Special Review of

Missing Money at Pahokee Middle-Senior High School

November 20, 2020

Report #2020-12
MISSION STATEMENT
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Superintendent of Schools

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Special Review of
Missing Money at Pahokee Middle-Senior High School

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Special Review of
Missing Money at Pahokee Middle-Senior High School

EXECUTIVE SUMMARY

Pursuant to the Office of Inspector General’s 2019-2020 Work Plan, and in response to the requests from the school Principal and the Accounting Services Department, we have conducted (1) a special review of money collections and (2) an unannounced cash count at Pahokee Middle-Senior High School. This special review produced the following major conclusions:

1. $20,253.24 Missing

We examined the contents in the school’s drop-safe on October 21, 2019; and reviewed the available collections and deposit records for July 1, 2019, through October 18, 2020. The review concluded that a total of $20,253.24 was missing from the school: (a) $5,427.09 from the drop-safe and (b) $14,903.15 from two deposits prepared on August 29, 2019, and October 18, 2019. The $5,427.09 missing from the drop-safe was comprised of: (a) $2,322.39 from the drop-safe, (b) $2,157.70 from 12 collections improperly removed from the safe by the treasurer, and (c) $870 from one Monies Collected Report (MCR) not listed on the Drop-safe Log.

Management’s Responses

Principal of Pahokee Middle-Senior High School: I concur with the IG conclusions. (Please see page 8 for details.)

Office of the CFO: Management concurs. (Please see page 10 for details.)

2. School Treasurer and Secretary Had Full Access to Drop-safe

Chapter 7 of the Internal Accounts Manual states, “The safe combination is confidential, and the only person on campus who is authorized to have the complete safe combination is the principal.”

During our review of security camera footage, the school treasurer accessed the drop-safe alone, indicating that she had the full combination to access the safe. Moreover, we also noticed that the principal observed the confidential secretary opening the drop-safe with the full combination.

Management’s Responses

Principal of Pahokee Middle-Senior High School: I concur with the IG conclusions. Corrective actions are in place and ongoing to make sure the school has accountability and operate within district policies for compliance. (Please see page 8 for details.)

Office of the CFO: Management concurs. (Please see page 10 for details.)
3. Overall Noncompliance with District Procedures

During the unannounced cash count and analysis of collections and deposit records, we noted the following noncompliances with money collection procedures by staff:

(a) Drop-safe Log Not Being Used. Activity sponsors did not always record the collections on the Drop-safe Log before putting the collection into the safe.

(b) School Did Not Enforce District’s Bulletin #P-14051-S/CFO. District’s Bulletin #P-14051-S/CFO – Drop-safe Log Procedures, requires that staff submit all the yellow copies of MCRs to administration at year-end for retention. However, the yellow copies for 354 (41%) of the 865 MCRs for FY19 were not available for our review. Moreover, during our examination of the drop-safe contents on October 21, 2019, seven of the 65 collections listed on the Drop-safe Log were accompanied by both the white and the yellow copies of the MCRs; i.e. the activity sponsors did not keep the yellow copies. Both white and yellow copies of the MCRs, with the money, were submitted to the treasurer.

(c) Collections Not Deposited Within Five Days After Collection. During Fiscal Year 2019, the treasurer prepared 60 deposits, totaling $420,565.44. We found that $183,942.13 included in 28 (47%) deposits was not timely processed by the school treasurer. The money was not deposited into the bank until six to 38 working days after collection.

Management’s Responses

Principal of Pahokee Middle-Senior High School: I concur with the IG conclusions. Corrective actions are in place and ongoing to make sure the school has accountability and operate within district policies for compliance. (Please see page 8 for details.)

Office of the CFO: Management concurs. (Please see page 10 for details.)

Additional Comments from the Office of the CFO: While District staff continues to enhance both in-person and on-line training, the prescribed procedures must be implemented with fidelity by school staff to be effective. (Please see page 10.)

FURTHER ACTIONS

Referrals to School Police and Employee & Labor Relations. On October 21, 2019, we notified School Police of the money missing incidents at the school. At our October 22, 2019, meeting with a School Police representative, it was agreed that the OIG would assist School Police in analyzing the financials and deposit records of the school. School Police would conduct the investigation regarding the missing money.

We worked with School Police in analyzing the financials and deposit records. Our fieldwork was completed in March 2020. On April 13, 2020, we forwarded our draft report to School Police and Employee & Labor Relations Department for appropriate actions.

