

Audit of
District's Background Screening Procedures for
Employees, Vendors, and School Volunteers

September 17, 2021

Report #2021-09



MISSION STATEMENT

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Employees, Vendors, and School Volunteers**

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**Audit of
District’s Background Screening Procedures for
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EXECUTIVE SUMMARY

Pursuant to the *Office of Inspector General’s (OIG) 2019-2020 Work Plan*, we have audited the District’s Background Screening Procedures for Employees, Vendors, and School Volunteers. The primary objectives of this audit were to (1) assess the adequacy of the District’s Criminal Background Screening Procedures, (2) determine the extent of compliance with the criminal background screening requirements of *Florida Statutes* and *School Board Policies*, and (3) assess the adequacy of controls for accessing District facilities by employees and vendors. The audit produced the following major conclusions:

1. Employee Criminal Background Screening Processes Need Improvement

School Board Policy 3.10 - Conditions of Employment with the District requires that criminal background screening be performed upon initial hiring of all new employees regardless of whether they will have regularly scheduled unsupervised access to students. Pursuant to the July 22, 2020, *District Bulletin #PD 21-009-CHR*, “Effective immediately, applicants will not be authorized to work prior to receiving an acceptable result on ... criminal background check...” Our review of 60 random sample employees hired during July 1, 2020, through January 25, 2021, revealed that:

- 10 (17%) of the sampled employees were allowed to start working prior to the District receiving the background screening results.

Moreover, our review of PeopleSoft records between July 1, 2020, and April 21, 2021, noted that seven employees hired between August 12 and October 26, 2020, were subsequently terminated because their criminal background screening results did not meet the District’s employment requirements.

- 40 (67%) sample employees’ background screening results were not accurately recorded in the PeopleSoft System, such as missing screening results, and missing or incorrect screening dates.

Management’s Response: Management concurs. (See page 18.)

2. Five-Year Criminal Background Rescreening of Employees Not Always Completed

Florida Statute 1012.465(2) requires all District employees and contractual personnel to complete a Level 2 Criminal Background Screening once every five years.

77% of the Sampled Employees Were Not Submitted to Florida Department of Law Enforcement (FDLE) for Completing the Five-Year Rescreening. We reviewed the background screening history for 60 sample active employees hired during 2015, who were due for the Five-Year Criminal Background Rescreening in 2020. The review noted that 57 (95%) of the samples did not have the required Five-Year Rescreening completed timely:

- 46 (77%) of the sampled employees had not been submitted to FDLE for completing the required Five-Year Rescreened as of January 28, 2021.
- 11 (18%) of the sampled employees had their rescreening completed late. Delays in resubmitting these employees' fingerprints to FDLE for the Five-Year Rescreening ranged from two days to four years eight months (i.e. 56 months late).

One of the 46 employees who had not been rescreened as of January 28, 2021, was (a) initially hired by the District in August 2010, (b) resigned in April 2014, and (c) rehired in February 2015. However, this employee did not have the Level 2 Background Screening completed when he was rehired in February 2015, and his last Level 2 Criminal Background Screening was completed in August 2010, or more than 10 years ago.

School Police Department Staff Were Not Submitted to FLDE for Completing the Five-Year Rescreening. According to School Police and the Department of Information Technology, the monthly review of employees due for the Five-Year Rescreening did not include staff of the School Police Department. As a result, School Police did not submit the fingerprints of their staff to the FDLE for completing the Five-Year Rescreening as required by *Florida Statute 1012.465(2)*. OIG could not find any records reflecting that sworn and non-sworn staff of the School Police Department have been rescreened at any point during their employment with the District.

Management's Response: Management concurs. (See page 19.)

3. FALCON Records Not Up-to-Date: 221 Current Employee Records Were Missing and 35,079 Former Employee Records Were Retained in the System

School Police utilizes the FDLE's FALCON System for (a) completing the Level 2 Criminal Background Screening for employees, (b) maintaining employees' digital fingerprints for future rescreening, and (c) tracking and notifying the District of any employees' new Florida arrest records. The FALCON System retains employee fingerprints and dates of background screenings until School Police delete separated employees from the FALCON System. Currently, FDLE charges the District an annual maintenance fee of \$6 per employee maintained in the FALCON System.

On March 3, 2021, the OIG and School Police jointly reviewed the FALCON database for 60 sample former employees who separated from the District between July 1, 2018, and February 15, 2021. The review found that 58 (97%) of the 60 sample employees had not been removed from the FALCON database, despite no longer being employed by the District for 85 to 976 days.

The District Incurs an Estimated \$210,474 in Annual Fees for Needlessly Maintaining Separated Employee Records in the FALCON System. Subsequently, our review of the FALCON database found that the District maintained 34,230 former/non-District employees and 849 duplicated active employee records in the FALCON System as of May 25, 2021. Keeping these 35,079 (34,230 + 849) unneeded records in FALCON resulted in an estimated avoidable annual cost of \$210,474 (\$6 x 35,079) to the District.

Delays in removing separated employees from the FALCON database results in (a) unwarranted maintenance costs to the District, and (b) waste of resources for reviewing arrest records of employees who no longer employed by the District.

221 Active Employee Records Not Found in FALCON Database. Based on the social security number, our comparison of the FALCON records with the PeopleSoft records also revealed 221 active employees were not found in FALCON database as of May 25, 2021. Without keeping the 221 active employees in the FALCON System, the District would not be notified of new arrests, if any, for these employees, and (b) might fail to submit these employees to FDLE for the Five-Year Rescreening.

Management's Response: Management concurs. (See page 19.)

4. Controls for the Symmetry Security System Need Improvement

The District utilizes the Symmetry Security Management System (Symmetry) for controlling and monitoring people's access to unsupervised/unguarded District facilities with electronic door locks. The Symmetry database had 33,042 active employee accounts (with a total of 38,627 active access cards) as of June 11, 2020. Our review of all the 33,042 active employee accounts compared to the PeopleSoft employee records revealed that:

- 13,722 (42%) accounts did not include the cardholders' employee identification number (employee ID).
- 492 (1%) accounts had employee IDs not found in the PeopleSoft System.
- 3,149 (10%) accounts belonged to former employees.
- 4,829 cardholders were assigned more than one access card, ranging from two to 10 cards. A total of 10,414 active cards were assigned to these 4,829 cardholders.

Of the 13,722 accounts without the cardholders' employee IDs:

- 316 accounts had incomplete cardholder names, which only included the initials or titles (i.e., Mr. or Mrs.).
- 1,322 accounts were generic cards issued to schools/departments for use by substitute teachers, visitors, students, aftercare employees, PTA representatives, and cafeteria managers, etc.

Furthermore, our review noted:

- There are no written procedures for schools/departments to (1) retrieve the ID badges/access cards from separated employees, and (2) timely notify School Police of lost/stolen access cards and separated employees for deactivate the related access cards.
- There were no records indicating that the 2,936 cards assigned to former employees had been returned to the District for proper disposal.

