Special Review of

Inlet Grove Community High School’s
Adult Education and Community School Programs

September 20, 2019
### MISSION STATEMENT

The School Board of Palm Beach County is committed to providing a world class education with excellence and equity to empower each student to reach his or her highest potential with the most effective staff to foster the knowledge, skills, and ethics required for responsible citizenship and productive careers.

Donald E. Fennoy II, Ed.D.
Superintendent of Schools

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<td>Mike Burke, Chief Financial Officer</td>
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Special Review of  
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Adult Education and Community School Programs  

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Special Review of
Inlet Grove Community High School’s
Adult Education and Community School Programs

EXECUTIVE SUMMARY

Pursuant to the Office of Inspector General’s (OIG) 2018-2019 Work Plan and in response to the requests of a School Board Member and the Chief Executive Officer/President of the school, we have reviewed the Adult Education and Community School Programs of Inlet Grove Community High School (Inlet Grove). The primary objectives of this review were to determine: (1) whether the school properly accounted for the revenues and expenditures in its Adult Education and Community School Programs, and (2) the extent of compliance by the school with the financial and governance requirements of the school’s Charter Contract, specifically in the Adult Education and Community School Programs. This special review produced the following conclusions.

1. Inlet Grove Community High School Appears to Lack the Authority to Offer the Night School Adult Practical Nursing Program

Inlet Grove offers an adult pre-licensure education program for Practical Nursing (PN) through its Community Education Program. It appears that Inlet Grove, as a public K-12 charter school, does not meet the statutory requirements for an educational institution that can offer an adult pre-licensure nursing education program in the State. However, the Governing Board may consider making a separate charter application as a Charter Technical Center pursuant to Section 1002.34, Florida Statutes.

2. Night School Adult Practical Nursing Program License and Accreditation Under Different School Names

Inlet Grove’s Night School Adult Nursing Program applied to and received the program license from the Florida Board of Nursing (FBON) in 2012 under the name of Inlet Grove Adult Community High School (emphasis added). However, there is neither a corporation with that name nor a fictitious name registered with the State of Florida.

The program was accredited by the Council on Occupational Education (COE) since 2013. However, the accredited institution for the program is Inlet Grove Vocational Institute, Inc. (emphasis added), which is no longer an active registered corporation in the State since September 25, 2018 for failure to submit the required Annual Report to the State.

3. Night School Adult Practical Nursing Program License on Probation Status

On June 7, 2017, Inlet Grove’s Night School Adult Practical Nursing Program was placed on probation by the FBON. In calendar years 2016 and 2017, the first-time test taker cumulative passage rate was more than 10 percentage points below the designated passage rate. A nursing program on probation has two years to achieve the designated passage rate or risk termination and closure. On February 6, 2019, Inlet Grove received a one-year extension of its night school
nursing program’s probation status by demonstrating adequate progress toward achieving the graduate passage rate goal. [Note: The probationary status only applies to the night school’s adult nursing program. The day school’s nursing program holds active status granted by the Florida Board of Nursing.]

4. Fees for Adult Nursing Night Program Courses Exceed State Guidelines

The fee for the 18-month, 1,350 contact hour, adult nursing night program in Fiscal Year 2019 was $12,600 (or $9.33 per contact hour). Section 1009.22(3)(c), Florida Statutes mandates the range of tuition fees that post-secondary students may be billed for programs leading to a career certificate in a public institution. The standard tuition shall be $2.33 per contact hour for residents. The law allows District school boards to set tuition no more than five percent above the standard tuition or $2.45. Inlet Grove’s current tuition of $9.33 per contact hour exceeds the maximum allow tuition by 281%. Inlet Grove should adhere to statutory requirements for setting fees.

5. MOU Defining Adult Services Never Executed

Language was added to Inlet Grove’s first Charter Agreement renewal (2009) to define the Night School programs offered at Inlet Grove. These night programs would “be operated through a Memorandum of Understanding” (MOU). A draft version of the MOU was identified in District files, but the MOU was never executed. As a result, the District has been funding the Adult and Community Education Programs with State funding at Inlet Grove without a MOU in place as required by the 2009 Charter. During Fiscal Years 2010 through 2019, Inlet Grove received a total of $2.5 million in State funds for its Adult and Community Education Programs. In addition, Inlet Grove’s Adult Education and Community School Programs were also advertised through the District’s website and the “Palm Beach Community Educator” publication. The District should ensure that applicable guidelines and requirements are in place regarding the appropriate use of State funds for Adult Education and proper reporting of expenditures.

6. Annual Financial Reports Include Both Day and Night School Finances

The Charter Agreement between the District and Inlet Grove only authorizes the day school program, because the MOU for the night school adult programs was never executed. The annual financial report for the charter school combined the financial data for both the day and the night programs. Consequently, revenues and expenditures of the non-chartered night school programs are not clearly identified in the report. As a result, the financial position of the contracted Charter School is not clearly reflected in the financial statements.

7. 23% of Accounts Receivables Had No Activity in More than Two Years

The June 30, 2018, net accounts receivables of $153,220 included 155 accounts with balances totaling $337,178. Twenty-three percent (23%), or $78,621, of the accounts had no payment activity in two years. The school should review all accounts receivables and determine which ones are collectible, and uncollectible and make appropriate adjustments.
8. Questionable Disbursements

Our review of sample disbursements noted the following questionable expenditures:

- **Advance to Employee.** On March 28, 2018, the CEO/President received a personal loan of $16,145.84 from the operating account. An authorizing memo was signed by the Governing Board Chair. However, the Governing Board meeting minutes did not reflect that the advance to the CEO was presented to the Board for approval. The advance was repaid by the CEO/President three months later.

- **Inadequate Documentation.** Two disbursements for $599 each were paid to the CEO/President and her family member for performing parking lot duties during a lease for November 3 to 5, 2017. No additional documentation was attached to determine the calculation of the payments.

*Management’s Response from Inlet Grove:* Please see Appendix A on pages 18-42.

*School District’s Comments:* Once the audit is complete and published the district will begin the process of placing Inlet Grove on a Corrective Action Plan. (Please see Appendix B on page 43.)

*Note:* At the September 20, 2019, Audit Committee Meeting, the Audit Committee approved this report, and requested the Deputy Superintendent Office to develop a Corrective Action Plan, with input provided by the charter school. The Corrective Action Plan will be brought back to the Audit Committee at a future meeting.
MEMORANDUM

TO: Honorable Chair and Members of the School Board
    Donald E. Fennoy II, Ed.D., Superintendent of Schools
    Chair and Members of the Audit Committee

FROM: Lung Chiu, CPA, Inspector General

DATE: September 20, 2019

SUBJECT: Special Review of Inlet Grove Community High School’s Adult Education and Community School Programs

PURPOSE AND AUTHORITY

Pursuant to the Office of Inspector General’s (OIG) 2018-2019 Work Plan and in response to the requests of a School Board Member and the Chief Executive Officer/President of the school, we have reviewed the Adult Education and Community School programs of Inlet Grove Community High School (Inlet Grove). The primary objectives of this review were to:

1. Determine whether the school properly accounted for the revenues and expenditures in its Adult Education and Community School Programs; and

2. Determine the extent of compliance by the school with the financial and governance requirements of the school’s Charter Contract, specifically in the Adult Education and Community School Programs.

SCOPE AND METHODOLOGY

This review focused on the Adult Education and Community School programs for the 18-month period during July 1, 2017, and December 31, 2018, with emphasis on the Practical Nursing Night Program. The review included (1) interviews with District and school staff, and (2) review of:

- Section 1001.44, Florida Statutes – Career Centers
- Section 1001.60, Florida Statutes – Florida College System
- Section 1022.33, Florida Statutes – Charter schools
- Section 1022.34, Florida Statutes – Charter technical career centers
REFERRAL TO THE OFFICE OF INSPECTOR GENERAL (OIG)

On July 10, 2018, a School Board Member discussed with OIG the concerns about Inlet Grove’s Adult Education and Community School (Night School) Programs. These concerns included: (1) the school charged extremely high tuition fees for the Night School Practical Nursing (PN) program, and (2) students had been allowed to attend the nursing classes without paying the tuitions. Subsequent discussions with the District’s Director of Adult and Community Education and Chief Executive Officer/President (CEO) of Inlet Grove revealed similar concerns. One additional concern of District staff was the probationary status of Inlet Grove’s Night School Adult PN program imposed by the State’s Board of Nursing.

