

**To: Commission for Florida Law Enforcement Accreditation, Inc.**  
**From: Keith B. Riddick, Team Leader**  
**Date: March 25, 2022**  
**Re: Office of Inspector General, The School District of Palm Beach County**  
**Full Compliance Assessment Report**  
**March 16, 2022**

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**A. Agency/Assessment Information:**

Chief Executive Officer: Teresa A. Michael, Inspector General  
Accreditation Manager: Senior Investigator Veronica Vallecillo

Standards Manual Version: Florida Inspectors General Standards Manual  
Edition 2.11

Previous Accreditation Dates: June 2019

Additional Accreditations: Association of Inspectors General (AIG)

Assessment Team Recommendation: Reaccreditation

**Assessment Team**

Team Leader: Inspector Keith B. Riddick (KR)  
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Major Frank Ruggiero (FR)  
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**B. Compliance Tally:**

Status	Number of Mandatory Standards	Other Than Mandatory Standards	Total Standards
In compliance	41	0	41
Not in compliance	0	0	0
Not applicable	7	0	7
<b>Total:</b>	48	0	48

Total Applicable Other-than-mandatory Standards	0
Maximum allowable number of Elected Exemptions	0

**C. Agency Profile:**

The School District of Palm Beach County is the tenth largest in the nation and the fifth largest in the state of Florida serving more than 197,000 students (this number includes students that attend non-district operated charter schools) who speak 146 languages and dialects. As the largest employer in Palm Beach County, the school district has 22,426 employees, including more than 13,080 teachers. The mission of the School District of Palm Beach County is to educate, affirm, and inspire each student in an equity-embedded school system.

The School Board of Palm Beach County converted the district’s Auditor’s Office to the Office of Inspector General (OIG) in December 2011, upon adoption of School Board Policy 1.092. The OIG reports directly to the school board with oversight by the Audit Committee to ensure the necessary independence. OIG staff consists of a skilled team of professionals and is organized into three units: audits, investigations, and contracts oversight/compliance. The OIG has a complement of 21 staff members.

The Investigative Unit conducts professional, independent, and objective investigations and reviews to ensure all allegations of fraud, waste, mismanagement, misconduct, or other abuses in violation of law, rule, or policy against district employees, or entities contracting with the school district, are appropriately reviewed and investigated. Complaints received and determined to be of a criminal nature are referred to law enforcement. Additionally, performance issues or management decisions which do not violate policy, rule, or law are referred to district management or the Department of Employee and Labor Relations, as appropriate. The OIG Investigative Unit is staffed by the director of investigations, an intake coordinator, and four investigators.

During the 2020-2021 fiscal year, the OIG received 119 complaints. Of those 119 complaints, 63 were referred to other district departments while the remaining 56 complaints were retained by the OIG. Also, during the 2020-2021 fiscal year the Investigative Unit completed and closed five preliminary reviews and 13 investigations.

All OIG investigations are conducted in accordance to Principles and Standards for Offices of Inspector General as published by the AIG and Inspectors General Standards Manual as published by the Commission for Florida Law Enforcement Accreditation.

The evidentiary standard used by the School District of Palm Beach County OIG in determining whether the facts and claims asserted in the complaint were proven or disproven is based upon the preponderance of the evidence. Preponderance of the evidence is contrasted with “beyond a reasonable doubt” which is the highest standard of proof required to convict a criminal defendant and “clear and convincing evidence” another heightened standard of proof establishing a matter as substantially more likely than not to be true.

The Investigative Unit of the OIG began its journey to accreditation under the leadership of Inspector General (IG) Lung Chiu. Finally, on June 26, 2019, the School District of Palm Beach County, Office of the Inspector General, received their initial accreditation from the Commission for Florida Law Enforcement Accreditation (CFA).

#### **D. Assessment Summary:**

Team Leader Keith Riddick and Assessor Frank Ruggiero conducted several pre-assessment conferences via phone and email prior to the assessment. The two discussed the pre-read packet as provided by OIG Accreditation Manager (AM) Veronica Vallecillo, chapter assignments, CFA philosophy, and the conduct of the assessment.

On Wednesday, March 16, 2022, the assessment team was met by OIG Director of Investigations (DOI) Oscar Restrepo and AM Vallecillo in the lobby of the school district's administrative offices. Once the team completed the district's security protocols for access, DOI Restrepo and AM Vallecillo escorted them to the offices of the OIG. The offices were secure and only authorized persons are allowed entry via proximity card system. Visitors to the office must ring a bell, be observed via security camera, and then they are allowed access to the suite of offices. After a tour of the offices, conducted by DOI Restrepo and AM Vallecillo, the team was taken to a conference room within the office suite and provided with the necessary knowledge and means that would allow them to conduct the electronic aspect of the assessment.