Referral to State Attorney’s Office. On March 16, 2020, School Police completed its investigation and forwarded its conclusions to the State Attorney’s Office for further action. Subsequently, criminal charges were filed by the State Attorney’s Office on August 20, 2020.
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: Teresa Michael, Inspector General

DATE: November 20, 2020

SUBJECT: Special Review of Missing Money at Pahokee Middle-Senior High School

PURPOSE AND AUTHORITY

Pursuant to the Office of Inspector General’s 2019-2020 Work Plan, and in response to the requests from the school Principal and the Accounting Services Department, we have conducted (1) a special review of money collections and (2) an unannounced cash count at Pahokee Middle-Senior High School. The primary objectives of this special review were to determine:

(1) Whether all the collections were properly processed and deposited in the school’s bank account;

(2) If all the monies in the drop-safe and change funds were properly accounted for; and

(3) The extent of compliance with District procedures in safeguarding money after collections.

SCOPE AND METHODOLOGY

To accomplish the objectives of this project, we interviewed appropriate school staff and:

- Reviewed applicable District’s procedures related to money collections including:
  - Internal Accounts Manual, Chapter 7 – Cash Receipts and Deposit
  - Bulletin #P-14051-S/CFO – Drop-safe Log Procedures
  - Bulletin #P 18-132 CFO – FY18 Updated Drop-safe Log Procedures

- Reviewed Internal Funds collection records, including Drop-safe Log, Armored Car Courier Log, Monies Collected Reports (MCRs) and bank deposit records for the period July 1, 2019 through October 18, 2020.

- Performed an unannounced cash count on October 21, 2019.
Draft findings were sent to the school principal and the Office of Chief Financial Officer (CFO) for review and comment. The management responses are included in the Appendix. We appreciate the courtesy and cooperation extended to us by the school and District staff during the review. The final draft report was presented to the Audit Committee at its November 20, 2020, Meeting.

**BACKGROUND**

*NOTE: Pahokee Middle-Senior High School operates two separate campuses with a high school and a middle school. The two schools share one bank account and one school treasurer.*

**Principal’s Referral.** On October 17, 2019, the Principal of Pahokee Middle-Senior High School informed the OIG about how the money is handled by the school treasurer. Specifically, he was informed by staff that (1) there had been no bank deposits since early September 2019, (2) the monthly reconciliation reports for July 2019 and August 2019 had not been submitted to the District, and (3) expenditure documentation requested by the State Auditor General had not been sent to the Accounting Department.

**Collections Information Entered Into System, But Money Not Deposited.** On October 18, 2019, the OIG discussed the Principal’s concerns with the Accounting Services Department (Accounting). Accounting staff indicated that $8,692.65 in collections was missing. On August 29, 2019, the school treasurer entered the collection information, totaling $8,692.65, into the school’s accounting software system, SchoolCash.net. However, as of October 15, 2019, the money had not been deposited in the school’s bank account. Furthermore, the required monthly reconciliation reports for July and August 2019 had not been submitted by the school treasurer despite several email reminders by Accounting Services staff.

**Unannounced Visit: $2,322.39 Missing from the Safe.** On October 21, 2019, the OIG performed an unannounced site visit at the school and examined the contents of the drop-safe. The examination revealed that a total of $2,322.39 in collections were missing from the safe.

**FURTHER ACTIONS**

**Referrals to School Police and Employee & Labor Relations.** On October 21, 2019, we notified School Police of the money missing incidents at the school. At our October 22, 2019, meeting with a School Police representative, it was agreed that the OIG would assist School Police in analyzing the financials and deposit records of the school. School Police would conduct the investigation regarding the missing money.

We worked closely with School Police during the analysis of the financials and deposit records. Our fieldwork was completed in March 2020. On April 13, 2020, we forwarded our draft report to School Police and Employee & Labor Relations Department for appropriate actions.

**Referral to State Attorney’s Office.** On March 16, 2020, School Police completed its investigation and forwarded its conclusions to the State Attorney’s Office for further action. Subsequently, criminal charges were filed by the State Attorney’s Office on August 20, 2020.
CONCLUSIONS

1. $20,253.24 Missing

On October 21, 2019, we examined the contents in the school’s drop-safe and reviewed the available collection and deposit records for July 1, 2019, through October 18, 2020. The review concluded that a total of $20,253.24 was missing from the school: (a) $5,427.09 from the drop-safe and (b) $14,903.15 from two deposits prepared on August 29, 2019, and October 18, 2019, respectively. The $5,427.09 missing from the drop-safe comprised of: (a) $2,322.39 from the drop-safe, (b) $2,157.70 from 12 collections improperly removed from the safe by the treasurer, and (c) $870 from one Monies Collected Report (MCR) not listed on the Drop-safe Log.