BACKGROUND

Conversion Charter School. Inlet Grove Community High School (Inlet Grove) is a conversion charter school sponsored by the School District of Palm Beach County that focuses on career education. On April 26, 2004, the School Board approved Inlet Grove’s initial Conversion Charter School Contract (Charter) for a term of five years from July 1, 2004, through June 30, 2009. On August 19, 2009, the School Board approved the first renewal of the Charter for a ten-year term from July 1, 2009, through June 30, 2019. On February 6, 2019, the School Board authorized staff to negotiate the terms of the second renewal of the Charter for another 15 years, effective July 1, 2019, through June 30, 2034. As of August 9, 2019, District staff were in the process of negotiating the terms of the renewal Charter with the school.
Postsecondary Education Programs. Inlet Grove also operates a Night School which offers two segments of postsecondary education: (1) Adult Education, and (2) Community School. Adult Education includes Adult Basic Education which includes English for Speakers of Other Languages (ESOL) classes and courses that lead to the attainment of General Education Development (GED) diploma. At the time of conversion from a District school to a charter school, Inlet Grove was an Adult Education and Community School site for the District. After conversion to a charter school, Inlet Grove continued receiving state funding for Adult Education ($227,158 in FY 2018) which paid for an Assistant Principal, a program secretary, instructors, and supplies. Minimal fees, which are set by Florida Statutes, are collected from participants for Adult Education classes.

The Community School at Inlet Grove offers both leisure courses (such as cooking and foreign languages classes) and Career and Technical Education Programs (CTE Programs, formerly known as Vocational). CTE Programs offered by the school included Practical Nursing, Medical Coding, Skin Care, and Forklift Operator. These classes are usually held in the evenings and on weekends. Community School programs are intended to be cost recovery (without profit) and do not receive state funds. Inlet Grove sets the fee schedules for these programs. Figure 1 illustrates the courses offered by Inlet Grove Community High School.

**Figure 1**

Courses Offered by Inlet Grove Community High School

Practical Nursing Education. Inlet Grove offers two Practical Nursing Education programs, one in the day school and one in the night school. The day school’s Practical Nursing program is offered to high school students in Grades 9 through 12. The night school’s adult Practical Nursing program is offered through the Adult Community School.

Pursuant to *Section 464.019, F.S.*, the Florida Board of Nursing (FBON) is responsible for approving professional and practical nursing education programs in the State, establishing accountability measures for such programs and issuing operational licenses to programs which meet its criteria. On September 30, 2011, Inlet Grove applied to the FBON for a new Adult Practical Nursing Education Night Program and received approval in 2012. In 2013, Inlet Grove received accreditation for both its day and night schools from the Council on Occupational Education (COE).
Based on our review, the day school program is fully approved by the FBON and in good standing. As of February 6, 2019, the night school’s program received a one-year extension of its probationary status from the FBON (see page 7). This special review focused on the Adult Practical Nursing Program offered in the night school.

**School Audited by External CPA.** During our planning and preliminary review of the Adult Practical Nursing night program, on July 16, 2018, the CEO indicated that the school’s Governing Board engaged their external Certified Public Accountants Firm (CPA) to perform additional work as part of their annual audit to look at the Night School programs. The CPA’s engagement letter, dated August 2, 2018, specified that the firm would audit the financial statements of the Adult Community Practical Nursing Program for the year ending June 30, 2018. On November 14, 2018, the CPA delivered the audit report to the school. A review of the Governing Board’s meeting agendas and minutes did not indicate that the report was presented to the board related to the CPA’s audit report of the Nursing Program.

The OIG reviewed the CPA’s audit report of the Nursing Program and found that the reported financials included transactions of other adult vocational programs, such as Intro to Catering, Nail Tech, and Medical Coding. The report did not indicate that the Practical Nursing Night Program was in probationary status imposed by the FBON. On December 7, 2018, the OIG notified the Governing Board chair and the CEO that we would perform a review of the Adult and Community School Programs.

**CONCLUSIONS**

This special review produced the following conclusions:

1. **Inlet Grove Community High School Appears to Lack the Authority to Offer the Night School Adult Practical Nursing Program**

   Inlet Grove offers an adult pre-licensure education program for Practical Nursing (PN) through its Community Education program. Pursuant to the *Nurse Practice Act*¹, three requirements must be met for an educational institution to operate an adult nursing education program in the State of Florida:

   1. To operate adult certificate technical education courses, the institution (i.e., Inlet Grove) must be properly authorized pursuant to the applicable Florida Statutes.

   2. The educational institution must become accredited by an authorized accreditation agency by July 1, 2019.

   3. The pre-licensure education program application must be reviewed and approved by the FBON.

¹ *Chapter 464, Florida Statutes*
Qualified Educational Institutions for Offering Adult Nursing Program. According to staff at the Florida Department of Education (FDOE), in order for an educational institution to offer an adult (postsecondary) nursing education program, the educational institution must be authorized and operated under one of the following categories pursuant to Florida Statutes (F.S.):

1. Public State College in the Florida College System, pursuant to Section 1001.60, F.S.
2. Public School District Career Center, pursuant to Section 1001.44, F.S.
3. Charter Technical Career Center, pursuant to Section 1002.34, F.S.
4. Nonpublic Postsecondary Educational Institution, pursuant to Chapter 1005, F.S.

FDOE staff indicated that Inlet Grove does not qualify under the first three categories because Inlet Grove is a public charter school established under Florida Statutes Section 1002.33. However, as a public K-12 conversion charter school, Inlet Grove could apply to the School Board for a separate charter to operate a Charter Technical Career Center. With a separate charter for a Charter Technical Career Center, the existing Night School Adult Practical Nursing Program and other adult career certification programs can be offered through the new Charter Technical Career Center.

Recommendation

Inlet Grove should ensure its programs comply with Florida Statutes and FDOE requirements. Inlet Grove’s Governing Board should consider applying for a separate charter under Section 1002.34, F.S. for creating a Charter Technical Career Center. The Statute states that, “the establishment of charter technical career centers can assist in promoting advances and innovations in workforce preparation and economic development. A charter technical career center may provide a learning environment that better serves the needs of a specific population group or a group of occupations, thus promoting diversity and choices within the public education and public postsecondary technical education community. ... A charter technical career center may be formed by creating a new school or converting an existing school district or Florida College System institution program to charter technical status.”

Management’s Response from Inlet Grove:

a. Inlet Grove has been operating the Practical Nursing Program since 2003 -2004 school year. In our 2009-2019 Charter Contract on pages 12-13, you will see that we addressed the Practical Nursing Program for the Night Program. It stated: “(page 13) continuing Workforce Education. This program targets those students not currently enrolled in high school who desire career training to enhance employment skills”. (Exhibit 1.1). Dr. Johnson who was the Superintendent at that time of Palm Beach County School District signed our contract.

b. The institution must become accredited by an authorized accreditation agency by July 1, 2019. We were accredited by COE (Council on Occupational Education, which expired on July 1, 2018. This accreditation should have been Inlet Grove Adult and
Community High School instead of Inlet Grove Vocational Institute. This was brought to the attention of COE and I was informed that we were up for renewal and we could make the change then (Exhibit 1.2). The wrong name was done by the former night assistant principal without my knowledge who is no longer with Inlet Grove.

c. The pre-licensure education program must be received and approved by the FBON.

d. We were given a license by the FBON (Exhibit 1.3 – 6 pages). The name was not the correct name.

We are a Charter Technical Career Center
We have always been 1461, which was North Technical Education Center. When we became a conversion charter school we changed our name only and today we are still 1461 which is considered by the state as a Technical Center (Exhibit 1.4 – 2 pages).

We do concur with the audit finding:
Unfortunately, we were licensed by the Florida Board of Nursing as Inlet Grove Vocational Institute (Exhibit 1.3) and it should have been Inlet Grove Community High School. Community was included because it includes Adults. The District nor the state never informed us that we did not have the authority to offer the Night School Adult Practical Nursing Program.

Corrective Actions:
We have put the Nursing Program in our new Charter Contract and contacted the State Department of Education to begin the process of having a PN Program at Inlet Grove.

Targeted completion date: By July 1, 2020

(Please see page 19.)

2. Night School Adult Practical Nursing Program License and Accreditation Under Different School Names

Program Licensed by Florida Board of Nursing. Inlet Grove’s adult nursing education program’s initial application submitted to the FBON in 2012 listed the sponsoring educational institution’s legal name as Inlet Grove Adult Community High School (emphasis added). However, there is neither a corporation with that name registered with the State of Florida, Division of Corporations, nor is there a registered fictitious name. As of June 10, 2019, the night school adult nursing program continued to be registered with the FBON as Inlet Grove Adult Community High School.

