efficiency data and fiscal trend information for the previous 3 years, and a link to the Web-based fiscal transparency tool developed by the Florida Department of Education (FDOE).
- Evaluated severance pay provisions in the two employee contracts to determine whether the provisions complied with Section 215.425(4), Florida Statutes. We also examined District records supporting severance payments totaling \$64,756 to determine whether the payments complied with State law and Board policies.
- Determined whether the elected Superintendent was properly compensated in accordance with Section 1001.47, Florida Statutes, and Board policies.
- Evaluated Board policies and District procedures addressing the ethical conduct of school personnel, including reporting responsibilities related to employee misconduct which affects the health, safety, or welfare of a student, and the investigation responsibilities for all reports of alleged misconduct to determine whether those policies and procedures were effective and sufficient to ensure compliance with Section 1001.42(6) and (7)(b)3., Florida Statutes.
- Evaluated the effectiveness of Board policies and District procedures for reporting to the FDOE personnel subject to the disqualification list in accordance with SBE Rule 6A-10.084, Florida Administrative Code.
- From the 31 significant construction projects with expenditures totaling \$400.1 million, selected 3 projects with expenditures totaling \$247.5 million and examined related support to evaluate District compliance with Board policies, District procedures, and applicable provisions of State law and rules, and adherence to good business practices. Specifically, we examined District records to determine whether:
 - The construction manager was properly selected pursuant to Section 255.103, Florida Statutes.
 - District personnel properly monitored subcontractor selections and licenses.
 - The architects were properly selected pursuant to Section 287.055, Florida Statutes, and adequately insured.
 - Appropriate Board policies and District procedures addressing the negotiation and monitoring of general conditions costs had been established.
 - Documentation supporting the selected payments was sufficient and complied with the contract provisions.
 - The projects progressed as planned consistent with established benchmarks, and were cost effective, and the contractors performed as expected.
 - The District made use of its sales tax exemption to make direct purchases of materials or documented justification for not doing so.

- Examined District records to determine whether the Board had adopted appropriate school safety policies and the District implemented procedures to ensure the health, safety, and welfare of students and compliance with Sections 1006.07, 1006.12, and 1011.62(12), Florida Statutes.
- Examined District records to determine whether the Board had adopted appropriate mental health awareness policies and the District had implemented procedures to promote the health, safety, and welfare of students and ensure compliance with Sections 1012.584 and 1011.62(13), Florida Statutes, and SBE Rule 6A-1.094124, Florida Administrative Code.
- From the population of purchasing card (P-card) expenditures totaling \$6.9 million during the audit period, examined documentation supporting 64 selected expenditures totaling \$292,000 to determine whether P-cards were administered in accordance with Board policies and District procedures. We also determined whether the District timely canceled the P-cards for the nine cardholders who separated from District employment and the 30 P-cards that were reported lost or stolen during the period May 2024 through May 2025.
- Reviewed Board policies and District procedures for the audit period related to identifying potential conflicts of interest. For the 18 District employees, we reviewed Florida Department of State, Division of Corporation, records; statements of financial interests; and District records to identify any potential relationships with District vendors that represent a potential conflict of interest.
- Examined District records for the audit period to determine whether District procedures were effective for timely distributing the correct amount of local capital improvement funds to eligible charter schools, pursuant to Section 1013.62(3), Florida Statutes.
- From the population of payments totaling \$460.3 million during the audit period related to contracted services, examined supporting documentation, including the contract documents, for 30 selected payments totaling \$11.2 million to determine whether:
 - The District complied with applicable competitive selection requirements (e.g., SBE Rule 6A-1.012, Florida Administrative Code).
 - The contracts clearly specified deliverables, time frames, documentation requirements, and compensation.
 - The payments complied with contract provisions.
- Examined District records for the audit period to determine whether District procedures ensured that vendor and employee information changes, such as address and bank information changes, were properly authorized, documented, and verified before payments were made.
- Communicated on an interim basis with applicable officials to ensure the timely resolution of issues involving controls and noncompliance.
- Performed various other auditing procedures, including analytical procedures, as necessary, to accomplish the objectives of the audit.
- Prepared and submitted for management response the findings and recommendations that are included in this report and which describe the matters requiring corrective actions. Management's response is included in this report under the heading **MANAGEMENT'S RESPONSE**.

AUTHORITY

Section 11.45, Florida Statutes, requires that the Auditor General conduct an operational audit of each school district on a periodic basis. Pursuant to the provisions of Section 11.45, Florida Statutes, I have directed that this report be prepared to present the results of our operational audit.

A handwritten signature in blue ink that reads "Sherrill F. Norman". The signature is written in a cursive style with a large initial "S".

Sherrill F. Norman, CPA
Auditor General

MANAGEMENT'S RESPONSE



The School District of Lee County

Denise M. Carlin, Ed.D., Superintendent

2855 Colonial Boulevard, Fort Myers, FL 33966

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February 13, 2026

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

Dear Ms. Norman,

The District acknowledges the preliminary and tentative audit findings and appreciates the Auditor General's review. The District is committed to strengthening internal controls, ensuring compliance with applicable laws and rules, and implementing sustainable corrective actions.

Thank you for your assistance.

