REPORT NO. 2013-017
SEPTEMBER 2012

LEE COUNTY
DISTRICT SCHOOL BOARD

Florida Education Finance Program (FEFP)
Full-Time Equivalent (FTE) Students

and

Student Transportation

For the Fiscal Year Ended
June 30, 2011

STATE OF FLORIDA
AUDITOR GENERAL
DAVID W. MARTIN, CPA

BOARD MEMBERS AND SUPERINTENDENT

Lee County District School Board members and the Superintendent of Schools who served during the 2010-11 fiscal year are listed below:

Member	District No.
Vacant to 11-15-10	1
Mary Fischer, Vice Chair from 11-16-10	1
Jeanne S. Dozier	2
Jane E. Kuckel, Ph.D.	3
Steven K. Teuber, Chair to 11-15-10	4
Don H. Armstrong from 11-16-10	4
Elinor C. Scricca, Ph.D., Vice Chair to 11-15-10	5
Thomas Scott, Chair from 11-16-10	5

James W. Browder, Ed.D., Superintendent to 9-24-10

Lawerence D. Tihen, Ph.D., Interim Superintendent from 9-25-10

The examination team leader was Eric R. Seldomridge, CPA, and the examination was supervised by J. David Hughes, CPA. Please address inquiries regarding this report to Nancy M. Reeder, CPA, CISA, CFE, Audit Manager, by e-mail at nancyreeder@aud.state.fl.us or by telephone at (850) 414-9941.

This report and other reports prepared by the Auditor General can be obtained on our Web site at www.myflorida.com/audgen; by telephone at (850) 487-9175; or by mail at G74 Claude Pepper Building, 111 West Madison Street, Tallahassee, Florida 32399-1450.

Lee County District School Board
Florida Education Finance Program (FEFP)
Full-Time Equivalent (FTE) Students and Student Transportation

LIST OF ABBREVIATIONS

For the Fiscal Year Ended June 30, 2011

CELLA	Comprehensive English Language Learning Assessment
ELL	English Language Learner
ESE	Exceptional Student Education
ESOL	English for Speakers of Other Languages
F.A.C.	Florida Administrative Code
FCAT	Florida Comprehensive Assessment Test
FES	Fluent English Speaker
F.S.	Florida Statutes
IDEA	Individuals with Disabilities Education Act
IEP	Individual Educational Plan
LEA	Local Education Agency
OJT	On-the-Job Training
PK	Prekindergarten
SAT	Scholastic Assessment Test

Lee County District School Board
Florida Education Finance Program (FEFP)
Full-Time Equivalent (FTE) Students and Student Transportation

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EXECUTIVE SUMMARY

Summary of Attestation Examination

Except for the material noncompliance mentioned below involving reporting errors or records that were not properly or accurately prepared or were missing and could not be located for students in ESOL and Career Education 9-12 (OJT), the Lee County District School Board complied, in all material respects, with State requirements regarding the determination and reporting of full-time equivalent (FTE) students under the Florida Education Finance Program (FEFP) and the number of students transported for the fiscal year ended June 30, 2011.

- **Fifty-six of the 423 students in our ESOL sample and 194 of the 360 students in our Career Education 9-12 (OJT) sample had exceptions involving reporting errors or records that were not properly or accurately prepared or were missing and could not be located.**

Noncompliance related to reported FTE resulted in 63 findings. The resulting proposed net adjustment to the District's reported, unweighted FTE totaled to a negative 204.0343 but has a potential impact on the District's weighted FTE of a negative 229.7167. Noncompliance related to student transportation resulted in 6 findings and a proposed net adjustment of a negative 1 student.

Weighted adjustments to FTE are presented in our report for illustrative purposes only. The weighted adjustments to FTE 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 FTE may be estimated by multiplying the proposed net weighted adjustment to FTE by the base student allocation amount. For the Lee County District School Board, the estimated gross dollar effect of our proposed adjustments to reported FTE is a negative $832,438 (negative 229.7167 times $3,623.76).

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 FTE and student transportation and the computation of their financial impact is the responsibility of DOE.

School District of Lee County

The District was established pursuant to Section 1001.30, Florida Statutes, to provide public educational services for the residents of Lee County. Those services are provided primarily to prekindergarten through twelfth 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 State Board of Education. The geographic boundaries of the District are those of Lee 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 appointed Superintendent of Schools. For the fiscal year ended June 30, 2011, the District operated 114 schools serving prekindergarten through twelfth grade students, reported 80,819.69 unweighted FTE for those students, and received approximately $83 million in State funding through FEFP.

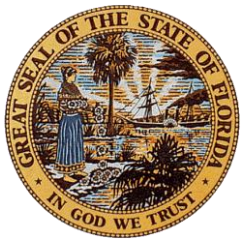
Florida Education Finance Program (FEFP)

Full-Time Equivalent (FTE) Students

Florida school districts receive State funding through FEFP to serve prekindergarten through twelfth grade students (adult education is not funded by FEFP). FEFP was established by the Florida Legislature in 1973 to guarantee to each student in the Florida public school system the availability of programs and services appropriate to the student's educational needs which are substantially equal to those available to any similar student notwithstanding geographic differences and varying local economic factors. To provide equalization of educational opportunity in Florida, the FEFP formula recognizes: (1) varying local property tax bases, (2) varying program cost factors, (3) district cost differentials, and (4) differences in per-student cost for equivalent educational programs due to sparsity and dispersion of student population. The funding provided by FEFP is based upon the numbers of individual students participating in particular educational programs. A numerical value is assigned to each student according to the student's hours and days of attendance in those programs. The individual student thus becomes equated to a numerical value known as an unweighted FTE (full-time equivalent) student. For example, one student would be reported as one FTE if the student was enrolled in six classes per day at 50 minutes per class for the full 180-day school year (i.e., six classes at 50 minutes each per day is 5 hours of class a day or 25 hours per week that equals one FTE).

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 two or more miles from school, be physically handicapped, 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 is on a route that meets the criteria for hazardous walking conditions specified in Section 1006.23(4), Florida Statutes. The District received approximately $19.5 million for student transportation as part of the State funding through FEFP.



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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
LEE COUNTY DISTRICT SCHOOL BOARD
FLORIDA EDUCATION FINANCE PROGRAM (FEFP)
FULL-TIME EQUIVALENT (FTE) STUDENTS

We have examined management's assertion, included in its representation letter dated March 15, 2012, that the Lee County District School Board complied with State requirements governing the determination and reporting of the number of full-time equivalent (FTE) students under the Florida Education Finance Program (FEFP) for the fiscal year ended June 30, 2011. These requirements are found primarily in Sections 1011.60, 1011.61, and 1011.62, Florida Statutes; State Board of Education Rules, Chapter 6A-1, Florida Administrative Code; and the *FTE General Instructions* issued by the Department of Education. As discussed in the representation letter, management is responsible for the District's compliance with State requirements. Our responsibility is to express an opinion on the District's compliance based on our examination.

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

Compliance

Our examination procedures disclosed the following material noncompliance: 56 of the 423 students in our ESOL sample[1] and 194 of the 360 students in our Career Education 9-12 (OJT) sample[2] had exceptions involving reporting errors or records that were not properly or accurately prepared or were missing and could not be located.

In our opinion, except for the material noncompliance mentioned above involving reporting errors or records that were not properly or accurately prepared or were missing and could not be located for students in ESOL and Career Education 9-12 (OJT), the Lee County District School Board complied, in all material respects, with State requirements governing the determination and reporting of the number of full-time equivalent (FTE) students under the Florida Education Finance Program (FEFP) for the fiscal year ended June 30, 2011.

The results of our examination disclosed other noncompliance with the State requirements mentioned above. We considered this other noncompliance in forming our opinion regarding the District's compliance and it did not affect our opinion as stated above. All noncompliance disclosed by our examination procedures is discussed in SCHEDULE D. The impact of this noncompliance on the District's reported FTE is presented in SCHEDULES A, B, C, and D.

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[1]*For ESOL, see SCHEDULE D, Finding Nos. 6, 7, 15, 16, 17, 18, 22, 23, 24, 28, 29, 32, 34, 36, 37, 38, 41, 42, 43, 44, 45, 48, 50, 51, 52, 53, and 59.*

[2]*For Career Education 9-12 (OJT), see SCHEDULE D, Finding Nos. 8, 13, 14, 19, 20, 22, 25, 26, 39, 50, 54, 56, 57, and 58.*

Internal Control Over Compliance

In accordance with attestation standards established by the AICPA and *Government Auditing Standards*, we are required to report significant deficiencies in internal control detected during our examination and identify those considered to be material weaknesses. The purpose of our examination was to express an opinion on the District's compliance with State requirements and did not include expressing an opinion on the District's related internal controls. Accordingly, we express no such opinion. Due to its limited purpose, our examination would not necessarily identify all deficiencies in internal control over compliance that might be significant deficiencies or material weaknesses.[3] 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 missing and could not be located for students in ESOL and Career Education 9-12 (OJT). Other noncompliance disclosed by our examination procedures is indicative of control deficiencies[3] and is also presented herein. The findings, populations, samples, and exception totals that pertain to material and other noncompliance are presented in SCHEDULES A 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.

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 AICPA require us to indicate that this report is intended solely for the information and use of the Legislative Auditing Committee, members of the Florida Senate and the Florida House of Representatives, the State Board of Education, the Department of Education, and applicable District management and is not intended to be and should not be used by anyone other than these specified parties.

Respectfully submitted,

David W. Martin, CPA
September 17, 2012

[3] *A control deficiency in the entity's internal control over compliance exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent or detect noncompliance on a timely basis. A significant deficiency is a control deficiency, or combination of control deficiencies, that adversely affects the entity's ability to comply with the aforementioned State requirements such that there is more than a remote likelihood that noncompliance that is more than inconsequential will not be prevented or detected by the entity's internal control. A material weakness is a significant deficiency, or combination of significant deficiencies, that results in a more-than-remote likelihood that material noncompliance will not be prevented or detected by the entity's internal control.*

SCHEDULE A

Lee County District School Board
Florida Education Finance Program (FEFP)
Full-Time Equivalent (FTE) Students
POPULATIONS, SAMPLES, AND TEST RESULTS
For the Fiscal Year Ended June 30, 2011

Reported FTE

The funding provided by FEFP is based upon the numbers of individual students participating in particular educational programs. FEFP funds ten specific programs that are grouped under the following four general program titles: Basic, ESOL, ESE, and Career Education 9-12. Unweighted FTE represents FTE prior to the application of the specific cost factor for each program. (See SCHEDULE B and NOTES A3, A4, and A6.) The District reported 80,819.69 unweighted FTE at 114 schools to the Department of Education for the fiscal year ended June 30, 2011.

