

Exceptional Student Education (ESE) Services - Professional Development

Internal Audit Report

May 25, 2021



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EXECUTIVE SUMMARY

Why We Did This Audit

This audit was requested by School Board. We evaluated ESE departments' professional development activities, the Professional Learning Department's ESE trainings, and ESE parents' trainings and support from July 1, 2019 to March 31, 2021.

Our objectives were to evaluate and analyze:

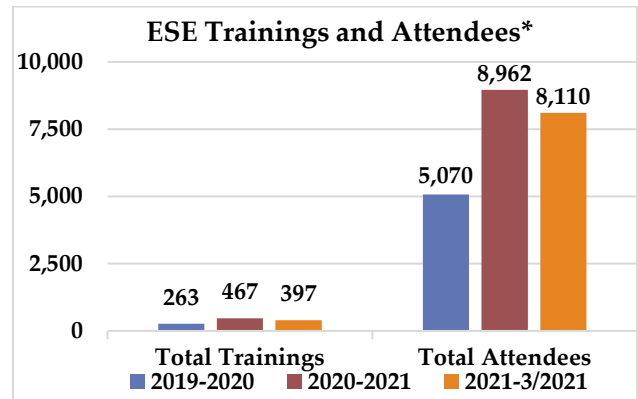
- Exceptional Student Education (ESE) teachers' and staff's professional development activities
- ESE parents' trainings and support

Observations and Conclusion

Audit Results at a Glance			
	Risk/Impact Rating		
Results and Observations	Significant	Moderate	Minor
IA - Internal Audit M - Management	-	-	IA - 2
D - Deficiency O - Opportunity	-	-	O - 2

The ESE department provides extensive training and professional development opportunities. Key observations:

- They provided no fewer than 1,127 training /support sessions to more than 22,000 ESE teachers and staff over the last two years and nine months.
- They use a variety of training methods.
- Attendees' evaluation and feedback were positive and constructive.
- Abundant support, training, and resources are provided for ESE parents.



* Some ESE departments did not have complete records of annual training hours and total attendees, therefore the numbers reported above are fewer than actual trainings and attendees.

Our overall conclusion is that ESE professional development trainings and support are provided effectively and efficiently.

Results and Recommendations

We examined a sample of individual ESE trainings for teachers/staff and ESE parents' trainings, and surveyed school staffing specialists. As noted above, the ESE department was not able to provide all training records.

We recommend all ESE departments maintain training records including titles of programs, dates conducted, total training hours and total attendees. We also recommend that the ESE department incorporate suggestions from the School Staffing Specialists' survey into its training.

We have discussed this report with management and they have prepared their response which follows.

DEFINITIONS:

Risk / Impact Ratings

Minor	Low risk with a financial impact of less than one percent and/or an isolated occurrence limited to local processes (low impact and low likelihood)
Moderate	Slight to moderate risk with a financial impact between one and five percent and/or a noticeable issue that may extend beyond local processes (low impact and high likelihood or high impact and low likelihood)
Significant	High risk with a financial impact greater than five percent and/or a significant issue that occurs in multiple processes (high impact and high likelihood)

Observations Categories

Opportunity	A process that falls short of best practices or does not result in optimal productivity or use of resources
Deficiency	A shortcoming in controls or processes that reduces the likelihood of achieving goals related to operations, reporting and compliance

Criteria for Observations Sourced to Management

- Internal audit was informed of the issue prior to starting detailed testing
- Management identified, evaluated, and communicated the issue to appropriate levels of the district
- Management has begun corrective action with clear, actionable plans and targeted completion dates

None of the observations resulting from this audit were sourced to management.

We rate risk/impact as:

- *Minor*
- *Moderate*
- *Significant*

Internal Audit identified one minor risk during this audit.

We categorize observations as opportunities or deficiencies. This audit identified two opportunities for management.

