

OFFICE OF THE INSPECTOR GENERAL
MIAMI-DADE COUNTY
PUBLIC SCHOOLS



ANNUAL REPORT

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Greetings from the Inspector General



This annual report summarizes the work of the Miami-Dade County Public Schools Office of the Inspector General (M-DCPS OIG) during Fiscal Year 2019/20. The M-DCPS OIG has an annual budget of 850,000 dollars and a staff of six, one special agent supervisor, four special agents and one administrative assistant. The M-DCPS OIG functions through an Inter-Local Agreement between the School Board and the County, wherein the Miami-Dade Inspector General is the Inspector General for the School District.

On September 29th of this year I will be retiring, and Miami-Dade County has completed its formal search for a new Inspector General. Pursuant to County Ordinance and to ensure independence, the new Inspector General was selected by an Ad Hoc Selection Committee made up of the State Attorney, Public Defender, Chair of the Commission on Ethics,

President of the Miami-Dade County Association of Chiefs of Police and the Special Agent in Charge of the Miami Regional Office of FDLE. The Committee selected Felix Jimenez, the current Deputy Inspector General of the Miami-Dade County OIG, as the incoming IG. On August 31st the Board of County Commissioners, in a unanimous vote confirmed his appointment. Effective September 30th, Mr. Jimenez will be the IG for the County and the School District.

I would like to take this opportunity to thank the Chair, Perla Tabares Hantman, and the full Board for the opportunity to serve as the School District's Inspector General. Our focus has been to add value to the School District through collaboration where appropriate, independent reviews of the General Obligation Bond to ensure checks and balances, charging of wrong doers, oversight of contracts and issuance of reports laying out Findings and Recommendations for improved processes. The Chair has been supportive of our work and mindful of our independence, thus creating the appropriate environment for a successful OIG.

I would like to thank our School District OIG staff for their untiring work, done with integrity, objectivity and expertise. They are the backbone of the M-DCPS OIG and their commitment is unwavering.

On September 30th, 2020, Felix Jimenez will take the helm as the School District's new Inspector General. Mr. Jimenez has been with the Miami-Dade County OIG since 2009. For the past four years he has been the Deputy Inspector General. He oversees the multi-disciplinary efforts of investigators, auditors, lawyers and contract oversight specialists. Mr. Jimenez is a 28-year veteran of the Miami-Dade Police Department where he spent years supervising complex homicide investigations. Importantly, because of his investigative expertise, he was tapped to develop the Miami-Dade Police Department's Public Corruption Investigations Unit which culminated with his appointment to lead a Public Corruption Task Force comprised of federal, state and local law enforcement agents. He is a proven leader in our community and will lead the OIG into the future with integrity.



Two thousand twenty will be defined by the pandemic for years to come. When the School District went to online teaching and government offices and businesses began teleworking, we all thought it would be short term. Now we find ourselves in September, headed into October with our lives still far from the normal we knew. Yet, under the experienced leadership of Superintendent Carvalho and his staff, children continue to learn, teachers continue to teach, technical resources are being made available and children continue to receive much needed meals. Our community is extremely fortunate to have a Superintendent who leads with vision and integrity.

As I retire my post as your Inspector General and begin a new chapter of life, I wish you all well as these are difficult times. It is my hope that in the coming months children and teachers will return to our school buildings and they will be filled with learning and laughter.

Sincerely,

A handwritten signature in black ink that reads "Mary T. Cagle". The signature is written in a cursive, flowing style.

Mary T. Cagle

THE MIAMI-DADE COUNTY PUBLIC SCHOOLS OFFICE OF THE INSPECTOR GENERAL

The M-DCPS OIG, through independent oversight of School District affairs, detects, investigates and prevents fraud, waste, mismanagement, misconduct and abuse of power. The organization and administration of the OIG is independent to assure that no interference or influence external to the Office adversely affects the objectivity of the OIG.

The Inter-Local Agreement (ILA) between the School Board of Miami-Dade County and Miami-Dade County, initially executed in 2007, authorizes the operation of the M-DCPS OIG. The ILA sets forth the responsibilities, functions, authority and jurisdiction of the M-DCPS OIG.

The M-DCPS OIG promotes accountability, integrity and efficiency through its efforts in conducting audits, investigations and oversight activities of School District employees, contractors, projects and programs. All case assignments are conducted with the goal of improving the School District's performance.

We are pleased to submit this annual report, summarizing M-DCPS OIG activities during the past fiscal year (July 1, 2019 - June 30, 2020). The publication of this report provides an opportunity to share our accomplishments of the past year and fulfills the reporting requirements of the ILA.

The M-DCPS OIG is staffed with an on-site Supervisory Special Agent, four full-time Special Agents, and an Administrative Assistant. The supervision of the M-DCPS OIG falls directly under the Deputy Inspector General for Miami-Dade County. As needed, Miami-Dade County OIG personnel will supplement the M-DCPS OIG staff by providing legal, audit, and contract oversight assistance. This is in addition to the managerial and executive decisions, which by nature of the ILA, is performed by the County's Inspector General and her Executive Team.