(a) $5,427.09 Missing from Drop-safe

12 Collections Removed From the Drop-Safe by the Treasurer With No Justifications. On October 21, 2019, we examined the contents of the drop-safe and compared it to the Drop-safe Log completed by staff. The Log listed a total of $20,196 in 65 collections dated from September 14 through October 18, 2019. 53 of the 65 collections recorded on the Log were found in the safe, the other 12 collections were not in the safe.

Upon discovery of 12 missing collections, the OIG discussed with a School Police representative/detective who recommended us to interview the school treasurer and examine her office in the High School Division. During our examination, in the presence of the Principal, the 12 missing collections were found in the bottom drawer of a locked file cabinet in the treasurer’s office. Only the treasurer had the key to this cabinet, who unlocked it upon our request during our examination of her office.

$2,399.39 Missing from 8 of the 53 Collections in the Safe. Of the 53 collections found in the safe, eight collections had total shortages of $2,399.39 (ranging from $0.19 to $2,101); and five collections had overages totaling $77 (ranging from $2 to $40).

$2,157.70 Missing from 12 Collections Improperly Removed from the Safe by the Treasurer. Based on the Drop-safe Log record, the 12 collections, which had not been removed from the safe for processing by the treasurer, were missing from the safe. These 12 collections were subsequently found in the treasurer’s office. The accompanying Monies Collected Reports (MCRs) found with the collections agreed with the amounts listed on the Log. However, seven of the 12 collections had total shortages of $2,157.70, ranging from $10 to $920.

$870 Missing from One MCR Not Listed On Drop-safe Log. One additional MCR for $870 not listed on the Log was found in the treasurer’s locked file cabinet, but the money was missing. The activity sponsor indicated that she had put the $870 in the drop-safe but forgot to list the collection on the Log. She retained the yellow copy of the MCR.
(b) $14,903.15 Missing from Two Prepared Deposits

According to the school’s accounting records, the school treasurer prepared two deposits: Deposit #975 (for $8,692.65) on August 29, 2019, and Deposit #978 (for $7,300.15) on October 18, 2019, respectively. As of October 21, 2019, both deposits, totaling $15,992.80, had not been deposited in the school’s bank account. Neither deposit was recorded on the armored car service Courier’s Pick-up Log nor located in the drop-safe during our site visit on October 21, 2019.

During our examination of the treasurer’s High School office on October 21, 2019, the deposit documentation for Deposit #975 along with $1,089.65 ($1,075 in checks and $14.65 in coins) were found in the treasurer’s locked cabinet drawer. The deposit documentation for Deposit #978 was subsequently located in the treasurer’s Middle School office on October 23, 2019; however, the accompanying money was missing.

Based on the available MCRs, Deposit #975 was comprised of $7,617.65 in cash and $1,075 in two checks; and Deposit #978 was comprised of $5,660.15 in cash and $1,640 in 17 checks. As a result, $14,903.15 ($13,263.25 in cash and $1,640 in 17 checks) was missing from these two deposits.

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<th>Deposit #978</th>
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<td>$7,300.15</td>
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</tr>
</tbody>
</table>

Management’s Responses:

**Principal of Pahokee Middle-Senior High School:** I concur with the IG conclusions. (Please see page 8.)

**Office of the CFO:** Management concurs. Items were recorded on the Drop Safe Log and in SchoolCash System, but were not received at the bank for deposit. In addition, items were recorded on the Drop Safe Log but not processed in SchoolCash for deposit to the bank. (Please see page 10.)

2. School Treasurer and Secretary Had Full Access to Drop-safe

*Chapter 7* of the Internal Accounts Manual states, “The safe combination is confidential, and the only person on campus who is authorized to have the complete safe combination is the principal. The safe combination may be shared between two or more trustworthy members of the office staff (such as the school treasurer, data processor, assistant principal, or secretary) with each person having a portion of the combination, so it takes two individuals to open the safe in the principal’s absence.”
However, during our review of security camera footage, the school treasurer accessed the drop-safe alone, indicating that she had the full combination to access the safe. Moreover, we noticed that the principal observed the confidential secretary opening the drop-safe with the full combination.

**Recommendation**

To ensure assets are safeguarded properly, access to the drop-safe should be restricted to authorized personnel only. The safe combination should be assigned to staff consistent with the requirements of the *Internal Accounts Manual*.

**Management’s Responses:**

*Principal of Pahokee Middle-Senior High School:* I concur with the IG conclusions. Corrective actions are in place and ongoing to make sure the school has accountability and operate within district policies for compliance.