Program Accredited by the Council on Occupational Education. Section 464.019(11), F.S. requires that nursing education programs be accredited by an authorized accreditation agency by July 1, 2019. The night school adult nursing education program at Inlet Grove has been accredited through the Council on Occupational Education (COE) since 2013. However, the
accredited institution is Inlet Grove Vocational Institute, Inc. (emphasis added), which is no longer an active registered corporation in the State of Florida. Its corporate status was changed to inactive on September 25, 2018 for failure to submit the required Annual Report to the State. The hyperlink on the COE website for the accredited institution of the adult nursing education night program directs the user to the main website of Inlet Grove.

**Recommendation**

As noted in conclusion number 1, Inlet Grove’s Governing Board should consider applying for a separate charter under Section 1002.34, F.S. for creating a Charter Technical Career Center, and transfer the program to the new Charter Technical Career Center. Licenses and accreditations should be rectified to reflect the accurate legal name of the school.

**Management’s Response from Inlet Grove:**

*The last time the Board of Nursing issued a License was 2012 (Exhibit 1.3). According to the Board of Directors Mrs. Sherri Sutton-Johnson, they only provide a letter to show that we are license[d] to run the PN Program (Exhibit 2.2 – 4 pages)*

*We do not concur about the License but we do concur about the Accreditation.*

As of July 1, 2019, our accreditation with COE has expired, and according to the FBON, we are licensed to run the LPN Program. The name of the school was the problem.

**Corrective Actions:**

We are in the process of getting approval from the State Department of Education and applying to COE for accreditation. We are making sure all licenses and accreditations are in the correct name.

**Target completion date:** By July 1, 2020

(Please see page 19.)

3. **Night School Adult Practical Nursing Program License on Probation Status**

The State’s Board of Nursing is responsible for monitoring compliance of nursing education programs with accountability standards set by the Statute. Section 464.019(5), F.S. states, “an approved program must achieve a graduate passage rate for first-time test takers which is not more than 10 percentage points lower than the average passage rate during the same calendar year for graduates of comparable programs who are United States educated.”

On June 7, 2017, Inlet Grove’s night school adult nursing education program was placed on probation by the FBON², because the passage rate of its first time test takers was more than 10% below the State required passage rate. Specifically, for calendar year 2016, Inlet Grove

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² The probation status only applies to the adult night program. Inlet Grove also has a day school PN program which is designated active status by the FBON.
program’s cumulative passage rate was 55.56% which was more than 28 percentage points lower than the designated graduate passage rate 83.73%. A nursing program on probation has two years to achieve the designated graduate passage rate or risks termination and closure. For calendar year 2017, the program’s cumulative passage rate was 70.59% which was not within the 10 percentage points of the designated passage rate of 83.24%. On February 6, 2019, Inlet Grove received a one-year extension of its program’s probation status by demonstrating adequate progress toward achieving the graduate passage rate goal.

Recommendation

Inlet Grove should continue to strive to retain its Night School Adult Practical Nursing Program license. Inlet Grove should ensure adequate academic supports are provided to students in preparing for the National Council of State Boards of Nursing Licensing Examination.

Management’s Response from Inlet Grove:

We just received information from the Florida Board of Nursing extending our probation (Exhibit 2.2).

We do concur with this finding

Corrective Actions:
We have a new Night Assistant Principal, I am working with him, and we have had more students passing the PN Program. We are proving academic support and ESOL classes to make sure students are prepared to take the State Board. In 2019, we enrolled nine students in the program and all nine passed.

Target Completion date: By July 1, 2020

(Please see page 20.)

4. Fees for Night School Adult Nursing Program Courses Exceed State Guidelines

The Night School Adult Practical Nursing program consists of six sessions of 225 contact hours of instruction each for a total of 1,350 contact hours. Instruction includes both classroom time and clinical practice. The fee for the complete 18-month program in the Night School when started in Fiscal Year 2019 was $12,600 (or $9.33 per contact hour). The fee is billed in six sessions at $2,100 each. Students make three monthly payments of $700 each session.

Section 1009.22(3)(c), F.S. dictates the range of fees that post-secondary students may be billed for programs leading to a career certificate in a public institution. By law, the standard tuition shall be $2.33 per contact hour for residents. The law allows District school boards to

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3 Section 464.019(5), Florida Statutes.
set tuition no more than five percent above or five percent below the standard tuition, or at a maximum of $2.45. The current tuition of $9.33 per contact hour charged by Inlet Grove Night School for the program exceeds the maximum allowed tuition for career certificate courses by 281%.

**Recommendation**

In addition to establishing the statutory authority for offering post-secondary career technical education, Inlet Grove should adhere to statutory requirements in setting the tuition amounts for post-secondary career certificate programs, such as the adult nursing education program.

**Management’s Response from Inlet Grove:**

\[\text{I was informed by the District in 2004 that as a Charter School the District has no say as to what we offer and the fees we charged our students. We tried to be in the average range of other schools. We do not get any money from the State for the Medical Program, as a Community School, we have to make money to pay the instructors who are Registered Nurses. No one has ever mention or informed me from the District or State that we had to go by State Guidelines.}\]

**We do concur that we Exceed State Guidelines.**

**Corrective actions taken:**

We will be adhering immediately to statutory requirements in setting the tuition amounts for post-secondary career certificate program. I will ask the district to provide me with the fees for career programs that are offered in the adult programs.

**Target Completion date:** By July 1, 2020

*(Please see page 20.)*

5. **MOU Defining Adult Services Never Executed**

The original 2004 Charter Agreement with the School District identified the primary target student population as students ages between 14 and 19 in grades 9 through 12. An additional target population was identified as “adults seeking ESOL or GED programs and those interested in upgrading current career skills or initiating a new career path.”\(^4\) The Charter also provided that “the Conversion Charter School may set and charge tuition and other fees for community and post-secondary programs, courses and classes.”\(^5\)

\(^4\) *Conversion Charter School Contract* between the School Board of Palm Beach County and Inlet Grove Community High School, Inc., April 26, 2004, Part I, Section 2.0(B).

\(^5\) ibid., Part III, Section 18.0(P).
In the first Charter renewal (2009), new language was added to define the Night School programs.

“Continuing workforce education, ESOL, GED, and Adult Basic Education courses are offered at night. The purpose of these courses is a continuation of Inlet Grove Community High School’s thirty-plus year legacy of meeting community needs. Day career academy facilities are utilized for adult programs and thereby generate revenue for the school.”6

Students to be served were identified, “In addition to the daytime high school program, Inlet Grove Community High School will continue to address community needs through the continuation of successful programs and the implementation of new programs:” This section went on to list programs for adult (post-secondary) learners, (1) Continuing Workforce Education, (2) ESOL, (3) Adult Basic Education, (4) GED, and (5) Medical Academy Classes.7

The Charter further stated, “The [school’s] Board of Directors understands that the programs listed above, ...., are not secondary programs. These programs (Adult Basic Education, ESOL, GED, and Continuing Workforce Education) will be operated through a Memorandum of Understanding [emphasis added], rather than incorporated into the Charter, as they have been throughout the present charter.”8

A draft Memorandum of Understanding (MOU) was located in District records, but the MOU was never executed. The intended purpose of the MOU was to define the administrative and financial guidelines applicable to the State funding passed through to the school for the Adult and Community Education programs. As a result, the District has been funding the Adult and Community Education Programs with State funds at Inlet Grove without an executed MOU as required by the 2009 Charter. The State funding for Adult Education, received by Inlet Grove pays for an Assistant Principal, a program secretary, instructors, and supplies. During Fiscal Years 2010 through 2019, Inlet Grove received a total of $2.5 million in Adult Education funds. (Please see Table 1.)

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Source: District’s Budget Department.

In addition, Inlet Grove’s Adult and Community School Programs were also advertised through the District’s website and the “Palm Beach Community Educator” printed publication.

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6 *Conversion Charter School Contract* between the School District of Palm Beach County and Inlet Grove Community High School, Inc., August 19, 2009, Part I, Section 1.0(D).

7 *ibid.*, Part I, Section 2.0(A).

8 *ibid..*, Part I, Section 2.0(A).
Recommendation

The District should ensure that applicable guidelines and requirements are in place regarding the appropriate use of State funds for Adult Education and proper reporting of expenditures.