Management's Response: Management concurs. (See page 20.)

5. Inconsistent Procedures for Verifying Background Screening Information of Vendors and Volunteers at Schools

Florida Statutes require contract vendors to complete a Level 2 Background Screening prior to working on a school campus, and *School Board Policy 2.53 – Volunteers in Public Schools, Section 6*, requires that “volunteers must submit to a background screening as required by §943.04351, *Florida Statutes*.¹” The District fulfills this requirement by using the Raptor Visitor Management System (Raptor) for screening.

Raptor and VIPS Count Tracking Systems. Since January 4, 2016, all schools are required to use the Raptor System² for background clearance checks and the VIPS Count Tracking System (VIPS)³ for tracking volunteers’ hours. All volunteers and visitors must have their driver’s licenses scanned through the Raptor System prior to going onto campus. The Raptor System is used for a background clearance check by comparing the driver’s license to a sexual offender database maintained by FDLE. School administrators are alerted if a match is found. Once cleared through the Raptor System, a visitor badge is printed that includes the visitor’s name, photo, date and destination of the visit. Volunteers use the VIPS System for completing volunteer applications and recording their hours of services.

During the audit, we surveyed all 174 schools’ procedures for verifying the background screening information of vendors and volunteers at the schools. The survey revealed that:

- (a) Raptor System was not installed at two schools and malfunctioned at three schools.
- (b) Six schools did not screen volunteers through Raptor each time before allowing them to come onto school campus.
- (c) Required training was not completed by volunteer coordinators at 118 Schools.

¹ *Section 943.04351, Florida Statutes* requires all government agencies conduct a search of volunteers’ names against the sexual predator database maintained by the United States Department of Justice or the [Florida] Department of Law Enforcement if those volunteers will work in a place where children regularly congregate.

² *Bulletin #P 15-020 COO* – Raptor Visitor Management System, January 27, 2015.

³ *Bulletin #P 16-197 DSCOS* – VIPS Count Tracking System Reactivation, December 15, 2015.

(d) Schools were using inconsistent procedures in verifying the vendor's background screening information prior to allowing them to work on campus.

- 49 (28%) schools inspect the vendors' ID badges issued by the District.
- 43 (25%) schools require the vendors to complete a background screening through the Raptor System.
- 21 (12%) schools inspect the vendors' ID badges AND require the vendors to complete a background screening through the Raptor System.
- 61 (35%) schools NEITHER inspect the vendors' ID badges NOR require the vendors to complete a background screening through the Raptor System.
- 64 (37%) schools require the vendors to record their visits on the *Visitor Log Books*.
- Six (3%) schools require the vendors to record their visits through the VIPS Count Tracking System.

Management's Response: *Management concurs. (See pages 20 to 22.)*

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MEMORANDUM

TO: Honorable Chair and Members of the School Board
Michael J. Burke, Superintendent of Schools
Chair and Members of the Audit Committee

FROM: Teresa Michael, Inspector General

DATE: September 17, 2021

SUBJECT: Audit of District's Background Screening Procedures for Employees, Vendors, and School Volunteers

PURPOSE AND AUTHORITY

Pursuant to the *Office of Inspector General's (OIG) 2019-2020 Work Plan*, we have audited the District's Background Screening Procedures for Employees, Vendors, and School Volunteers. The primary objectives of this audit were to (1) assess the adequacy of the District's Criminal Background Screening Procedures, (2) determine the extent of compliance with the criminal background screening requirements of *Florida Statutes* and *School Board Policies*, and (3) assess the adequacy of controls for accessing District facilities by employees and vendors.

SCOPE AND METHODOLOGY

This audit was conducted in accordance with *Generally Accepted Government Auditing Standards*. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on the audit objectives. We believe the evidence obtained provides a reasonable basis for our findings and conclusions.

The audit covered the period during July 2018 through March 2021, and included interviewing District staff and reviewing:

- *Florida Statutes*
 - *Section 1012.32 - Qualifications of personnel*
 - *Section 1012.56 - Educator certification requirements*
 - *Section 1012.465 - Background screening requirement for certain noninstructional school district employees and contractors*

- *Section 1012.467 - Noninstructional contractors who are permitted access to school grounds when students are present; background screening requirements*
- *Section 1012.468 - Exceptions to certain fingerprinting and criminal history checks*
- *Section 943.04351 - Search of registration information regarding sexual predators and sexual offenders required before appointment or employment*
- *Chapter 435 – Employment Screening*
- *School Board Policies*
 - *2.53 - Volunteers in Public Schools*
 - *3.10 - Conditions of Employment with the District*
 - *3.12 – Criminal Background Checks*
- *District’s Bulletins*
 - *#P 15-020 COO - Raptor Visitor Management System*
 - *#P 16-197 DSCOS - VIPS Count Tracking System Reactivation*
 - *#P 20-086 COS - FY20 Fall Leadership Training Through eLearning for District Volunteer and Business Partnership Coordinators*
 - *#PD 21-009 CHR - Authorization to Work – Business Process Change*
- District’s Operating Procedures
 - Compensation & Employee Information Services – Manager Online Termination Process Manual
 - Compensation & Employee Information Services – Employee Online Resignation Process Manual
 - Recruitment & Retention Office – Hiring Process Map
 - Recruitment & Retention Office – Back Office Procedures Manual
- Employee ID Badge/Access Card Records in the Symmetry database
- Employees’ Fingerprinting records in the District’s PeopleSoft Database and the Florida Department of Law Enforcement’s FALCON Database

Details of the audit findings and observations were discussed with and provided to staff during the audit so that immediate corrective actions could be implemented accordingly. Draft audit findings were sent to management for review and comments. Management responses are included in the Appendix. We appreciate the courtesy and cooperation extended to us by staff during the audit. The final draft report was presented to the Audit Committee at its September 17, 2021, meeting.

BACKGROUND

To protect the safety of students and staff, *Florida Statutes* and *School Board Policies* require District employees, contractual personnel, vendors, and school volunteers to complete certain criminal background screening, as appropriate.

(A) District Employees and Contractual Personnel

School Board Policy 3.12 and *Florida Statutes*⁴ mandate a Level 2 background screening at least once every five years for each person hired, or contracted, to work for the District, who has access to a school campus when students are present or who has direct contact with students. A Level 2 background screening includes fingerprinting for comparing against the statewide criminal history records database through the Florida Department of Law Enforcement (FDLE) and the National Criminal Information System (NCIS) database through the Federal Bureau of Investigation (FBI). Specifically,

Florida Statute Section 1012.32(2)(a) states, in pertinent part,

“Instructional and noninstructional personnel who are hired or contracted to fill positions that require direct contact with students in any district school system or university lab school must, upon employment or engagement to provide services, undergo background screening...”

Florida Statute Section 1012.465(2) states, in pertinent part,

“Every 5 years following employment or entry into a contract ... the school district shall request the Department of Law Enforcement to forward the fingerprints to the Federal Bureau of Investigation for the level 2 screening.”

