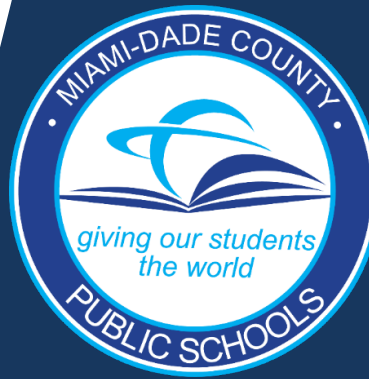


ANNUAL REPORT

2023

www.MiamiDadeIG.org



OFFICE OF THE INSPECTOR GENERAL
MIAMI-DADE COUNTY
PUBLIC SCHOOLS



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A MESSAGE FROM YOUR INSPECTOR GENERAL



To the Chair and Members of the Miami-Dade County Public School Board, Miami-Dade Schools Administration and employees, M-DCPS families and residents of Miami-Dade County, pursuant to the Inter-local Agreement between the School Board and Miami-Dade County, the enclosed Annual Report provides a summary of investigations, reviews and other matters conducted by the Miami-Dade County Public Schools Office of the Inspector General (OIG) during Fiscal Year 2023, the period of July 1, 2022, through June 30, 2023. The work done by the OIG provides impactful investigations, audits and reviews that aid in operational improvements to the district. Some cases result in criminal prosecution with our law enforcement partners such as the Miami-Dade State Attorney's Office and the United States Attorney's Office for the Southern District of Florida. When in the best interest of the investigation, we

often partner with agencies such as the State or Federal Departments of Education OIGs.

In this report you will find data regarding the number of complaints received during the fiscal year and their disposition as well as financial reporting of recoveries, questioned costs and funds put to better use. We also summarize several administrative investigations pertaining to allegations of cone of silence violation, alleged improper coercion, alleged misuse of donation, and the questionable cancellation of a contract. It's important to note that some of these complaints were deemed to be unfounded, allowing us to clear baseless allegations made against district employees. The M-DCPS OIG also opened investigations during the year and remain ongoing. These cases will be reported, when completed, in subsequent annual reports.

I am also pleased to introduce our new squad supervisor, Jose Gonzalez. Mr. Gonzalez had an eminent career with the U.S. Postal Inspection Service and has been with the OIG for six years, most recently serving as the unit's acting supervisor. It is an honor to work alongside OIG employees, who are dedicated to promoting integrity and trustworthiness in district operations.

I thank Chairwoman Rojas, the Board Members, and Superintendent Dotres and his staff for their unwavering support to the OIG. It is my honor to serve as your inspector general. Please feel free to contact our office with questions about the report and with any information about fraud, waste, and mismanagement.

Respectfully,

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I. ABOUT US

The Miami-Dade County Public Schools Office of the Inspector General (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 M-DCPS OIG is independent to assure that no interference or influence external to the Office adversely affects the objectivity of the M-DCPS OIG.

MISSION

Detecting, investigating, and preventing fraud, waste, mismanagement, and abuse of power within the school district.

INTER-LOCAL AGREEMENT

The Inter-Local Agreement (ILA) between the School Board of Miami-Dade County and Miami-Dade County, initially executed in 2007, sets forth the responsibilities, functions, authority, and jurisdiction of the M-DCPS OIG. The current agreement expires on December 18, 2025.

The M-DCPS OIG promotes accountability, integrity and efficiency through its efforts in conducting investigations, audits, and oversight activities of school district employees, contractors, projects and programs. All case assignments are conducted with the goal of improving M-DCPS's ability to provide the highest quality education.

II. THE OIG EXECUTIVE TEAM



(left to right) Hector Ortiz, Patra Liu, Felix Jimenez, Marie Perikles, James Schlotzhauer

Inspector General Felix Jimenez is the head of the organization. His Executive Team includes Deputy Inspector General/General Counsel Patra Liu, Assistant Inspector General for Investigations Hector Ortiz, Deputy General Counsel Marie Perikles and Director of Data Analytics James Schlotzhauer.

