



## Commission for Florida Law Enforcement Accreditation, Inc.

P.O. Box 1489 ~ Tallahassee, FL 32302  
(800) 558-0218 ~ (850) 410-7200

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April 25, 2019

Inspector General Lung Chiu  
School District of Palm Beach County-  
Office of Inspector General  
3300 Forest Hill Blvd, C-306  
West Palm Beach, FL 33406

Dear Inspector General Chiu,

Enclosed you will find a copy of the team leader's final report from your accreditation assessment. The Commission's next meeting is scheduled for June 26, 2019, at Omni Orlando Resort at Championsgate, 1500 Masters Boulevard, Championsgate, FL, 33896, and telephone (407) 390-6664. The Commission meeting agenda is enclosed for your review.

Your agency will be reviewed by a panel of Commissioners prior to the regular business meeting. You have been assigned for review by Panel B. Reviews will begin at 8:00am, followed by the general business meeting at 10:00am. At the beginning of your agency's review, you will be given the opportunity to give a brief description of your agency size and service community. Please keep your comments to no more than two minutes. You will also be given the opportunity to make additional remarks after the panel vote is taken. At the general business meeting, your agency's accreditation will be voted on by the full Commission.

The Commission expects the agency Chief Executive Officer will attend the Commission meeting. In the event the Chief Executive Officer is unavailable to attend, a high ranking agency official should be present to represent the agency. Questions will be asked in reference to your assessment and the operation of your agency. The very nature of the Commission Review processes may require a level of expertise and institutional knowledge commensurate with this level of authority.

For your convenience, information is enclosed if you would like to order additional accreditation merchandise. If ordered prior to the Commission meeting, it can be delivered there.

If you have any questions, or require any additional information, please do not hesitate to contact me.

We look forward to seeing you in Orlando!

Sincerely,

Lori Mizell  
Executive Director

Enclosure

**To: Commission for Florida Law Enforcement Accreditation, Inc.**  
**From: Gary Robinson, Team Leader**  
**Date: March 7, 2019**  
**Re: School District of Palm Beach County, Office of Inspector General**  
**Full Compliance Assessment Report**  
**March 6, 2019**

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**A. Agency/Assessment Information**

Chief Executive Officer: Lung Chiu, Inspector General

Accreditation Manager: Veronica Vallecillo, Senior Investigator

Standards Manual Version: Florida Inspectors General Standards Manual  
Edition 2.06

Assessment Team Recommendation: Initial Accreditation

**Assessment Team**

Team Leader: Investigator Gary Robinson  
Palm Beach County Sheriff's Office  
robinsong@pbso.org

Inspector Specialist Anthony Jackson  
Florida Department of Management Services  
Office of Inspector General  
Anthony.jackson@dms.myflorida.com

**B. Standards Summary Tally**

Status	% of		Other-than- mandatory Standards	% of	
	Mandatory Standards	Mandatory Standards		Applicable Other- than- mandatory Standards	Total Standards
In compliance	38	100.0%	0	0.0%	38
Not in compliance	0	0%	0	0.0%	0
Not applicable	8	21.1%	0	0.0%	8
<b>Total:</b>	46	100%	0		46

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

**C. Agency Profile**

The School District of Palm Beach County is the tenth largest in the nation and the fifth largest in Florida serving more than 193,000 students. As the largest employer in Palm Beach County, the school district has 22,340 employees and a \$2.9 billion budget. The School District 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.

The School Board of Palm Beach County created the Office of Inspector General (OIG), in December 2011, upon adoption of School Board Policy 1.092. The OIG reports directly to the school board to ensure the necessary independence. The OIG is organized into three areas: audits, investigations, and compliance and quality assurance. The OIG has an annual budget of \$2.4 million and a staff of 18. The Investigations Section is comprised of the director of investigations, an intake coordinator, and three investigators.

The mission of the OIG's Investigations Section is to support the Palm Beach County School District in its mission to provide a world-class education by initiating investigations designed to detect, deter, prevent, and eradicate fraud, waste, mismanagement, misconduct, and other abuses in the school district and school district funded operations. A primary goal of OIG is to enhance the public's confidence in the district by assisting district management and school administrators with making continuous improvements in programs and operations.

The Investigations Section receives complaints through a hotline, emails, telephone calls, letters, in person statements, and external agencies. All complaints received are reviewed to determine whether the complaints fall within the jurisdiction of the OIG or should be referred to another district office. Pursuant to school board policies 1.092, 2.62 and 3.28,

wrongdoings under the jurisdiction of the inspector general include: fraud, waste, abuse, fiscal misconduct, financial mismanagement, misconduct, and Whistle-blower complaints.

During Fiscal Year 2017-2018, the Investigations Section received and processed 155 complaints, completed 21 preliminary reviews, and released 16 investigative reports.