The assessment team then held an entrance interview with Inspector General (IG) Teresa Michael, DOI Restrepo, AM Vallecillo, and the OIG's General Counsel (GC) Cary High. The assessors introduced themselves to the IG and the GC and discussed the philosophy of the Commission, as well as congratulating them on becoming accredited and having reached their first reaccreditation assessment. IG Michael expressed her commitment to the accreditation process and thanked the assessors for their dedication. The assessors then returned to the conference room to finalize the review of the files and documentation as provided by AM Vallecillo and to conduct interviews and observations necessary to confirm compliance with the applicable standards.

Key employee interviews:

Director of Investigations (DOI) Oscar Restrepo  
General Counsel (GC) Cary High  
Senior Investigator I Robert Sheppard  
Senior Investigator II Veronica Vallecillo  
Investigator II Tanya M. Lawson  
Investigator II Angela Feaman  
Executive Assistant Joyce Edison

All subjects interviewed were not only professional and knowledgeable in their assigned positions as OIG members, it was obvious that they believed in the accreditation process and its guiding principles.

The exit interview was again conducted with IG Michael, GC High, DOI Restrepo, and AM Vallecillo. The assessors thanked the IG for her unit's consummate cooperation during the assessment. The assessment team expressed their thanks to AM Vallecillo for having presented an impeccable array of files and their associated proofs. The staff was informed the recommendation of the assessors to the Commission would be for reaccreditation of the OIG.

- E. Standards Noncompliance Discussion:** None
- F. Corrective Action Discussion:** None
- G. Standards Elected for Exemption:** None
- H. Standards Verified by the Team as Waiver Applicable:** None
- I. Standards Verified by the Team as Not Applicable to the Agency:**

3.03M	5.04M	7.05M
3.04M	7.01M	
5.02M	7.03M	
- J. Standards with a Status Changed by Assessors:** None
- K. Public Information Activities:** None
- L. Exemplary Policies/Projects/Procedures:**

Not only are the OIG's policies and practices under the scrutiny of the Commission and its assessments, but, as required by School Board Policy 1.092 Inspector General, the OIG undergoes periodic peer review to promote the independence and objectivity of the investigative and audit functions. The Association of Inspectors General (AIG) encourages professional development; standardizing practices, policies, and ethics; and

establishing professional qualifications and certifications of Offices of Inspectors General (OIG).

AIG's peer review program is intended to help AIG member organizations in their efforts to comply with statutes, local ordinances, charters, etc. requiring OIGs to follow one or more of the aforementioned standards.

The Standards (Green Book) require OIGs to have external peer reviews to assess if their internal quality control system is suitably designed and operating effectively. The Yellow Book requires an external peer review at least once every three years, and the Green Book recommends periodic external reviews. The peer review provides assurance that an OIG is following its established policies and procedures, and applicable standards.

## **M. Chapter Summaries:**

### **Chapter One: Organization and Governing Principles (Assigned Assessor KR)**

The School District of Palm Beach County's OIG follows in the footsteps of the first inspector general created by General George Washington in 1777, a position he created in order to address a lack of preparedness and a failing supply structure within the Continental Army. In 1994, Florida lawmakers passed Florida's version of the Federal Inspector General Act, which set forth the modern-day mission for State of Florida Inspectors General to promote economy, efficiency, and effectiveness in state government.

The current OIG receives its authority primarily from School Board Policy 1.092 as well as the rights granted by collective bargaining agreements or contracts and various Florida Statutes as honored throughout their investigative process. The unit's mission statement and organizational chart are prominently displayed immediately upon one's entrance into the office suite.

The OIG follows CFA standards concerning annual signatory acknowledgement of the members' attestation of adherence to their code of ethics, as well as an annual confirmation of their independence of impairments that could possibly show bias in their investigations. The OIG policies are well written and offer clear cut guidance to the OIG members on their responsibilities, as well as the agency's responsibilities and practices.

### **Chapter Two: Personnel Practices (Assigned Assessor KR)**

Personnel matters and records related to OIG members are the responsibility of the Human Resources Department of the school district. IG Michaels and DOI Restrepo make their employee selection decisions based on the criteria outlined in the OIG investigative policies regarding required education, expertise, suitability, and compatibility for the respective position in question, and the candidate's relevant experience as related to the investigative functions of the unit.