Assistant Inspector General Hector Ortiz leads the Investigations Unit. When investigations of fraud, waste and abuse of authority reveal criminal wrongdoing, the Assistant

Inspector General for Investigations coordinates with state and federal criminal prosecutors to shepherd OIG cases to a successful legal resolution.

Patra Liu oversees the Legal Unit with Deputy General Counsel Marie Perikles and three additional attorneys. The Legal Unit provides continuous support and guidance to all OIG personnel from the moment a complaint is received to case closure, which oftentimes involves the issuance of public reports and memoranda. OIG attorneys provide counsel on jurisdictional questions and help assess the strengths and weaknesses of OIG cases for potential civil, administrative or criminal implications.

Deputy Inspector General Liu also manages the OIG's Contract Oversight and Audit Units. Their work includes active monitoring and random inspections of contracting and construction activities to ensure fairness in the procurement process and compliance with contract specifications. The Audit Unit consists of a team of certified professionals with a wide range of government and private sector experience. The Audit Unit frequently coordinates with the Investigations Unit and/or Contract Oversight Unit. All three units work together to advance the mission of the Office.

As the Director of Data Analytics, James Schlotzhauer has the primary responsibility to ensure the alignment, development and integration of data analytics, business intelligence and artificial intelligence necessary to support the mission, vision, strategies, objectives, and goals of the OIG. Mr. Schlotzhauer organizes and assembles resources necessary to address the current and future analytical needs of the OIG.

III. FAREWELL AND WELCOME TO THE M-DCPS OIG TEAM



Ms. Tracey Skwarek, a M-DCPS employee since 1996, joined the M-DCPS OIG in August 2023 as our new Administrative Assistant. Her tenure at M-DCPS has included positions such as a Skilled Clerical Assistant, Data Input Specialist II, School Secretary/Treasurer, and District Administrative Assistant in the Instructional Recruitment & Staffing Department.

Prior to her employment with the school system, Ms. Skwarek began her professional career as transcriber/typist for court reporters through Unicorn, Ltd. where she was employed for 11 years.



Tom Knigge and Jose Gonzalez



From left to right Hector Ortiz, Jose Gonzalez, Archie Moore, Maria Portillo, Tom Knigge, Julie Mondragon and David Hernandez



Jose Gonzalez and Maria Portillo

The M-DCPS OIG team bid a farewell to Supervisory Special Agent Tom Knigge who has led the team since 2012. Maria Portillo, a M-DCPS employee since 1997 and an OIG M-DCPS employee since April 2019 also retired this year.



Congratulations, to Jose R. Gonzalez also known as “Joe,” to the position of Supervisory Special Agent. Prior to his promotion, Joe, served as an OIG Special Agent since November 2016. Prior to joining the OIG, Joe, had a distinguished career as a sworn Federal Law Enforcement Officer, having retired as a Postal Inspector from the U.S. Postal Inspection Service. During his career he conducted and participated in numerous investigations and/or supervised others in the investigation of White-Collar Crimes (domestic and international), including Mail Fraud, Wire Fraud and Computer Crimes among others. He also holds the credentials of Certified Fraud Examiner (CFE) and Certified Inspector General Investigator (CIGI). He is also a veteran of the United States Navy.

IV. OPERATING BUDGET AND STAFFING



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 2022 - 2023 fiscal year, the School Board approved a \$905,850 budget to cover operating needs and personnel staffing.

The M-DCPS OIG is staffed with a supervisor, four special agents, and an administrative assistant. M-DCPS OIG employees are contracted managerial

exempt personnel and serve at the will of the Inspector General, who, by virtue of the ILA between the School Board and Miami-Dade County, is the County Inspector General.

The ILA also enables County OIG staff to provide services to the M-DCPS OIG on a reimbursement basis. OIG investigative analysts provide investigative and analytical support, including intelligence gathering, to the M-DCPS OIG upon request. OIG attorneys provide legal advice and guidance in support of M-DCPS OIG investigations and operations. The Inspector General and the Assistant Inspector General of Investigations directly oversee all operations of the M-DCPS OIG.