Schools and Students

As part of our examination procedures, we sampled schools and students for testing FTE reported to the Department of Education for the fiscal year ended June 30, 2011. (See NOTE B.) The population of schools (114) consisted of the total number of schools in the District that offered courses in FEFP-funded programs. The population of students (25,621) consisted of the total number of students in each program at the schools in our samples. Our Career Education 9-12 data includes only those students who participated in OJT. Our populations and samples of schools and students are summarized as follows:

	Number of Schools		Number of Students		Students with	Unweighted FTE		Proposed
Programs	Population	Sample	Population	Sample	Exceptions	Population	Sample	Adjustments
Basic	109	21	17,476	250	23	57,318.6700	210.8405	(40.1674)
Basic with ESE Services	114	24	4,684	202	14	16,283.4800	178.8882	(40.1752)
ESOL	104	21	1,807	423	56	3,973.3600	336.8669	(33.3946)
ESE Support Levels 4 and 5	71	22	754	430	21	770.2200	301.4784	(5.3702)
Career Education 9-12	26	8	900	360	194	2,473.9600	55.2441	(84.9269)
All Programs	114	24	25,621	1,665	308	80,819.6900	1,083.3181	(204.0343)

The accompanying notes are an integral part of this schedule.

SCHEDULE A (Continued)

Lee County District School Board
Florida Education Finance Program (FEFP)
Full-Time Equivalent (FTE) Students
POPULATIONS, SAMPLES, AND TEST RESULTS
For the Fiscal Year Ended June 30, 2011

Teachers

We also sampled teachers as part of our examination procedures. (See NOTE B.) Specifically, the population of teachers (941) consisted of the total number of teachers at schools in our sample who taught courses in ESE Support Levels 4 and 5 or Career Education 9-12 (OJT) or taught courses to ELL students. From the population of teachers, we sampled 283 and found exceptions for 8 of those teachers.

Proposed Adjustments

Our proposed adjustments present the net effects of noncompliance disclosed by our examination procedures, including those related to our tests of teacher certification. Our proposed adjustments generally reclassify 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 FTE and the computation of their financial impact is the responsibility of DOE.

The accompanying notes are an integral part of this schedule.

SCHEDULE B

Lee County District School Board
Florida Education Finance Program (FEFP)
Full-Time Equivalent (FTE) Students
EFFECT OF PROPOSED ADJUSTMENTS ON WEIGHTED FTE
(For Illustrative Purposes Only)
For the Fiscal Year Ended June 30, 2011

No.	Program[1]	Proposed Net Adjustment[2]	Cost Factor	Weighted FTE[3]
101	Basic K-3	10.2651	1.089	11.1787
102	Basic 4-8	4.2872	1.000	4.2872
103	Basic 9-12	(54.7197)	1.031	(56.4160)
111	Grades K-3 with ESE Services	.0800	1.089	.0871
112	Grades 4-8 with ESE Services	(1.0000)	1.000	(1.0000)
113	Grades 9-12 with ESE Services	(39.2552)	1.031	(40.4721)
130	ESOL	(33.3946)	1.147	(38.3036)
254	ESE Support Level 4	(3.7700)	3.523	(13.2817)
255	ESE Support Level 5	(1.6002)	4.935	(7.8970)
300	Career Education 9-12	(84.9269)	1.035	(87.8993)
Total		(204.0343)		(229.7167)

[1] *See NOTE A6.*

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

[3] *Weighted adjustments to FTE are presented for illustrative purposes only. The weighted adjustments to 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 Department of Education. (See NOTE A4.)*

The accompanying notes are an integral part of this schedule.

SCHEDULE C

Lee County District School Board
Florida Education Finance Program (FEFP)
Full-Time Equivalent (FTE) Students
PROPOSED ADJUSTMENTS BY SCHOOL
For the Fiscal Year Ended June 30, 2011

		Proposed Adjustments[1]		
No. Program	**Districtwide**	**#0093**	**#0221**	**Balance Forward**
101 Basic K-3	.....	1.4308	.....	1.4308
102 Basic 4-8	.....	.....	.....	.0000
103 Basic 9-12	(60.2620)	.....	2.4000	(57.8620)
111 Grades K-3 with ESE Services	.....	.5000	.....	.5000
112 Grades 4-8 with ESE Services	.....	.....	.....	.0000
113 Grades 9-12 with ESE Services	(14.1952)	.....	.....	(14.1952)
130 ESOL	.....	(1.4308)	(2.4000)	(3.8308)
254 ESE Support Level 4	.....	(.5000)	.....	(.5000)
255 ESE Support Level 5	.....	.....	.....	.0000
300 Career Education 9-12	.....	.....	(.6000)	(.6000)
Total	(74.4572)	.0000	(.6000)	(75.0572)

[1] *These proposed adjustments are for unweighted FTE. (See NOTE A4.)*

The accompanying notes are an integral part of this schedule.

SCHEDULE C (Continued)

Lee County District School Board
Florida Education Finance Program (FEFP)
Full-Time Equivalent (FTE) Students
PROPOSED ADJUSTMENTS BY SCHOOL
For the Fiscal Year Ended June 30, 2011

		Proposed Adjustments[1]				
No.	**Brought Forward**	**#0241**	**#0311**	**#0321**	**#0511**	**Balance Forward**
101	1.4308	.....	.....	.5000	.....	1.9308
102	.0000	.....	.....	.7872	.....	.7872
103	(57.8620)	3.8580	.....	.....	2.6887	(51.3153)
111	.5000	.....	.....	.....	.....	.5000
112	.0000	.....	.....	.....	.....	.0000
113	(14.1952)	(.5000)	.....	.....	.....	(14.6952)
130	(3.8308)	(3.3580)	.....	(1.2872)	(2.6887)	(11.1647)
254	(.5000)	(.8200)	.....	.....	.....	(1.3200)
255	.0000	(.5000)	.....	.....	.....	(.5000)
300	(.6000)	.....	(.1329)	.....	(.5540)	(1.2869)
Total	(75.0572)	(1.3200)	(.1329)	.0000	(.5540)	(77.0641)

[1] *These proposed adjustments are for unweighted FTE. (See NOTE A4.)*

The accompanying notes are an integral part of this schedule.

SCHEDULE C (Continued)

Lee County District School Board
Florida Education Finance Program (FEFP)
Full-Time Equivalent (FTE) Students
PROPOSED ADJUSTMENTS BY SCHOOL
For the Fiscal Year Ended June 30, 2011

		Proposed Adjustments[1]				
No.	**Brought Forward**	**#0531**	**#0631**	**#0651**	**#0672**	**Balance Forward**
101	1.9308	.....	1.5000	1.0000	.9730	5.4038
102	.7872	.....	.....	.5000	.....	1.2872
103	(51.3153)	3.4500	.....	.....	.....	(47.8653)
111	.5000	.....	.....	.....	.....	.5000
112	.0000	.....	.....	.5000	.....	.5000
113	(14.6952)	.....	.....	.....	.....	(14.6952)
130	(11.1647)	(3.8000)	(1.5000)	.....	(.9730)	(17.4377)
254	(1.3200)	.....	.....	(2.0000)	.0500	(3.2700)
255	(.5000)	.....	.....	.....	(.0500)	(.5500)
300	(1.2869)	(.4900)	.....	.....	.....	(1.7769)
Total	(77.0641)	(.8400)	.0000	.0000	.0000	(77.9041)

[1] *These proposed adjustments are for unweighted FTE. (See NOTE A4.)*

The accompanying notes are an integral part of this schedule.

SCHEDULE C (Continued)

Lee County District School Board
Florida Education Finance Program (FEFP)
Full-Time Equivalent (FTE) Students
PROPOSED ADJUSTMENTS BY SCHOOL
For the Fiscal Year Ended June 30, 2011

		Proposed Adjustments[1]				
No.	**Brought Forward**	**#0681**	**#0711**	**#0745**	**#0763**	**Balance Forward**
101	5.4038	.4443	2.9170	.....	.....	8.7651
102	1.2872	.....	1.0000	.....	1.0000	3.2872
103	(47.8653)	.....	.....	3.5456	.....	(44.3197)
111	.5000	.....	(1.0000)	.....	.....	(.5000)
112	.5000	.....	(.5000)	.....	.....	.0000
113	(14.6952)	.....	.....	(2.0000)	.....	(16.6952)
130	(17.4377)	(.4443)	(2.4170)	(4.3956)	(1.0000)	(25.6946)
254	(3.2700)	.....	.....	.....	.....	(3.2700)
255	(.5500)	.....	.....	.....	.....	(.5500)
300	(1.7769)	.....	.....	(.1500)	.....	(1.9269)
Total	(77.9041)	.0000	.0000	(3.0000)	.0000	(80.9041)

[1] *These proposed adjustments are for unweighted FTE. (See NOTE A4.)*

The accompanying notes are an integral part of this schedule.

SCHEDULE C (Continued)

Lee County District School Board
Florida Education Finance Program (FEFP)
Full-Time Equivalent (FTE) Students
PROPOSED ADJUSTMENTS BY SCHOOL
For the Fiscal Year Ended June 30, 2011

		Proposed Adjustments[1]				
No.	**Brought Forward**	**#0771**	**#0781**	**#0851**	**#4242**	**Balance Forward**
101	8.7651	.5000	1.0000	.....	.....	10.2651
102	3.2872	.....	1.0000	.....	.....	4.2872
103	(44.3197)	.....	.....	.....	3.6000	(40.7197)
111	(.5000)	.....	.5800	.....	.....	.0800
112	.0000	.....	(1.0000)	.....	.....	(1.0000)
113	(16.6952)	.....	.....	.....	(9.7000)	(26.3952)
130	(25.6946)	(.5000)	(1.0000)	.....	(1.7000)	(28.8946)
254	(3.2700)	.....	(.5000)	.5000	.....	(3.2700)
255	(.5500)	.....	(.0800)	(.5000)	.....	(1.1300)
300	(1.9269)	.....	.....	.....	(46.1000)	(48.0269)
Total	(80.9041)	.0000	.0000	.0000	(53.9000)	(134.8041)

[1] *These proposed adjustments are for unweighted FTE. (See NOTE A4.)*

The accompanying notes are an integral part of this schedule.