BACKGROUND:

We audited professional development activities and trainings and parents' support and training conducted by the six Exceptional Student Education (ESE) departments. We also reviewed ESE training provided by the Professional Learning Department. The different ESE departments and other audited areas are briefly described below:

- **ESE Behavior and Instructional (BI) Support:**
This department provides behavioral and instructional strategies to ESE teachers and staff. Strategies help them in their classrooms and with students' Individual Education Plan (IEP) and Education Plan (EP) goals.
- **ESE Specialized and Instructional (SI) Support:**
This department provides screenings, evaluations, Individual Education Plan services, and accommodations. Their training supports the following programs: Assistive Technology, Audiology, Hearing Impaired, Speech and Language and Visually Impaired Programs. This support and training helps staff provide appropriate accommodations and services that address students' IEP goals.
- **ESE Policy and Procedures (P&P)**
This is a compliance function. This department ensures all staff receive training, builds a high level of capability with all staff, monitors Section 504, monitors compliance at schools, and handles ESE dispute resolution.
- **ESE Transition Services (TS)**
The Preschool Diagnostic Intervention Services (PDIS) team conducts screenings and evaluations of children between the ages of 3-5 years to determine the need for ESE services. The Transition Services Department also focuses on high school students' employability skills which helps those students obtain paid employment.

Audit covered training conducted by these ESE departments:

- *Behavior and Instructional Support*
- *Specialized and Instructional Support*
- *Policy and Procedures*
- *Transition Services*
- *Supplemental Services*
- *OCPS FDLRS/FIN*
- *ESE Parents Support and Trainings, and*

Professional Learning trainings with ESE content.

- **ESE Supplemental Services (SS)**
This department provides support and services to charter and private schools, and the homeschooled.

- **OCPS Florida Diagnostic and Learning Resources System (FDLRS) and Florida Inclusion Network (FIN)**
This department is responsible for writing and managing a grant for funding each year as well as ensuring funds and resources are distributed equitably among multiple districts including OCPS. They collaborate with the ESE, professional development, and curriculum development departments in multiple districts.

- **ESE Parents Support and Trainings**
Many ESE resources and trainings are available to parents on the OCPS website. All ESE departments provide support and trainings/courses to ESE parents. For example:
 - The Big Idea Conference
 - PDIS
 - ESE Basic Overview
 - Open Forum/Roundtable Discussion
 - Decision Making Skills
 - Problem Solving Process for Dyslexia Students
 - Promoting Positive Presence and Preventing Problems
 - Survival Guide for the Beginning of School
 - Fridays with FDLRS
 - Self-advocacy Trainings
 - Learning at Lunch Series
 - Assistive Technology Resources
 - Mental Wellness Tips
 - Social Emotional Learning Conference

- **OCPS Professional Learning (PL)**
The Professional Learning Department supports instructional leadership. They provide ESE content during Preparing Future Principals Academy (PFPA), Aspiring Leaders Academy (ALA), and other trainings.

OCPS FDLRS/FIN administers funds among multiple districts and provides trainings to multiple district's ESE staff.

Many ESE resources and training opportunities are available to parents on the OCPS website.

Training content and intended audiences for each ESE department are summarized below:

Table 1 - Training content and intended audience for ESE departments

ESE Department/Area	Training Content	Intended Audience
Instructional Support - Behavior	Strategies specific to behaviors and gifted education	ESE teachers/staff, ESE Paraprofessionals, Autistic teachers/staff, Substitute ESE Paraprofessionals, Administrative staff, School Staffing Specialists, District Staffing Specialists, Behavior Specialists, Speech Clinicians, Gifted teachers/staff, new teachers/staff, and more
Instructional Support - Specialized	Accommodations and services delivery for students' IEP goals	ESE teachers/staff, Assistive Technology staff, Teachers of the Deaf, Teachers of the Visually Impaired, Occupational, Physical, Speech and Language Therapists, new teachers/staff, and more
Policy and Procedures	ESE policy / procedures and Florida Statute requirements	Occupational, Physical, and Speech/Language Therapists, School Staffing Specialists, District Staffing Specialists, Gifted teachers/staff, new teachers/staff, and more
Transition Services	PDIS screening and evaluation and high school students' employability skills	ESE teachers/staff, Administrators, PreK ESE teachers, Job Coaches, Employment Specialists, PreK ESE Paraprofessionals, School Staffing Specialists new teachers/staff, and more
Supplemental Services	Executive function for ESE students, classroom management, behavior, and other ESE topics	Private and Charter schools' ESE teachers/staff psychologists, therapists, and more
FDLRS/FIN	Quality IEP and FEFP Matrix of Services process and other ESE topics	ESE teachers/staff, Assistive Technology staff, Specialized Language Clinicians, School Support Staff, School Staffing Specialists, District Staffing Specialists, Media Specialists, Principals, Assistant Principals, Autistic teachers/staff, Behavior Specialists, Varying

Each ESE department provides training to varied audiences.