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

Team Leader Gary Robinson and Assessor Anthony Jackson had a pre-assessment team meeting via telephone prior to the assessment. The purpose of this meeting was to review and discuss the School District of Palm Beach County, Office of Inspector General (OIG) background materials, chapter assignments, CFA philosophy, and conduct of the assessment.

On Wednesday, March 6, 2019, the assessment team was met by Director of Investigations Oscar Restrepo and Accreditation Manager (AM) Veronica Vallecillo at the School District of Palm Beach County administrative offices, a secure building with controlled access. After completing security access, the assessors were escorted to a conference room within the OIG and provided a briefing regarding resources and computer access for the electronic assessment. A brief tour of the offices was conducted by Director Restrepo.

The assessment team held an entrance interview with Inspector General (IG) Lung Chiu, Director Restrepo, AM Vallecillo, Investigator II Tanya Lawson, Senior Investigator I Robert Sheppard, and Intake Coordinator Angela Feaman. The conduct of the assessment and the philosophy of the Commission were discussed. IG Chiu welcomed the assessors and stated the commitment of the OIG to the accreditation process. He assured the full cooperation of the staff during the assessment. The assessors then began the review of files and interviews necessary to confirm compliance with the applicable standards.

Key employee interviews:

Director of Investigations Oscar Restrepo  
Accreditation Manager Veronica Vallecillo  
Senior Investigator I Robert Sheppard  
Investigator II Tanya Lawson  
Intake Coordinator Angela Feaman  
School District Personnel Department  
HR Analyst Vickie McGee

All individuals interviewed were knowledgeable in the accreditation process and with policies and procedures of the agency. Security of the facility was observed throughout the assessment. Information security was observed during site visits and interviews with staff members.

The exit interview was conducted with IG Lung Chiu, Legal Counsel Elizabeth McBride, Director Restrepo, AM Vallecillo, Investigator II Lawson, Senior Investigator I Sheppard, and Intake Coordinator Feaman. The assessors thanked the IG and his staff for their exemplary cooperation during the assessment. The assessors discussed the findings in each chapter and the overall findings of no corrective actions and no non-compliance issues. The staff was informed the recommendation of the assessors to the Commission would be for the accreditation of the OIG.

**E. Standards Noncompliance Discussion:** None.

**F. Corrective Action Discussion:** None.

**G. Standards Elected for Waiver:** None.

**H. Standards Verified by the Team as "Not Applicable" to the Agency:**

1.08M	5.02M	7.03M
3.03M	5.04M	7.05M
3.04M	7.01M	

**I. Standards, the Status of Which, Were Changed by Assessors:** None.

**J. Public Information Activities:** None.

**K. Exemplary Policies/Projects/Procedures:**

#### Case Management Tracking System

The Palm Beach County School District Office of Inspector General (OIG) has procured a new system for managing their daily investigative activities. On December 3, 2018, the OIG went online with a Case Management Tracking System (CMTS). CMTS is a web-based case management application developed from the ground up exclusively for IG offices to provide investigative communities an easy-to-use, comprehensive and configurable method for tracking cases and related information across the entire life-cycle of a case. The use of CMTS will increase the efficiency and effectiveness of the Investigations Unit, who formerly tracked all activity using an Excel spreadsheet and maintained all case files in printed paper form. CMTS will allow the OIG to enhance productivity, reduce time to close cases, and create annual, semi-annual, or ad-hoc reports quickly. The use of CMTS will allow the OIG to become almost 100% paperless while tracking case activity for all investigations, complaints and referrals.

## **L. Chapter Summaries**

### **Chapter 1: Organization and Governing Principles (Assigned Assessor: GR)**

The School District of Palm Beach County created the Office of Inspector General (OIG) in 2012 to assure audits and investigations are handled in an organized, professional manner. The OIG derives its authority from school district policies, with the OIG reporting directly to the school board. The mission statement and table of organization are presented in written directives and posted prominently in the office.

The OIG Code of Ethics are reviewed and signed annually by the members. Written directives clearly define the impairments that may impact the impartiality of the OIG. Each member completes an annual attestation of independence. Written directives guide the members on compliance with public records in accordance with Florida Statutes Chapter 119. The OIG written directives provide guidance for members on agency responsibilities and practices. A clear process is in place for keeping the directives up to date.

### **Chapter 2: Personnel Practices (Assigned Assessor: GR)**

Personnel practices for the OIG are governed by the school district Personnel Department, with functions outside Personnel by OIG written directives. The Personnel Department maintains all employee records, including applications, testing, and background investigations. Each member receives a copy of their job description, which they sign in receipt.

IG Chiu and Director Restrepo assure the investigative staff is properly trained and familiar with the functions they audit or investigate. Case assignments are made based upon the experience of the investigator with the area involved. Each investigator conducts any necessary research into the area, which is documented in the final report.

Each member receives an annual evaluation utilizing forms provided by Personnel. The forms are generally formatted for use with instructional personnel. The OIG expands upon the form using the job description, employee interview, and counselling to set goals and expectations for each rating period. Job descriptions are maintained by the Compensation Section in Personnel.