Members receive and sign for position descriptions relevant to their appointment. OIG Investigative Unit staff are evaluated annually by DOI Restrepo, in conjunction with IG Michael, a process that involves criteria specific to their position during the assigned rating period. The members are annually counseled on their job expectations prior to the evaluation period. The OIG has in place procedures for the member and their supervisor to review, discuss, and acknowledge the respective evaluation. The evaluation process had recently been revised to more adequately address the idiosyncrasies of the Investigative Unit, thereby making it more relative to their function.

### **Chapter Three: Training (Assigned Assessor KR)**

All OIG Investigative Unit personnel were noted as having received training required for and relative to their respective positions. Those interviewed routinely expressed that they are allowed to, and required by some of their certifications i.e. Certified Fraud Examiner (CFE), to receive more than enough training to help them maintain expertise in their functions. Members receive the appropriate refresher training for standard delineated policies and procedures.

There are no sworn members in the agency.

### **Chapter Four: Investigation Process (Assigned Assessor KR)**

Actions taken on complaints received by the OIG Investigative Unit are tracked and documented in their case management tracking system (CMTS). The digital system is properly safeguarded from misuse and intrusion. Investigators are required to complete a written case plan outlining the elements of the complaint, the potential violation(s), as well as the identity of possible subject(s) and/or witnesses, which is then approved by DOI Restrepo prior to the initiation of the investigation. Investigations are conducted with deference to the Bill of Rights and the various union contracts associated with the school district. Reports rendered on said investigations follow the agency required format(s).

Completed investigations are reviewed by DOI Restrepo and IG Michael for completeness, relevancy of evidence and case supporting materials, evidence that at least an attempt has been made to interview all relevant witnesses, and to collect all relevant evidence/case supportive material, and finally that there is sufficient "evidence" to support the conclusion(s).

Any complaint received that is determined to be criminal in nature is referred to the Palm Beach County School District Police Department.

### **Chapter Five: Case Supporting Materials and Evidence (Assigned Assessor KR)**

Entrance into the OIG's suite of offices was physically secured by locking mechanisms that were operated by proximity card; only the OIG staff was allowed unescorted access. All files are kept digitally in the CMTS, to include case related materials. The CMTS can only be accessed by an individual member's login ID and password. If there was material

received relevant to an investigation that could not be entered into the CMTS, it would be secured in a locked filing cabinet that could only be accessed by the assigned investigator.

Any related material and/or evidence received by the OIG related to a criminal complaint would be released to the Palm Beach County School District Police Department.

### **Chapter Six: Whistle-blower's Act (Assigned Assessor FR)**

The OIG has a primary role in coordinating the activities of the Whistle-blower's Act and investigating allegations made by employees, individuals, contractors, and other entities within the school board's jurisdiction. DOI Restrepo, AM Vallecillo, and Investigator Sheppard all were able to confirm the department's roles in investigating these types of activities, to ensure compliance with Florida Statutes and applicable standards.

### **Chapter Seven: Notification Process (Assigned Assessor FR)**

The standards outlined in this chapter address the procedures for non-state agency Offices of Inspectors General to notify contracted entities and individuals substantially affected by the findings, conclusions, and recommendations of Offices of Inspectors General investigative reports within their jurisdictions of their opportunity to respond to final investigative reports. All investigators and the director were very familiar with the proper procedures set forth to maintain compliance with these standards. In addition to knowing these procedures they were extremely knowledgeable and enthusiastic about sharing their knowledge with Assessor Ruggiero.

### **Chapter Eight: Case Management (Assigned Assessor FR)**

All of the investigators assigned to this office knew the correct elements necessary for case tracking, file organization, and records retention regarding investigative cases.

### **Chapter Nine: Final Reporting Processes (Assigned Assessor FR)**

All investigators were able to identify the proper investigative conclusions, distribution of final reports, post investigative activities, and notification of criminal allegations to appropriate law enforcement agencies required by standards. The final distribution of reports is made by Executive Assistant Ms. Joyce Edison.

## **N. Summary and Recommendation:**

The School District of Palm Beach County's Office of Inspector General is a well maintained and professional organization. All of the employees interviewed were extremely organized, professional, outgoing, and knowledgeable.

The assessment team recommends the School District of Palm Beach County, Office of Inspector General, be favorably reviewed for reaccreditation by the Commission for Law Enforcement Accreditation at the next commission meeting.

Submitted by Keith B. Riddick  
Team Leader