Management’s Response from Inlet Grove:

At the time of our first Charter in 2003-2004, Mrs. Mae Gamble was the Director, Mike Murgio was the CEO, and to my knowledge, there was no MOU. From 2009 -2019, I was aware of a MOU in my contract, but since the district and lawyers signed the contract, it was my understanding that was all I needed. The Charter Office nor the District never mentioned a MOU until we were audited. As of today, the Charter Office is not aware of a MOU from the District or where I can get a copy. I would like to have a copy for Inlet Grove’s record.

We did advertise through the District’s website because Mr. Fred Barch told us to do so according to Mr. Moses Baker our night assistant principal.

We do concur with this finding.

Corrective actions taken:
I called Mr. Fred Barch for assistant to get applicable guidelines and requirements to make sure they are in place regarding the appropriate use of State Fund for Adult Education and proper reporting of expenditures. She was not aware of a problem; however, she is sending me what she has.

Target Completion date: By July 1, 2020

(Please see page 20.)

6. Annual Financial Reports Include Both Day and Night School Finances

Pursuant to Section 1002.33(5)(b)1.b, Florida Statutes, the District, as sponsor, is responsible for monitoring and reviewing revenues and expenditures of the charter school. Our review of money collection procedures at the school encompassed both the day and night programs. The internal controls appeared to be sufficient and were being followed.

The Charter Agreement between the District and Inlet Grove only authorizes the day school program, because the MOU for the night school adult programs was never executed. The annual financial report for the charter school combined financial data for both the day and night programs. Revenues and expenditures are recorded in the day school program, but separated by account code. Consequently, revenues and expenditures of the non-chartered, night school programs are not clearly identified. The financial position of the contracted Charter School cannot be clearly reflected in the financial statements.
Recommendation

To better assist the Governing Board and management in making informed decisions for school operations, Inlet Grove should separate financial information for the day and night programs in its reporting. The School District should provide clear guidelines to Inlet Grove so that the school can fully comply with the financial reporting requirements.

Management’s Response from Inlet Grove:

The school provides monthly financial reports to the school district in accordance with state and district guidelines. However, the school’s management and board of directors receive monthly reports in much detail than the reports required by the established state and district guidelines. The more detailed reports, which do provide separate accounting for the day and night programs, are presented in monthly board meetings where they are discussed and are the basis for informed operating decisions made on a regular and ongoing basis.

We concur with the finding:

Corrective Actions:
The necessary procedures are in place

Target Completion date: Completed.

(Please see page 20.)

7. 23% of Accounts Receivables Had No Activity in More than Two Years

Accounts Receivable Balance. As of June 30, 2018, Inlet Grove reported a net Accounts Receivables of $153,220 on the Annual Financial Report which consisted of four General Ledger accounts (see Table 2).

Table 2
Accounts Receivables Recorded in the General Ledger
June 30, 2018

<table>
<thead>
<tr>
<th>Account #</th>
<th>Description</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>1130</td>
<td>A/R-Misc.</td>
<td>$(183,958)</td>
</tr>
<tr>
<td>1131</td>
<td>A/R-Fee Programs</td>
<td>$516,909</td>
</tr>
<tr>
<td>1132</td>
<td>Allowance for Bad Debt-Fee Programs</td>
<td>$0</td>
</tr>
<tr>
<td>1133</td>
<td>A/R- General</td>
<td>$(179,731)</td>
</tr>
</tbody>
</table>

Total Accounts Receivable, June 30, 2018 | $153,220

Source: Inlet Grove’s accounting system.
Note: Prior year audit adjustments of uncollectable receivables (pre-2017).
Aging Report by Program. The June 30, 2018, Accounts Receivable Aging Report contained 155 accounts with balances totaling $337,178 (the net of Accounts #1131 and #1133 or $516,909 - $179,731). By program, $336,472.95 (or 99.79%) of the accounts are for Night School programs (see Table 3). Seventy-seven percent (77%) or $258,556.95 of the accounts indicated some payment activity during calendar years 2017 and 2018. However, 23%, or $78,621 of the accounts had no payment activity in two years (see Table 4).

### Table 3
Aging Report by Program
June 30, 2018

<table>
<thead>
<tr>
<th>Program</th>
<th>No. of Accounts</th>
<th>Total</th>
<th>Percent of Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Night School</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Practical Nursing</td>
<td>131</td>
<td>$311,039.45</td>
<td>92.25%</td>
</tr>
<tr>
<td>Medical Coding</td>
<td>13</td>
<td>14,258.50</td>
<td>4.23%</td>
</tr>
<tr>
<td>Cosmetology</td>
<td>3</td>
<td>8,750.00</td>
<td>2.60%</td>
</tr>
<tr>
<td>Certified Nursing Assistant (Note)</td>
<td>3</td>
<td>1,625.00</td>
<td>0.48%</td>
</tr>
<tr>
<td>Nail Tech</td>
<td>1</td>
<td>700.00</td>
<td>0.20%</td>
</tr>
<tr>
<td>Catering</td>
<td>1</td>
<td>100.00</td>
<td>0.03%</td>
</tr>
<tr>
<td><strong>Total Night School Receivables</strong></td>
<td><strong>148</strong></td>
<td><strong>$336,472.95</strong></td>
<td>99.79%</td>
</tr>
<tr>
<td>Day School</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Miscellaneous</td>
<td>3</td>
<td>$705.00</td>
<td>0.21%</td>
</tr>
<tr>
<td><strong>Total Aging Reports, June 30, 2018</strong></td>
<td><strong>151</strong></td>
<td><strong>$337,177.95</strong></td>
<td>100%</td>
</tr>
</tbody>
</table>

Source: Inlet Grove’s accounting system.

Note: The Certified Nursing Assistant night program was terminated by the Florida Board of Nursing on February 1, 2017, for failure to meet the test passing rate required by statute.

### Table 4
Last Payment Activity by year

<table>
<thead>
<tr>
<th>Year of Last Activity</th>
<th>Total Accounts Receivable Balance (6/30/2018)</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>2017 and 2018</td>
<td>$258,556.95</td>
<td>77%</td>
</tr>
<tr>
<td>2016</td>
<td>$73,146.00</td>
<td>21%</td>
</tr>
<tr>
<td>2015</td>
<td>$5,475.00</td>
<td>2%</td>
</tr>
<tr>
<td><strong>All Accounts</strong></td>
<td><strong>$337,177.95</strong></td>
<td><strong>100%</strong></td>
</tr>
</tbody>
</table>

Source: Inlet Grove’s accounting system.

Many of the apparent inactive accounts belong to adult nursing students who no longer attend the night school programs. There were 18 active students as of August 22, 2018, with receivable balances totaling $26,860, as of June 30, 2018. Inlet Grove’s management stated that the former Assistant Principal (AP) in charge of the Night School was lax in enforcing collections of fees from the students, resulting in large receivable balances. Moreover, the AP also allowed students to attend classes even when the students were in arrears. The current AP reviewed all the accounts and available attendance records and since has adjusted the accounts of active students to accurately reflect balances owed as of August 22, 2018.
Recommendation

The school should monitor all accounts receivables and enforce the collections. Those uncollectible should be adjusted accordingly.

Management’s Response from Inlet Grove:

We concur with the finding

Corrective Actions Taken:
I as well as the night assistant principal are monitoring all current students accounts on a monthly basis. We are currently using Parson-Bishop Services, Inc. to collect from past students. If we can’t collect all of the debts, we will adjust all uncollectable accordingly.

Target Completion date: By July 1, 2020

(Please see page 21.)

8. Questionable Disbursements

We reviewed 60 sample expenditures during July 2017, through December 2018, totaling $148,850 for the day school and night school programs. Our review of these sample disbursements noted the following:

• Advance to Employee

On March 28, 2018, the CEO/President received an advance of $16,145.84 from the school. The related Check Requisition and supporting documentation indicated that the payment was for “advance pay” to the CEO/President. The memo attached to the Requisition was signed by the Board Chair. However, the Governing Board meeting minutes did not reflect that the advance to the CEO was presented to the Board for approval. This advance was repaid by the CEO/President three month later.

Inlet Grove’s Bylaws, Article IV, Section 4.1, states, “No part of the net earnings of the Corporation shall inure to the benefit of any member, director, officer of the Corporation, or any other person.”

• Inadequate Documentation

Two disbursements totaling $1,198 (Checks #27408 and #27409, each for $599) were paid to the CEO/President and her family member. The Check Requisitions indicated payments were for parking lot attendants for November 3 to 5, 2017. One check requisition indicated “Lease of Parking Lot.” However, no additional documentation was attached to indicate the terms of the lease.
Without proper documentation and justifications for expenses, there is no assurance that the expenditures were appropriate. Moreover, approval of payments to family members may result in conflicts of interest in absence of proper justification.