		Exceptionalities, PreK teachers, new teachers/staff, and more
ESE Parents	ESE support and resources (By Behavior, Specialized, Transition, Policy and Procedures, and FDLRS)	Parents of ESE students.
OCPS Professional Learning	ESE support for instructional leaders	Principals, Assistant Principals, Direct Supervisors, new leaders, and more

Source: ESE Departments

OBJECTIVES, SCOPE, AND METHODOLOGY:

Objectives

The objectives of this audit were to evaluate and analyze:

- ESE teacher and staff professional development activities
- ESE parents' trainings and support

Scope

The scope of the audit included professional development activities of all ESE departments, the Professional Learning department's ESE trainings, and ESE parents' trainings and supports from July 1, 2019 to March 31, 2021. We also obtained information about school-based ESE training from a sample of schools.

Methodology

Our audit methodology included:

- Reviewing Chapter 1012.98, Florida Statutes, *School Community Professional Development ACT*;
- Reviewing *Professional Development Catalog* (PDC) formerly known as *Master Inservice Plan* (MIP) 2019, 2020, and 2021.
- Reviewing ESE training information on OCSP ESE webpages;
- Discussions with ESE Executive Director, ESE Department Directors and staff, and OCPS Professional Learning Department;
- Obtaining, to the extent records were available, lists of all training and professional development conducted by each of the

This audit covered the period from July 2019 to March 2021.

We conducted discussions with ESE Management and the Professional Learning Department.

ESE departments and, for ESE-related training, from Professional Learning. (Some departments did not have records available.)

- Selecting a sample of 74 ESE trainings for teachers/staff out of total 1,127 training sessions, and 10 support and training sessions for ESE parents, and reviewing:
 - communications or advertisements and registration process
 - materials or presentation slides or handouts
 - subject and audience
 - attendees' logs
 - attendees' evaluation/ feedback
 - action plan, if any negative feedback
- Selecting a sample of 15 ESE teachers/staff from the 505 ESE teachers/staff employed in the district's ESE departments and verifying ESE endorsements on SAP-PA20-HR Master Data and Florida Department of Education (FLDOE) website for those positions subject to these requirements;
- Selecting a sample of 15 attendees of the 74 sampled ESE trainings, and verifying they submitted Temporary Duty leave slips (TDY) on SAP-PA20-HR Master Data;
- Verifying ESE inservice points with Professional Development Catalog component numbers on SAP-PA20 - Inservice History for aforementioned 15 ESE teachers/staff and 15 attendees of sample ESE trainings;
- Summarizing survey responses related to trainings received from School Staffing Specialists. Refer to *Table 3*;
- Reviewing *An Evaluation of the Exceptional Student Education Program in Orange County Public Schools* by Evergreen Solutions, LLC dated October 10, 2013 and the Internal Audit Department's *Evergreen Report Follow-up Review* dated November 6, 2015, and confirming accomplishment of management response on the 2013 audit report's recommendations related to training and professional development; and,
- Reviewing contracts and/or Purchase Orders (PO) for those vendors who provided ESE trainings and equipment for Specialized Support.

We performed detailed testing of a sample of 74 trainings for ESE teachers/staff and 10 trainings for parents.

We verified ESE certifications, ESE inservice points, and Temporary Duty (TDY) leave slips for selected sample.

Confirmed accomplishment of management response to recommendations related to training from previous Evergreen audit report.

We conducted this audit in accordance with the *International Standards for the Professional Practice of Internal Auditing* of the Institute of Internal Auditors and included such procedures as deemed necessary to provide reasonable assurance regarding the audit objective. Internal auditing is an independent, objective assurance and consulting activity designed to add value and improve an organization’s operations. It helps an organization accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control, and governance processes.