V. COMPLAINT INTAKE AND DISPOSITION

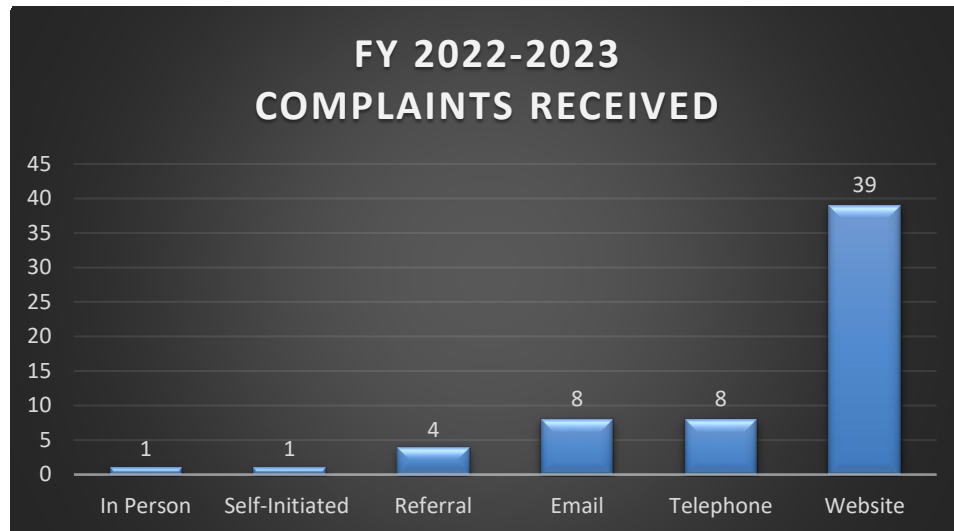
The majority of cases opened each year stem from complaints submitted to the M-DCPS OIG by school district employees, vendors, parents and other concerned citizens. Other cases result from ongoing investigations and audits, and some are self-initiated. We strive to provide a voice to all complainants. 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 addresses every complaint, either through an investigation, audit, review, or referral.

The M-DCPS OIG receives complaints by mail, via our 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 and the action warranted. Based on the subject matter and the specificity of the information received, some complaints will result in the M-DCPS OIG initiating an investigation, audit or review. Other complaints may be determined to be more appropriately addressed by the M-DCPS administration or by another governmental agency. In the case of most referrals, the receiving agency is requested to provide the M-DCPS OIG with its findings.

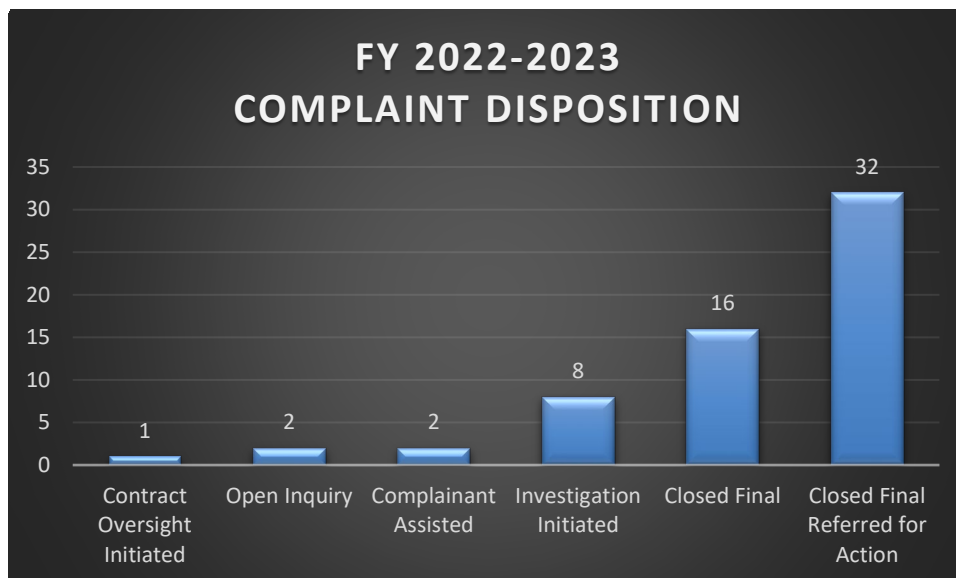
In accordance with Section 3(h) of the ILA, the M-DCPS OIG is the school district's designee for purposes of receiving Whistleblower Act disclosures pursuant to Florida Statutes, Section 112.3187(7). Whistleblower disclosures are those disclosures that allege violations or suspected violations of law, 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.