**Recommendation**

Public funds should not be used to provide advance to employees. Disbursements and credit card purchases should be adequately documented and supported by itemized invoices and receipts.

**Management’s Response from Inlet Grove:**

I do concur that I received an advance of $16,145.84 from Inlet Grove Community High School for purchasing dilapidated homes in Riviera Beach, Fla. for our homeless students and veterans. It was not a personal loan to me only for my students who needed a place to stay. This was from money that I personal had donated to the school for a home for our homeless students. I did ask several of my Board Members if I could borrow the money and they said I could. I felt that I had donated over $16,145.84 for my special projects that I could. I really did not think about it being in the minutes.

I met with Riviera Beach CRA Director and a staff member and explained to them that I wanted to do something innovative for our school and there was a need for a home for the homeless students. I searched the state to see if such project had ever been implemented in the state of Florida before I met with the CRA and found that no such project exists. CRA got on board with me and Mrs. Jenkins informed me if I open a construction program in our night program they would provide the certified contractors to work with the students. I had spoken to my Night AP about this project as well as some of the City of Riviera Beach Council Members. They thought this project would be great for the school as well as the city and they would like to be involved. I asked my Night AP to please call Mrs. Jenkins, set up an appointment with her, and move forward to implement this project (Exhibit 8.1 - 2 pages). In the meantime, I had the money available to buy supplies, pay for an instructor and purchase several homes at a reasonable price (the $16,145.84). If the owner of the homes wanted to charge a fee for the homes, I would have the money available.

I have had this vision for over four years, but never had anyone to help me with it. When I found out that we had homeless students at my school, that when I decided to move forward with this project.

When I ask my Night Director (Dr. Brown) if he followed through with the CRA about the purchasing of the homes he would always tell me yes. After several months and not seeing of hearing about the progress, I return the money back in two payments to the school. I thought if I gave half of the money back, my Night Director would start moving on this project by calling all of the stakeholders letting them know we were ready. Unfortunately, he never moved on this project and the remainder of the money that I donated to the school was returned back to the school.
This money was not FTE money; it was my personal money that I donated. The sad thing about this is, when I call the district about projects that I would like to implement or any questionable things, I am always informed, “to ask your Governing Board for approval because you are a charter school and we do not get involved.

One thing I do know is you cannot touch FTE money or grant money for any special project. Now, I know if you give personal money, you cannot use it for special projects for students.

I concur with the finding:

Corrective Actions:
If I am going to do a project for my school, I will give my personal money to a non-profit organization and earmark it for Special Projects (i.e. a home for homeless students).

I will never ask for an advance for any of the money that I have donated to the school to do a project.

I will make sure that everything that is said in our Governing Board meeting is placed in our minutes.

It will never happen again; I have learned so much from this. I have never taken a cent from Inlet Grove, I have always given to the school for our students.

Target Completion date:
Completed already.

Inadequate Documentation:
Yes, the two disbursements totaling $1,198.00 was paid to a family member and me. The check requisitions were coded wrong by the accountant at my school, she is the one who wrote lease for parking lot on the check requisition after I had signed it (Exhibit 8.2). It was not for lease of the parking lot it was for work that we had done on the weekend at the Marina Village in Riviera Beach, FL (Exhibit 8.3). The event did not have any connection with Inlet Grove; it was our personal time on weekends.

The company wanted to lease our parking lot for the event and they gave our leasing department a $1,500.00 deposit check to hold the date. When my secretary gave them the price, they said it was too high and they never executed the lease (Exhibit 8.4).

I was asked by the company if I knew anyone who wanted to work with them on the weekend at the marina. I said I would, and I informed a family member and he said he wanted to work, because he did not want me to work late at night in Riviera by myself. We put in over 45 hours from Friday evening through Monday Morning.

The company did not pay us at the end of the concert instead they informed me that they would call me on Monday. On Monday morning, my secretary informed me that the
company had called and said to take $599.00 and give me and $599.00 to give to a family member for the work we had done on the weekend. The balance was to be given to me as a donation to my scholarship program at the school. The information was not for leasing the parking lot; it was for work that a family member and I had performed on the weekend at the Marina. My understanding was they wanted the both of us to be paid from the deposit.

I concur with the finding

**Corrective action Taken:**
I will never, never have any one to pay me through a school check they have given for a deposit. I will make sure all proper documentation is in place.

**Target Completion date:** Completed.

(Please see page 21.)

**Additional Comments from Inlet Grove:** I am constantly asking if I can attend principal’s meetings and I am told “NO”, you are a charter school. I feel if I were allowed to attend, I could ask questions about things that I have concerns about. (Please see page 23.)

**School District’s Comments:** Once the audit is complete and published the district will begin the process of placing Inlet Grove on a Corrective Action Plan. (Please see page 43.)

– End of Report –
July 16, 2019

Randy Law
Director Audit
Office of Inspector General

Dear Mr. Law,

I am replying to you in reference to the audit findings with Inlet Grove Community High School, attached you would see our responses.

Sincerely,

Charles Woodard
Chairman

Emma Banks, Ed.D.
CEO/President

Inspection Received

Jul 18, 2019
Appendix A

Management’s Response
Inlet Grove Community High School

IGCHS AUDIT RESPONSE

1. Inlet Grove Community High School appears to lack the Authority to Offer the Night School Adult Practical Nursing Program.
   a. Inlet Grove has been operating the Practical Nursing Program since 2003-2004 school year. In our 2009-2019 Charter Contract on pages 12-13, you will see that we addressed the Practical Nursing Program for the Night Program. It stated: “(page 13) continuing Workforce Education. This program targets those students not currently enrolled in high school who desire career training to enhance employment skills”. (Exhibit 1.1). Dr. Johnson who was the Superintendent at that time of Palm Beach County School District signed our contract.

   b. The institution must become accredited by an authorized accreditation agency by July 1, 2019. We were accredited by COE (Council on Occupational Education, which expired on July 1, 2018. This accreditation should have been Inlet Grove Adult and Community High School instead of Inlet Grove Vocational Institute. This was brought to the attention of COE and I was informed that we were up for renewal and we could make the change then (Exhibit 1.2). The wrong name was done by the former night assistant principal without my knowledge who is no longer with Inlet Grove.

   c. The pre-licensure education program must be received and approved by the FBON.
   d. We were given a license by the FBON (Exhibit 1.3 – 6 pages). The name was not the correct name.

   We are a Charter Technical Career Center
   We have always been 1461, which was North Technical Education Center. When we became a conversion charter school we changed our name only and today we are still 1461 which is considered by the state as a Technical Center (Exhibit 1.4 – 2 pages)

   We do concur with the audit finding:
   Unfortunately, we were licensed by the Florida Board of Nursing as Inlet Grove Vocational Institute (Exhibit 1.3) and it should have been Inlet Grove Community High School. Community was included because it includes Adults. The District nor the state never informed us that we did not have the authority to offer the Night School Adult Practical Nursing Program.

   Corrective Actions:
   We have put the Nursing Program in our new Charter Contract and contacted the State Department of Education to begin the process of having a PN Program at Inlet Grove.

   Targeted completion date: By July 1, 2020

2. Night School Adult Practical Nursing Program License and Accreditation
   The last time the Board of Nursing issued a License was 2012 (Exhibit 1.3). According to the Board of Directors Mrs. Sherri Sutton-Johnson, they only provide a letter to show that we are license to run the PN Program (Exhibit 2.2 – 4 pages)

   We do not concur about the License but we do concur about the Accreditation.
   As of July 1, 2019, our accreditation with COE has expired, and according to the FBON, we are licensed to run the LPN Program. The name of the school was the problem.

   Corrective Actions:
   We are in the process of getting approval from the State Department of Education and applying to COE for accreditation. We are making sure all licenses and accreditations are in the correct name.

   Target completion date: By July 1, 2020

1
IGCHS AUDIT RESPONSE

3. Night School Adult Practical Nursing Program License on Probation Status
   We just received information from the Florida Board of Nursing extending our probation (Exhibit 2.2).
   
   We do concur with this finding
   Corrective Actions:
   We have a new Night Assistant Principal, I am working with him, and we have had more students passing the PN Program. We are proving academic support and ESOL classes to make sure students are prepared to take the State Board. In 2019, we enrolled nine students in the program and all nine passed.
   