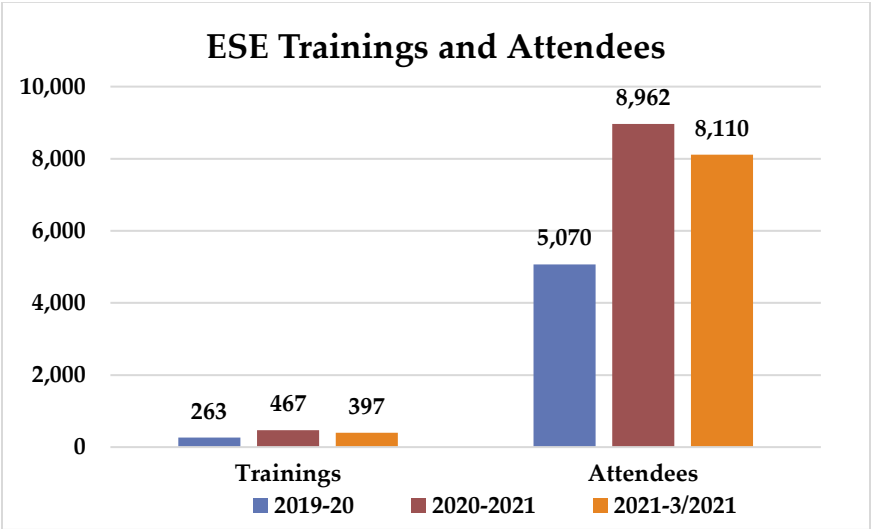
We are required to note any material deficiencies in accordance with Florida Statutes, School Board Policy and sound business practices. No material deficiencies were noted in this audit. We also offer suggestions to improve controls or operational efficiency and effectiveness.

COMMENDATIONS:

ESE trainings and professional development are extensive. We noted that:

- The ESE department provided more than 1,127 training sessions to more than 22,000 total ESE teachers and staff for fiscal years 2019, 2020, and 2021 through March 31,2021. The total attendees does not include all attendees from some ESE areas because that data was not available. Refer to *Table 2* and *Audit Result*.

Graph 1 – ESE Training Sessions and Attendees



Source: ESE staff and total trainings counted by Internal Audit

We conducted this audit in accordance with the International Standards for the Professional Practice of Internal Auditing

We noted no material deficiencies.

At a minimum, more than 1,127 total training sessions were provided to more than 22,000 total ESE teachers and staff for the last three fiscal years.

Actual number of trainings and attendees is higher but not determinable due to records not being available.

Details of the documented number of training sessions and attendees for each ESE area are shown below:

Table 2 – Training sessions and Total Attendees by ESE Area

ESE Dept.	2019		2020		2021	
	T	A	T	A	T	A
BI	58	1,228	279	5,033	263	6,794
SI	40	NA	30	NA	15	NA
P&P	105	1,750	85	1,920	52	NA
TS	29	37	28	136	25	78
SS	8	268	14	257	16	474
FDLRS	19	1,723	28	1,586	23	730
PL/ESE	4	64	3	30	3	34
Totals	263	5,070	467	8,962	397	8,110

T = Trainings A = Attendees NA = Not Available (see Recommendation)

Source: ESE Department

- ESE face to face and virtual trainings are conducted in a variety of training methods such as interactive, case study, scenarios, hands-on, videos, audios, examples, skills based, question and answer, group discussion, on the job, classroom based, and technology based.
- The ESE training attendees' evaluation and feedback we reviewed were positive and constructive, and attendees commented on how useful trainings were related to their job.
- ESE provides abundant face to face and/or virtual support, trainings, and resources for ESE parents.

RESULTS AND RECOMMENDATIONS:

Overall Conclusion

Our overall conclusion is that ESE professional development activities, trainings, and supports are provided effectively and efficiently.

Trainings are conducted in a variety of training methods.

Selected trainings' attendees provided positive and constructive feedback.

ESE provides abundant support and trainings for parents.

Results

Training Records

We learned that there is no complete record of all training conducted at OCPS. No single source of this information exists. Some departments keep these types of records for sessions they conduct. In these instances, the records stay in those departments and only the information necessary to update employee inservice points is transmitted to HR. The type of information kept in the ESE departments varied from no historical record to very complete and detailed records and in between.

As a result, some of our analyses were limited, and we noted an opportunity for more complete and consistent record keeping among ESE departments for training hours and attendees' data. Our recommendation on this matter is later in this report.