SCHEDULE C (Continued)

Lee County District School Board
Florida Education Finance Program (FEFP)
Full-Time Equivalent (FTE) Students
PROPOSED ADJUSTMENTS BY SCHOOL
For the Fiscal Year Ended June 30, 2011

No.	Program[1]	Brought Forward	Proposed Adjustments[1] #4251	#9450	Total
101	Basic K-3	10.2651	.....	.....	10.2651
102	Basic 4-8	4.2872	.....	.....	4.2872
103	Basic 9-12	(40.7197)	(14.0000)	.....	(54.7197)
111	Grades K-3 with ESE Services	.0800	.....	.....	.0800
112	Grades 4-8 with ESE Services	(1.0000)	.....	.....	(1.0000)
113	Grades 9-12 with ESE Services	(26.3952)	(12.9000)	.0400	(39.2552)
130	ESOL	(28.8946)	(4.5000)	.....	(33.3946)
254	ESE Support Level 4	(3.2700)	(.5000)	.....	(3.7700)
255	ESE Support Level 5	(1.1300)	.....	(.4702)	(1.6002)
300	Career Education 9-12	(48.0269)	(36.9000)	.....	(84.9269)
Total		(134.8041)	(68.8000)	(.4302)	(204.0343)

[1] *These proposed adjustments are for unweighted FTE. (See NOTE A4.)*

The accompanying notes are an integral part of this schedule.

SCHEDULE D

Lee County District School Board
Florida Education Finance Program (FEFP)
Full-Time Equivalent (FTE) Students
FINDINGS AND PROPOSED ADJUSTMENTS
For the Fiscal Year Ended June 30, 2011

Overview

Management is responsible for determining and reporting the number of full-time equivalent (FTE) students under the Florida Education Finance Program (FEFP) in compliance with State requirements. These requirements are found primarily in Sections 1011.60, 1011.61, and 1011.62, Florida Statutes; State Board of Education Rules, Chapter 6A-1, Florida Administrative Code; and the *FTE General Instructions* issued by the Department of Education. Except for the material noncompliance involving reporting errors or records that were not properly or accurately prepared or were missing and could not be located for students in ESOL and Career Education 9-12 (OJT), the Lee County District School Board complied, in all material respects, with State requirements governing the determination and reporting of FTE for the fiscal year ended June 30, 2011. All noncompliance disclosed by our examination procedures is discussed below and requires management's attention and action, as recommended on page 36.

Findings	Proposed Net Adjustments (Unweighted FTE)
Our examination included the July and October 2010 surveys and the February and June 2011 surveys (see NOTE A5). Unless otherwise specifically stated, the Findings and proposed adjustments presented herein are for the October 2010 survey or the February 2011 survey or both. Accordingly, our Findings do not mention specific surveys unless necessary for a complete understanding of the instances of noncompliance being disclosed.	

Districtwide – Incorrect Reporting of Students' Course Schedules

1. [Ref. 1/148] We noted that the District reported a varying number of students for State funding using course numbers unrelated to the subject area of instruction provided. Students received instruction in Basic subject areas and electives but were reported under varying course numbers within the Research and Critical Thinking Program area (course numbers 1700300/310/320/330/340/350 [Research 1 - 6, respectively]). We inquired of District management and were informed that most of these reportings were for students taking courses for credit recovery and that only at the time of completion would the course numbers be updated to reflect the actual courses that the students had taken. *Finding continues on next page.*

The accompanying notes are an integral part of this schedule.

SCHEDULE D (Continued)

Lee County District School Board
Florida Education Finance Program (FEFP)
Full-Time Equivalent (FTE) Students
FINDINGS AND PROPOSED ADJUSTMENTS
For the Fiscal Year Ended June 30, 2011

Findings		Proposed Net Adjustments (Unweighted FTE)
Districtwide – Incorrect Reporting of Students' Course Schedules (Continued)		
In these instances, we are not questioning the eligibility of State funding. We are presenting this disclosure Finding with no proposed adjustment (Ref. 1).		.0000
However, there were three courses involving four schools and 865 students that were incorrectly reported in these courses (Ref. 148), as follows:		
a. One hundred ninety-five students (reported for 13.0278 FTE) were engaged in preparation for the SAT exam and were reported in course number 1700310.		
b. Six hundred seventy students (reported for 46.6228 FTE) were involved in activities as student aides working with Guidance Counselors and other office staff assigned and were reported in course numbers 1700300 or 1700320.		
Our review of the State curriculum frameworks for Research and Critical Thinking Program courses did not disclose that preparation for the SAT exam or activities performed by student aides met the instructional requirements set forth in the State curriculum frameworks. We inquired of Department of Education management, who concurred that students engaged in these activities were not working on curriculum that was based on the Florida State Board of Education's approved Next Generation Sunshine State Standards. Consequently, the students reported in these courses should not have been reported for State FEFP funding for those courses. We propose the following adjustment:		
103 Basic 9-12	(48.9326)	
113 Grades 9-12 with ESE Services	(10.7180)	(59.6506)

The accompanying notes are an integral part of this schedule.

SCHEDULE D (Continued)

Lee County District School Board
Florida Education Finance Program (FEFP)
Full-Time Equivalent (FTE) Students
FINDINGS AND PROPOSED ADJUSTMENTS
For the Fiscal Year Ended June 30, 2011

Findings	Proposed Net Adjustments (Unweighted FTE)

Districtwide – Incorrect Reporting of Students' Course Schedules (Continued)

Follow-Up to Management's Response to Finding No. 1 [Ref. 148]: ***In his written response, the Superintendent disagreed with this Finding and indicated that, while the course codes used for the activities in question may have been incorrect, the activities constituted instruction that was eligible for FTE reporting. He further stated that the District believed that all of the courses involved instructional activities specifically listed within the District's program of studies and constituted an integral part of the District's educational program. However, as we stated in the Finding, we inquired of Department of Education management, who concurred that the students were not working on curriculum that was based on the Florida State Board of Education's approved Next Generation Sunshine State Standards and, as such, the students should not have been reported for State FEFP funding for those courses. Accordingly, our Finding stands as presented.***

2. [Ref. 149] We noted that 261 students involving six schools were reported incorrectly for course number 2500510 (Temporary Instructional Placement). We inquired with District management and were informed that this particular course number was meant only to be a place holder in the student's schedule for students who were planning to take a college-level course. The intent was for School personnel to code these courses as 999 making the course not eligible for State funding. However, for the six schools involved, the student courses were inadvertently coded for Program No. 103 (Basic 9-12) or Program No. 113 (Grades 9-12 with ESE Services) resulting in the students' courses being funded in error. We propose the following adjustment:

103 Basic 9-12	(11.3294)	
113 Grades 9-12 with ESE Services	(3.4772)	(14.8066)
		(74.4572)

The accompanying notes are an integral part of this schedule.

SCHEDULE D (Continued)

Lee County District School Board
Florida Education Finance Program (FEFP)
Full-Time Equivalent (FTE) Students
FINDINGS AND PROPOSED ADJUSTMENTS
For the Fiscal Year Ended June 30, 2011

Findings		Proposed Net Adjustments (Unweighted FTE)
River Hall Elementary School (#0093)		
3. [Ref. 9301] The *Matrix of Services* form for one ESE student incorrectly included one Special Considerations point for which the student was not eligible. The point was designated for students with a *Matrix of Services* score of 17 points and a Level 5 rating in three Domains. This student had a Level 5 rating in only one Domain. We propose the following adjustment:		
111 Grades K-3 with ESE Services	.5000	
254 ESE Support Level 4	(.5000)	.0000
4. [Ref. 9370] One teacher was not properly certified and was not approved by the School Board to teach Elementary Education out of field. We also noted that the teacher was in the fifth year of out-of-field status and had earned none of the 30 college credits toward certification in Elementary Education. We further noted that the teacher was teaching ELL students and had earned only 180 of the 300 in-service training points in ESOL strategies required by rule and the teacher's in-service training timeline. We propose the following adjustment:		
101 Basic K-3	1.2264	
130 ESOL	(1.2264)	.0000
5. [Ref. 9373] One out-of-field ESOL teacher had earned only 60 of the 180 in-service training points in ESOL strategies required by rule and the teacher's in-service training timeline. We propose the following adjustment:		
101 Basic K-3	.2044	
130 ESOL	(.2044)	.0000
		.0000

The accompanying notes are an integral part of this schedule.

SCHEDULE D (Continued)

Lee County District School Board
Florida Education Finance Program (FEFP)
Full-Time Equivalent (FTE) Students
FINDINGS AND PROPOSED ADJUSTMENTS
For the Fiscal Year Ended June 30, 2011

Findings		Proposed Net Adjustments (Unweighted FTE)
Fort Myers High School (#0221)		
6. [Ref. 22101] Two ELL students were beyond the maximum six-year period allowed for State funding of ESOL. We propose the following adjustment:		
103 Basic 9-12	1.3500	
130 ESOL	(1.3500)	.0000
7. [Ref. 22102] The English language proficiency of three students was prematurely assessed prior to the students' continued ESOL placements for a fifth year. Assessments were conducted in April 2010; however, the students were due for reevaluation in October and November 2010. Consequently, the students' ESOL placements were not adequately supported. We propose the following adjustment:		
103 Basic 9-12	1.0500	
130 ESOL	(1.0500)	.0000
8. [Ref. 22103] The files for four Career Education 9-12 (OJT) students did not contain documentation to support the students' off campus work time in the Financial Internship Program. We propose the following adjustment:		
300 Career Education 9-12	(.6000)	(.6000)
		(.6000)

The accompanying notes are an integral part of this schedule.

SCHEDULE D (Continued)

Lee County District School Board
Florida Education Finance Program (FEFP)
Full-Time Equivalent (FTE) Students
FINDINGS AND PROPOSED ADJUSTMENTS
For the Fiscal Year Ended June 30, 2011

Findings		Proposed Net Adjustments (Unweighted FTE)
Lehigh Senior High School (#0241)		
9. [Ref. 24101] Two ESE students were incorrectly reported for both on-campus instruction and homebound instruction. The students were not in attendance at school during one or both of the October 2010 and February 2011 surveys. Consequently, the students' on-campus instruction should not have been included with the surveys' results. We propose the following adjustment:		
254 ESE Support Level 4	(.8200)	
255 ESE Support Level 5	(.5000)	(1.3200)
10. [Ref. 24102] The file for one ESE student did not contain an IEP that was valid during the October 2010 survey. We propose the following adjustment:		
103 Basic 9-12	.5000	
113 Grades 9-12 with ESE Services	(.5000)	.0000
11. [Ref. 24170/72] Two teachers had earned none of the 60 in-service training points in ESOL strategies required by rule and the teachers' in-service training timeline. One teacher was in her first year of out-of-field status in ESOL (Ref. 24170) and one teacher taught a Basic subject area course with an ELL student (Ref. 24172). We propose the following adjustments:		
Ref. 24170		
103 Basic 9-12	1.0021	
130 ESOL	(1.0021)	.0000
Ref. 24172		
103 Basic 9-12	1.6423	
130 ESOL	(1.6423)	.0000

The accompanying notes are an integral part of this schedule.