(Please see page 8.)

*Office of the CFO:* Management concurs. This procedure is outlined in Bulletin #P 20-009 CFO and in the following eLM Courses:

a. *Internal Accounts: Principal’s Overview of Internal Accounts*
b. *Internal Accounts: All involved in the Drop Safe Log Inventory Verification Process*

(Please see page 10.)

**3. Overall Noncompliance with District Procedures**

During the unannounced cash count and analysis of collections and deposit records, we noted the following noncompliances with money collection procedures by staff:

(a) **Drop-safe Log Not Being Used.** During Fiscal Year 2019, seven activity sponsors from our sample review did not record 12 collections, totaling $8,160.99, on the *Drop-safe Log* before putting the collection into the safe. In addition, our examination of the drop-safe contents on October 21, 2019, found seven collections, totaling $3,717.16, were not recorded on the *Log* by the activity sponsors.

(b) **School Did Not Enforce District’s Bulletin #P-14051-S/CFO.** District’s Bulletin #P-14051-S/CFO – *Drop-safe Log Procedures* requires staff submit all the yellow copies of MCRs to administration at year-end for retention. During FY19, the school treasurer processed 865 MCRs and recorded these collections in the Internal Funds Accounting System, SchoolCash.net. We requested from the school all the yellow copies of MCRs for FY19. However, the yellow copies for 354 (41%) of the 865 MCRs were not available for our review.
We found that activity sponsors were instructed to turn in the yellow copies of the MCRs, along with the computerized receipts, at year-end to the school treasurer instead of the school secretary. This indicated that the school did not enforce the requirements of Bulletin #P14051-S/CFO in collecting and maintaining the yellow MCRs from all staff at fiscal year-end (June 30th).

During our examination of the drop-safe contents on October 21, 2019, seven collections, totaling $2,414.21, of the 65 collections listed on the Drop-safe Log were accompanied by both the white and the yellow copies of the MCRs; i.e. the activity sponsors did not keep the yellow copies. They submitted to the treasurer both the white and yellow copies of the MCRs with the money.

(c) Collections Not Deposited Within Five Days After Collection. During Fiscal Year 2019, the treasurer prepared 60 deposits, totaling $420,565.44. We found that $183,942.13 included in 28 (47%) deposits was not timely processed by the school treasurer. The money was not deposited into the bank until six to 38 working days after collection.

Recommendation

Money collections should be administered in accordance with DOE Rules (Chapter 8 of the Department of Education’s Financial and Program Cost Accounting and Reporting for Florida Schools), District’s Internal Accounts Manual, and District guidelines. Specifically,

- To ensure proper fiscal accountability and as required by Bulletin #P-14051-S/CFO, deposit information should be properly recorded on the Drop-safe Log.

- Bulletin #P-14051-S/CFO requires that activity sponsors keep the yellow copy of the MCR, instead of giving it to the bookkeeper with the monies collected. Keeping a copy of the MCR will assist the sponsors in (1) ensuring that the dollar amount indicated on the Official Receipt provided by the bookkeeper agrees with the monies collected and submitted for deposit, (2) tracking the account balance periodically, and (3) providing documentation for the amount of revenue collected if recording errors should occur.

- DOE Rules and District Bulletin #P-14051-S/CFO require that monies collected be put into the drop-safe daily and be deposited into the bank within five working days after the collections. Delay in turning in the monies for deposit could subject the monies to unwarranted exposure and result in financial irregularities.

Management’s Responses:

Principal of Pahokee Middle-Senior High School: I concur with the IG conclusions. Corrective actions are in place and ongoing to make sure the school has accountability and operate within district policies for compliance.
1) All personnel that are responsible for any monetary interactions will stay in compliance with the district’s financial protocol through the district’s financial trainings.

2) The school has implemented a 10 ft. procedure for opening the drop safe. No person(s) are allowed to stand around or hover over the person(s) with the partial combinations during opening of the safe.

3) By district rule, only the principal allowed to have the full combination.

4) The school hired a new bookkeeper whom fully trained on district procedures and meet weekly with the principal about the budget or account issues.

5) All personnel that handles the exchange of monetary funds must take the district training to understand protocol and follow the district’s accountability structure in place.

6) There will be no pre-signatures, all signatures must go in the requirement order and all paperwork must meet district’s financial policy.

7) The principal will attend budgetary trainings to make sure the school stays in compliance.

8) Financial interaction and amount verification are in place to meet the compliance of the district’s standards. The school will reach out to the district’s accounting office for needed support to any questions and issues.