The Office received 61 complaints in Fiscal Year 2022-2023. 64% of the complaints received were submitted through our website's report fraud page: www.miamidadeig.org/inspector-general/fraud.page. The remainder of the complaints were received through a variety of means as depicted in the chart in the chart below.



Each complaint is reviewed and evaluated by the Assistant Inspector General for Investigations, General Counsel, and, ultimately, the Inspector General. Of the 61 complaints received last year, 13% resulted in investigations. The remainder of the complaints were resolved in the manner depicted in the chart below.



VI. INVESTIGATIVE HIGHLIGHTS

The M-DCPS OIG conducts criminal and administrative investigations of fraud, waste, abuse and misconduct related to M-DCPS programs, operations, contracts and employees. OIG special agents have a wide variety of professional experience from prior positions with law enforcement and regulatory agencies. They have extensive training 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 and/or administrative reports with recommendations and monetary recoveries.

During this past fiscal year, numerous administrative investigations were completed pertaining to allegations of cone of silence violation, coercion, misuse of a donation, and the cancellation of a procurement contract. The M-DCPS OIG also opened investigations during the year that remain ongoing. These cases will be reported, when completed, in subsequent annual reports. Summaries of our completed cases follow in the next few pages.

Cone of Silence Violation

On January 10, 2022, M-DCPS OIG received a phone call from M-DCPS' Chief Facilities Design and Construction Officer (Chief Facilities Officer), reporting a possible violation of M-DCPS' Cone of Silence Policy in relation to Request for Qualifications (RFQ) -192: Architectural/Engineering Projects Consultants (A/EPC). The RFQ is designed to establish a pool of Architect/Engineer (A/E) consultants that M-DCPS would commission for future projects where the construction estimates do not exceed \$4 million or for study activities for which professional fees do not exceed \$500,000.

The Chief Facilities Officer related that he received voicemails and emails from two prospective architects requesting to set up a meeting between several architectural firms and him, to address A/E contractual improvements. The communication attempts took place in early January 2022, while the Cone of Silence was active. The Chief Facilities Officer did not reply, speak with, or meet with them. He consulted with the School Board Attorney's Office, where it was recommended that he coordinate with his procurement liaison to send a reply to the architects letting them know that the solicitation was still under the Cone, to copy the Board Clerk (Clerk) on said reply, and to report this matter to the OIG.

The OIG conducted an inquiry into the incident and independently established a timeline of events surrounding the potential violation. As part of the review, the OIG reviewed policies, procurement/RFQ documents, meeting recordings/agenda items, spoke with several key personnel, and conducted sworn interviews of the involved architects.

The OIG concluded that a technical violation of the Cone was committed by the architects attempting to communicate with the Chief Facilities Officer, by email and by leaving voice mail messages. However, these communications were never reciprocated. There was no intent to violate the Cone of Silence because the architects were erroneously led to believe by M-DCPS staff that it was not a violation to contact him. Just because the concerns involved contract language and not a specific project does not render it outside of the Cone. The Cone applies to the procurement process and this communication involved a central component of the procurement – the contract negotiations.

Shortly after the attempted communication with the Chief Facilities Officer, a very clear message was relayed to all 15 proposers reminding them that the Cone of Silence was still in effect and that a future meeting with the M-DCPS's senior staff will be scheduled, at which time comments expressed at the pre-negotiations will be presented by the Facilitator.

This was a minor, technical violation. It should have never happened if M-DCPS staff had corrected the consultant's assumption that contacting the Chief Facilities Officer would not be prohibited by the Cone. Based on the foregoing, especially the quick reply by staff to all proposers that the Cone was still on and there would be a forum to collectively address their concerns, the OIG concluded that no further action was necessary.