SCHEDULE D (Continued)

Lee County District School Board
Florida Education Finance Program (FEFP)
Full-Time Equivalent (FTE) Students
FINDINGS AND PROPOSED ADJUSTMENTS
For the Fiscal Year Ended June 30, 2011

Findings		Proposed Net Adjustments (Unweighted FTE)
Lehigh Senior High School (#0241) (Continued)		
12. [Ref. 24171] The parents of ELL students were not notified of one teacher's out-of-field status in ESOL. We propose the following adjustment:		
103 Basic 9-12	.7136	
130 ESOL	(.7136)	.0000
		(1.3200)
North Fort Myers High School (#0311)		
13. [Ref. 31101] The timecard for one Career Education 9-12 (OJT) student indicated that the student worked fewer hours than were reported (5 hours versus 7.5 hours). We propose the following adjustment:		
300 Career Education 9-12	(.0498)	(.0498)
14. [Ref. 31102] The timecard for one Career Education 9-12 (OJT) student indicated that the student was not employed during the week of the October 2010 survey. We also noted that there was no documentation to indicate that the student was engaged in a job search. We propose the following adjustment:		
300 Career Education 9-12	(.0831)	(.0831)
		(.1329)
Orange River Elementary School (#0321)		
15. [Ref. 32101] One student scored English proficient on all three subtests of the CELLA assessment and achieved a Level 3 on the FCAT test; however, an ELL Committee was not convened to consider the student's continued ESOL placement. We propose the following adjustment:		

The accompanying notes are an integral part of this schedule.

SCHEDULE D (Continued)

Lee County District School Board
Florida Education Finance Program (FEFP)
Full-Time Equivalent (FTE) Students
FINDINGS AND PROPOSED ADJUSTMENTS
For the Fiscal Year Ended June 30, 2011

Findings		Proposed Net Adjustments (Unweighted FTE)
Orange River Elementary School (#0321) (Continued)		
102 Basic 4-8	.7872	
130 ESOL	(.7872)	.0000

16. [Ref. 32102] One student was reported incorrectly in ESOL. The student was exited from the ESOL Program on May 29, 2009, prior to the survey. We propose the following adjustment:

101 Basic K-3	.5000	
130 ESOL	(.5000)	.0000
		.0000

South Fort Myers High School (#0511)

17. [Ref. 51101] The file for one ELL student did not contain an *ELL Student Plan* that was valid for the 2010-11 school year. We propose the following adjustment:

103 Basic 9-12	.9787	
130 ESOL	(.9787)	.0000

18. [Ref. 51102] The file for one ELL student did not contain an *ELL Student Plan* that was valid for the 2010-11 school year. We also noted that the student's English language proficiency was not properly assessed prior to being placed in the ESOL Program after an absence of three years. We propose the following adjustment:

103 Basic 9-12	.2736	
130 ESOL	(.2736)	.0000

19. [Ref. 51103] The timecards for seven Career Education 9-12 (OJT) students were missing and could not be located. We propose the following adjustment:

300 Career Education 9-12	(.3748)	(.3748)

The accompanying notes are an integral part of this schedule.

SCHEDULE D (Continued)

Lee County District School Board
Florida Education Finance Program (FEFP)
Full-Time Equivalent (FTE) Students
FINDINGS AND PROPOSED ADJUSTMENTS
For the Fiscal Year Ended June 30, 2011

Findings		Proposed Net Adjustments (Unweighted FTE)
South Fort Myers High School (#0511) (Continued)		
20. [Ref. 51104] The timecards for two Career Education 9-12 (OJT) students indicated that the students did not work during the October 2010 survey. We propose the following adjustment:		
300 Career Education 9-12	(.1792)	(.1792)

Follow-Up to Management's Response to Finding No. 20 [Ref. 51104]: ***In his written response, the Superintendent disagreed with this Finding and indicated that as long as the total hours worked by the students substantiated the amount of FTE claimed, then that should be sufficient for FTE documentation. While we agree that the District cannot control when employers schedule students for work or when students are sick, our review of the students' timecards for the month of October 2010 did not disclose a regular weekly work schedule that would otherwise infer the students would have worked during the survey week. Accordingly, our Finding stands as presented.***

21. [Ref. 51170] One out-of-field ESOL teacher had earned none of the 60 in-service training points in ESOL strategies required by rule and the teacher's in-service training timeline. We propose the following adjustment:		
103 Basic 9-12	1.4364	
130 ESOL	(1.4364)	.0000
		(.5540)

The accompanying notes are an integral part of this schedule.

SCHEDULE D (Continued)

Lee County District School Board
Florida Education Finance Program (FEFP)
Full-Time Equivalent (FTE) Students
FINDINGS AND PROPOSED ADJUSTMENTS
For the Fiscal Year Ended June 30, 2011

Findings		Proposed Net Adjustments (Unweighted FTE)
Cypress Lake High School (#0531)		
22. [Ref. 53101] One ELL student was not in membership during the October 2010 survey and should not have been reported with that survey's results. We propose the following adjustment:		
130 ESOL	(.3500)	
300 Career Education 9-12	(.1500)	(.5000)
23. [Ref. 53102] The file for one ELL student did not contain an *ELL Student Plan* that was valid for the 2010-11 school year. We propose the following adjustment:		
103 Basic 9-12	.3500	
130 ESOL	(.3500)	.0000
24. [Ref. 53103] The English language proficiency of four ELL students was prematurely assessed prior to the students' continued ESOL placements for a fifth or sixth year. Assessments were conducted in April 2010; however, the students were due for reevaluation in November 2010 or January 2011. Consequently, the students' ESOL placements were not adequately supported. We propose the following adjustment:		
103 Basic 9-12	2.0300	
130 ESOL	(2.0300)	.0000
25. [Ref. 53104] The timecards for five Career Education 9-12 (OJT) students were missing and could not be located. We propose the following adjustment:		
300 Career Education 9-12	(.3300)	(.3300)

The accompanying notes are an integral part of this schedule.

SCHEDULE D (Continued)

Lee County District School Board
Florida Education Finance Program (FEFP)
Full-Time Equivalent (FTE) Students
FINDINGS AND PROPOSED ADJUSTMENTS
For the Fiscal Year Ended June 30, 2011

Findings		Proposed Net Adjustments (Unweighted FTE)
Cypress Lake High School (#0531) (Continued)		
26. [Ref. 53105] The timecard for one Career Education 9-12 (OJT) student indicated that the student was not employed during the survey week and was not otherwise engaged in a job search. We propose the following adjustment:		
300 Career Education 9-12	(.0100)	(.0100)
27. [Ref. 53170] One teacher taught a Basic subject area course to classes that included ELL students but had earned none of the 60 in-service training points in ESOL strategies required by rule and the teacher's in-service training timeline. We propose the following adjustment:		
103 Basic 9-12	1.0700	
130 ESOL	(1.0700)	.0000
		(.8400)
San Carlos Park Elementary School (#0631)		
28. [Ref. 63101] One ELL student was assessed FES and a competent English reader and writer; however, an ELL Committee was not convened to consider the student's continued ESOL placement. Consequently, the student's ESOL placement was not adequately supported. We propose the following adjustment:		
101 Basic K-3	1.0000	
130 ESOL	(1.0000)	.0000
29. [Ref. 63102] One student was incorrectly reported in ESOL. The student was dismissed from ESOL on August 23, 2010, prior to the October 2010 survey. We propose the following adjustment:		

The accompanying notes are an integral part of this schedule.

SCHEDULE D (Continued)

Lee County District School Board
Florida Education Finance Program (FEFP)
Full-Time Equivalent (FTE) Students
FINDINGS AND PROPOSED ADJUSTMENTS
For the Fiscal Year Ended June 30, 2011

Findings		Proposed Net Adjustments (Unweighted FTE)
San Carlos Park Elementary School (#0631) (Continued)		
101 Basic K-3	.5000	
130 ESOL	(.5000)	.0000
		.0000
Royal Palm Exceptional Center (#0651)		
30. [Ref. 65101] The file for one ESE student was missing and could not be located. We propose the following adjustment:		
101 Basic K-3	1.0000	
254 ESE Support Level 4	(1.0000)	.0000
31. [Ref. 65102] There was no evidence that the *Matrix of Services* forms for two ESE students were reviewed and updated when the students' new IEPs were prepared. We also noted that one of the student's files did not contain an IEP that was valid during the February 2011 survey. We propose the following adjustment:		
102 Basic 4-8	.5000	
112 Grades 4-8 with ESE Services	.5000	
254 ESE Support Level 4	(1.0000)	.0000
		.0000
Gulf Elementary School (#0672)		
32. [Ref. 67201] One ELL student was assessed FES and a competent English reader and writer; however, an ELL Committee was not convened to consider the student's continued ESOL placement. Consequently, the student's ESOL placement was not adequately supported. We propose the following adjustment:		
101 Basic K-3	.9730	
130 ESOL	(.9730)	.0000

The accompanying notes are an integral part of this schedule.

SCHEDULE D (Continued)

Lee County District School Board
Florida Education Finance Program (FEFP)
Full-Time Equivalent (FTE) Students
FINDINGS AND PROPOSED ADJUSTMENTS
For the Fiscal Year Ended June 30, 2011

Findings		Proposed Net Adjustments (Unweighted FTE)
Gulf Elementary School (#0672) (Continued)		
33. [Ref. 67202] One ESE student was co-enrolled in school and in the Hospital and Homebound Program; however, the on-campus instruction was incorrectly reported in Program No. 255 (ESE Support Level 5) rather than Program No. 254 (ESE Support Level 4) in accordance with the student's on-campus *Matrix of Services* form. We propose the following adjustment:		
254 ESE Support Level 4	.0500	
255 ESE Support Level 5	(.0500)	.0000
		.0000
Spring Creek Elementary School (#0681)		
34. [Ref. 68101] One student was assessed FES and an ELL Committee was not convened to consider the student's continued ESOL placement until October 29, 2010, which was after the October 2010 survey. Consequently, the student's ESOL placement was not adequately supported for the October 2010 survey. We propose the following adjustment:		
101 Basic K-3	.4443	
130 ESOL	(.4443)	.0000
		.0000
Sunshine Elementary School (#0711)		
35. [Ref. 71101] The IEPs for two ESE students were not signed by the General Education teachers to indicate participation in the development of the IEPs. We propose the following adjustment:		
101 Basic K-3	1.0000	
102 Basic 4-8	.5000	
111 Grades K-3 with ESE Services	(1.0000)	
112 Grades 4-8 with ESE Services	(.5000)	.0000

The accompanying notes are an integral part of this schedule.