   Target Completion date: By July 1, 2020

4. Fee for Night School Adult Nursing Program Courses Exceed State Guidelines.
   I was informed by the District in 2004 that as a Charter School the District has no say as to what we offer and the fees we charged our students. We tried to be in the average range of other schools. We do not get any money from the State for the Medical Program, as a Community School, we have to make money to pay the instructors who are Licensed Nurses. No one has ever mentioned or informed me from the District or State that we had to go by State Guidelines.
   
   We do concur that we Exceed State Guidelines.
   Corrective actions taken:
   We will be adhering immediately to statutory requirements in setting the tuition amounts for post-secondary career certificate program. I will ask the district to provide me with the fees for career programs that are offered in the adult programs.
   
   Target Completion date: By July 1, 2020

5. MOU Defining Adult Services Never Executed
   At the time of our first Charter in 2003-2004, Mrs. Mae Gamble was the Director, Mike Murgio was the CEO, and to my knowledge, there was no MOU. From 2009-2019, I was aware of a MOU in my contract, but since the district and lawyers signed the contract, it was my understanding that was all I needed. The Charter Office nor the District had never mentioned a MOU until we were audited. As of today, the Charter Office is not aware of a MOU from the District or where I can get a copy. I would like to have a copy for Inlet Grove’s record.
   
   We did advertise through the District’s website because Mr. Fred Barch told us to do so according to Mr. Moses Baker our night assistant principal.
   
   We do concur with this finding.
   Corrective actions taken:
   I called Mr. Fred Barch for assistant to get applicable guidelines and requirements to make sure they are in place regarding the appropriate use of State Fund for Adult Education and proper reporting of expenditures. She was not aware of a problem; however, she is sending me what she has.
   
   Target Completion date: By July 1, 2020

6. Annual Financial Reports Include Both Day and Night School Finance
   The school provides monthly financial reports to the school district in accordance with state and district guidelines. However, the school’s management and board of directors receive monthly reports in much detail than the reports required by the established state and district guidelines. The more detailed
Management’s Response  
*Inlet Grove Community High School*

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**IGCHS AUDIT RESPONSE**

reports, which do provide separate accounting for the day and night programs, are presented in monthly board meetings where they are discussed and are the basis for informed operating decisions made on a regular and ongoing basis.

We concur with the finding:

**Corrective Actions:**
The necessary procedures are in place.

**Target Completion date:**
Completed

7. **23% of Accounts Receivables Had No Activity in more than two years**

We concur with the finding.

**Corrective Actions Taken:**
I as well as the night assistant principal are monitoring all current students accounts on a monthly basis. We are currently using Parson-Bishop Services, Inc. to collect from past students. If we can’t collect all of the debts, we will adjust all uncollectable accordingly.

**Target Completion date:** By July 1, 2020

8. **Questionable Disbursements**

I do concur that I received an advance of $16,145.84 from Inlet Grove Community High School for purchasing dilapidated homes in Riviera Beach, Fla. for our homeless students and veterans. It was not a personal loan to me only for my students who needed a place to stay. This was from money that I personal had donated to the school for a home for our homeless students. I did ask several of my Board Members if I could borrow the money and they said I could. I felt that I had donated over $16,145.84 for my special projects that I could. I really did not think about it being in the minutes.

I met with Riviera Beach CRA Director and a staff member and explained to them that I wanted to do something innovative for our school and there was a need for a home for the homeless students. I searched the state to see if such project had ever been implemented in the state of Florida before I met with the CRA and found that no such project exists. CRA got on board with me and Mrs. Jenkins informed me if I open a construction program in our night program they would provide the certified contractors to work with the students. I had spoken to my Night AP about this project as well as some of the City of Riviera Beach Council Members. They thought this project would be great for the school as well as the city and they would like to be involved. I asked my Night AP to please call Mrs. Jenkins, set up an appointment with her, and move forward to implement this project *(Exhibit 8.1 - 2 pages).* In the meantime, I had the money available to buy supplies, pay for an Instructor and purchase several homes at a reasonable price (the $16,145.84). If the owner of the homes wanted to charge a fee for the homes, I would have the money available.

I have had this vision for over four years, but never had anyone to help me with it. When I found out that we had homeless students at my school, that when I decided to move forward with this project. When I ask my Night Director (Dr. Brown) if he followed through with the CRA about the purchasing of the homes he would always tell me yes. After several months and not seeing of hearing about the progress, I return the money back in two payments to the school. I thought if I gave half of the money back, my Night Director would start moving on this project by calling all of the stakeholders letting them know we were
Management’s Response  
*Inlet Grove Community High School*

**IGCHS AUDIT RESPONSE**

read, Unfortunately, he never moved on this project and the remainder of the money that I donated to the school was returned back to the school. This money was not FTE money, it was my personal money that I donated. The sad thing about this is, when I call the district about projects that I would like to implement or any questionable things, I am always informed, “to ask your Governing Board for approval because you are a charter school and we do not get involved.”

One thing I do know is you cannot touch FTE money or grant money for any special project. Now, I know if you give personal money, you cannot use it for special projects for students.

I concur with the finding:

**Corrective Actions:**
I am going to do a project for my school, I will give my personal money to a non-profit organization and earmark it for Special Projects (i.e. a home for homeless students).

I will never ask for an advance for any of the money that I have donated to the school to do a project. I will make sure that everything that is said in our Governing Board meeting is placed in our minutes. It will never happen again; I have learned so much from this. I have never taken a cent from Inlet Grove, I have always given to the school for our students

**Target Completion date:**
Completed already.

**Inadequate Documentation:**
Yes, the two disbursements totaling $1,198.00 was paid to a family member and me. The check requisitions were coded wrong by the accountant at my school, she is the one who wrote lease for parking lot on the check requisition after I had signed it (Exhibit 8.2). It was not for lease of the parking lot It was for work that we had done on the weekend at the Marina Village in Riviera Beach, FL (Exhibit 8.3). The event did not have any connection with Inlet Grove; It was our personal time on weekends. The company wanted to lease our parking lot for the event and they gave our leasing department a $1,500.00 deposit check to hold the date. When my secretary gave them the price, they said it was too high and they never executed the lease (Exhibit 8.4).

I was asked by the company if I knew anyone who wanted to work with them on the weekend at the marina. I said I would, and I informed a family member and he said he wanted to work, because he did not want me to work late at night in Riviera by myself. We put in over 45 hours from Friday evening through Monday Morning.

The company did not pay us at the end of the concert instead they informed me that they would call me on Monday. On Monday morning, my secretary informed me that the company had called and said to take $599.00 and give me and $599.00 to give to a family member for the work we had done on the weekend. The balance was to be given to me as a donation to my scholarship program at the school. The Information was not for leasing the parking lot; it was for work that a family member and I had performed on the weekend at the Marina. My understanding was they wanted the both of us to be paid from the deposit.

I concur with the finding:

**Corrective action Taken:**
I will never, never have any one to pay me through a school check they have given for a deposit. I will make sure all proper documentation is in place.
Management’s Response
Inlet Grove Community High School

IGCHS AUDIT RESPONSE

Target Completion date:
Completed

9. **Concerns:** I am constantly asking if I can attend principal’s meetings and I am told “NO”, you are a charter school. I feel if I were allowed to attend, I could ask questions about things that I have concerns about.
1. International Baccalaureate Program: Inlet Grove Community High School plans to offer an IB Career-related education program and a Law and Public Safety program within the next 10 years. Presently, we are in the planning stage of the process.

2. Continuing Workforce Education: This program targets those students not currently enrolled in high school who desire career training to enhance employment skills.

3. ESOL: This five-step program takes adult speakers of other languages from basic language skills to the ability to read, write, and speak English.

4. Adult Basic Education: The target population for this program consists of adults testing at least two grade levels below high school range. Academic skill training ranges from basic literacy to pre-GED classes.

5. GED: Academic preparatory classes which prepare students to pass the examinations required to attain a General Equivalency Diploma.

Medical Academy Classes: Certificate of completion programs in Nursing Assistant and Practical Nursing prepare students to obtain certification (CAN) and licensure (LPN) in the state of Florida.

The Board of Directors understands that the programs listed above, with the exception of Innovative Options, are not secondary programs. These programs (Adult Basic Education, ESOL, GED, and Continuing Workforce Education) will be operated through a Memorandum of Understanding, rather than incorporated into the Charter, as they have been throughout the present charter. Funding for these programs will be passed through the sponsor in the same manner as FRFP grants and grants are provided for the high school population.