School Board Policy 3.12 – Criminal Background Checks states, in pertinent part,

“A prospective or current employee who is recommended to fill a non-instructional position shall, as a condition of employment, file a complete set of fingerprints taken by an authorized law enforcement officer or a designated employee of the District trained to take fingerprints...”

(B) Vendors

The *School Police Background Screening Guideline* and the *District's Purchasing Manual, Chapter 13, Consultant Agreements*, require all contracted workers and consultants be fingerprinted by School Police and completion of a Level 2 background screening prior to working for the District. Vendor Badges are issued with an expiration date five years from the initial fingerprinting and the vendors must be fingerprinted again when their badges expire. Pursuant to *§1012.467(8)(b), Fla. Stat.*, a valid Vendor Identification Badge issued by any Florida School District shall be recognized by all Florida School Districts that the Badge holder has met the criminal background screening requirements.

⁴ *Florida Statute sections 1012.32(2), 1012.465, 1012.467, and 1012.56(10).*

(C) School Volunteers

To protect the safety of students and staff, ***School Board Policy 2.53 – Volunteers in Public Schools, Section 6***, requires that “*volunteers must submit to a background screening as required by §943.04351, Florida Statutes.*”⁵ The District fulfills this requirement by using the Raptor Visitor Management System (Raptor) for screening.

Raptor and VIPS Count Tracking Systems. Since January 4, 2016, all schools are required to use the Raptor System⁶ for background clearance checks and the VIPS Count Tracking System (VIPS)⁷ for tracking volunteers’ hours. All volunteers and visitors must have their driver’s licenses scanned through the Raptor System prior to entering campus. The Raptor System compares the individual driver’s license to a sexual offender database maintained by FDLE. School administrators are alerted if a match is found. Once cleared through the Raptor System, a visitor badge is printed that includes the visitor’s name, photo, date and destination of the visit. The VIPS System is used by volunteers for completing volunteer applications and recording their hours of services.

⁵ ***Section 943.04351, Florida Statutes*** requires all government agencies conduct a search of volunteers’ names against the sexual predator database maintained by the United States Department of Justice or the [Florida] Department of Law Enforcement if those volunteers will work in a place where children regularly congregate.

⁶ ***Bulletin #P 15-020 COO*** – Raptor Visitor Management System, January 27, 2015.

⁷ ***Bulletin #P 16-197 DSCOS*** – VIPS Count Tracking System Reactivation, December 15, 2015.

CONCLUSIONS

This audit produced the following major conclusions:

1. Employee Criminal Background Screening Processes Need Improvement

School Board Policy 3.10 - Conditions of Employment with the District requires that criminal background screening be performed upon initial hiring of all new employees regardless of whether they will have regularly scheduled unsupervised access to students. Specifically, the **Policy** states,

“All applicants who are recommended for employment shall be required to meet any and all requirements of federal and state law, School Board policies ... to be eligible to commence work for the District.”

To comply with the **Florida Statutes** and **School Board Policies**, the District requires all prospective employees and contractual personnel submit their fingerprints for criminal background screening through the District’s School Police Department. School Police utilize the FDLE’s FALCON System (Florida Integrated Criminal History System) for completing the initial Level 2 Criminal Background Screening and the five-year Criminal Background Rescreening for employees and contractual personnel. The background screening results are to be manually entered into the PeopleSoft System by School Police when the results are available.

Hiring Procedures Prior to July 2020. Prior to July 1, 2020, after an applicant completed the fingerprinting for background screening by School Police, the applicant was allowed to begin working while the District waited for the applicant’s background screening result. During Fiscal Years 2018 through 2020, 192 newly hired employees were terminated from employment due to lack of acceptable background screening results. (See Table 1.)

Table 1
Employees Terminated Due to Lack of Acceptable Background Screening Results
During Fiscal Years 2018, 2019, and 2020

Fiscal Year	Number of Employees	Number of Days Employed by the District
2018	47	1 to 47 Days
2019	73	1 to 33 Days
2020	72	1 to 104 Days
Total	192	

Sources: PeopleSoft System and the Department of Compensation & Employee Information Services.

New Hiring Procedures Beginning July 2020. To ensure all employees are cleared with satisfactory background screening results, effective July 2020, applicants are not allowed to start working for the District prior to receiving acceptable background screening results. Pursuant to the July 22, 2020, **District Bulletin #PD 21-009 CHR, Authorization to Work – Business Process Change,**

*“Effective immediately, applicants will **not be authorized to work prior to receiving an acceptable result on all District required screenings to include the criminal background check, drug test, and physical demand test (when applicable).** [Emphasis added.]*

Our review of 60 randomly sampled employees hired during July 1, 2020, through January 25, 2021, revealed that:

(a) 10 (17%) of the Sample Employees Were Allowed to Start Working Prior to the District Receiving the Background Screening Results

Ten (17%) of the 60 sample employees were allowed to start working at the District prior to the District receiving their background screening results. Specifically, eight of them had not been fingerprinted by School Police until one to 32 days after they had been assigned a start date with the District, and two employees were allowed to start working nine and 14 days before the District received their background screening results.

Seven Employees Were Terminated Due to Unacceptable Background Screening Results in FY 2021. Moreover, our review of PeopleSoft records between July 1, 2020, and April 21, 2021, revealed that seven employees hired between August 12 and October 26, 2020, were subsequently terminated because their criminal background screening results did not meet the District’s employment requirements. (See Table 2.)

**Table 2
Employees Terminated Due to Lack of Acceptable Background Screening Results During July 1, 2020, Through April 21, 2021**

Employee	Hire Date	Termination Date	Number of Days Employed by the District
Employee #1	08/12/2020	09/01/2020	20
Employee #2	10/12/2020	10/26/2020	14
Employee #3	09/04/2020	09/14/2020	10
Employee #4	10/15/2020	10/24/2020	9
Employee #5	09/21/2020	09/28/2020	7
Employee #6	09/29/2020	09/30/2020	1
Employee #7	10/26/2020	10/27/2020	1

Sources: PeopleSoft System and the Department of Compensation & Employee Information Services.

(b) 40 (67%) Sample Employees’ Background Screening Results Were Not Accurately Recorded in the PeopleSoft System

In June 2019, the District updated the PeopleSoft’s *PB Endorsement Screen* for School Police to record the employees’ background screening results. However, the background screening results for 40 (67%) sample employees were not accurately recorded in the PeopleSoft System as follows:

- Eight (13%) employees' background screening results were not recorded in PeopleSoft.
- 27 (45%) employees only had the background screening completion dates but not the results per PeopleSoft.
- Five (8%) employees' background screening completion dates recorded in PeopleSoft did not coincide with those in the FDLE's FALCON System. The dates in PeopleSoft were one to 33 days earlier than the FALCON's dates.

Recommendations

To protect the safety of students and staff and to ensure full compliance with applicable *Florida Statutes* and *School Board Policies*, the District should confirm:

- Prospective employees are not allowed to start working until satisfactory criminal background screening results have been received by the District.
- Employees' background screening dates and results are accurately and timely recorded in the PeopleSoft System.