The M-DCPS office is located on the third floor of the Annex Building of the School Board Administrative Complex, at 1501 NE Second Avenue, Suite 343, Miami, Florida.



THE MIAMI-DADE COUNTY OIG EXECUTIVE TEAM



Inspector General Mary T. Cagle heads the OIG's executive team comprised of three direct reports. Deputy Inspector General Felix Jimenez is charged with leading the Investigations Unit and directing specific functions of detecting and investigating both criminal and administrative violations. As General Counsel, Patra Liu heads the OIG's Legal Unit, which includes the Office's contract oversight function. Audit Manager James Schlotzhauer is charged with leading the Audit Unit, which consists of a team of certified professionals with a wide range of government and private sector experience. Investigative, audit, contract oversight and legal staff from the Miami-Dade County OIG work jointly with M-DCPS OIG as needed, ensuring productivity and maximizing efficiency. In accordance with the ILA, all services that Miami-Dade County OIG provides to the School District are billed on a quarterly basis.

THE MIAMI-DADE COUNTY PUBLIC SCHOOLS OIG SUPERVISORY SPECIAL AGENT



Since 2012 Mr. Knigge has led the Miami-Dade County Public Schools OIG team consisting of four Special Agents and one Administrative Assistant. Mr. Knigge received a Master's Degree in Public Administration from the University of Miami, and a Bachelor's Degree in Criminal Justice from Florida International University. Mr. Knigge retired with the rank of major in 2010 from the Miami-Dade Police Department after 33-years of service. He has a plethora of investigative and administrative experience, has been a detective in a General Investigations Unit, an Auto Theft Sergeant, a Commander of a General Investigations Unit, a Captain

assigned to the Major Narcotics and Money Laundering Section of the Narcotics Bureau, the Major overseeing the Crime Scene Investigations Bureau, and his last assignment as the Major overseeing the Police Operations Bureau, which provided police services to the Port of Miami, the Metro-Rail System, Jackson Memorial Hospital, County owned and operated buildings and other areas where county jurisdiction was necessary inside of incorporated areas.

IN LOVING MEMORY OF ANGELA "ANGIE" EVANS



December 28, 1952 - June 25, 2020

Ms. Angela Evans was a dedicated school board employee for over 30 plus years and served as the Administrative Assistant for the School Board Office of the Inspector General from September 2011 until her retirement in March 2019. She served in many capacities during her tenure with the school system and held the positions of Secretary/Treasurer; Executive Secretary in the Office of Human Resources & Staff Development and in the Office of the Superintendent; Administrative Secretary in the Office of Personnel Operations & Records, in the Office of PK Early Intervention Program and in the Office of Administration and Compliance; and Coordinator-I in the Office of Project and Contract Management and the Office of Capital Construction. Angie was a gift to our office, and we are grateful that we had the opportunity to work with her over the past years. She was the epitome of professionalism but more importantly, she was known for her kindness and caring for others. She truly lived by the adage "do unto others as you would have others do unto you." We will always remember Angie fondly.

M-DCPS OIG RECEIVES CIGIE AWARD



One of the key components of the work of the OIG is its holistic approach to allegations of fraud, waste and abuse. Offices of Inspectors General are generally made up of investigators, auditors and lawyers. In many cases, all three disciplines are critical to determining culpability and calculating losses. On September 12, 2019, the Miami-Dade State Attorney's Office hosted the awards ceremony for the Council of the Inspectors General on Integrity and

Efficiency, South Florida Chapter (CIGIE). The featured speakers were State Attorney Katherine Fernandez Rundle and the United States Attorney for the Southern District of Florida, Ariana Fajardo Orshan. This year's winners included our very own M-DCPS OIG Special Agent Larry Riley. Together with Miami Beach Police Department Detective Matt Ambre, OIG Assistant Legal Counsel Marie Perikles, and Assistant State Attorney Sandra Miller-Batiste, they received the CIGIE award for Public Corruption Investigation of the Year for their multi-year investigation into bribery, fraud and other corrupt practices by an adult education center principal.

M-DCPS OIG PANEL AT THE ASSOCIATION OF INSPECTORS GENERAL CONFERENCE

The AIG 2019 Training Conference was held in West Palm Beach, Florida from September 25 to 27, 2019. An excellent slate of 60 presenters featuring federal, state, and local IGs, prosecutors and private practitioners presented relevant topics to over 300 attendees of the OIG community which included inspectors general, analysts, investigators, auditors, and other government and industry experts.

Deputy Inspector General Felix Jimenez, Supervisory Special Agent Thomas A. Knigge and Special Agent Larry Riley presented the Ridore investigation as a case study to highlight the success of multi-agency collaboration.



M-DCPS OIG BUDGET AND STAFFING LEVELS

The School Board funds the M-DCPS OIG annually to provide inspector general services to the School District. All personnel costs are funded under an annual budget allocation. For the 2019-2020 Fiscal Year, the School Board approved M-DCPS OIG's budget at \$850,498 to cover operating needs and personnel staffing. The ILA between the School Board and Miami-Dade County, enables OIG staff to work closely with the M-DCPS OIG employees. Under the ILA, the Miami-Dade County Inspector General is appointed Inspector General for the School District. The sub-account, Professional and Technical Services, funds reimbursements to Miami-Dade County for staffing services provided to the School District under the terms and conditions of the ILA. The M-DCPS OIG employees are all contracted managerial exempt personnel and serve at the will of the Inspector General. The Inspector General and her Deputy Inspector General directly oversee all operations of the M-DCPS OIG.