Sincerely,

Denise Carlin, Ed.D.
Superintendent of Schools

DMC/ww

C: Mr. Armor Persons, Board Chair, Lee County School Board
Board Members, Lee County School Board
Dr. Jennifer Cupid-McCoy, Chief Strategy Officer
Sarah Cox, Chief Financial Officer

Board Members: Armor Persons, District 5, Chair | William F. Ribble, Jr., District 3, Vice Chair
Samuel Fisher, District 1 | Melisa W. Giovannelli, District 2 | Debbie Jordan, District 4 | Jada Langford Fleming, District 6
Vanessa M. Chaviano, District 7 | Denise M. Carlin, Ed.D., Superintendent | Robert Dodig, Esq., Board Attorney

Finding 1: Alleged Misconduct Investigation Records and Reporting

Auditor General Recommendation:

The District should improve efforts to ensure compliance with the alleged misconduct records and reporting requirements. Such efforts should include Board policy revisions to establish the time frame for issuing final orders and reporting persons for inclusion on the disqualification list and the implementation of effective procedures requiring appropriate follow-up to verify that final orders are promptly issued and persons are timely reported for inclusion on the disqualification list.

District Response:

The District acknowledges the finding and has implemented corrective actions consistent with the Auditor General’s recommendation. The District plans to revise Board policy to require reporting and recordkeeping in accordance with applicable Florida Statutes governing alleged misconduct investigations and disqualification list reporting. In addition, the District has implemented procedures to ensure appropriate documentation, follow-up, and management oversight to verify that final orders are promptly issued, and reporting requirements are met in a timely and consistent manner.

Finding 2: Affidavits of Separation

Auditor General Recommendation:

The Board and District should ensure compliance with State law and SBE rules by revising policies and implementing effective procedures requiring the completion and maintenance of affidavits of separation for all employment separations due to termination for cause or resignation in lieu of termination.

District Response:

The District acknowledges the finding and plans to implement corrective actions consistent with the Auditor General’s recommendation. The District will revise applicable policies and implement procedures requiring the timely completion and retention of affidavits of separation for all required employment separations. Oversight controls will be implemented to ensure affidavits are consistently completed, maintained, and available in accordance with statutory and rule requirements.

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Finding 3: Emergency Drills

Auditor General Recommendation:

The District should enhance procedures to ensure that school personnel understand and comply with all emergency drill requirements, including the conduct of two drills for severe weather, natural disasters, hazardous materials, or reunification every school year.

District Response:

The District acknowledges the finding and has implemented corrective actions consistent with the Auditor General's recommendation. The District has enhanced procedures and guidance to clarify emergency drill requirements and expectations for school personnel. In addition, monitoring processes have been implemented to verify that all required drills are conducted and properly documented each school year to ensure compliance with State Board of Education requirements.

Finding 4: Workforce Education Program Industry Certifications

Auditor General Recommendation:

The District should strengthen procedures to ensure that only eligible industry certifications are reported for performance funding. Such procedures should include documented independent verification that reportable industry certifications are consistent with the FDOE-maintained list of eligible certifications before certifications are reported, and appropriate training for District personnel. In addition, District personnel should compare industry certifications reported to the FDOE for the 2023-24 fiscal year with the FDOE-maintained list of eligible certifications and refund the amount received for ineligible industry certifications, including the \$8,000 identified on audit.

District Response:

The District acknowledges the finding and has implemented corrective actions consistent with the Auditor General's recommendation. The District has strengthened procedures to ensure that only eligible industry certifications are reported for performance funding, including documented verification against the Florida Department of Education-maintained list of eligible certifications prior to reporting.

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In addition, the District will work with the Florida Department of Education to address any performance funding identified during the audit related to ineligible certifications and take appropriate corrective action, as necessary. Staff involved in the reporting process have received additional guidance to support ongoing compliance.

Finding 5: Purchasing Cards

Auditor General Recommendation:

The District should continue efforts to ensure that effective controls are employed over P-card use. Such controls should include restoration of original purchasing dollar limits by the date specified in the approved P-card Threshold Exception Request Form and prompt cancellation of P-cards upon a cardholders' separation from District employment.

District Response:

The District acknowledges the finding and plans to implement corrective actions consistent with the Auditor General's recommendation. The District will enhance procedures to ensure temporary purchasing card limit increases are restored in accordance with approved exception requests and that separation-related cancellation requests are documented and submitted promptly to the financial institution.

In addition, the District will continue to require that purchasing cards be frozen upon notification of an employee's separation and remain frozen while cancellation by the financial institution is in process. The District will strengthen coordination among Finance, Procurement, and Human Resources to improve tracking, documentation, and oversight of purchasing card activity, including monitoring of cancellations and limit restorations.

Finding 6: Severance Pay

Auditor General Recommendation:

The District should ensure that severance pay is only provided to an employee who has recently been or is about to be terminated and that such pay is limited to the amount allowed in State law. In addition, District records should demonstrate

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compliance with the statutory severance pay provisions or the Board should take appropriate action to recover the severance payments totaling \$78,110.

District Response:

The District acknowledges the finding and plans to implement corrective actions consistent with the Auditor General’s recommendation. The District will enhance procedures to ensure severance pay is provided only when statutorily authorized, limited to allowable amounts, and supported by documentation demonstrating compliance with State law and a clear public purpose. The District will also evaluate the severance payments identified in the audit and review any current agreements to ensure they are in compliance with the law. These actions are intended to ensure future severance and separation agreements are supported by adequate documentation, reflect a clear public purpose, and are subject to appropriate legal and Board-level review.

Finding 7: Information Technology User Access Privileges

Auditor General Recommendation:

The District should continue efforts to ensure that IT resource access privileges are limited to those necessary for the performance of the user’s assigned responsibilities. Such efforts should include documented periodic evaluations of user access privileges and the prompt removal of any unnecessary or inappropriate access privileges identified.

District Response:

The District acknowledges the finding and has implemented corrective actions consistent with the Auditor General’s recommendation. The District has implemented documented periodic evaluations of user access privileges, strengthened segregation-of-duties reviews, and ensured the timely removal of unnecessary or inappropriate access. Management oversight has been enhanced to promote sustained compliance and prevent recurrence of this finding. These actions are intended to address the root cause of prior findings by establishing a sustainable, repeatable access-review process.

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