Management's Response: Management concurs.

School Police Fingerprinting, in collaboration with Human Resources, has revised the criminal background screening process. When the audit process began, a computer glitch in PeopleSoft was discovered. This glitch would automatically default to saying no results were available. Once this glitch was corrected, the issue of missing and/or incorrect screening results was resolved.

When the results of an applicant's fingerprints are received and reviewed, School Police Fingerprinting staff notifies Human Resources via PeopleSoft. Now, the next step involving School Police Fingerprinting is an authorization/clearance email notifying School Police Fingerprinting to print a badge for external applicants. The badge is then delivered to Human Resources for dissemination to the applicant, with the start date provided by Human Resources.

This change in the procedure, to not print a badge until Human Resources notifies School Police Fingerprinting that the hiring process is completed, should eliminate the incidence of applicants starting work without proper clearance.

On January 13, 2021, all Recruitment & Retention Staff were trained and provided with access to the PeopleSoft System in order to determine that satisfactory criminal background results are received prior to permitting applicants to begin working in any capacity.

Staff were directed again on April 2, 2021, that going forward and as a part of the applicant clearing process, all recruiting staff are required to confirm acceptable results.

If results were not inputted into the system, recruiting representatives will communicate with School Police representatives before proceeding. If a result is unacceptable, the applicant will be removed from the hiring process.

Effective start dates will only be assigned after acceptable results are documented in the PeopleSoft System.

This response is relative only to those prospective employees who were hired through the centralized system. Decentralized hires are typically temporary employees such as athletic coaches, adult and community education teachers and after-school counselors. These workers are hired directly by the school sites - often without the involvement of Human Resources. We have advised principals and Athletic Directors that employees must not begin working until such time as satisfactory criminal background screening results have been processed by Human Resources.

(See page 18.)

2. Five-Year Criminal Background Rescreening of Employees Not Always Completed

Florida Statute Section 1012.465(2) requires all District employees and contractual personnel to complete a Level 2 Criminal Background Screening once every five years. To comply with the five-year criminal background rescreening (Five-Year Rescreening) requirement, the District currently relies on the FALCON database to determine which employees are due for their Five-Year Rescreening. The District's Information Technology (IT) Department downloads selected employee records, based on a date range of last fingerprint submissions, from the FALCON database monthly. The FALCON records are manually compared with the PeopleSoft active employee records to identify employees for School Police to resubmit the employees' fingerprints to FDLE for completing the required Five-Year Rescreening.

77% of the Sample Employees Were Not Submitted to FDLE for the Required Five-Year Rescreening. As of December 31, 2020, the District had 27,272 active employees.⁸ We reviewed the background screening history for 60 sample active employees hired during 2015, who were due for the Five-Year Rescreening in 2020. The review noted that 57 (95%) of them did not have the required Five-Year Rescreening completed timely:

- 46 (77%) of the employees had not been submitted to FDLE for the required Five-Year Rescreening as of January 28, 2021.
- 11 (18%) employees had their rescreening completed late. Delays in resubmitting these employees' fingerprints to FDLE for the Five-Year Rescreening ranged from two days to four years eight months (i.e. 56 months late).

⁸ Source: Department of Compensation & Employee Information Services.

Moreover, one of the 46 employees who had not been rescreened as of January 28, 2021, was (a) initially hired by the District in August 2010, (b) resigned in April 2014, and (c) rehired in February 2015. However, this employee did not have a Level 2 Background Screening completed when he was rehired in February 2015, and his last Level 2 Criminal Background Screening was completed in August 2010, or more than 10 years ago.

School Police Department Staff Were Not Submitted to FLDE for Completing the Five-Year Rescreening. According to School Police and IT, the monthly review of employees due for the Five-Year Rescreening did not include staff of the School Police Department. As a result, School Police did not submit the fingerprints of their staff to the FDLE for completing the Five-Year Rescreening as required by *Florida Statute Section 1012.465(2)*. OIG could not find any records reflecting that sworn and non-sworn staff of the School Police Department have been rescreened at any point during their employment with the District.

Recommendations

To ensure full compliance with the *Florida Statute 1012.465(2)* requirement for rescreening employees and contractual personnel every five years, the District should,

- Identify and rescreen active employees who are overdue for their Five-Year Rescreening.
- Ensure the fingerprints for all employees, including staff of the School Police Department, who are due for the Five-Year Rescreening are timely submitted to FDLE for completing the required criminal background rescreening.
- Consider automating the comparison of records between the PeopleSoft and FALCON Systems for identifying employees due for the Five-Year Rescreening.

Management's Response: Management concurs.

In the past, School Police Fingerprinting waited on ERP to pull the five (5) year renewal report and forward it to School Police Fingerprinting for resubmission to FDLE. School Police Fingerprinting is in the process of implementing a new procedure whereby they will run a report at the end of each month for the upcoming month. It is anticipated that this new procedure will begin at the end of August 2021 and continue monthly thereafter. This practice will ensure that renewals are completed in a timely fashion. As employee names come up for renewal, School Police Fingerprinting is checking their employment status in PeopleSoft to see if rescreening is necessary and removing the names from FALCON, as appropriate. School Police Fingerprinting is also in the process of resubmitting School Police employees who have been employed for over five (5) years, with a projected completion date of August 13, 2021.

(See page 19.)

3. FALCON Records Not Up-to-Date: 221 Current Employee Records Were Missing and 35,079 Former Employee Records Were Retained in the System

School Police utilizes the FDLE’s FALCON System for (a) completing the Level 2 Criminal Background Screening for employees, (b) maintaining employees’ digital fingerprints for future rescreening, and (c) tracking and notifying the District of any employees’ new Florida arrest records. The FALCON System retains employee fingerprints and dates of background screenings until School Police delete separated employees from the FALCON System. Currently, FDLE charges the District an annual maintenance fee of \$6 for each employee maintained in the FALCON System.

On March 3, 2021, the OIG and School Police jointly reviewed the FALCON database for 60 sample former employees who were terminated between July 1, 2018, and February 15, 2021. The review found that 58 (97%) of the 60 sample employees had not been removed from the FALCON database, despite no longer being employed by the District for 85 to 976 days.

Subsequently, we obtained from School Police the list of District employee records retained in the FALCON System as of May 25, 2021. The FDLE assigned three Originating Identifiers (ORI) numbers to District for tracking employees’ background screening records: (1) FL0504200 for School Police, (2) FL930021Z for teachers, and (3) FL930020Z for all other District employees.

Based on the social security number, we compared the FALCON records with the PeopleSoft active employee records and found that the FALCON System contained 34,549 records for non-District-employee⁹ and 855 duplicated records for active employees.