SCHEDULE D (Continued)

Lee County District School Board
Florida Education Finance Program (FEFP)
Full-Time Equivalent (FTE) Students
FINDINGS AND PROPOSED ADJUSTMENTS
For the Fiscal Year Ended June 30, 2011

Findings		Proposed Net Adjustments (Unweighted FTE)
Sunshine Elementary School (#0711) (Continued)		
36. [Ref. 71102] The file for one ELL student did not contain an *ELL Student Plan* that was valid for the 2010-11 school year. We propose the following adjustment:		
101 Basic K-3	.4585	
130 ESOL	(.4585)	.0000
37. [Ref. 71103] The English language proficiency of one ELL student was prematurely assessed prior to the student's continued ESOL placement for a fifth year. An assessment was conducted in April 2010; however, the student was due for reevaluation in January 2011. Consequently, the student's ESOL placement was not adequately supported. We propose the following adjustment:		
102 Basic 4-8	.5000	
130 ESOL	(.5000)	.0000
38. [Ref. 71104] Two ELL students were assessed FES and an ELL Committee was not convened to consider the students' continued ESOL placements. Consequently, the students' ESOL placements were not adequately supported. We propose the following adjustment:		
101 Basic K-3	1.4585	
130 ESOL	(1.4585)	.0000
		.0000
East Lee County High School (#0745)		
39. [Ref. 74501] Six students (one student was in our Career Education 9-12 [OJT] sample) were not in membership during the reporting surveys and should not have been included with the surveys' results. We propose the following adjustment:		

The accompanying notes are an integral part of this schedule.

SCHEDULE D (Continued)

Lee County District School Board
Florida Education Finance Program (FEFP)
Full-Time Equivalent (FTE) Students
FINDINGS AND PROPOSED ADJUSTMENTS
For the Fiscal Year Ended June 30, 2011

Findings		Proposed Net Adjustments (Unweighted FTE)
East Lee County High School (#0745) (Continued)		
103 Basic 9-12	(1.0016)	
113 Grades 9-12 with ESE Services	(1.5000)	
130 ESOL	(.3484)	
300 Career Education 9-12	(.1500)	(3.0000)

40. [Ref. 74502] The IEP for one student was not signed by the LEA Representative, the student's Exceptional Education teacher, or the student's General Education teacher to indicate their participation in the development of the IEP. We propose the following adjustment:

103 Basic 9-12	.5000	
113 Grades 9-12 with ESE Services	(.5000)	.0000

41. [Ref. 74503] Two students scored English proficient on the CELLA assessment and an ELL Committee was not convened to consider the students' continued ESOL placements. Consequently, the students' ESOL placements were not adequately supported. We propose the following adjustment:

103 Basic 9-12	.9068	
130 ESOL	(.9068)	.0000

42. [Ref. 74504] The English language proficiency of five ELL students was prematurely assessed prior to the students' continued ESOL placements for a fourth, fifth, or sixth year. Assessments were conducted in April 2010; however, the students were due for reevaluation in January 2011. Consequently, the students' ESOL placements were not adequately supported. We propose the following adjustment:

103 Basic 9-12	1.9536	
130 ESOL	(1.9536)	.0000

The accompanying notes are an integral part of this schedule.

SCHEDULE D (Continued)

Lee County District School Board
Florida Education Finance Program (FEFP)
Full-Time Equivalent (FTE) Students
FINDINGS AND PROPOSED ADJUSTMENTS
For the Fiscal Year Ended June 30, 2011

Findings		Proposed Net Adjustments (Unweighted FTE)
East Lee County High School (#0745) (Continued)		
43. [Ref. 74505] Three ELL students were beyond the maximum six-year period allowed for State funding of ESOL. We propose the following adjustment:		
103 Basic 9-12	1.1868	
130 ESOL	(1.1868)	.0000
		(3.0000)
Manatee Elementary School (#0763)		
44. [Ref. 76301] The English language proficiency of one student was not assessed when the student returned to the District after a two-year absence and an ELL Committee was not convened to consider the student's continued ESOL placement. Consequently, the student's ESOL placement was not adequately supported. We also noted that the student's parents were not notified of the student's reentry into the ESOL Program. We propose the following adjustment:		
102 Basic 4-8	1.0000	
130 ESOL	(1.0000)	.0000
		.0000
Diplomat Elementary School (#0771)		
45. [Ref. 77101] One ELL student was assessed FES as a second grader and an ELL Committee was not convened to consider the student's continued ESOL placement. Consequently, the student's ESOL placement was not adequately supported. We propose the following adjustment:		
101 Basic K-3	.5000	
130 ESOL	(.5000)	.0000
		.0000

The accompanying notes are an integral part of this schedule.

SCHEDULE D (Continued)

Lee County District School Board
Florida Education Finance Program (FEFP)
Full-Time Equivalent (FTE) Students
FINDINGS AND PROPOSED ADJUSTMENTS
For the Fiscal Year Ended June 30, 2011

Findings		Proposed Net Adjustments (Unweighted FTE)
Colonial Elementary School (#0781)		
46. [Ref. 78101] The file for one ESE student did not contain an IEP that was valid during the 2010-11 school year. We propose the following adjustment:		
102 Basic 4-8	1.0000	
112 Grades 4-8 with ESE Services	(1.0000)	.0000
47. [Ref. 78102] Two ESE students were not reported in accordance with the students' *Matrix of Services* forms. We propose the following adjustment:		
111 Grades K-3 with ESE Services	.5800	
254 ESE Support Level 4	(.5000)	
255 ESE Support Level 5	(.0800)	.0000
48. [Ref. 78103] One ELL student was assessed FES as a first grader and an ELL Committee was not convened to consider the student's continued ESOL placement. Consequently, the student's ESOL placement was not adequately supported. We propose the following adjustment:		
101 Basic K-3	1.0000	
130 ESOL	(1.0000)	.0000
		.0000
Veterans Park Academy for the Arts (#0851)		
49. [Ref. 85101] One ESE student was not reported in accordance with the student's *Matrix of Services* form. We propose the following adjustment:		
254 ESE Support Level 4	.5000	
255 ESE Support Level 5	(.5000)	.0000
		.0000

The accompanying notes are an integral part of this schedule.

SCHEDULE D (Continued)

Lee County District School Board
Florida Education Finance Program (FEFP)
Full-Time Equivalent (FTE) Students
FINDINGS AND PROPOSED ADJUSTMENTS
For the Fiscal Year Ended June 30, 2011

Findings		Proposed Net Adjustments (Unweighted FTE)
North Nicholas High School (#4242)		
50. [Ref. 424201] We determined that the bell schedule for 372 students (102 students in our sample as follows: 3 students in our ESOL sample, 4 students in our Basic with ESE Services sample, 11 students in our Basic sample, and 84 students in our Career Education 9-12 [OJT] sample) only reflected 20 hours per week of on-campus instruction with the remaining 5 hours to be provided through a course (Executive Internship) that required 5 hours of documented work time. However, there was no documentation on file, such as signed timecards or any other documentation, to support this work time. Consequently, that portion of each student's schedule should not have been reported for funding. We propose the following adjustment:		
103 Basic 9-12	(1.6000)	
113 Grades 9-12 with ESE Services	(9.7000)	
300 Career Education 9-12	(41.5000)	(52.8000)
51. [Ref. 424202] The files for two students in the ESOL Program did not contain *ELL Student Plans* that were valid for the 2010-11 school year. We also noted that the students should not have been funded for their Executive Internship course as noted in Finding No. 50 (Ref. 424201). We propose the following adjustment:		
103 Basic 9-12	.6000	
130 ESOL	(.6000)	
300 Career Education 9-12	(.3000)	(.3000)

The accompanying notes are an integral part of this schedule.

SCHEDULE D (Continued)

Lee County District School Board
Florida Education Finance Program (FEFP)
Full-Time Equivalent (FTE) Students
FINDINGS AND PROPOSED ADJUSTMENTS
For the Fiscal Year Ended June 30, 2011

Findings		Proposed Net Adjustments (Unweighted FTE)
North Nicholas High School (#4242) (Continued)		
52. [Ref. 424203] The file for one ELL student was missing and could not be located. We also noted that the students should not have been funded for their Executive Internship course as noted in Finding No. 50 (Ref. 424201). We propose the following adjustment:		
103 Basic 9-12	.2000	
130 ESOL	(.2000)	
300 Career Education 9-12	(.1000)	(.1000)
53. [Ref. 424204] The English language proficiency of two ELL students was prematurely assessed prior to the students' continued ESOL placements for a sixth year. Assessments were conducted in April 2010 and October 2010, respectively; however, the students were due for reevaluation in January 2011. Consequently, the students' ESOL placements were not adequately supported. We also noted that the students should not have been funded for their Executive Internship course as noted in Finding No. 50 (Ref. 424201). We propose the following adjustment:		
103 Basic 9-12	.5000	
130 ESOL	(.5000)	
300 Career Education 9-12	(.2000)	(.2000)
54. [Ref. 424205] One Career Education student was absent from school during the 11-day window of the October 2010 survey and should not have been included with the survey's results. We propose the following adjustment:		
103 Basic 9-12	(.3000)	
300 Career Education 9-12	(.2000)	(.5000)

The accompanying notes are an integral part of this schedule.

SCHEDULE D (Continued)

Lee County District School Board
Florida Education Finance Program (FEFP)
Full-Time Equivalent (FTE) Students
FINDINGS AND PROPOSED ADJUSTMENTS
For the Fiscal Year Ended June 30, 2011

Findings		Proposed Net Adjustments (Unweighted FTE)
North Nicholas High School (#4242) (Continued)		
55. [Ref. 424270] One teacher did not complete the General Knowledge requirements within one calendar year of the teacher's date of hire, contrary to Sections 1012.56(2)(g) and 1012.56(7), Florida Statutes, and Rule 6A 4.0021, Florida Administrative Code. We propose the following adjustment:		
103 Basic 9-12	4.2000	
130 ESOL	(.4000)	
300 Career Education 9-12	(3.8000)	.0000
		(53.9000)
Coronado High School (#4251)		
56. [Ref. 425101/04] We determined that the bell schedule for 464 students (99 students in our sample as follows: 5 students in our Basic with ESE Services sample, 12 students in our Basic sample, and 82 students in our Career Education 9-12 [OJT] sample) only reflected 20 hours per week of on-campus instruction with the remaining 5 hours to be provided through a course (Executive Internship) that required 5 hours of documented work time. However, there was no documentation on file, such as signed timecards or any other documentation, to support this work time. Consequently, that portion of each student's schedule should not have been reported for funding (Ref. 425101/04). We also noted that the IEP for one of the students was missing and could not be located (Ref. 425104). We propose the following adjustments:		
Ref. 425101		
103 Basic 9-12	(17.4000)	
113 Grades 9-12 with ESE Services	(12.5000)	
300 Career Education 9-12	(34.4000)	(64.3000)
Ref. 425104		
103 Basic 9-12	.4000	
113 Grades 9-12 with ESE Services	(.7000)	(.3000)

The accompanying notes are an integral part of this schedule.