COMPLAINTS ARE THE KEY

The majority of cases opened each year stem from complaints submitted to the OIG by School District employees, vendors, parents and other concerned citizens. Other cases stem from ongoing investigations and audits. We strive to provide a voice to all complainants. Complaints involving personnel matters and other similar issues, as well as matters beyond the M-DCPS OIG's jurisdiction, are referred to the appropriate parties. The M-DCPS OIG makes every effort to have every complaint addressed, either through an investigation, audit, review or referral.

INTAKE AND PROCESSING COMPLAINTS

The M-DCPS OIG receives complaints by mail, via website, through the OIG fraud hotline and in person. All complainants can be assured that investigators are trained to maintain the confidentiality of the information provided and ensure the confidentiality of the complainant's identity pursuant to applicable laws and policies. The M-DCPS OIG logs each complaint received, and each complaint undergoes a review process to determine jurisdiction in the matter and what action is warranted. Based on the subject matter and the specificity of the information received, some complaints will result in the OIG initiating an investigation, audit or review. Other complaints may be determined to be more appropriately addressed by the Administration or by another governmental agency. In the case of most referrals, the receiving agency is requested to provide the OIG with its findings.

In accordance with Section 3(h) of the ILA, the M-DCPS OIG is the School District's designee for purposes of receiving Whistleblower Act disclosures under Florida Statutes, Section 112.3187(7). Whistleblower disclosures are those disclosures that allege violations or suspected violations of law, rule or regulation that endanger health and public safety or allegations of gross mismanagement, malfeasance, misfeasance, gross waste of public funds or gross neglect of duty by persons in an agency or independent contractors.

Any individual who makes such a disclosure is entitled to have his/her identity kept confidential pursuant to state law. Except for those complaints received anonymously, complainants are advised of the disposition of their complaints.

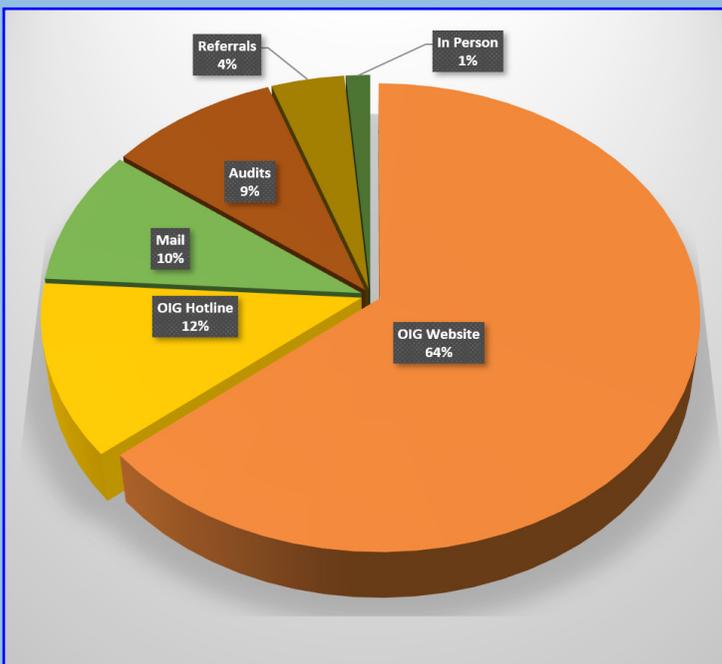
During FY 2019 - 2020, the M-DCPS OIG received 75 complaints in the following ways:

- 48 via OIG website
- 9 through the OIG hotline
- 7 by mail
- 7 stemming from audits
- 3 through a referral
- 1 in person

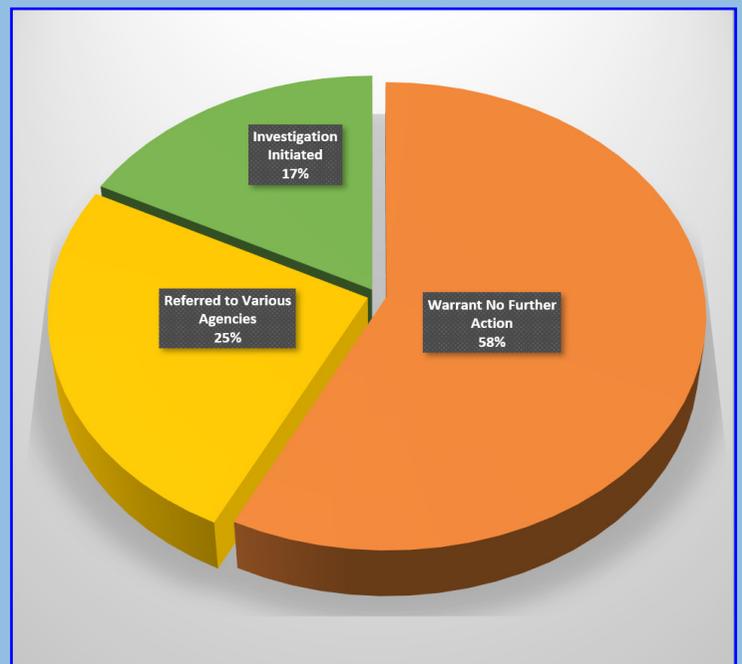
Of the complaints received, forty-three (43) were resolved by the M-DCPS OIG without need for further inquiry; nineteen (19) were referred to various agencies within the School District, including School Operations, Regional Offices, Charter School Compliance, Office of Exceptional Student Education, Compensation Administration and the Miami-Dade Schools Police Department (M-DSPD); and thirteen (13) resulted in the initiation of an investigation.