Alleged Improper Coercion to Allow a Childcare Center's Services Use of MDCPS' Facilities

The M-DCPS OIG received an anonymous complaint alleging that M-DCPS' then School Board Chair and a Florida House of Representatives member aided a private day care center by coercing M-DCPS to permit them to operate a day-care center at a District K-8 Center for free since 1995. The complaint alleged that the practice had been in place for years and anyone who handled building rentals for M-DCPS would have knowledge of the efforts.

The complainant also specifically referenced that the childcare center was charging fees and received funding from the Children's Trust. As the complainant was anonymous, the complainant's specific issue with the fees or funding could not be clarified. However, for purposes of this investigation, the OIG surmised that the core of the allegation was that it was operating at the K-8 school in violation of School Board Policy 7510 - *Use of District Facilities*. The OIG reviewed whether the center was inappropriately operating under an M-DCPS Temporary Use Agreement (TUA) for the use of the school facilities and obtained fee waivers in violation of School Board Policy.

During the investigation, the OIG interviewed M-DCPS school site administrators and other M-DCPS personnel and staff, the center's employees, and regulatory agency personnel. The OIG also reviewed Florida Statutes, M-DCPS Policies and Procedures, as well as records from M-DCPS, Florida Department of Children and Families (DCF), the City of Miami Beach, The Children's Trust, The Early Learning Coalition, and others.

The OIG investigation determined that the center operated at the K-8 school as part of M-DCPS' participation in the Full-Service Schools initiative created by the State of Florida. It provided services to children and families identified as part of an at-risk community and M-DCPS provided the facilities. The OIG found no evidence to show that the former School Board Chair or former State Representative coerced M-DCPS personnel to establish or maintain the childcare program at the school.

Alleged Misuse of the College Football Playoff Foundation's Donation to a Middle School

The MDCPS OIG initiated an investigation based on a complaint from a middle school's Parent-Teacher Association (PTA) President. The president alleged that M-DCPS had improperly reallocated a \$20,000 donation made by the College Football Playoff Foundation, Inc. (Foundation), which had been earmarked for the school. The president was concerned that M-DCPS was not utilizing the donation for intended improvements at the school and feared that the documentation that had been provided in response to a public records request was fraudulent.

During the investigation, the OIG reviewed documents including agreements, policies, budgets, plans, meeting summaries, minutes, communications, correspondence, invoices, payments, agenda items, resolutions, photographs, press releases, and interviewed key participants. The OIG interviewed, met with, and obtained information from several M-DCPS administrators and Foundation personnel whose responsibilities included processing, reviewing, and approving (or supervising) expenditures related to the projects funded by this donation.

The OIG investigation did not find any evidence that M-DCPS improperly reallocated a donation from the school to other schools. The actual cost of the intended improvements was less than the amount allocated in the budget and M-DCPS and the Foundation mutually reallocated the remaining budgeted funds towards other middle schools as permitted by their agreement. Additionally, the OIG found no evidence that documentation provided pursuant to a public records request was fraudulent.

Alleged Suspicious Cancellation of Mental Health Contract

M-DCPS OIG received information from an individual requesting that his/her identity be kept confidential. The information pertained to a proposed contract award to a mental health provider that was voted down by the School Board. According to the complainant, the Request for Proposals (RFP) was for the production of a 5-minute video to be shown to school children designed to gauge their mental well-being. The complainant suspected that the vote disapproving of the contract award was done in connection with an attempt to steer the contract to another vendor, a current school vendor. Moreover, the complainant believed that the winning vendor is owned by the nephew of a Miami lobbyist and politically influential individual. According to the complainant, the winning vendor has a contract with another large school district that has been highly criticized.

The complainant also questioned a school board member's comment with regards to the proposed contract award. The complainant stated that the proposed award for \$750,000 was voted down after the school board member complained about the cost of the program; the complainant explained that the school member misconstrued the contract amount as costing over \$2 million by taking into account the options to renew.

In summary, the OIG could find no connection between the named individual and the vendor.