**Table 3
Comparison of FALCON Records with PeopleSoft Records
As of May 25, 2021**

ORI # / Description	Active Employees		Separated/Non-District Employee Records	Total
	# of Employees	# of Duplicated Records		
FL930020Z / School Employment	26,718	849	34,230	61,797
FL930021Z / Teacher Certification				
FL0504200 - School Police	324	6	319	649
Total	27,042	855	34,549	62,446

Sources: (1) FALCON Records provided by School Police.
(2) Employee Records provided by the Department of Compensation & Employee Information Services.

⁹ There were 35 FALCON records did not have a social security number. We were unable to determine if these 35 persons were District employees.

The District Incurs an Estimated \$210,474 in Annual Fees for Needlessly Maintaining Separated Employee Records in FALCON System. According to FDLE, the District is not charged the \$6 annual maintenance fees for records maintained in the School Police ORI. However, keeping the 34,230 former/non-District employee records and 849 duplicated active employee records in the other two ORIs results in an estimated avoidable annual cost of \$210,474 [$\$6 \times (34,230 + 849)$] to the District.

Delays in removing separated employees from the FALCON database results in (a) unwarranted maintenance costs to the District, and (b) waste of resources for reviewing arrest records of non-District employees.

221 Active Employee Records Not Found in FALCON Database. Based on the social security number, our comparison of the FALCON records with the PeopleSoft records also revealed 221 active employees were not found in FALCON database as of May 25, 2021. Without keeping the 221 active employees in the FALCON System, the District would not be notified of new arrests, if any, for these employees, and (b) might fail to submit these employees to FDLE for the Five-Year Rescreening.

Recommendation

To ensure proper fiscal accountability and promote efficiency in monitoring employees' criminal records, the District should,

- Timely remove separated employees from the FALCON database.
- Ensure all active employee background screening records are maintained in the FALCON database.

Management's Response: *Management concurs.*

Currently there is no process in place for Human Resources to notify School Police Fingerprinting that a District employee has separated from the District. The 60 former employees sampled for the audit, which remained in FALCON, were removed immediately upon learning of this issue. School Police Fingerprinting requested, and has received, a report from Human Resources containing the list of all District personnel who have separated from the District in order to begin a systematic removal from FALCON. Human Resources recently provided School Police Fingerprinting a list of employees who retired during FY 20-21 for whom they wanted photos for the Superintendent's Virtual Retirement Celebration. School Police Fingerprinting has begun the removal of the employees on that list. School Police Fingerprinting, School Police IT, District IT, ERP and Human Resources are collaborating to implement a process to notify School Police Fingerprinting as soon as an employee separates so that they may be removed immediately from FALCON, security systems and badge access. The list of separated employees since 2007, supplied by Human Resources, has over 50,000 names. It is estimated it will take 6 months, depending on other District priorities and staffing.

In regards to the 221 active employees not in FALCON, it was discovered that the District hired some of the employees without requiring them to go through the School Police Fingerprinting process. Additionally, it was learned that FALCON did not come into existence until approximately 2008. Consequently, no one fingerprinted prior to that date, who is still employed with the District, would be in FALCON as there was no integration of information from the old system to FALCON. On June 11, 2021, the IG provided School Police with the list of 221 employees. School Police is actively working to bring those employees in for fingerprinting.

(See page 19.)

4. Controls for the Symmetry Security System Need Improvement

The District utilizes the Symmetry Security Management System (Symmetry System) for controlling and monitoring people's access to unsupervised/unguarded District facilities with electronic door locks. Identification (ID) Badges issued by School Police to employees and other cardholders, such as certain volunteers and vendors, serve as identification cards for the badge holders. The ID Badges¹⁰ also serve as electronic keys for accessing select District facilities, on an as-needed basis, that are controlled by Symmetry's electronic door locks.

The Symmetry database had 33,042 active employee accounts (with a total of 38,627 active access cards) as of June 11, 2020. We reviewed all 33,042 active employee accounts and compared them to the PeopleSoft employee records. Our review found that:

- 13,722 (42%) accounts did not include the cardholders' employee identification number (employee ID).
- 492 (1%) accounts had invalid employee IDs that were not found in the PeopleSoft System.
- 3,149 (10%) accounts belonged to separated employees.
- 4,829 cardholders were assigned more than one access card, ranging from two to 10 cards. A total of 10,414 active cards were assigned to these 4,829 cardholders.

Of the 13,722 accounts without the cardholders' employee IDs:

- 316 accounts had incomplete cardholder names, which only included the initials or titles (i.e., Mr. or Mrs.).
- 1,322 accounts were generic cards issued to schools/departments for use by substitute teachers, visitors, students, aftercare employees, PTA representatives, and cafeteria managers, etc.

¹⁰ ID Badges issued prior to the installation of the Symmetry System do not have the "electronic key" feature. Instead, separate access cards were issued to the employees for accessing doors controlled by Symmetry's electronic door locks.

Furthermore, our review noted:

- There are no written procedures for schools/departments to (1) retrieve the ID badges/access cards from separated employees, and (2) timely notify School Police of lost/stolen access cards and separated employees for deactivate the related access cards.
- There were no records confirming that the 2,936 cards assigned to former employees had been returned to the District for proper disposal.

Recommendations

To ensure proper accountability and safety of students and staff, the District should:

- Codify procedures for (a) retrieving, disposing, and deactivating ID Badges/access cards for separated employees to avoid potential misuse of the ID Badges/access cards for accessing students and District facilities, and (b) notifying School Police to deactivate lost/stolen ID Badges/access cards.
- Review and update the Symmetry database to ensure access cards for separated employees are deactivated and removed from the system.
- Maintain complete and accurate records in the Symmetry database for assignment of access cards.
- Develop a usage log for tracking the temporary assignments of the “generic access cards” to users at schools/departments.

Management’s Response: Management concurs.

Once this issue was brought to light by the Inspector General’s Office, School Police IT worked with District IT to identify a solution to prompt the system to disable and delete cards which have not been used in the last two years. This should help in several areas such as duplicate badges and separated employee badges. School Police IT is actively working towards verifying and cleaning up thousands of District employee accounts in order to clean up the data and implement Directory Synchronizations that will allow the system to automatically disable cards upon separation. It is anticipated that this project will take approximately 2-3 months, given the amount of data that must be manually corrected. In addition, a policy is currently being drafted to outline all requirements and procedures regarding badges, including but not limited to, the proper disposal of separating employee’s badges and the removal of separated employees from both FALCON and the Symmetry Security System. Based on the requirements of policy development and adopting, the expectation is to have the new policy in place by January 31, 2022.

(See page 20.)

5. Inconsistent Procedures for Verifying Background Screening Information of Vendors and Volunteers at Schools

During the audit, we surveyed all 174 schools regarding the procedures for verifying the background screening information of vendors and volunteers at the schools.

- (a) Raptor System Not Installed at Two Schools and Malfunctioned at Three Schools. *District Bulletin #P 15-020 COO, Raptor Visitor Management System*, states,

“Every school will be receiving software, a driver license scanner, and visitor badge printer which will be installed on a computer at each school site. Each school is required to provide a computer for the Raptor System, and that computer needs to be located at the main entrance reception desk at each site.”