To properly account for all referrals, the M-DCPS OIG maintains a log of the complaints routed to the administration and closely monitors responses. Based on the responses received, the M-DCPS OIG may close the complaint, return it to the administration for additional clarification or open our own investigation into the matter, provided we have jurisdiction. Throughout the year, M-DCPS OIG Special Agents continue to be engaged in ongoing investigations that were opened during prior fiscal years and have not reached conclusion.

Number of Complaints Received
FY 2019-2020



Disposition of Complaints Received
FY 2019-2020



ADMINISTRATIVE CASES

The M-DCPS OIG conducts criminal and administrative investigations of fraud, waste, abuse and misconduct related to School District programs, operations, contracts and employees. M-DCPS OIG Special Agents have a wide variety of experience from law enforcement and regulatory agencies. They are well trained in white collar crime, financial fraud and public corruption investigations. The M-DCPS OIG coordinates with the Miami-Dade State Attorney's Office and other law enforcement authorities to leverage resources and fraud-fighting efforts. Our investigations often lead to criminal cases, administrative reports with recommendations and monetary recoveries.

The OIG's Analyst Unit provides investigative support, including intelligence gathering and analytical support, to the M-DCPS OIG upon request. OIG Investigative Analysts are dedicated to maintaining relationships with organizations such as the Financial Institutions Security Association and the Florida Department of Law Enforcement. The analysts also manage the OIG Hotline that allows the public, stakeholders and others to report suspected fraud, waste and abuse.

Since the closing of schools because of the pandemic, like all entities, the M-DCPS OIG staff has had to make adjustments in our normal operation. We instituted the use of VPN so that staff could access the work computer from home and began to telework. Although the OIG still has Special Agents reporting to the office on most days, VPN access has allowed the office to continue to perform the necessary functions of our mandate. The Special Agents have adjusted to this new norm by conducting interviews either by video conferencing or by ensuring that any in-person interview is held in a safe environment while meeting all the standards recommended by the CDC and School District; inclusive of the wearing of masks and social distancing. The OIG has continued to monitor construction and purchasing activities by either attending meetings where appropriate or through video conferencing. The OIG is committed to ensuring that we continue to provide the necessary oversight to bring value to the School District.

During this past fiscal year, numerous administrative investigations were completed pertaining to allegations of kickbacks, fraud, unauthorized use of M-DCPS logo, filing fraudulent insurance claims, mismanagement of school funds, cone of silence violations and a Charter School's improper enrollment preferences. The M-DCPS OIG also opened numerous investigations during the year that remain ongoing. These cases will be reported, when completed, in a subsequent annual report. A summary of some of the investigations conducted this year follow in the next few pages.



Investigation of Alleged Kickbacks from a Vendor



An M-DCPS employee who requested to remain confidential contacted the OIG alleging that employees assigned to a

Facility Operations and Maintenance Department service center were receiving kickbacks from an air conditioning parts vendor in exchange for orders placed with the vendor. According to the complainant, the subject employees conducted outside employment as air conditioning repairmen and had private accounts with the vendor. The vendor would inflate the cost of the parts purchased by the district and pay kickbacks to the employees in the form of cash or credits to the employees' accounts. The investigation was conducted with the State Attorney's Office Public Corruption Task Force.

The OIG conducted a review of six years of the M-DCPS service center's purchase card and work order records. As part of the investigation, the OIG requested that M-DCPS Office of Management Compliance Audits (OMCA) conduct an audit of inventories focusing on the service center's purchase orders. OMCA auditors found nothing to substantiate the claims of inflated payments.

The OIG was able to identify that one district employee had a personal account with the vendor. A review of that account found only two purchases by the employee for

nominal amounts and revealed no credits received from the vendor.

We also conducted a review of the purchase order approval process and interviewed supervisors and other service center employees, including the subject employees as well as employees of the vendor. The investigation did not find any evidence to substantiate the allegation of inflated prices or kickbacks to the employees.

Allegation of a Student Loan Debt Consultant Defrauding Teachers and Unauthorized Use of M-DCPS' Logo

The Miami-Dade County Public Schools Office of the Inspector General (M-DCPS OIG) received an anonymous complaint alleging several violations by a student loan debt consulting company. The company was in the business of assisting individuals seeking federal student loan forgiveness or consolidation programs by pre-qualifying and submitting required documentation on their behalf. The complainant alleged the company was defrauding unsuspecting students and teachers by charging exorbitant fees and improperly recruiting high school students to work for the company. Additionally, the complainant reported that the company's website and social media prominently displayed the M-DCPS logo while repeatedly referring to its approved M-DCPS vendor status.