SCHEDULE D (Continued)

Lee County District School Board
Florida Education Finance Program (FEFP)
Full-Time Equivalent (FTE) Students
FINDINGS AND PROPOSED ADJUSTMENTS
For the Fiscal Year Ended June 30, 2011

Findings		Proposed Net Adjustments (Unweighted FTE)
Coronado High School (#4251) (Continued)		
57. [Ref. 425102] Two Career Education students had withdrawn from school prior to the October 2010 survey and should not have been included with the survey's results. We propose the following adjustment:		
103 Basic 9-12	(.6000)	
300 Career Education 9-12	(.5000)	(1.1000)
58. [Ref. 425103] Two Career Education students were not in attendance during the 11-day window of the survey and should not have been included with the survey's results. We propose the following adjustment:		
103 Basic 9-12	(.6000)	
300 Career Education 9-12	(.4000)	(1.0000)
59. [Ref. 425105] The files for 12 ELL students were missing and could not be located. We also noted that the students should not have been funded for an Executive Internship course as noted in Finding No. 56 (Ref. 425101). We propose the following adjustment:		
103 Basic 9-12	4.2000	
130 ESOL	(4.5000)	
300 Career Education 9-12	(1.6000)	(1.9000)
60. [Ref. 425106] One ESE student was not reported in accordance with the student's *Matrix of Services* form. We also noted that the student should not have been funded for an Executive Internship course as noted in Finding No. 56 (Ref. 425101). We propose the following adjustment:		

The accompanying notes are an integral part of this schedule.

SCHEDULE D (Continued)

Lee County District School Board
Florida Education Finance Program (FEFP)
Full-Time Equivalent (FTE) Students
FINDINGS AND PROPOSED ADJUSTMENTS
For the Fiscal Year Ended June 30, 2011

Findings		Proposed Net Adjustments (Unweighted FTE)
Coronado High School (#4251) (Continued)		
113 Grades 9-12 with ESE Services	.3000	
254 ESE Support Level 4	(.5000)	(.2000)
		(68.8000)
Countywide Exceptional Child Programs (#9450)		
61. [Ref. 945001] The course schedules for four ESE students in the Hospital and Homebound Program were incorrectly reported. Three of the students were reported for 120 instructional minutes and one student was reported for 240 instructional minutes; however, the students only received 30 instructional minutes (one student), 60 instructional minutes (two students), or 180 instructional minutes (one student), respectively, of homebound instruction. We propose the following adjustment:		
255 ESE Support Level 5	(.0900)	(.0900)
62. [Ref. 945002] The homebound instructors' contact logs for five students in the Hospital and Homebound Program were missing and could not be located. Consequently, the students' reported homebound instructional time was not adequately supported. We propose the following adjustment:		
255 ESE Support Level 5	(.3202)	(.3202)

The accompanying notes are an integral part of this schedule.

SCHEDULE D (Continued)

Lee County District School Board
Florida Education Finance Program (FEFP)
Full-Time Equivalent (FTE) Students
FINDINGS AND PROPOSED ADJUSTMENTS
For the Fiscal Year Ended June 30, 2011

Findings		**Proposed Net Adjustments (Unweighted FTE)**
Countywide Exceptional Child Programs (#9450) (Continued)		
63. [Ref. 945003] The course schedule for one ESE student in the Hospital and Homebound Program was incorrectly reported. The student was reported for 300 instructional minutes (.1000 FTE); however, the student was only receiving 240 instructional minutes (.0800 FTE) of homebound instruction. We also noted that the student's on-campus Driver Education course was incorrectly reported in Program No. 255 (ESE Support Level 5) rather than Program No. 113 (Grades 9-12 with ESE Services), in accordance with the student's on-campus *Matrix of Services* form. We propose the following adjustment:		
113 Grades 9-12 with ESE Services	.0400	
255 ESE Support Level 5	(.0600)	(.0200)
		(.4302)
Proposed Net Adjustment		(204.0343)

The accompanying notes are an integral part of this schedule.

SCHEDULE E

Lee County District School Board
Florida Education Finance Program (FEFP)
Full-Time Equivalent (FTE) Students
RECOMMENDATIONS AND REGULATORY CITATIONS
For the Fiscal Year Ended June 30, 2011

Recommendations

We recommend that management exercise more care and take corrective action, as appropriate, to ensure that: (1) only students who are in membership and in attendance at least 1 day during the 11-day survey window are reported with that survey's results; (2) students are reported in the proper funding categories for the correct amount of FTE and have adequate documentation to support that reporting, particularly with regard to students in ESOL, ESE Support Levels 4 and 5, and Career Education 9-12 (OJT); (3) assessments for students entering their fourth, fifth, or sixth year of ESOL placement should be made prior to students' entry into that year based on individual anniversary dates; (4) *ELL Student Plans* are reviewed and updated each school year; (5) parents are timely notified of their child's ESOL placement; (6) students assessed English proficient are either exited from the ESOL Program or referred to an ELL Committee to determine continued ESOL placement; (7) ELL students are not reported for more than the six-year period allowed for State funding of ESOL; (8) schedules for students in the Hospital and Homebound Program are accurately reported and the homebound portions of the students' schedules are based on the homebound instructors' contact logs and time authorized on the students' IEPs; (9) ESE students are reported in accordance with their *Matrix of Services* forms, which are accurately scored; (10) the *Matrix of Services* forms are initialed when reviewed to evidence that review and that the *Matrix of Services* forms still reflect the services provided; (11) IEPs and *Matrix of Services* forms are timely prepared and signed by the appropriate individuals; (12) students in Career Education 9-12 (OJT) are reported in accordance with timecards that are accurately completed, signed, and retained in readily-accessible files; (13) teachers are properly certified or, if out of field, are approved to teach out of field by the School Board; (14) out-of-field teachers earn appropriate college credit or in-service training points as required by their education timeline; (15) parents are appropriately notified of teachers' out-of-field status; (16) teachers complete the General Knowledge requirements within one calendar year of the teachers' hire dates; (17) State FEFP funding is claimed only for courses and course work that are reflected in the State Course Code Directory; (18) course numbers and related FTE reported for State funding accurately reflect the underlying subject area of instruction provided to the students; and (19) documentation is retained to support students' off-campus instruction.

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

The accompanying notes are an integral part of this schedule.

SCHEDULE E (Continued)

Lee County District School Board
Florida Education Finance Program (FEFP)
Full-Time Equivalent (FTE) Students
RECOMMENDATIONS AND REGULATORY CITATIONS
For the Fiscal Year Ended June 30, 2011

Regulatory Citations

Reporting

Section 1011.60, F.S. .....Minimum Requirements of the Florida Education Finance Program

Section 1011.61, F.S. .....Definitions

Section 1011.62, F.S. .....Funds for Operation of Schools

Rule 6A-1.0451, F.A.C. .....Florida Education Finance Program Student Membership Surveys

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

FTE General Instructions 2010-11

Attendance

Section 1003.23, F.S. .....Attendance Records and Reports

Rules 6A-1.044(3) and (6)(c), F.A.C. ....Pupil Attendance Records

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

FTE General Instructions 2010-11

Comprehensive Management Information System: Automated Student Attendance Recordkeeping System

English for Speakers of Other Languages (ESOL)

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

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

Rule 6A-6.0901, F.A.C. .....Definitions Which Apply to Programs for English Language Learners

Rule 6A-6.0902, F.A.C. .....Requirements for Identification, Eligibility Programmatic and Annual Assessments of English Language Learners

Rule 6A-6.0903, F.A.C. .....Requirement for Classification, Reclassification, and Post Reclassification of English Language Learners

Rule 6A-6.0904, F.A.C. .....Equal Access to Appropriate Instruction for English Language Learners

Career Education On-the-Job Attendance

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

Career Education On-the-Job Funding Hours

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

FTE General Instructions 2010-11

The accompanying notes are an integral part of this schedule.

SCHEDULE E (Continued)

Lee County District School Board
Florida Education Finance Program (FEFP)
Full-Time Equivalent (FTE) Students
RECOMMENDATIONS AND REGULATORY CITATIONS
For the Fiscal Year Ended June 30, 2011

Regulatory Citations (Continued)

Exceptional Education

Section 1003.57, F.S.	Exceptional Students Instruction
Section 1011.62, F.S.	Funds for Operation of Schools
Section 1011.62(1)(e), F.S.	Funding Model for Exceptional Student Education Programs
Rule 6A-6.03028, F.A.C.	Provision of Free Appropriate Public Education (FAPE) and Development of Individual Educational Plans for Students with Disabilities
Rule 6A-6.03029, F.A.C.	Development of Family Support Plans for Children with Disabilities Ages Birth Through Five Years
Rule 6A-6.0312, F.A.C.	Course Modifications for Exceptional Students
Rule 6A-6.0331, F.A.C.	General Education Intervention Procedures, Identification, Evaluation, Reevaluation and the Initial Provision of Exceptional Education Services
Rule 6A-6.0334, F.A.C.	Individual Educational Plans (IEPs) and Educational Plans (EPs) for Transferring Exceptional Students
Rule 6A-6.03411, F.A.C.	Definitions, ESE Policies and Procedures, and ESE Administrators

Matrix of Services Handbook (2004 Revised Edition)

Teacher Certification

Section 1012.42(2), F.S.	Teacher Teaching Out-of-Field; Notification Requirements
Section 1012.55, F.S.	Positions for Which Certificates Required
Rule 6A-1.0502, F.A.C.	Non-certificated Instructional Personnel
Rule 6A-1.0503, F.A.C.	Definition of Qualified Instructional Personnel
Rule 6A-4.001, F.A.C.	Instructional Personnel Certification
Rule 6A-6.0907, F.A.C.	In-service Requirements for Personnel of Limited English Proficient Students

The accompanying notes are an integral part of this schedule.

Lee County District School Board
Florida Education Finance Program (FEFP)
Full-Time Equivalent (FTE) Students
NOTES TO SCHEDULES
For the Fiscal Year Ended June 30, 2011

NOTE A – SUMMARY

A summary discussion of the significant features of the District, FEFP, FTE, and related areas follows:

1. School District of Lee County

The District was established pursuant to Section 1001.30, Florida Statutes, to provide public educational services for the residents of Lee County, Florida. Those services are provided primarily to prekindergarten through twelfth 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 State Board of Education. The geographic boundaries of the District are those of Lee County.