9) A new drop safe log custodian was appointed

We have completed the timeframe for some of the findings and other issue items in the report are ongoing. However, the major competition was September 29th.

(Please see page 8.)

Office of the CFO: Management concurs. In addition to the references made by the OIG, the District holds monthly Treasurer in-person meetings to train Treasurers on proper procedures, as well as having the following eLM Courses available:

a. Internal Accounts: Cash Receipts for Teacher/Sponsors
b. Internal Accounts: Principal’s Overview of Internal Accounts
c. Internal Accounts: Principal’s Receipts and Disbursement for Internal Accounts
d. Internal Accounts: Principal’s Timelines and Documentation for Internal Accounts

(Please see page 10.)

Additional Comments from the Office of the CFO: While District staff continues to enhance both in-person and on-line training, the prescribed procedures must be implemented with fidelity by school staff to be effective. (Please see page 10.)

– End of Report –
Appendix

Management’s Response
Principal of Pahokee Middle-Senior High School

Date: 10/21/2020
Due: October 27, 2020
Ref: Review of Missing Money at Pahokee Middle-Senior High School

To whom it may concern in IG:

I concur with the IG conclusions. Corrective actions are in place and ongoing to make sure the school has accountability and operate within district policies for compliance. As follows with respect to the report.

1) All personnel that are responsible for any monetary interactions will stay in compliance with the district’s financial protocol through the district’s financial trainings.

2) The school has implemented a 10 ft. procedure for opening the drop safe. No person(s) are allowed to stand around or hover over the person(s) with the partial combinations during opening of the safe.

3) By district rule, only the principal allowed to have the full combination.

4) The school hired a new bookkeeper whom fully trained on district procedures and meet weekly with the principal about the budget or account issues.
5) All personnel that handles the exchange of monetary funds must take the district training to understand protocol and follow the district’s accountability structure in place.

6) There will be no pre-signatures, all signatures must go in the requirement order and all paperwork must meet district’s financial policy.

7) The principal will attend budgetary trainings to make sure the school stays in compliance.

8) Financial interaction and amount verification are in place to meet the compliance of the district’s standards. The school will reach out to the district’s accounting office for needed support to any questions and issues.

9) A new drop safe log custodian was appointed.

We have completed the timeframe for some of the findings and other issue items in the report are ongoing. However, the major competition was September 29th.

Please feel free to contact me if you have any questions.

Humbly,

Mr. Dwayne Dennard, Principal
Management’s Response
Office of the CFO

THE SCHOOL DISTRICT OF PALM BEACH COUNTY, FL

CHIEF FINANCIAL OFFICE
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WEST PALM BEACH, FL 33406

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WWW.PALMBeACHSCHOOLS.ORG

MEMORANDUM

TO: Teresa Michael, Inspector General
FROM: Michael J. Burke, Chief Financial Officer
DATE: October 20, 2020

SUBJECT: Response to Draft Report – Special Review of Missing Money at Pahokee Middle-Senior High School

Management reviewed the Report related to Missing Money at Pahokee M-S High School and has the following responses to findings and recommendations.

1) $20,253.24 Missing
   Management Concurs – Items were recorded on the Drop Safe Log and in SchoolCash System, but were not received at the bank for deposit. In addition, items were recorded on the Drop Safe Log but not processed in SchoolCash for deposit to the bank.

2) Access to the Drop-Safe should be restricted to authorized personnel only. The safe combination should be assigned to staff consistent with the requirements of the Internal Accounts Manual.
   Management Concurs – This procedure is outlined in Bulletin #P 20-009 CFO and in the following eLM Courses:
   a. Internal Accounts: Principal’s Overview of Internal Accounts
   b. Internal Accounts: All Involved in the Drop Safe Log Inventory Verification Process

3) Money collections should be administered in accordance with DOE Rules (Chapter 8 of the Department of Education’s Financial and Program Cost Accounting and Reporting for Florida Schools), Internal Accounts Manual, and District guidelines.
   Management Concurs – In addition to the references made by the OIG, the District holds monthly Treasurer in-person meetings to train Treasurers on proper procedures, as well as having the following eLM Courses available:
   a. Internal Accounts: Cash Receipts for Teacher/Sponsors.
   b. Internal Accounts: Principal’s Overview of Internal Accounts
   c. Internal Accounts: Principal’s Receipts and Disbursement for Internal Accounts
   d. Internal Accounts: Principal’s Timelines and Documentation for Internal Accounts

While District staff continues to enhance both in-person and on-line training, the prescribed procedures must be implemented with fidelity by school staff to be effective.

MJB/NS/mw

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An Equal Opportunity Education Provider and Employer