B. The Charter School is available to all students residing in Palm Beach County and the student body will be diverse in ethnic and gender make-up and include students meeting the criteria of the Individuals with Disabilities Act (IDEA), English for Speakers of Other Languages (ESOL), Title II of the Americans with Disabilities Act, and section 504 of the Rehabilitation Act of 1973.

C. The Conversion Charter School attendance zone for transportation purposes shall be:

The Inlet Grove Community High School Governing Board desires to continue current transportation arrangements and the same transportation zone as in the previous charter, which consists of a combination of self transportation, ride-sharing, parent drop off, Sponsor’s school buses, Palm Tran, and Tri-Rail. Approximately 50 % of the 750 students enrolled at Inlet Grove Community High School ride the Sponsor’s buses. Bus transportation has been contracted with the Sponsor at an average or actual cost and Palm Tran directly with the carrier. Tri-Rail is another available option that is increasing in ridership. District students from all locations are eligible to enroll if they meet other admission criteria, but transportation has only been provided for students from the portion of Palm Beach County that lies between areas bordered on the north by Jupiter; on the south by the Lantana; on the east by the Atlantic Ocean and on the west by Boca Raton, Loxahatchee, Wellington and Royal Palm Beach communities.

D. Please explain the ways by which the Conversion Charter School will achieve a racial/ethnic balance reflective of the community it serves or within the racial/ethnic range of other public schools in Palm Beach County.

Ethnic balance has never been a problem for Inlet Grove Community High School. The current ratios are: White-84.75%, Black-7.19%, Hispanic-9.51%, Asian-2.08%, Indian-0.59%, Multiracial-4.16%. Males comprise 41.75% and females 58.25% of the student population. Gender ratios are skewed by an extremely large Medical Science program which typically draws higher percentages
Management’s Response
_Inlet Grove Community High School_
Inlet Grove Adult Community High School
Practical Nursing Program
PN Program Director
600 West 28th Street
Riviera Beach, FL 33404

RE: Inlet Grove Adult Community High School, US70108900:

This letter serves to document verification of the above referenced nursing education program’s approved status with the Florida Board of Nursing, as defined by Section 464.003, Florida Statutes.

According to our records, Inlet Grove Adult Community High School, US70108900 was granted approval on 12/16/2011.

Pursuant to Section 464.019(5), Florida Statutes, an approved prelicensure nursing education program is placed on probationary status if the program fails to meet the board’s minimum requirement for program graduate passage rates on the National Council of State Boards of Nursing Licensing Examination (NCLEX).

Section 464.019(5), Florida Statutes, requires programs placed on probationary status to disclose its probationary status in writing to the programs students and applicants. Please refer to the Statute for additional requirements.

If I can be of further assistance, do not hesitate to contact me by email Sherri.Sutton-Johnson@fldhhealth.gov or by telephone number, (850) 617-1496.

Sincerely,

Sherri Sutton-Johnson
Sherri Sutton-Johnson, MSN, RN, CCHW, DrPH(c)
Director, Nursing Education
Florida Board of Nursing

Florida Department of Health
Division of Medical Quality Assurance - Bureau of HCPR
405 S. Alafaya Trail, P.O. Box 4414
Tallahassee, FL 32302
PHONE: (850) 412-4900 • FAX: (850) 488-1960
Appendix A

Management’s Response
Inlet Grove Community High School

[Image of a document with a handwritten note: "Sherry Sutton-Johnson, Director of Nursing from Florida Board of Nursing"]
### Management’s Response

*Inlet Grove Community High School*

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**STATE OF FLORIDA**

**DEPARTMENT OF HEALTH**

**DIVISION OF MEDICAL QUALITY ASSURANCE**

**EDUCATION PROGRAM - PN**

Met all requirements of the state of Florida.

**DECEMBER 31, 2012**

**3H ADULT**

**DIRECTOR:** ROMAINE L. MARTIN

**101 STREET FL 33404**

---

**QUALIFICATION(S):**

- **CERTIFICATE**

---

**DISPLAY IF REQUIRED BY LAW**

**EXPIRATION DATE:** DECEMBER 31, 2012

---

**RECEIVED**

**JAN 04 2011**

---

**GOVERNOR**

Rick Scott

---

**STATE SURGEON GENERAL**

H. Frank Farmer, Jr., M.D., Ph.D., F.A.C.P.
Appendix A

Management’s Response

_Inlet Grove Community High School_
Appendix A

Management’s Response
Inlet Grove Community High School

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NURSING PROGRAMS LPN
med below has met all requirements of the laws and rules of the state of Florida.
Expiration Date: DECEMBER 31, 2010
LET GROVE COMMUNITY HIGH SCHOOL
PROGRAM DIRECTOR:
CAROL ALICER-ANN CLARKE
71 GARDEN ROAD
VIERA BEACH, FL 33404

Charlie Crist
GOVERNOR

Ana M. Viamonte Ros, M.D., M.P.H.
STATE SURGEON GENERAL

DISPLAY IF REQUIRED BY LAW

EXPIRATION DATE: DECEMBER 31, 2010

If your number is NPPN 70116, please use it in all correspondence with your board/council. Each licensee is solely responsible for notifying the department in writing of any change of the licensee's current mailing address and practice location address. If you have not received your renewal notice 90 days prior to the expiration date shown on this form, please call (800) 488-0595.

Use this section to report name change. Name changes require legal documentation showing the name change. Please make sure that a photocopy of one of the following documents for this form: marriage license, divorce decree or a court order. A driver’s license or social security card is not considered legal documentation.

Quality Assurance offers you the convenience of several online services. These services give you the ability to renew your license, update your mailing and practice location addresses and update your profile information.

2. Click on Licensee/Provider.
3. Click on Provider Login.
4. Select your profession.
5. Enter the account ID and password that was provided to you on your initial license and click on “Login.”
6. If you do not know your account ID and password, click on “Get Login Help” or call our Customer Contact Center at (850) 488-0595 for assistance.

TO: DEPARTMENT OF HEALTH
DIVISION OF MEDICAL QUALITY ASSURANCE
INFRINGEMENT AND AUDITING SERVICES UNIT
P.O. BOX 9320
TALLAHASSEE, FLORIDA 32302-9320

NAME CHANGE (ATTACH LEGAL DOCUMENTATION)

C/O:
LAST  FIRST  MIDDLE
2103, 5/98  FIRST  MIDDLE
## Management's Response

**Inlet Grove Community High School**

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FLORIDA DIFFERENTIATED ACCOUNTABILITY PROGRAM
2009 - 2010 SCHOOL IMPROVEMENT PLAN

School Name: INLET GROVE COMMUNITY HIGH SCHOOL
District Name: Palm Beach
Principal: Dr. Emma Banks
SAC Chair: Mary Woodard
Superintendent: Dr. Art Johnson
Date of School Board Approval: December 2009
Last Modified on: 05-12-2010

VISION and MISSION STATEMENTS

The Vision of Inlet Grove Community High School is to establish and communicate a shared purpose and direction for improving the performance of students and the effectiveness of the school by collaborating with the stakeholders for their support.

The Mission of Inlet Grove Community High School (Conversion) is to graduate students with the skills and knowledge to be lifelong learners and responsible contributing citizens through a technology-rich learning environment that integrates rigorous academic and career preparation. Students will be prepared to enter
Appendix A

Management’s Response

*Inlet Grove Community High School*

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**Inlet Grove is a Community High School. Our Night Program offers a variety of Programs and Courses to meet the needs of our community. This school offers Welding, Plumbing, Carpentry, Nursing, ESOL and GED.**

**Career and Technical Education**

1. Automotive Service Technology
2. Commercial Arts, Graphic Design
3. Pre Medicine
4. Nursing (LPN)
5. Health Science Technology
6. Criminal Justice
7. Pre Architecture
8. Pre Engineering
9. Television Production
10. Culinary Arts and Restaurant Management
Appendix A

Management’s Response
Inlet Grove Community High School

STATE OF FLORIDA
BOARD OF NURSING

IN RE PROGRAM STATUS OF:
INLET GROVE ADULT COMMUNITY HIGH SCHOOL
PN program
NCLEX Code: US70106900

NOTICE OF INTENT
TO EXTEND PROBATION

This matter came before the Board of Nursing at a duly-noticed public meeting on February 6-8, 2019, in Howey-In-The-Hills, Florida. Program Director, Akivia Cannon, appeared before the Board and presented testimony regarding the benchmarks contained in INLET GROVE ADULT COMMUNITY HIGH SCHOOL’s remediation plan.