For the fiscal year ended June 30, 2011, the District operated 114 schools serving prekindergarten through twelfth grade students, reported 80,819.69 unweighted FTE, and received approximately $83 million in State funding through FEFP. The primary sources of funding for the District are funds from FEFP, local ad valorem taxes, and Federal grants and donations.

2. Florida Education Finance Program (FEFP)

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

Lee County District School Board
Florida Education Finance Program (FEFP)
Full-Time Equivalent (FTE) Students
NOTES TO SCHEDULES
For the Fiscal Year Ended June 30, 2011

NOTE A - SUMMARY (Continued)

3. Full-Time Equivalent (FTE) Students

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

4. Calculation of FEFP Funds

The amount of State and local FEFP funds is calculated by the Department of Education 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 this product to obtain the total State and local FEFP dollars. All cost factors, the base student allocation amount, cost differential factors, and various adjustment figures are established by the Florida Legislature.

5. FTE Surveys

FTE is determined and reported during the school year by means of four FTE membership surveys that are conducted under the direction of district and school management. Each survey is a sampling of FTE membership for a period of one week. The surveys for the 2010-11 school year were conducted during and for the following weeks: survey one was performed for July 12 through 16, 2010; survey two was performed for October 11 through 15, 2010; survey three was performed for February 7 through 11, 2011; and survey four was performed for June 13 through 17, 2011.

Lee County District School Board
Florida Education Finance Program (FEFP)
Full-Time Equivalent (FTE) Students
NOTES TO SCHEDULES
For the Fiscal Year Ended June 30, 2011

NOTE A - SUMMARY (Continued)

6. Educational Programs

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

7. Statutes and Rules

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

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

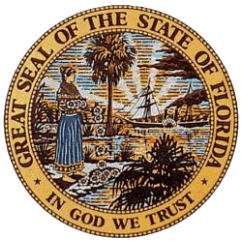
NOTE B - SAMPLING

Our examination procedures provided for the selection of samples of schools, students, and teachers using judgmental methods for testing FTE reported to the Department of Education for the fiscal year ended June 30, 2011. Our sampling process was designed to facilitate the performance of appropriate examination procedures to test the District's compliance with State requirements governing FTE and FEFP. The following schools were in our sample:

Lee County District School Board
Florida Education Finance Program (FEFP)
Full-Time Equivalent (FTE) Students
NOTES TO SCHEDULES
For the Fiscal Year Ended June 30, 2011

NOTE B - SAMPLING (Continued)

School Name/Description	Finding Number(s)
Districtwide – Incorrect Reporting of Students' Course Schedules	1 and 2
1. River Hall Elementary School	3 through 5
2. Bonita Springs Elementary School	NA
3. Fort Myers High School	6 through 8
4. Lehigh Senior High School	9 through 12
5. North Fort Myers High School	13 and 14
6. Orange River Elementary School	15 and 16
7. Villas Elementary School	NA
8. Patriot Elementary School	NA
9. South Fort Myers High School	17 through 21
10. Cypress Lake High School	22 through 27
11. San Carlos Park Elementary School	28 and 29
12. Royal Palm Exceptional Center	30 and 31
13. Gulf Elementary School	32 and 33
14. Spring Creek Elementary School	34
15. Buckingham Exceptional Center	NA
16. Sunshine Elementary School	35 through 38
17. East Lee County High School	39 through 43
18. Manatee Elementary School	44
19. Diplomat Elementary School	45
20. Colonial Elementary School	46 through 48
21. Veterans Park Academy for the Arts	49
22. North Nicholas High School	50 through 55
23. Coronado High School	56 through 60
24. Countywide Exceptional Child Programs	61 through 63



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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
LEE COUNTY DISTRICT SCHOOL BOARD
FLORIDA EDUCATION FINANCE PROGRAM (FEFP)
STUDENT TRANSPORTATION

We have examined management's assertion, included in its representation letter dated March 15, 2012, that the Lee County District School Board complied with State requirements governing the determination and reporting of the number of students transported for the fiscal year ended June 30, 2011. These requirements are found primarily in Chapter 1006, Part I, E., and Section 1011.68, Florida Statutes; State Board of Education Rules, Chapter 6A-3, Florida Administrative Code; and the *Student Transportation General Instructions* issued by the Department of Education. As discussed in the representation letter, management is responsible for the District's compliance with State requirements. Our responsibility is to express an opinion on the District's compliance based on our examination.

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

Compliance

In our opinion, the Lee County District School Board complied, in all material respects, with State requirements governing the determination and reporting of the number of students transported for the fiscal year ended June 30, 2011.

The results of our examination disclosed noncompliance with the State requirements mentioned above. We considered this other noncompliance in forming our opinion regarding the District's compliance and it did not affect our opinion as stated above. All noncompliance disclosed by our examination procedures is discussed in SCHEDULE G. The impact of this noncompliance on the District's reported number of transported students is presented in SCHEDULES F and G.

Internal Control Over Compliance

In accordance with attestation standards established by the AICPA and *Government Auditing Standards*, we are required to report significant deficiencies in internal control detected during our examination and identify those considered to be material weaknesses. The purpose of our examination was to express an opinion on the District's compliance with State requirements and did not include expressing an opinion on the District's related internal controls. Accordingly, we express no such opinion. Due to its limited purpose, our examination would not necessarily identify all deficiencies in internal control over compliance that might be significant deficiencies or material weaknesses.[1] The noncompliance mentioned above, while indicative of certain control deficiencies,[1] is not considered indicative of material weaknesses in the District's internal controls related to their reported ridership classification or eligibility for State transportation funding. The findings, populations, samples, and exception totals that pertain to noncompliance are 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.

[1] *A control deficiency in the entity's internal control over compliance exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent or detect noncompliance on a timely basis. A significant deficiency is a control deficiency, or combination of control deficiencies, that adversely affects the entity's ability to comply with the aforementioned State requirements such that there is more than a remote likelihood that noncompliance that is more than inconsequential will not be prevented or detected by the entity's internal control. A material weakness is a significant deficiency, or combination of significant deficiencies, that results in a more-than-remote likelihood that material noncompliance will not be prevented or detected by the entity's internal control.*

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 AICPA require us to indicate that this report is intended solely for the information and use of the Legislative Auditing Committee, members of the Florida Senate and the Florida House of Representatives, the State Board of Education, the Department of Education, and applicable District management and is not intended to be and should not be used by anyone other than these specified parties.

Respectfully submitted,

David W. Martin, CPA
September 17, 2012

SCHEDULE F

Lee County District School Board
Florida Education Finance Program (FEFP)
Student Transportation
POPULATIONS, SAMPLES, AND TEST RESULTS
For the Fiscal Year Ended June 30, 2011

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 two or more miles from school, be physically handicapped, 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 is on a route that meets the criteria for hazardous walking conditions specified in Section 1006.23(4), Florida Statutes. (See NOTE A1.)

As part of our examination procedures, we sampled students for testing the number of students transported as reported to the Department of Education for the fiscal year ended June 30, 2011. (See NOTE B.) The population of vehicles (1,847) consisted of the total of the numbers of vehicles reported by the District for each survey. For example, a vehicle that transported students during the July and October 2010 and February and June 2011 surveys would be counted in the population as four vehicles. Similarly, the population of students (96,908) consisted of the total numbers of students reported by the District as having been transported for each survey. (See NOTE A2.) The District reported students in the following ridership categories:

Ridership Category	Number of Students Transported
IDEA (K-12), Weighted	3,490
IDEA (K-12), Unweighted	94
IDEA (PK), Weighted	1,135
IDEA (PK), Unweighted	116
Teenage Parents and Infants	124
Hazardous Walking	3,217
Two Miles or More	88,732
Total	96,908

Students with exceptions are students with exceptions affecting their ridership category. Students cited only for incorrect reporting of days in term, if any, are not included.

The accompanying notes are an integral part of this schedule.

SCHEDULE F (Continued)

Lee County District School Board
Florida Education Finance Program (FEFP)
Student Transportation
POPULATIONS, SAMPLES, AND TEST RESULTS
For the Fiscal Year Ended June 30, 2011

Our examination results are summarized below:

	Buses	Students	
Description	Proposed Net Adjustment	With Exceptions	Proposed Net Adjustment
We noted that the reported number of buses in operation was overstated by 16 buses.	(16)		
We sampled 539 of the 96,908 students reported as being transported by the District.		6	(1)
We also noted certain issues in conjunction with our general tests of student transportation that resulted in the addition of 2 students.	—	2	0
Total	(16)	8	(1)

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 DOE.

The accompanying notes are an integral part of this schedule.

SCHEDULE G

Lee County District School Board
Florida Education Finance Program (FEFP)
Student Transportation
FINDINGS AND PROPOSED ADJUSTMENTS
For the Fiscal Year Ended June 30, 2011

Overview

Management is responsible for determining and reporting the number of students transported in compliance with State requirements. These requirements are found primarily in Chapter 1006, Part I, E., and Section 1011.68, Florida Statutes; State Board of Education Rules, Chapter 6A-3, Florida Administrative Code; and the *Student Transportation General Instructions* issued by the Department of Education. The Lee County District School Board complied, in all material respects, with State requirements governing the determination and reporting of students transported for the fiscal year ended June 30, 2011. All noncompliance disclosed by our examination procedures is discussed below and requires management's attention and action, as recommended on page 51.

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. Our detailed tests involved verification of the specific ridership categories reported for students sampled from the July and October 2010 surveys and the February and June 2011 surveys. Adjusted students who were in more than one survey are accounted for by survey. For example, a student sampled twice (i.e., once for the October 2010 survey and once for the February 2011 survey) will be presented in our Findings as two sample students.	
1. [Ref. 51] The District's reported number of buses in operation was overstated in the October 2010 survey (1 bus) and in the June 2011 survey (15 buses). The buses in question were transporting only students who lived less than two miles from their assigned school (i.e., courtesy riders) and the buses did not serve any other routes that served funded eligible students. We propose the following adjustments:	
October 2010 Survey	
Number of Buses in Operation (1)	
June 2011 Survey	
Number of Buses in Operation (15)	(16)

The accompanying notes are an integral part of this schedule.