The investigation identified several teachers who were clients of the consulting company. Interviews with these teachers, the company's owners and a review of relevant materials led the OIG to conclude that no fraud was committed against the teachers

and that high school students were not being improperly recruited.

The OIG investigation did find that the company's website and social media prominently displayed the M-DCPS logo, listed itself as an approved M-DCPS vendor, and listed its vendor number. Although the company had been issued a vendor number, it was only pre-approved and placed on a vendor list with thousands of other pre-approved vendors to receive M-DCPS procurement advertisements. The company never participated in any bids, was not under contract as a vendor with M-DCPS, and it had no relationship to M-DCPS in the services that it was providing. The prominent display of the M-DCPS logo and its "approved vendor status" was misleading and led to the company's representatives obtaining access to twenty schools to make its presentations and solicit business from teachers.

The OIG was also concerned if representatives of the company were ever present when students were on campus; and if so, did they comply with the required background checks. The investigation revealed that no background checks were conducted but interviews with teachers/clients indicated that the presentations were done when students were not on campus.

The company clearly exploited the use of the M-DCPS registered/trademarked logo and misrepresented its approved vendor status by prominently displaying these on its website, social media, business cards, forms, and banners. The OIG presented its findings to the district's Chief Procurement Officer and the School Board Attorney's Office. As a result, Procurement Management

Services issued Weekly Briefing #26866 reminding employees that:

"only vendors of materials or services which normally would be used in the schools are allowed admission to school facilities as approved by the administration during normally scheduled worktime (i.e. when school is in session). As part of the additional safety and security procedures currently being implemented, all other vendor access will be limited to hours outside of normally scheduled worktimes...."

Weekly Briefing #26721 was also distributed instructing employees that any vendor purporting to be an approved vendor, will have to provide a copy of an awarded contract as well as an M-DCPS official contractor's photo identification badge when visiting a school.

M-DCPS approved vendors that provide personal financial services to individuals, such as the company in this investigation, have been blocked from use in the district-wide financial database system.

The Procurement Management Services will post information and the process to follow for vendor site visits on its website.

The School Board Attorney's Office, after reviewing M-DCPS policies on trademarks and copyrights, and contracts which address the use of the M-DCPS logo, served the directors of the subject company a Cease and Desist Notice advising they are to stop using M-DCPS' logo. After the OIG investigation, the company was dissolved, although one of its principals has incorporated another consulting company with a similar name. This new company does not

use the M-DCPS logo or list a vendor number.

Complaint of Employees Working Part-Time at Adult Ed Centers

An anonymous complaint was received by the M-DCPS OIG alleging an employee who works full-time as a district director, was working part-time at an adult education center in a clerical position but was being paid at the regular director's rate. The second complaint alleged that another director, also working part-time at another adult education center, was being paid for hours not worked.

The OIG examined payroll records which revealed that the director was not receiving director's pay but was, in fact, receiving the appropriate pay for the part-time position held.

As to the allegation of the employee being paid for hours not worked, the OIG investigation found that the employee was given a temporary assignment as an assistant principal at the adult center. Payroll records and interviews determined that this employee worked, on average, 10 hours per pay period and was paid for only the hours worked. The allegations were found to be unsubstantiated.

Employee Cleared of False Allegation

In June 2019, the Florida Department of Financial Services (FDFS) arrested 12 current and former M-DCPS school bus employees for filing fraudulent insurance claims totaling \$426,933. The bus drivers and aides

were accused of using the personal information of approximately 11 children to file fraudulent insurance reimbursement claims. A few days later, our office received an anonymous website complaint identifying another M-DCPS employee who the complaint alleged was also involved in the insurance fraud case. Working with FDFS, OIG Special Agents found no evidence to support the allegation and were able to clear the employee of any wrongdoing.

Allegations of Fraud and Mismanagement by an Elementary School Principal

A complaint was made to the OIG by the parent of a student who wished to have their identity kept confidential. The parent claimed that the principal of the child's school was committing fraud by misappropriating school funds. The parent claimed that as a result, books and other school materials were not provided to the students. The complainant also alleged that a teacher at the school was stealing funds evidenced by the teacher dining at expensive restaurants and driving a luxury car. When contacted by the OIG, the parent made additional allegations of waste, favoritism and mismanagement. The complainant had no firsthand knowledge of any of the allegations and claims the suspicions were based on information gleaned from Facebook and other social media posts.

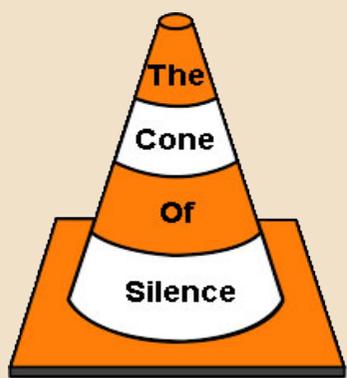
The OIG obtained and reviewed a copy of the school's most recent audit, conducted by the Office of Management and Compliance Audits (OMCA). The audit found that the financial records were maintained in good order and in accordance with pre-

scribed policies and procedures. Additionally, there were no significant exceptions noted during the audit period.