Communication of trainings to ESE teachers and staff

ESE training opportunities are communicated to teachers and staff via:

- Emails
- Canvas Toolkit notifications
- Announcement of upcoming trainings at the end of a training
- Links on ESE intranet pages
- Social media
- OCPS LaunchPad (ESE Ongoing Support Widget)
- Checklists
- FDLRS/FIN website
- FDLRS Action Email
- FDLRS/FIN Face Book and Twitter feeds
- Brochures/Fliers
- Calendar invites
- During Aspiring leader and Assistant Principals' trainings
- Memos on the Deputy Superintendent's SharePoint site
- Zoom and WebEx meeting invites
- During staff meetings

The ESE Policy and Procedure Department also offers daily open forums via a "hotline" for School Staffing Specialists or other ESE staff to contact with questions or for guidance. Recently some parents have begun calling this number with their questions.

No single record of training conducted at OCPS exists.

Training opportunities are communicated in many ways.

ESE Teachers and Staff Training - Attendees' Logs and Evaluation/Feedback

Before August, 2020, attendees signed on a sign in sheet and after training, submitted completed evaluation/feedback forms known as blue forms to the staff who delivered the professional development. Staff kept the sign in sheet and sent the completed blue forms with a header sheet known as the orange form to HR's Talent Acquisition and Compliance Department for scanning and recording in SAP.

Canvas trainings began after August, 2020, and since then, training attendees' logs and evaluation/feedback are documented in electronic form in Canvas. ESE staff can review or download these documents from Canvas.

We collected and reviewed available attendees' logs and evaluation/feedback forms/responses for sample trainings for ESE teachers and staff. Attendees' logs and/or feedback documentation for Behavior Instructional Support, Specialized Instructional Support, Transition Services, Policy and Procedures, and Professional Learning ESE trainings were not readily available. The reasons provided were:

- Documents prior to August 2020 were difficult to identify in SAP as the staff who delivered the trainings did not forward training documents with proper labeling and date.
- Inservice point/evaluation/feedback forms were not provided during the pandemic for virtual trainings such as on Microsoft Team, Zoom, or WebEx.
- Trainings were embedded with staff meetings.
- Trainings' evaluation/feedback forms were not collected from a vendor that provided the training.

ESE Parents' Support and Trainings

As mentioned previously, the district provides abundant face to face and virtual support, trainings, and resources for ESE parents through each ESE department, vendors, and the Parent Academy. *The Big IDEA Conference* is currently underway for ESE parents with links and widgets (see below) posted on the ESE website. Prior sessions are recorded and links to the recordings are also provided.

Currently, training attendees' logs and evaluation/feedback forms are in electronic format in Canvas.

Some records were not available.

We audited a sample of parents' support and trainings and noted the district provides abundant support, trainings, and resources for ESE parents.

There are several forms of announcement for support, trainings, and resources for parents. Among them are:

- OCPS and ESE parent web page (Active Links)



- ESE Facebook page
- ESE Behavior Instruction Twitter
- FDLRS/FIN website, Face Book, and Twitter

Attendees' logs and feedback are not applicable for training embedded in ongoing support, roundtable conferences, and open QA sessions. Staff could view the number of clicks by attendees for only some trainings. They were not able to determine the number of support and training sessions for parents as several trainings are ongoing, on demand, open forum format, question and answers (QA) session and recordings. We randomly selected 10 parent trainings and reviewed related documents, and noted no exceptions.

School Based ESE Teachers and Staff Trainings

We discussed school-based ESE trainings during our meetings with 40 schools' principals. We learned that school-based ESE trainings are typically conducted during pre-planning as well as during the school year. School Staffing Specialists (SSS), Program Specialists, and Behavior Specialists provide ESE trainings, support, and/or guidance to ESE teachers and staff on:

- IEP/EP procedures and goals
- Students' accommodations
- Behavior and progress plans
- Behavior issues and needs
- ESE challenges
- Strategies to provide services
- ESE procedures, compliance, and documentation
- Review of Multi-Tiered System of Supports (MTSS) framework
- Data Collection Process

Links are provided for ESE parents support, trainings, and resources on OCPS and ESE websites.

School-based ESE training varies from school to school and was impacted by the pandemic this year.

Schools provide ESE trainings, support, and/or guidance during pre-planning meetings as well as during the school year.

However, school-based training was reduced this past year due to the pandemic.

School Staffing Specialists Survey Responses on Trainings

During a separate IEP process audit, we surveyed School Staffing Specialists about their training and other aspects of their jobs. The survey asked, among other questions,

- What do you consider to be the most difficult part about this position?
- If you could change anything about this position, what would it be?

We received 131 responses and noted the following comments related to training.