Subsection 464.019(5), Florida Statutes (2018), requires that an approved nursing program meet and maintain certain criteria. The relevant portion of the statute reads as follows:

(a)3. Upon the program’s achievement of a graduate passage rate that equals or exceeds the required passage rate, the board, at its next regularly scheduled meeting following release of the program’s graduate passage rate by the National Council of State Boards of Nursing, shall remove the program’s probationary status. If the program, during the 2 calendar years following its placement on probationary status, does not achieve the required passage rate for any 1 calendar year, the board may extend the program’s probationary status for 1 additional year, provided the program demonstrates adequate progress toward the graduate passage rate goal by meeting a majority of the benchmarks established in the remediation plan. If the program is not granted the 1-year extension or
Management’s Response  
Inlet Grove Community High School

fails to achieve the required passage rate by the end of such extension, the board shall terminate the program pursuant to chapter 120.

Upon review of INLET GROVE ADULT COMMUNITY HIGH SCHOOL’s file and the testimony presented the Board has determined the following:

INLET GROVE ADULT COMMUNITY HIGH SCHOOL was placed on probation for the 2017 AND 2018 calendar years due to low graduate passage rates.

The 2018 average passage rate for United States educated, first-time test takers on the National Council of State Board of Nursing Licensing Examination, as calculated by the contract testing service of the National Council of State Boards of Nursing is 85.91%. The passage rate goal is 75.91%. INLET GROVE COMMUNITY HIGH SCHOOL’s passage rate was 64.29%.

Although INLET GROVE ADULT COMMUNITY HIGH SCHOOL did not meet or exceed the passage rated goal, it has demonstrated adequate progress towards the graduate passage rate goal by meeting a majority of the benchmarks established in the remediation plan.

Therefore, pursuant to subsection 464.019(5)(a)3, F.S., INLET GROVE ADULT COMMUNITY HIGH SCHOOL’s probation shall be extended for one additional year through the 2019 calendar year.

This Notice shall become effective upon filing with the Clerk of the Department of Health.
Appendix A

Management’s Response
Inlet Grove Community High School

DONE AND ORDERED this 11th day of March, 2019.

BOARD OF NURSING

Joe Baker, Jr.
Executive Director for
Kathryn L. Whitson, MSN, RN,
Chair

NOTICE TO PROGRAM

You may seek review of this Notice, pursuant to Sections 120.569 and 120.57, Florida Statutes, by filing a petition with the Executive Director of the Board, 4052 Bald Cypress Way, Bin #C02, Tallahassee, Florida 32329-3252, within 21 days of receipt of this Order. If you dispute any material fact upon which the decision of the Board is based, you may request a hearing before an administrative law judge pursuant to Section 120.57(1), Florida Statutes; your petition must contain the information required by Rule 28-106.201, Florida Administrative Code, including a statement of the material facts which are in dispute. If you do not dispute any material fact, you may request a hearing before the Board pursuant to Section 120.57(2), Florida Statutes; your petition must include the information required by Rule 28-106.301, Florida Administrative Code.

Pursuant to Section 120.573, Florida Statutes, you are hereby notified that mediation pursuant to that section is not available.
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail to: INLET GROVE COMMUNITY HIGH SCHOOL, 600 West 28th Street, Riviera Beach, FL 33404, Attn: Program Director Akilia Cannon; and by e-mail to: to John B. Fricke, Jr., Assistant Attorney General, john.fricke@myfloridalegal.com, this 12th day of March, 2019.

Angel Gardes
Deputy Agency Clerk
June 5, 2019

Explanation Letter for Funds

To whom it my concern,

Dear Sir/Madam,

I would like to submit this letter as an explanation of your request. I Dr. Charles Woodard Chairman Board of Inlet Grove Community High School, and Board Members were aware that Dr. Emma Banks requested the amount of $16,145.84 for a restoration project to purchase dilapidated houses in the City of Riviera Beach. The purpose of this project was to purchase homes for veterans and homeless students. The City of Riviera Beach was supporting Dr. Emma Banks with the restoration project by providing certified contractors.

The funds were to purchase houses, materials and equipment for the restoration project. The funds were repaid by Dr. Emma Banks when the project was not successful. Dr. Emma Banks is still looking to purchase a dilapidated house to continue the project.

Thank you for your consideration.

Sincerely,

[Signature]

Dr. Charles Woodard
Chairman
Appendix A

Management’s Response
Inlet Grove Community High School

June 4, 2019

To Whom It May Concern:

I met several times, around 2017, with Dr. Emma Banks and her Night School Administrator, Mr. Brown, about starting a rehabilitation/construction program for night school students. Their vision was to acquire dilapidated structures that could be rehabbed for low income residents, veterans, homeless students, etc., while simultaneously providing an opportunity for students to learn construction trades.

Sincerely,

Annette Jenkins
Executive Director
Management’s Response
Inlet Grove Community High School
Management’s Response
Inlet Grove Community High School

Singer Island Pulse
November 2, 2017

This weekend: https://www.brittweekend.com/
Fri, Nov 3, 2017, 10:00 AM – Sun, Nov 5, 2017, 10:00 PM EDT
Rivera Beach (Municipal Beach, Marina Village, & Bicentennial Park) 190 E
13th St Riviera Beach, FL 33404

BRT Weekend: "Riviera Beach, FL" 3-Day Caribbean Music
Festival

Moeti Ncube and 5 others
2 Shares

Like Comment Share

https://www.facebook.com/search?q=BRIT%20Weekend%20in%20Riviera%20Beach%20FL&ref=SEARCH_BOX
Appendix A

Management’s Response

Inlet Grove Community High School

THE SCHOOL DISTRICT OF PALM BEACH COUNTY

Lease Agreement for the Use of School Facilities

Lease ID: LID - 2018 - 1461 - 1001
Revision: 1

Lessee Type: Non-Profit (Taxable)
Status: Draft
School Facility: Inlet Grove @ Old Sancoast

DIRECTIONS: Please review all information for accuracy. Have Lessee and Witness sign and date document below. After this lease agreement has been completed and all signatures obtained, make copies for Lessee. Schools are to keep the signed, original lease on file at the school center location.

This AGREEMENT made as of , between The SCHOOL BOARD OF PALM BEACH COUNTY, as Lessor, and HELPING OUT PEOPLE EVERYWHERE, INC., as Lessee located at the following address:

Address: 1201 NE 191ST STREET
City: NORTH MIAMI BEACH
State: FL
Zip Code: 33162

Exhibits provided by Lessee include the following:

X Liability Insurance
Sales Tax Exempt Certification
X Non-Profit Corporation
Health Department

Event Name: HELP
Event Description: Use for overflow parking on Nov 3, 2017 - 5:30 p.m. - 12:00 a.m.

SUMMARY OF LEASE AGREEMENT CHARGES:

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*Total is displayed only if purchased from School Board of Palm Beach County

That by signing this agreement, Lessor does hereby lease unto the Lessee and Lessee takes and hires from Lessor in premises for the event as described in this contract, for the purpose as specified and agreed upon, and will abide by all other “Terms & Conditions” listed on or attached to this lease, front and back, including all required documentation.

DRAFT LEASE

Signature of Lessee

Date

Signature Witness

Date

Date approved by Principal in System

PB03 2016 (Rev. 04/2016)

Page 1 of 4

LID - 2018 - 1461 - 1001

ORIGINAL-School COPY-Lease

42
Re: IG Inlet Grove
1 message

Fri. Aug 9, 2019 at 1:09 PM

Keith Oswald <keith.oswald@palmbeachschools.org>
To: "Joe DePasquale (Dr Of Charter School)" <joe.depascuale@palmbeachschools.org>
Cc: Randy Law <randy.law@palmbeachschools.org>, Glenda Sheffield <glenda.sheffield@palmbeachschools.org>, Mike Burke <mike.burke@palmbeachschools.org>, Heather Knust <heather.knust@palmbeachschools.org>, A Denise Sagerholm <adenise.sagerholm@palmbeachschools.org>

CORRECTION to RESPONSE RANDY>

Once the audit is complete and published the district will begin the process of placing Inlet Grove on a Corrective Action Plan.

Keith Oswald
Deputy Superintendent/Chief of Schools
School District of Palm Beach County
Phone: 561-649-6605 PX 46205
Fax: 561-649-6637 PX: 46837
keith.oswald@palmbeachschools.org

RECEIVED
AUG-9 2019
INSPECTOR GENERAL