The OIG obtained a copy of the school's most recent textbook inventory, and consulted with the school's regional administrative director, who stated that the textbook inventory meets Florida State standards. He also advised that the school purchased additional supplemental materials as needed to meet the needs of their students.

The complainant's allegations were determined to be unfounded.

Cone of Silence Violation



The Miami-Dade County Public Schools Office of the Inspector General received a written referral from Procurement Management Services (PMS), alleging possible violation(s) of the

Cone of Silence in RFP-19-027-CM, Million Dollar Community Literacy Challenge – Adult Literacy Services. PMS related that it had received a telephone call from a vendor stating that, in the caller's opinion, there were an insufficient number of vendors selected to properly fulfill this contract. PMS contacted a representative of the owner department, the Division of Adult and Workforce Education (Adult Education), who stated that during a "monthly call" with several of the incumbent vendors, the active RFP was discussed. According to PMS, the Selection Committee's recommendation to the Superintendent, as well as the number

of current incumbent vendors that submitted proposals for the new RFP were discussed during the monthly call. PMS concluded that the Cone of Silence may have been violated.

The OIG conducted a review of the incident to independently establish a timeline of events surrounding the potential disclosure, to identify how the disclosure occurred, who was responsible for the disclosure and what information was disclosed. As part of the review, the OIG interviewed, under oath, Adult Education personnel and an incumbent vendor who participated in the monthly call (two other vendors participated in the call but could not be contacted because of the limitations posed by the COVID19 pandemic). The monthly call is a status meeting held monthly via conference call between Adult Education staff and the incumbent vendors. The OIG learned that a Selection Committee member who was assigned as the representative for the Office of Adult Education, briefed her supervisor (the District Supervisor for Adult Education), about the results of the RFP's selection process. During the monthly call, in response to a question by one of the incumbent vendors, the District Supervisor mentioned that two or three of the current vendors had been selected to be awarded contracts pursuant to the new RFP. The names of the vendors were not revealed. The Superintendent had not yet presented the recommendation for award and, therefore, the Cone of Silence was still in effect.

While perhaps a technical violation of the Cone of Silence, the OIG review did not reveal any evidence to suggest that the District Supervisor's revelation was intentional. Moreover, at the time of the utterance, the

work of the Selection Committee had been completed. The information disclosed had no impact on the fairness of the competitive process nor did it impart any advantage to one vendor over another.

The OIG recommended that M-DCPS staff be reminded to refrain from commenting on or attempting to answer questions about an active procurement. Questions from incumbent vendors and potential vendors should be directed to the M-DCPS Procurement Management Services Division.

Allegation of a Charter School's Improper Enrollment Preferences Unfounded

The Office of Charter Schools Compliance and Support informed the M-DCPS Office of the Inspector General that a complaint had been received alleging that students graduating from a private pre-kindergarten school and seeking admission to a charter school were being offered improper enrollment preferences. The Director added that one of the co-owners of the private school is also the principal of the charter school in question. The OIG was requested to review the admissions process and determine the validity of the allegation regarding the improper enrollment preferences.

The OIG examined the charter school's policies and procedures, student admission applications, and student admissions lottery results. In our review and analysis, coupled with a sworn statement of the principal, we determined that the admissions process being practiced by the school is in compliance with Florida State Statute 1002.33, its charter with M-DCPS, and the school's own policies and procedures. Additionally, it

was also determined that students originating from the private pre-K and seeking admission to the charter school's kindergarten class, are not receiving improper preferences and are being subjected to the same application process and admissions criteria as all other students applying for admission to the charter school.

GED Fraud - Case Update

In last year's annual report, the OIG presented an investigation involving School District employees who engaged in a fraudulent scheme to sell high school general equivalency degrees (GEDs). The investigation uncovered an extensive scam involving the selling of GEDs to individuals for prices between \$150 and \$2,800. The OIG investigation determined that a test administrator at a district adult educational center, and the GED Registrar falsified records and submitted false information to the Department of Education, M-DCPS and the GED Testing Service to obtain certificates for individuals who never took the test. Another individual (not a M-DCPS employee) identified as a "broker", recruited and collected cash from the fraudulent GED recipients and split the money with school employees. All three were charged with Organized Scheme to Defraud and are awaiting trial. As a result of this investigation, M-DCPS has developed a GED Testing Procedures protocol including a testing facility flow chart to be used at all its GED testing locations to deter fraud and enhance testing validity. Moving forward, the OIG will conduct periodic reviews of the GED testing program.