Bulletin #P 16-197 DSCOS, VIPS Count Tracking System Reactivation, states,

“All District schools will begin using both Raptor and VIPS Count computer tracking system effective January 4, 2016. Raptor will continue to be used for background clearance. All volunteers and visitors must scan in/out through the Raptor system prior to passing the school’s front desk and going onto campus.”
[Emphasis added.] *The VIPS Count tracking system will be used only for volunteer application completion and recording hours.”*

Our Survey revealed that five schools did not use the Raptor System for background clearance check of volunteers. According to the schools,

- Two schools had the required hardware (a driver’s license scanner and visitor badge printer) but did not have the Raptor System Software installed on the computers at the main entrance reception desk.
- Three schools had the Raptor System but it was not working for most of the time during the year.

- (b) Six Schools Did Not Screen Volunteers through Raptor Each Time Before Allowing Them to Come onto School Campus. The *Volunteer Handbook, Guidelines for Volunteers*, states,

“Volunteers are required to scan their ID in order to be screened through Raptor and to log in and out on the VIPS COUNT Tracking System every time they are working on a school campus.”

Our interviews with school staff noted that six (3%) of the 174 schools did not always screen volunteers through Raptor each time prior to allowing them to come onto campus. Instead, volunteers were screened through the Raptor System once a month at one school, and once a year at five schools.

Moreover, during our interviews with school staff, some indicated they were not aware who was responsible for verifying if volunteer chaperones had completed the background screening through the Raptor System prior to attending a field trip.

- (c) Required Training Not Completed by Volunteer Coordinators at 118 Schools. District guidelines require each school's Principal to (1) appoint a Volunteer Coordinator at the school, and (2) oversee and enforce the background screening procedures at the school. The Volunteer Coordinator is responsible for providing orientation and training to prospective school volunteers and informing school staff of the volunteer guidelines and current best practices.

According to the District's Volunteer Coordinator in the Office of Communications & Engagement, face-to-face training is no longer provided for school-based Volunteer Coordinators. Beginning Fiscal Year 2020, training for school-based Volunteer Coordinators became available through the eLearning Management (eLM) System.¹¹ As of June 18, 2020, 56 (or 32%) of the 174 schools had at least one staff member complete the required training through the eLM System. The other 118 (68%) schools had no staff members who completed the Volunteer Coordinator Training through the eLM System.

- (d) Procedures for Verifying Contract Vendors' Background Screenings Need Improvement. *Florida Statutes* require contract vendors to complete a Level 2 Criminal Background Screening prior to working on a school campus. Upon completion of a Level 2 Criminal Background Screening by School Police, a Vendor ID Badge valid for five years will be issued to the vendor. Pursuant to **§1012.467, Fla. Stat.**, a valid Vendor Identification Badge issued by any Florida School District shall be recognized by all Florida School Districts that the Badge holder has met the criminal background screening requirements. Our interview with school staff noted that schools were using inconsistent procedures in verifying the vendors' background screening information prior to allowing them to work on campus. Of the 174 schools we surveyed,

- 49 (28%) inspected the vendors' ID badges issued by Florida school districts.
- 43 (25%) required the vendors to complete a background screening through the Raptor System.
- 21 (12%) inspected the vendors' ID badges AND required the vendors to complete a background screening through the Raptor System.
- 61 (35%) NEITHER inspected the vendors' ID badges NOR required the vendors to complete a background screening through the Raptor System.
- 64 (37%) required the vendors to record their visits on the *Visitor Log Books*.
- Six (3%) required the vendors to record their visits through the VIPS System.

¹¹ *Bulletin #P 20-086 COS* – FY20 Fall Leadership Training Through eLearning for District Volunteer and Business Partnership Coordinators, September 9, 2019.

Table 4
Schools With Inconsistent Procedures
For Verifying Vendors' Background Clearance Screenings

Procedures for Verifying Contract Vendors' Background Screening at Schools	# of Schools
(A) Staff Inspects District Issued Vendor ID Badge	49
(B) Vendors Complete Background Screening Through Raptor System	43
(C) Requires Both (A) & (B)	21
(D) Neither (A) Nor (B) Is Required	61
(E) Vendors Sign-in on Visitor Log Book	64
(F) Vendors Sign-in to the VIPS System	6

Source: OIG Survey of Schools

Recommendations

To protect the safety and welfare of students and staff and comply with *Florida Statutes 943.04351* and *District Bulletin #P 15-020 COO*,

- The District should develop and implement procedures consistent with *Florida Statutes* and School Board requirement for schools to verify the background clearance checks for volunteers and vendors; and
- All schools should have a properly installed and functioning Raptor System for conducting background screening for volunteers and visitors.

OIG Observation Results Provided to Staff for Immediate Corrective Actions

On June 29, 2020, OIG provided the details of the above survey results, preliminary conclusions, and recommendations to the Deputy Superintendent/Chief of Schools, Chief of School Police, and Director of Communications and Engagement for corrective actions.

Management's Responses:

Chief Operating Officer and Chief of Human Resources: Management concurs.

The screening process for District vendors is done by School Police Fingerprinting in Florida Shared School Results (FSSR), as well as through FDLE level 2 background screening. School Police Fingerprinting verifies all background screening information for vendors who process through the School Police Fingerprinting system. A clear background results in the vendor being issued a vendor badge, which has a five (5) year expiration date on the front. This badge is to be displayed by vendors at all times when on District property. It is important to note that a school may hire a business as a consultant, thereby bypassing the background screening process and badging. Every school should ensure that these consultants are run through Raptor before being allowed access to the campus. All operation and use of Raptor and VIPS are the responsibility of each school. The inconsistencies are in the application of the system.

When a Raptor user first signs on to the system, they are provided with a training video from Raptor. Currently, School Police does not purchase, install or maintain the Raptor system. Any additional training, questions, or needs are handled by the District Applications team. Based on personnel turnover, transfers and promotions at schools, Raptor training occurs as new staff are assigned. School Police have been working with District leadership to update the Visitor Policy to further memorialize appropriate processes and procedures.

(See page 20.)

Deputy Superintendent/Chief of Schools: *On January 5, 2021, the Office of the Deputy Superintendent/Chief of Schools informed the OIG that,*

1. ***Raptor System Not Installed at Two Schools, and Malfunctioned at Three Schools.*** *A Process is now in place by which a principal or designee who has a malfunctioning Raptor System on their campus will submit a service ticket to the IT Department, which will then make the necessary repairs.*

In addition, the schools mentioned in the report now confirm that their Raptor Systems are functioning appropriately.