All applicants are processed using an electronic system. Jobs are posted by the Hiring Department and applicant's information can only be seen by them and Personnel. Applications are submitted by applicants via the web. Qualifications are reviewed and confirmed by the Hiring Department. Qualified applicants are then scheduled for an interview. The interview confirms the applicant's education, training, skills and experience for the position.

### **Chapter 3: Training (Assigned Assessor: GR)**

All personnel assigned to the investigative function have received training required for their position. There have been no new hires in the year prior to assessment. The OIG requires a level of continuing education and training in compliance with standards, but proves a much higher level is attained. Training for all personnel is tracked via a transcript. Contact hours are logged with each training topic received.

There are no sworn members of the agency.

### **Chapter 4: Investigation Process (Assigned Assessor: GR & AJ)**

The Inspector General Case Management and Tracking System (CMTS) is used for both tracking and investigative documentation. Protocols are in place to assure the system is used as intended. The complaint and conduct of the investigation is reviewed by the director of investigations and documented in the system. A written case plan approved by the director is required for each authorized investigation. Upon completion of the investigation, the complainant is notified in writing of the findings.

Completed investigations are reviewed and signed by both the director and the inspector general. Cases are reviewed periodically by the in-house General Counsel Elizabeth McBride. Any case referred for legal sufficiency is maintained in the activity log of CMTS.

Senior Investigator I Robert Sheppard was interviewed and found to be very knowledgeable of the process. Investigator II Tanya Lawson was interviewed and also found to be very knowledgeable. Examples of investigative reports were provided. The OIG complies with the Bill of Rights and union contracts. All the necessary steps taken during an investigation are documented within CMTS.

### **Chapter 5: Case Supporting Materials and Evidence (Assigned Assessor: AJ)**

The OIG suite is secured with only OIG staff having access. Any visitors must ring an intercom bell with a camera before they access the suite. The OIG no longer maintains paper files for cases arising after implementation of CMTS. Everything is stored electronically within CMTS. CMTS is secured with each staff member having a user ID and password.

Case supporting materials are annotated with the date the information was received, the individual providing the documentation, and a description of the information received. Prior to the implementation of CMTS, all case supporting materials were maintained in the paper case file. Paper case files were organized and secured in a locked filing cabinet.

The OIG investigative staff is non-sworn and they do not handle or maintain criminal evidence.

### **Chapter 6: Whistle-blower's Act (Assigned Assessor: AJ)**

Every complaint is assessed for Whistle-blower determination following Florida Statutes and school board policies. Director of Investigations Oscar Restrepo reviews every complaint and notifies the complainant in a timely manner as written in their policy. Whistle-blower cases are secured within CMTS. Since the inception of their policy, there have been no Whistle-blower cases requiring notifications, notice to respond, or dissemination of documentation.

### **Chapter 7: Notification Process (Assigned Assessor: AJ)**

Per their written directive, the OIG provides a draft report to the contractor, department, and/or substantially affected individual with 20 working days to submit a written explanation or rebuttal to the findings. During this initial assessment, there were no entities that were a subject of an IG investigation. A proof was available to show that they have provided an individual an opportunity to respond to the investigative report. There is an interlocal agreement with an external agency for investigation of allegations against the inspector general and/or any other OIG employee. The policy requires the IG or board chair to immediately forward allegations or complaints to the external agency.

### **Chapter 8: Case Management (Assigned Assessor: AJ)**

All case information is maintained in the IG Case Management and Tracking System (CMTS), which was initiated on December 3, 2018. The CMTS was observed to be a secure system. The investigators, director of investigations, inspector general, legal counsel, and compliance staff have access to the system. Prior to CMTS, case files were tracked on an Excel spreadsheet. The spreadsheet was organized and neat. Completed case files are located in CMTS. Their office no longer maintains paper files on cases arising after the implementation of CMTS.

Prior paper case files are located in a secured filing cabinet. Intake Coordinator Angela Feaman maintains the key to the secured filing cabinet. Any staff member that needs to access a paper file must sign a sheet stating they are checking out the case file. During this initial assessment, no case files have been purged or archived. All existing paper cases were scanned and uploaded to CMTS.

### **Chapter 9: Final Reporting Processes (Assigned Assessor: AJ)**

The conclusions of fact were written precisely and proofs were accurate. The assessor interviewed Director of Investigations Oscar Restrepo. All final investigative reports are distributed to the superintendent, Audit Committee, Professional Services, and the director of the program area of the investigation and were addressed with review and responses. Any criminal activity is expeditiously referred to law enforcement. During this initial assessment, there were no referrals to law enforcement.



**M. Summary and Recommendation**

The assessment team found the School District of Palm Beach County, Office of Inspector General to be in compliance with 38 applicable mandatory standards with eight standards verified as not applicable. There were no standards requiring corrective action and no non-compliance issues.

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

Submitted by Gary Robinson  
Team Leader