Alleged Fraud Concerning Psycho-Educational Evaluations

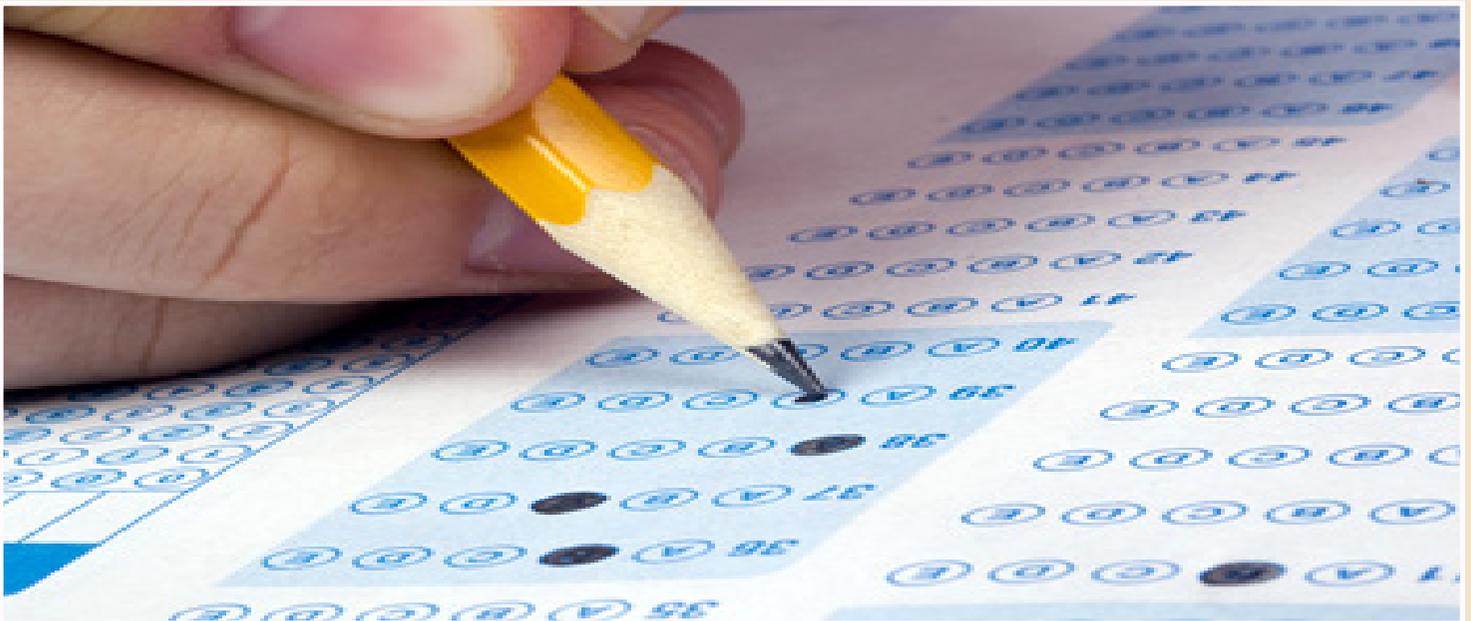
The Miami-Dade County Public Schools (M-DCPS), Office of the Inspector General (OIG) received a complaint via our website from an individual wishing to remain confidential alleging that a Psycho-Educational Evaluation (PE) performed by the M-DCPS lead psychologist for Charter Schools, “did not provide enough information to qualify the student for services.” Additionally, the complainant believed “that Medicaid fraud of some kind is going on.” The basis for the complainant’s belief stems from the facts that the child (subject of the PE) was attending a private school at the time and was referred directly to the M-DCPS lead psychologist by a private psychologist; that the PE was conducted in what was described by the child’s mother as a doctor’s office during “the evening hours”; that the child’s mother was told she would not have to pay for the evaluation, as she did not have insurance; and

that the evaluation was ultimately processed as an M-DCPS evaluation.

The complainant was interviewed and provided the OIG with documentation and two additional PEs conducted by the lead psychologist that the complainant believed were also suspect. The complainant was unable to provide any evidence indicative of a fraud scheme. The complainant only reiterated the belief that a fraud was being perpetrated simply because the PE had been conducted at a private medical office.

The OIG investigated to independently determine if the protocols undertaken by the lead psychologist to initiate, process and complete this PE violated established M-DCPS policies and procedures.

As part of the investigation, the OIG reviewed the documentation provided by



the complainant, the Exceptional Student Education and Student Support (ESE) Policies and Procedures, and payroll records for the lead psychologist. The OIG also interviewed the Administrative Director of ESE, the Instructional Support Supervisor for ESE Charter School Compliance, and the lead psychologist. Additionally, the OIG interviewed the mothers of two of the three children for which the complainant provided documentation and alleged irregularities in the processing of their PEs. The mother of the third child did not respond to numerous requests by the OIG for an interview.

The OIG's review found no evidence to support the complainant's allegation that fraud was being perpetrated by the lead psychologist in connection with the PEs. The testimony of the children's mothers clearly revealed that the lead psychologist never received or solicited any payments from them, and in fact informed them that no payment was required. We further determined that contrary to the complainant's assertion, it was not improper for the lead psychologist to have received a referral from a private psychologist.

The investigation did confirm that the lead psychologist does maintain a private medical practice/office and did perform one of the PEs in question at his private office. However, our review found that ESE's policies and procedures are moot as to this issue, and ESE managers confirmed, that there is no prohibition as to the where and when these evaluations can take place.