As for the winning vendor's contract with the other school district, there have been news media accounts questioning the level of spending by the school district and the functionality of the vendor's on-line platforms. A recent news article revealed that in December 2021, the company was cited with ethics violations for having hired a former district employee and deploying him to lobby the district in violation of the 12-month cooling period.

Regarding the school board member's comments and the cost of the contract, the OIG learned that there was some ambiguity regarding the actual cost of proposed contract award. Ultimately, the agenda item was revised to reflect that the estimated cost of \$750,000 was only for one year. As presented, it was a 3-year contract term with a 2-year optional extension period. The contract value was \$2,250,000 for the base term; there would be an additional \$1,500,000 if the contract were to be extended. The comments by the board member as to total contract value, however, were accurate.

Flaws In School District Contract for Printer Consumables

The M-DCPS OIG received a complaint concerning an Invitation to Bid (ITB). ITB-15-038-MT was a solicitation for vendors to supply Original Equipment Manufacturer (OEM), Compatible and Remanufactured printer cartridges. The complaint alleged that the ITB was improperly structured, which led to toner contracts being awarded to certain companies at an increased cost to the school district. As a result, the OIG began a review of this ITB.

OIG Special Agents requested all relevant documentation concerning the referenced ITB, including but not limited to, the solicitation announcement, bid packages, all recordings, all notes, and all communications. OIG Agents interviewed M-DCPS officials and administrators and interviewed current and former employees of the M-DCPS Office of Procurement Management Services (herein the Procurement Department). OIG Agents reviewed M-DCPS documents including ITB's, current and historical bid submissions, invoices, bid tabulations, contracts, email correspondence, digital images, and various other documents related to this review. After a thorough review, Special Agents found a number of deficiencies and concerns. In essence the ITB was poorly prepared; documentation was incomplete, missing and poorly maintained; the awarding of vendors was flawed; and there were inadequate controls in place to ensure that the school district was getting the lowest and best price. The complaint, which was received from a participating vendor, was by all measures substantiated. During this review, OIG Agents learned that this ITB was directly prepared by the former Chief Procurement Officer (CPO)—as were several others. We learned during a meeting with new CPO (joined with another former CPO in his new capacity as a M-DCPS procurement consultant) that many

of the conditions the OIG observed relative to the ITB were found throughout the entire portfolio of ITBs. The consultant described an “amalgamation” of inappropriate contract terms and copies of contracts, which were solicited and prepared by the former CPO as either ITBs or Requests for Proposals (RFPs) that, in his professional opinion, just did not make sense. He explained to the OIG that he cancelled all the open ITBs until he could make the necessary corrections. Efforts were also made to review all existing contracts and determine whether to extend, cancel, or re-procure.

As to ITB-15-038-MT, it is clear that the flaws evident in the solicitation and tabulation of bids for the various categories of toner cartridges did not always result in M-DCPS getting the lowest price. At issue was the method of soliciting a discount (percentage) off list price where the list prices were different among each bidder. Had each bidder been asked to provide a fixed price per product, an objective—albeit time consuming—bid tabulations could have been prepared. (The OIG notes that this would be time consuming because there are hundreds if not thousands of models of toner cartridges.) Had the discounts proffered by each bidder been tabulated against a uniform set of list prices that would have been in effect for the contract term, it also would have resulted in an objective bid tabulation. However, in this case, each bidder proffered its own list prices and then provided its discount rate off those prices. There was no apples-to-apples comparison to determine the lowest price(s). The solicitation was flawed, the agenda item seeking award of the contract was misleading, and the contracts awarded (to the various vendors for different bid groups) were not always based on the lowest price.

The M-DCPS OIG substantiated the allegation that ITB-15-038-MT was improperly structured negating any assurances that the School District was getting the lowest price. The OIG investigation revealed that the ITB was poorly prepared and that the vendor awards for the various cartridge groups were flawed. There were inadequate controls in place to ensure that the school district was getting the lowest and best price. Similar deficiencies were also found by the incoming Procurement officials on several other ITBs. Given the shortcomings identified by the OIG and the self-review conducted by the new CPO, the OIG was pleased that the implementation of reforms and heightened training measures have had a positive effect on improving the function of the Procurement Department.