2. ***Not All Volunteers Cleared Through the Raptor System.*** *Administration at each school site is responsible for making sure this procedure is followed. The District's Volunteer Coordinator has included this information in the mandatory annual Volunteer Coordinator Training. The District's Volunteer Coordinator monitors compliance of this required training. An annual bulletin alerting principals about mandatory background clearance requirements will begin with the adoption of an updated Volunteer Policy (2.53). This policy will be presented to the School Board this spring.*
3. ***Required Training Not Completed by Volunteer Coordinators at 118 Schools.*** *The District Volunteer Coordinator confirms that all 118 schools identified in the IG Report are now in compliance regarding Volunteer Coordinator Training.*
4. ***Procedures for Verifying Contract Vendors' Background Checks Need Improvement.*** *Staff will create and provide training to school administrators on a process to follow for verification of vendors prior to being admitted on a school campus this spring.*

(See page 26.)

Management's Response
Revised Response from the Chief Operating Officer and Chief of Human Resources



**THE SCHOOL DISTRICT OF
PALM BEACH COUNTY, FL**

WANDA F. PAUL, M.Ed., MBA
CHIEF OPERATING OFFICER

DONALD E. FENNOY II, Ed.D.
SUPERINTENDENT

CHIEF OPERATING OFFICE
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MEMORANDUM

TO: Teresa Michaels
Inspector General

FROM: Wanda F. Paul, M.Ed., MBA *WFB Paul*
Chief Operating Officer

Gonzalo La Cava, Ed.D. *GLC*
Chief of Human Resources

DATE: July 27, 2021

**SUBJECT: MANAGEMENT RESPONSE – DISTRICT'S BACKGROUND SCREENING PROCEDURES FOR
EMPLOYEES, VENDORS, AND SCHOOL VOLUNTEERS**

RECEIVED

AUG - 4 2021

INSPECTOR GENERAL

Following is the Management Response to the referenced audit.

1. Employee Criminal Background Screening Processes Need Improvement

Management concurs.

School Police Fingerprinting, in collaboration with Human Resources, has revised the criminal background screening process. When the audit process began, a computer glitch in PeopleSoft was discovered. This glitch would automatically default to saying no results were available. Once this glitch was corrected, the issue of missing and/or incorrect screening results was resolved.

When the results of an applicant's fingerprints are received and reviewed, School Police Fingerprinting staff notifies Human Resources via PeopleSoft. Now, the next step involving School Police Fingerprinting is an authorization/clearance email notifying School Police Fingerprinting to print a badge for external applicants. The badge is then delivered to Human Resources for dissemination to the applicant, with the start date provided by Human Resources.

This change in the procedure, to not print a badge until Human Resources notifies School Police Fingerprinting that the hiring process is completed, should eliminate the incidence of applicants starting work without proper clearance.

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Management's Response

Revised Response from the Chief Operating Officer and Chief of Human Resources

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July 27, 2021

SUBJECT: Management Response – District's Background Screening Procedures for Employees, Vendors, and School Volunteers

On January 13, 2021, all Recruitment & Retention Staff were trained and provided with access to the PeopleSoft System in order to determine that satisfactory criminal background results are received prior to permitting applicants to begin working in any capacity.

Staff were directed again on April 2, 2021, that going forward and as a part of the applicant clearing process, all recruiting staff are required to confirm acceptable results.

If results were not inputted into the system, recruiting representatives will communicate with School Police representatives before proceeding. If a result is unacceptable, the applicant will be removed from the hiring process.

Effective start dates will only be assigned after acceptable results are documented in the PeopleSoft System.

This response is relative only to those prospective employees who were hired through the centralized system. Decentralized hires are typically temporary employees such as athletic coaches, adult and community education teachers and after-school counselors. These workers are hired directly by the school sites - often without the involvement of Human Resources. We have advised principals and Athletic Directors that employees must not begin working until such time as satisfactory criminal background screening results have been processed by Human Resources.

2. Five-Year Criminal Background Rescreening of Employees Not Always Completed

Management concurs.

In the past, School Police Fingerprinting waited on ERP to pull the five (5) year renewal report and forward it to School Police Fingerprinting for resubmission to FDLE. School Police Fingerprinting is in the process of implementing a new procedure whereby they will run a report at the end of each month for the upcoming month. It is anticipated that this new procedure will begin at the end of August 2021 and continue monthly thereafter. This practice will ensure that renewals are completed in a timely fashion. As employee names come up for renewal, School Police Fingerprinting is checking their employment status in PeopleSoft to see if rescreening is necessary and removing the names from FALCON, as appropriate. School Police Fingerprinting is also in the process of resubmitting School Police employees who have been employed for over five (5) years, with a projected completion date of August 13, 2021.

3. FALCON Records Not Up-to-Date: 221 Current Employee Records Were Missing and 35,079 Former Employee Records Were Retained in the System

Management concurs.

Currently there is no process in place for Human Resources to notify School Police Fingerprinting that a District employee has separated from the District. The 60 former employees sampled for the audit, which remained in FALCON, were removed immediately upon learning of this issue. School Police Fingerprinting

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SUBJECT: Management Response – District's Background Screening Procedures for Employees, Vendors, and School Volunteers

requested, and has received, a report from Human Resources containing the list of all District personnel who have separated from the District in order to begin a systematic removal from FALCON. Human Resources recently provided School Police Fingerprinting a list of employees who retired during FY 20-21 for whom they wanted photos for the Superintendent's Virtual Retirement Celebration. School Police Fingerprinting has begun the removal of the employees on that list. School Police Fingerprinting, School Police IT, District IT, ERP and Human Resources are collaborating to implement a process to notify School Police Fingerprinting as soon as an employee separates so that they may be removed immediately from FALCON, security systems and badge access. The list of separated employees since 2007, supplied by Human Resources, has over 50,000 names. It is estimated it will take 6 months, depending on other District priorities and staffing.

In regards to the 221 active employees not in FALCON, it was discovered that the District hired some of the employees without requiring them to go through the School Police Fingerprinting process. Additionally, it was learned that FALCON did not come into existence until approximately 2008. Consequently, no one fingerprinted prior to that date, who is still employed with the District, would be in FALCON as there was no integration of information from the old system to FALCON. On June 11, 2021, the IG provided School Police with the list of 221 employees. School Police is actively working to bring those employees in for fingerprinting.

4. Controls for the Symmetry Security System Need improvement

Management concurs.

Once this issue was brought to light by the Inspector General's Office, School Police IT worked with District IT to identify a solution to prompt the system to disable and delete cards which have not been used in the last two years. This should help in several areas such as duplicate badges and separated employee badges. School Police IT is actively working towards verifying and cleaning up thousands of District employee accounts in order to clean up the data and implement Directory Synchronizations that will allow the system to automatically disable cards upon separation. It is anticipated that this project will take approximately 2-3 months, given the amount of data that must be manually corrected. In addition, a policy is currently being drafted to outline all requirements and procedures regarding badges, including but not limited to, the proper disposal of separating employee's badges and the removal of separated employees from both FALCON and the Symmetry Security System. Based on the requirements of policy development and adopting, the expectation is to have the new policy in place by January 31, 2022.

5. Inconsistent Procedures for Verifying Background Screening Information of Vendors and Volunteers at Schools

Management concurs.