COLLABORATIVE PARTNERSHIPS

Section 4 of the Inter-Local Agreement between Miami-Dade County and M-DCPS recognizes the importance of forming collaborative and professional relationships with internal and external entities. While maintaining our level of independence, the M-DCPS OIG works with the Office of Management and Compliance Audits, the M-DSPD and several offices under the umbrella of Human Capital Management; particularly the Office of Professional Standards and Compensation Administration, the Civilian Investigative Unit and the Office of Civil Rights. The M-DCPS OIG attends all Audit and Budget Advisory Committee meetings and Ethics Advisory Committee meetings. Through these forums, we present the findings of our reviews, inspections, investigations and audits. Additionally, we also attend the 21st Century Bond Advisory Committee meetings and the Secure Our Future/Teacher Salary Task Force, where the Inspector General sits as a non-voting member of the committee. Attendance at these meetings keeps us apprised of the activities of partner agencies and facilitates opportunities for communication and teamwork.

The M-DCPS OIG continues to develop relationships with external entities, recognizing the synergistic value of these partnerships. Our external partners have included the following:

- Florida Department of Law Enforcement
- Florida Auditor General
- Internal Revenue Service
- Federal Bureau of Investigation
- Miami-Dade State Attorney's Office
- Florida Department of Education OIG
- U.S. Department of Education OIG
- Florida Department of Business and Professional Regulation
- Florida Department of Financial Services, Division of Insurance Fraud
- United States Attorney's Office, Southern District of Florida

The Ethics Advisory Committee (EAC) and the Office of Inspector General (OIG)

The OIG attends all Ethics Advisory Committee (EAC) meetings where we present our investigative reports, reviews and annual reports. Comprised of six prominent community members, Chairman Donald Slesnick, Esq., the Honorable Gerald Kogan, Mr. Frank Silva, Esq., Dr. Laura Kohn Wood, Dr. Ursula Wright, and Ms. Sharon Watson, the committee is regularly attended by one or more board members (or a staff delegate) and a representative from the School Board Attorney's Office. The meetings are open to the public. At its last committee meeting, the OIG presented our investigative report regarding misrepresentations by a private after school care provider to obtain free access to schools, pressure from a board member's chief of staff to approve the provider's use applications and the district's failure to properly manage its after school childcare program. Some of the issues involved the use of a Temporary Use Agreement (TUA) to lease the facility over a ten year period, misrepresentations to obtain a Fee Waiver and the failure to vet personnel that would be interacting with students.

Based on the OIG recommendations, the School District Administration took several actions. First, the Administration developed a new form, an Affidavit to Receive a Fee Waiver for the Utilization of School Facilities. This Affidavit will help determine the eligibility for an organization to receive and/or continue to receive a fee waiver. Second, the Administration has strengthened its security processes by requiring each employee of an organization with student affiliation be fingerprinted and undergo a background check to receive a State of Florida Public Schools Contractor identification badge, which must be presented to a school staff member at the respective facility. Third, Weekly Briefing #26776 was issued on November 21, 2019, to all principals and assistant principals outlining the procedures for Facility Rental and Affiliating Agreements for Educational Services On/Off Campus.

All community-based organizations and/or outside agencies that request the use of School Board facilities, and that have direct contact with students after school, are required to complete an annual Affiliating Agreement and the online facility rental application. Additionally, Request for Proposals (RFP) #19-047-CM, Eligibility for Providing State-Licensed Before and After School/Child Care Services for Elementary School, K-8 Centers, Middle Schools and Centers for Special Education has been finalized. The OIG provided the School District with input during the drafting of the RFP to ensure the issues that arose during the investigation were addressed. The RFP was advertised to select duly qualified entities that will provide these services at District schools beginning in the 2020-2021 school year. Once awarded by the Board, only those providers selected through this RFP will be authorized to offer fee-based child care services and these entities will be subject to audit by the District. The OIG will continue to monitor the progress of the RFP and provide input as necessary or requested. The OIG looks forward to the continued relationship with the EAC and supports their role in helping to ensure ethical governance.

The Audit and Budget Advisory Committee (ABAC) and the Office of the Inspector General (OIG)

The purpose of the ABAC is to review and make recommendations to the School Board and Superintendent on fiscal management matters presented to the committee. The ABAC serves as the principal advisory committee to assist the Board in fulfilling its fiduciary responsibilities on budgeting, financial reporting and accounting and business policies and practices. The ABAC is the Board's principal agent in ensuring the independence of the District's external and internal auditors.

ABAC members (and their alternates) are appointed by each School Board Member, the Superintendent and the President of the PTA/PTSA. There are eleven ABAC members. The Audit and Budget Advisory Committee is advisory in nature. Its recommendations regarding audit findings and exceptions, and other items is provided in writing to the Board and Superintendent. The OIG attends all ABAC meetings. Similar to the EAC, we present our investigative reports, reviews and annual reports to the ABAC.



We are committed to providing oversight to the 4th largest school district in the nation.

M-DCPS Budget in 2019-2020	\$5,456,965,902
M-DCPS OIG Budget in 2019-2020	\$850,498
Paid to Vendors	\$1,323,856,996
# of Vendors	6,959
# of Students	347,069
# of Employees	37,696
# of Public Schools	340
# of Charter Schools	140

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