SCHEDULE G (Continued)

Lee County District School Board
Florida Education Finance Program (FEFP)
Student Transportation
FINDINGS AND PROPOSED ADJUSTMENTS
For the Fiscal Year Ended June 30, 2011

Findings		Students Transported Proposed Net Adjustments
2. [Ref. 51] Our general tests of student transportation disclosed that two PK students were incorrectly reported in the Two Miles or More ridership category and should have been reported in the IDEA (PK), Unweighted ridership category. We propose the following adjustments:		
July 2010 Survey		
12 Days in Term		
IDEA (PK), Unweighted	1	
Two Miles or More	(1)	
October 2010 Survey		
90 Days in Term		
IDEA (PK), Unweighted	1	
Two Miles or More	(1)	0
3. [Ref. 52] The number of days in term for 31 students was incorrectly reported as 35 days in term and should have been reported for only 31 days in term. We propose the following adjustment:		
July 2010 Survey		
35 Days in Term		
Two Miles or More	(31)	
31 Days in Term		
Two Miles or More	31	0
4. [Ref. 53] Four students in our sample were reported incorrectly in the Hazardous Walking ridership category. The students lived more than two miles from school and should have been reported in the Two Miles or More ridership category. We propose the following adjustments:		

The accompanying notes are an integral part of this schedule.

SCHEDULE G (Continued)

Lee County District School Board
Florida Education Finance Program (FEFP)
Student Transportation
FINDINGS AND PROPOSED ADJUSTMENTS
For the Fiscal Year Ended June 30, 2011

Findings		Students Transported Proposed Net Adjustments
July 2010 Survey		
12 Days in Term		
Hazardous Walking	(2)	
Two Miles or More	2	
October 2010 Survey		
90 Days in Term		
Hazardous Walking	(2)	
Two Miles or More	2	0

5. [Ref. 54] One student in our sample was reported incorrectly in the Two Miles or More ridership category. The student lived less than two miles from school and was not otherwise eligible for State transportation funding. We propose the following adjustment:

July 2010 Survey		
12 Days in Term		
Two Miles or More	(1)	(1)

6. [Ref. 55] One student in our sample was reported incorrectly in the IDEA (K-12), Weighted ridership category. The student's IEP indicated that the student did not meet one of the five criteria required for IDEA-Weighted classification. However, the student lived more than two miles from school and was eligible for reporting in the Two Miles or More ridership category. We propose the following adjustment:

October 2010 Survey		
90 Days in Term		
IDEA (K-12), Weighted	(1)	
Two Miles or More	1	0
Proposed Net Adjustment		(1)

The accompanying notes are an integral part of this schedule.

SCHEDULE H

Lee County District School Board
Florida Education Finance Program (FEFP)
Student Transportation
RECOMMENDATIONS AND REGULATORY CITATIONS
For the Fiscal Year Ended June 30, 2011

Recommendations

We recommend that management exercise more care and take corrective action, as appropriate, to ensure that: (1) transported students are reported in the correct ridership category for the correct number of days in term and have appropriate documentation on file to support that reporting; (2) the distance from home to school for students classified in the Two Miles or More ridership category is verified prior to students being reported; (3) students reported in IDEA-Weighted classifications are appropriately documented as meeting one of the five criteria as noted on the students' IEPs; and (4) only students who live less than two miles from their assigned school and are on a route that meets the criteria for hazardous walking conditions are reported in the Hazardous Walking ridership category.

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

Regulatory Citations

Chapter 1006, Part I, E., F.S. .....Transportation of Public K-12 Students
Section 1011.68, F.S. .....Funds for Student Transportation
Chapter 6A-3, F.A.C. .....Transportation
Student Transportation General Instructions 2010-11

The accompanying notes are an integral part of this schedule.

Lee County District School Board
Florida Education Finance Program (FEFP)
Student Transportation
NOTES TO SCHEDULES
For the Fiscal Year Ended June 30, 2011

NOTE A – SUMMARY

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

1. Student Eligibility

Any student who is transported by bus must meet one or more of the following conditions in order to be eligible for State transportation funding: live two or more miles from school, be physically handicapped, be a Career Education 9-12 or an ESE student who is transported from one school center to another where appropriate programs are provided, or is on a route that meets the criteria for hazardous walking conditions specified in Section 1006.23(4), Florida Statutes.

2. Transportation in Lee County

For the fiscal year ended June 30, 2011, the District received approximately $19.5 million for student transportation as part of the State funding through FEFP. The District's transportation reporting by survey was as follows:

Survey Period	Number of Vehicles	Number of Students
July 2010	153	1,373
October 2010	769	46,915
February 2011	772	47,179
June 2011	153	1,441
Total	1,847	96,908

3. Statutes and Rules

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

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

Lee County District School Board
Florida Education Finance Program (FEFP)
Student Transportation
NOTES TO SCHEDULES
For the Fiscal Year Ended June 30, 2011

NOTE B – SAMPLING

Our examination procedures provided for the selection of samples of buses and students using judgmental methods for testing the number of students transported as reported to the Department of Education for the fiscal year ended June 30, 2011. Our sampling process was designed to facilitate the performance of appropriate examination procedures to test the District's compliance with State requirements governing students transported.

EXHIBIT A
MANAGEMENT'S RESPONSE

THE SCHOOL DISTRICT OF LEE COUNTY
2855 COLONIAL BLVD. ♦ FORT MYERS, FLORIDA 33966-1012 ♦ (239) 334-1102 ♦ WWW.LEESCHOOLS.NET

MARY FISCHER, M.A.
CHAIRMAN, DISTRICT 1
JEANNE S. DOZIER
VICE CHAIRMAN, DISTRICT 2
JANE E. KUCKEL, PH.D.
DISTRICT 3
DON H. ARMSTRONG
DISTRICT 4
THOMAS SCOTT
DISTRICT 5
JOSEPH BURKE, ED.D.
SUPERINTENDENT
KEITH B. MARTIN, ESQ.
BOARD ATTORNEY

September 17, 2012

Mr. David W. Martin, CPA
Auditor General
G74 Claude Pepper Building
111 West Madison Street
Tallahassee, FL 32399-1450

Mr. Martin:

Thank you for your report on the examination of our full-time equivalent students for the fiscal year ended June 30, 2011. Christopher Tynes and Eric Seldomridge were very professional as they always have been, and we appreciate their work for our district. The District strives to report only eligible students in the proper weight categories, and complete all required documentation accurately and timely. In addition, it is critical that every teacher is properly certified and out-of-field teachers are reported timely. While we are pleased with our improvement over the 2009 audit in some areas, we will work to improve in the future.

The findings from two charter schools make up almost 60% of the total findings. While we do not have complete control over charter schools and the documentation they keep, I have corresponded with them concerning these FTE issues. They have assured me that many of these problems have been corrected, or will be corrected in the future. I am pleased that this audit made them aware of these issues, and hope that they have taken the appropriate corrective action.

For our non-charter schools, ESOL was the area with the most findings. We will increase our training for all of our school and department personnel so they will be more aware of the rules, and actively seek to ensure compliance.

While our District will make every effort to correct the issues reported in this audit, there are findings that we do not agree with, and will contest. District finding #148 disallows 59.6506 FTE because these FTE were reported in a research course, and students were engaged in SAT/ACT preparation, or performing activities as student aides. The finding states that these activities do not constitute instruction eligible for state FTE funding. We disagree with this finding. While the course codes used for these activities may have been incorrect, the activities do constitute instruction that is eligible for FTE reporting.

Rule 6A-1.09441 states that in order for a course to generate funding through the FEFP the following conditions shall be met:

EXHIBIT A (CONTINUED)
MANAGEMENT'S RESPONSE

1. The program in which the student is in membership shall be one of the programs listed in section 1011.62(1)(c).
    - Each of the programs the students were reported in were allowable (103 and 113).
2. The course or programs shall be an educational activity which constitutes a part of the instructional program approved by the district school board.
    - SAT/ACT preparation constitutes instruction in writing, reading, critical thinking, and math, all of which are part of the program of studies. In addition, it fosters college and workforce readiness, one of the main components of the District's instructional plan at the high school level. One of the requirements for graduation is a passing score on the FCAT. Beginning in school year 2010-2011, students could begin using a concordant score from the ACT or SAT as a substitute for this requirement, and many of our students did this during that year. So ACT and SAT preparation allows many of our students to do well on the test and meet graduation requirements, and has taken on greater significance as it can now be used to satisfy a graduation requirement. We believe that any instructional activity that can satisfy a graduation requirement should be eligible for FTE funding. Critical thinking (course 17003700) is probably best suited as the correct course code for this course, and is listed in our academic program of studies. The course description in our program of studies says that "The purpose of this course is to enable students to develop learning strategies, critical-thinking skills, and problem solving skills to enhance their performance in academic and nonacademic endeavors." This is exactly the purpose of the SAT/ACT preparation classes, and these courses should be allowable for FTE funding.

    - Activities of student aides are also related to the academic plan. These students are engaging in instructional activities that prepare them for college or work life. Our program of studies has a course code for "career research and decision making" (course 17003800). According to our program of studies, the purpose of this course is to enable students to make informed career choices and develop the skills needed to successfully plan and apply for college or a job. These students aides are involved in daily activities that develop their skills to be in the workforce, and/or apply for colleges and jobs. They complete college applications, utilize and improve communication skills with school employees and with the public, and develop skills that can be used in professional office settings in the workforce.

3. The student shall be under the supervision of an instructional staff member.
    - All students in question were under the supervision of an instructional staff member
4. The course or program shall be listed in the course code directory and instructional personnel assignments for the year in which the student is in membership.
    - The course number that should be utilized has been questioned in the finding, but whether we use the current research course numbers used or the other course

EXHIBIT A (CONTINUED)
MANAGEMENT'S RESPONSE

numbers suggested above, each was listed in the course code directory for the 2010-2011 year.

In light of this information, we ask that this finding be reversed, and FTE funding be allowed for the courses in question. We believe that all of the courses involve instructional activities specifically listed within the district's program of studies, and constitute an integral part of the District's educational program. The link to our program of studies is below; we appreciate your consideration of this documentation.

http://academic.leeschools.net/Forms/High%20School%20Program%20of%20Studies%202011-12%20Board%20Approved%207-26-11.pdf

Also, finding #20 (Ref 51104) proposes the loss of .1792 FTE because the time cards for two OJT students indicated that the students did not work during the October 2010 survey. One student was sick with excused absences during the survey week, but worked a total of 50.5 hours in October, enough to substantiate the FTE we reported for her. The other student did not work during FTE week, but worked all other weeks in October, also for a total of 50.5 hours. While we can't control when employers schedule the students, we believe that as long as the total hours worked substantiates the amount of FTE claimed, that should be sufficient for FTE documentation.

We appreciate your consideration of our issues noted above. Again, we always strive to report our FTE correctly, and will work to correct areas that have been noted in this audit. We look forward to your response to our contested findings, and are available to answer any questions your may have.

Sincerely,

Joseph Burke
Superintendent of Schools