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WFP/DA/GL/SKS:tb

C: Edward Tierney, Deputy Superintendent/Chief of Schools
Daniel Alexander, Chief, School Police
Mike Burke, Chief Financial Officer
Regina Price, Assistant Chief of School Police
Lynn Powell, Director of Police Administration

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Management's Response
Initial Response from the Chief Operating Officer and Chief of Human Resources



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WANDA F. PAUL, M.Ed., MBA
CHIEF OPERATING OFFICER

DONALD E. FENNOY II, Ed.D.
SUPERINTENDENT

MEMORANDUM

TO: Teresa Michaels
Inspector General

FROM: Wanda F. Paul, M.Ed., MBA
Chief Operating Officer

Gonzalo La Cava, Ed.D
Chief of Human Resources

DATE: July 27, 2021

SUBJECT: MANAGEMENT RESPONSE – DISTRICT'S BACKGROUND SCREENING PROCEDURES FOR
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Initial Response from the Chief Operating Officer and Chief of Human Resources

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SUBJECT: Management Response – District's Background Screening Procedures for Employees, Vendors, and School Volunteers

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Staff were directed again on April 2, 2021, that going forward and as a part of the applicant clearing process, all recruiting staff are required to confirm acceptable results.

If results were not inputted into the system, recruiting representatives will communicate with School Police representatives before proceeding. If a result is unacceptable, the applicant will be removed from the hiring process.

Effective start dates will only be assigned after acceptable results are documented in the PeopleSoft System.

This response is relative only to those prospective employees who were hired through the centralized system. Decentralized hires are typically temporary employees such as athletic coaches, adult and community education teachers and after-school counselors. These workers are hired directly by the school sites - often without the involvement of Human Resources. We have advised principals and Athletic Directors that employees must not begin working until such time as satisfactory criminal background screening results have been processed by Human Resources; however, Human Resources has little to no control over whether this advice is followed.

2. Five-Year Criminal Background Rescreening of Employees Not Always Completed

Management concurs.

In the past, School Police Fingerprinting waited on ERP to pull the five (5) year renewal report and forward it to School Police Fingerprinting for resubmission to FDLE. School Police Fingerprinting is in the process of implementing a new procedure whereby they will run a report at the end of each month for the upcoming month. It is anticipated that this new procedure will begin at the end of August 2021 and continue monthly thereafter. This practice will ensure that renewals are completed in a timely fashion. As employee names come up for renewal, School Police Fingerprinting is checking their employment status in PeopleSoft to see if rescreening is necessary and removing the names from FALCON, as appropriate. School Police Fingerprinting is also in the process of resubmitting School Police employees who have been employed for over five (5) years, with a projected completion date of August 13, 2021.

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SUBJECT: Management Response – District's Background Screening Procedures for Employees, Vendors, and School Volunteers

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4. Controls for the Symmetry Security System Need improvement

Management concurs.

Once this issue was brought to light by the Inspector General's Office, School Police IT worked with District IT to identify a solution to prompt the system to disable and delete cards which have not been used in the last two years. This should help in several areas such as duplicate badges and separated employee badges. School Police IT is actively working towards verifying and cleaning up thousands of District employee accounts in order to clean up the data and implement Directory Synchronizations that will allow the system to automatically disable cards upon separation. It is anticipated that this project will take approximately 2-3 months, given the amount of data that must be manually corrected. In addition, a policy is currently being drafted to outline all requirements and procedures regarding badges, including but not limited to, the proper disposal of separating employee's badges and the removal of separated employees from both FALCON and the Symmetry Security System. Based on the requirements of policy development and adopting, the expectation is to have the new policy in place by January 31, 2022.

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July 27, 2021

SUBJECT: Management Response – District's Background Screening Procedures for Employees, Vendors, and School Volunteers

The screening process for District vendors is done by School Police Fingerprinting in Florida Shared School Results (FSSR), as well as through FDLE level 2 background screening. School Police Fingerprinting verifies all background screening information for vendors who process through the School Police Fingerprinting system. A clear background results in the vendor being issued a vendor badge, which has a five (5) year expiration date on the front. This badge is to be displayed by vendors at all times when on District property. It is important to note that a school may hire a business as a consultant, thereby bypassing the background screening process and badging. Every school should ensure that these consultants are run through Raptor before being allowed access to the campus. All operation and use of Raptor and VIPS are the responsibility of each school. The inconsistencies are in the application of the system. When a Raptor user first signs on to the system, they are provided with a training video from Raptor. Currently, School Police does not purchase, install or maintain the Raptor system. Any additional training, questions, or needs are handled by the District Applications team. Based on personnel turnover, transfers and promotions at schools, Raptor training occurs as new staff are assigned. School Police have been working with District leadership to update the Visitor Policy to further memorialize appropriate processes and procedures.

WFP/DA/GL/SKS:tb

C: Edward Tierney, Deputy Superintendent/Chief of Schools
Daniel Alexander, Chief, School Police
Mike Burke, Chief Financial Officer
Regina Price, Assistant Chief of School Police
Lynn Powell, Director of Police Administration

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Management's Response
Deputy Superintendent/Chief of Schools



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KEITH OSWALD
DEPUTY SUPERINTENDENT/CHIEF OF SCHOOLS

RECEIVED
JAN - 5 2021
INSPECTOR GENERAL

MEMORANDUM

TO: Teresa Michael, Inspector General
Randy Law, Director of Audit

FROM: Keith Oswald, Deputy Superintendent/Chief of Schools *Keith Oswald*

DATE: January 4, 2021

SUBJECT: Management Advisory: Response
Background Check Procedures for Volunteers and Vendors at Schools

C: Frank Kitzerow, Chief of School Police
Claudia Shea, Director of Communications and Engagement

Item 1. Raptor System Not Installed at Two Schools, and Malfunctioned at Three Schools

Response:

A process is now in place by which a principal or designee who has a malfunctioning Raptor System on their campus will submit a service ticket to the IT Department, which will then make the necessary repairs.

In addition, the schools mentioned in the report now confirm that their Raptor Systems are functioning appropriately.

Item 2. Inconsistent Procedures for Volunteer Background Clearance Checks at Schools

Response:

Not All Volunteers Cleared Through the Raptor System

Administration at each school site is responsible for making sure this procedure is followed. The District's Volunteer Coordinator has included this information in the mandatory annual Volunteer Coordinator Training. The District's Volunteer Coordinator monitors compliance of this required training. An annual bulletin alerting principals about mandatory background clearance requirements will begin with the adoption of an updated Volunteer Policy (2.53). This policy will be presented to the School Board this spring.

Required Training Not Completed by Volunteer Coordinators at 118 Schools

The District Volunteer Coordinator confirms that all 118 schools identified in the IG Report are now in compliance regarding Volunteer Coordinator Training.

Item 3. Procedures for Verifying Contract Vendors' Background Checks Needed Improvement

Response:

Staff will create and provide training to school administrators on a process to follow for verification of vendors prior to being admitted on a school campus this spring.

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