Table 3 –Survey Responses by School Staffing Specialists

Survey Responses Related to Training
Need intensive training on preparing and planning for meetings involving advocates, state complaints, etc.
Reviewing a PowerPoint one time then referring the SSS to it is ineffective. Need systematic sequence for DSS to provide follow-up and guidance.
Providing duplicate trainings year after year.
Need trainings for ESE providers in writing compliant IEPs.
Training should include specific samples/examples that we can follow to ensure information is input correctly and we are on the same page with compliance. Ambiguity in training is not helpful.
Information presented in trainings is different than what school administrators are told.
Training materials cover many topics. Locating specific guidance is difficult without an index or other organization method.
Attending training consumes time and training documents are overwhelming. Materials need to be broken down by topics rather than by date for easy reference. Should have hub for training docs.
Mini trainings are helpful, but consume a lot of time, especially when training related to other duties is also required.
It is helpful if trainings will be prior to starting the job and having to hold meetings.
Need more extensive and systematic trainings by the DSS.
You should ask the SSS what trainings we need.

Source: Survey responses during IEP Process audit

We surveyed School Staffing Specialists about their jobs.

The ESE Department should incorporate feedback from the surveys as appropriate.

**House Bill (HB) 149 – Students with Disabilities in Public Schools
(effective July 1, 2021)**

HB 149, passed in the most recent legislative session, requires the Florida Commissioner of Education to develop recommendations to incorporate instruction regarding emotional or behavioral disabilities into continuing education or inservice training requirements for instructional personnel. The ESE Department is assessing the impact of this legislation on its training programs.

Recommendations *Minor Risk, Opportunity*

As noted earlier in this report, some training and professional development records were not available. For accountability and effective management oversight, we recommend the ESE Department maintain complete training records including titles of programs, dates conducted, total training hours and total attendees for each ESE department. This data helps in decision making and reporting.

We also recommend the ESE Department incorporate feedback from the School Staffing Specialists' survey regarding training as appropriate.

We wish to thank the ESE Executive Director and staff, Professional Learning department and staff, HR Talent Acquisition department and staff, and Parent Academy department and staff for their cooperation and assistance with this audit.

*We recommend
maintaining a complete
record of all courses held*

*Incorporate feedback from
School Staffing Specialists
in future trainings.*



Department / School Name	Exceptional Student Education (ESE)
Administrator / Department Head	Ian Gesundheit
Cabinet Official / Area Superintendent	Susan Abbe

Audit Result / Recommendation	Management Response Acknowledgement/ Agreement of Condition	Responsible Person (Name & Title) And Target Completion Date (MM/YYYY)	Management's Action Plan
<p>Maintain a complete record of all courses held to include titles, dates conducted, total training hours and total attendees for each ESE Department.</p> <p>ESE Departments:</p> <ul style="list-style-type: none"> • Behavior and Instructional Support-BI • Specialized and Instructional Support-SI • Policy and Procedures-P&P • Transition Services – TS • Supplemental Serviced – SS • Florida Diagnostic and Learning Resources System FDLRS and Florida Inclusion Network FIN • Parent Support and Training 	<p>A system to document and track professional learning opportunities provided to our stakeholders is inconsistent across teams and departments.</p>	<p>August 2, 2021 and ongoing Ian Gesundheit, Executive Director and Mary K. Boyd, Senior Administrator</p>	<p>Utilize Canvas to document and track all professional learning opportunities provided to our teachers and staff. In addition, create a master professional learning catalogue in Google for ESE teachers and staff that can serve as a library of resources with links to courses in Canvas.</p>



<p>Incorporate feedback from School Staffing Specialists survey in future trainings.</p>	<p>Feedback from stakeholders is critical in order to improve practice.</p>	<p>August 2, 2021 and ongoing Directors and Senior Administrators over each department: BI: Mary K Boyd, Senior Administrator SI: Elizabeth Padilla, Director P&P – Elizabeth Prince – Principal on Assignment TS – Leigh Austin, Director SS – Bev Knestrick, Director, Sylvia Schaffer, Senior Director FDLRS & FIN- Ian Gesundheit, Executive Director Parent Support- Terranesha Young, Senior Administrator</p>	<p>Incorporate and leverage anonymous feedback surveys related to the value and relevancy of all professional learning and incorporate trend feedback to improve professional learning where necessary.</p>
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