VII. FOLLOW-UP ACTIVITIES

Plea Agreements Reached for GED Fraud Case

Roxanne Insignares and Antonio Bouzan, both former Miami-Dade County Schools (M-DCPS) employees and Marta Avalos, not a school employee, pled guilty to charges stemming from a joint investigation by the Miami-Dade County Public Schools Office of the Inspector General (OIG) and the Miami-Dade County State Attorney’s Office Public Corruption Task Force. All three engaged in a scheme to issue GED certificates that were unearned, while charging large fees to enrich themselves.

The investigation revealed that Insignares was responsible for the GED test location at Miami Lakes Educational Center and Technical College and Bouzan was a GED Registrar under Insignares. Insignares and Bouzan received cash payments ranging from \$150 to \$2,800 in exchange for issuing GED certificates. Insignares falsified records and submitted false information to the Department of Education, M-DCPS, and GED Testing Service LLC/Pearson VUE (the testing company) to obtain those certificates. The investigation identified Bouzan and Avalos as the “brokers” who collected cash from the fraudulent GED recipients.

In January 2019, Ms. Insignares, Mr. Bouzan, and Ms. Avalos were arrested and charged with multiple counts of Organized Scheme to Defraud, and Cheating. Ms. Insignares and Mr. Bouzan were charged with Unlawful Compensation for Official Behavior. As a public servant, Ms. Insignares was also charged with Official Misconduct for her falsification of documents.

Ms. Avalos was sentenced in March of last year to 3 years of probation, 100 hours of community service, assessed fines, and costs of investigation. This January, Mr. Bouzan was adjudicated guilty and sentenced to 2 years of house arrest followed by 3 years of probation, assessed fines, costs of investigation, and ordered to complete 100 hours of community service. Ms. Insignares pled guilty on January 3, 2023 to the following charges; 1 count of organized fraud, 2 counts of cheating and 1 count of unlawful compensation. Her sentencing is scheduled for December 2023.

The OIG will remain vigilant in exposing behavior that is detrimental to preserving the integrity and public trust in M-DCPS.

VIII. AUDIT AND BUDGET ADVISORY COMMITTEE



Created by School Board Policy No. 6840, the Audit and Budget Advisory Committee (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. 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 ABAC's purpose is to review and make recommendations to the School Board and Superintendent on fiscal management matters presented to the committee. The ABAC also serves as the Board's principal agent in ensuring the independence of the school district's external and internal auditors. In addition to receiving and reviewing all reports issued by the District's Office of Management and Compliance Audits, the ABAC, pursuant to Board policy, is charged with receiving and reviewing reports issued by the OIG and monitoring the corrective action taken by the District in response to the OIG's recommendations. The OIG's annual report is also presented to the ABAC.

IX. ETHICS ADVISORY COMMITTEE



The OIG attends all Ethics Advisory Committee (EAC) meetings where we present our investigative reports, reviews, and annual reports. Comprised of seven prominent community members, Chairman Donald Slesnick,

Esq.; Mr. Frank Silva, Esq.; Dr. Laura Kohn Wood; Dr. Ursula Wright; Ms. Sharon Watson, Hon. Jerald Bagley and Dr. Carmen Concepcion. The EAC is regularly attended by one or more board members (or a staff delegate), and a representative from the School Board Attorney's Office.

With regard to terms of membership, Policy 0158 provides that: "The members of the Ethics Advisory Committee shall serve terms of four (4) years each. Upon expiration of said term, any member may be re-appointed to additional four (4) year terms." With respect to quorum, the Policy 0158 states that: "A minimum of four (4) voting members of the Committee shall constitute a quorum. A quorum must be present before a vote is taken on any matter appearing before the Committee."

The OIG looks forward to the continued relationship with the EAC and supports its role in helping to ensure ethical governance.

X. PROVIDING OVERSIGHT TO THE 3RD LARGEST SCHOOL DISTRICT IN THE NATION

