

Volusia County Schools, Florida Internal Audit Report: FY25 Student Discipline Follow Up

May 7, 2025





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Transmittal Letter

May 7, 2025

The Audit Committee of The School Board of Volusia County, Florida 200 N. Clara Avenue DeLand, FL 32720

Pursuant to the Volusia County Schools' ("VCS," "District") approved internal audit plan for fiscal year ("FY") 2024-25, we hereby present our full scope FY25 Follow Up Internal Audit Report of Student Discipline. The following table provides a summary of each open Student Discipline observation identified in our original Student Discipline report on March 6, 2024, alongside the status of each observation following our initial follow-up procedures. We will continue to update the status of the implementation of management action plans with the results of detailed testing performed following each estimated completion date.

Student Discipline Observation Status							
Original Observations	Original Rating	New Rating	Status				
Student Discipline Policy Non-Compliance	High	Moderate	In Progress				
2. Retention of Discipline Documentation	High	Moderate	In Progress				
3. Accuracy and Completeness of Discipline Documentation	High	Moderate	In Progress				
4. Standard Operating Procedures	Moderate	Moderate	In Progress				
5. Formalized Monitoring Processes	Moderate	Moderate	In Progress				

We would like to thank the staff and all those involved in assisting our firm with this follow-up report.

Respectfully Submitted,

RSM US LLP

RSM US LLP

Report Date: May 7, 2025



Background

Overview and History

In the 2023-24 school year, Volusia County Schools commissioned a discipline audit to evaluate its existing systems and practices. The resulting report was issued March 6, 2024, and included five (5) observations surrounding the discipline process. This report serves as a full scope follow up audit, in which a detailed examination was conducted of the procedural and systematic observations identified during the originally issued report to verify progress made towards the management action plans and recent implementations developed by the District.

Student discipline encourages a supportive atmosphere conducive to learning within the classroom, and individual student needs through comprehensive prevention strategies, targeted interventions, and development of self-discipline. Districts are tasked with the responsibility of addressing the behavioral violations and mitigating the risk of future behavior violations. The District's primary framework for handling and managing behavioral violations is the Code of Student Conduct and Discipline, which was most recently revised on July 30, 2024, School Board Policy 507 – Non-Discrimination and Educational Equity, School Board Policy 509 – Prohibition of Harassment, and School Board Policy 525 – Policy Against Bullying and Harassment (collectively, "Student Discipline Policies"). Contained within the entirety of the updated Student Discipline Policies are definitions of behavioral violations, categories for severity of offense, rights and responsibilities for students and parents, and disciplinary consequence procedures with a revised Discipline Matrix (see **Appendix A**) which were implemented during the 2024-25 school year. The District continues to comply with the Americans with Disabilities Act Settlement that was entered into on July 2021. Under the settlement agreement the District agreed to:

- 1. Not exclude a qualified individual with a disability from participation in, or deny a qualified individual with a disability, the benefits of the services, programs or activities of VCS by reason of the individual's disability;
- 2. Not utilize methods of administering its programs and services that have the effect of subjecting a qualified individual with a disability to discrimination on the basis of disability;
- 3. Make reasonable modifications to polices, practices, or procedures when the modifications are necessary to avoid discrimination on the basis of disability, unless VCS can demonstrate that making the modifications would fundamentally alter the nature of the service, program, or activity; and
- 4. Not retaliate against any individual or coerce, intimidate, threaten, or interfere with any individual in the exercise of enjoyment of, or on account of his or her having aided or encouraged any other individual in the exercise information or enjoyment of any right granted or protected by the ADA.

Additionally, the District must monitor all removals of students with disabilities from classroom instruction based on behavioral incidents that may be a result or manifestation of the student's disability. For students with an IEP, the IEP team must meet to determine whether a Functional Behavior Assessment ("FBA") must be completed, and whether Behavioral Intervention Plan ("BIP") should be modified with additional or different behavioral supports and interventions. These provisions are intended to prevent over-discipline of students with disabilities as a result of a manifestation of their disability. Additional personnel requirements, reporting expectations, training, and certifications are also specified within the settlement in which the District complies.

District Student Discipline Enhancements

Since the original discipline audit was issued in March 2024, Student Services has made many key milestones and initiatives that have shaped the District's renewed discipline framework. From infrastructure upgrades and leadership shifts to policy updates and training programs, each component reflects Volusia County Schools' commitment to building a more responsive, effective, and student-centered discipline system. The District has reworked the previous system of administering discipline by developing a new and updated Discipline Matrix, which now details consequences contingent upon the frequency of the incident for more equitable and appropriate discipline. Additionally, the District has added a designated Threat Coordinator as was mandated per the newly implemented HB5101 Rule 6AER 23-02. This position will help facilitate the administration and address the requirements surrounding threat related student incidents. The District has developed a Volusia Assistance & Prevention Education ("VAPE") program to teach the effects of vaping and combat the usage of vape amongst students. As it relates to transparency and reporting, Student Services has implemented a consistent quarterly reporting structure in which the Board will be informed regularly of the discipline team's current initiatives, most recent reporting trends, progress on addressing high discipline rates, and other important discipline related criteria. Finally, monitoring has been expanded through reporting capabilities built out through the source student material retained within Focus. Monitoring details are meant to provide the District Discipline team with both aggregate trend information, as well as more granular discipline insights specific to schools and students. These dashboards have been built out electronically to be more intuitive and visually based, allowing for easier interpretation of the existing SIS data (See Appendix B).

VOLUSIA COUNTY SCHOOLS

Background (Continued)

District Student Discipline Enhancements (Continued)

VAPE Program

At the beginning of the FY24, VCS introduced the Volusia Assistance & Prevention Education program which is focused on teaching the effects of vaping and combating the usage of vapes amongst students. Should a student be commit an infraction related to the possession or use of a vaping device, the Discipline Matrix requries that the student participate in and complete the correspondiong program. The VAPE Program is a 9 week assigned course after a student is assessed a vaping related behavioral code and includes but is not limited to sessions on the health risks of vaping as well as coursework requiring students to awknowledge the effects of vaping. The student completes the course electronically through Canvas, the Districts academic and education platform. The VAPE course is assigned in FOCUS for each student, and administrators track completion of the course through the corresponding Canvas module. If the student fails to complete the course, this can result in off-campus instruction, alternative education placements, or other corrective actions.

Improved Training and Resources

Student Services is responsible for training District personnel regarding student behavior and discipline. Annual training for administrators is performed each summer to educate those involved in the discipline processes for the requirements and procedures necessary to adequately document and report on discipline incidents within the District.

In September of 2024, the Student Services held a 'Discipline Matters' training to instruct administrators on new initiatives and reinforce existing expectations. Topics incorporated as a part of this training included the VAPE Program, random screening, facilitation of culture walks, de-escalation methods, District resources, and the updated 2024-2025 Student Services Manual.

Additionally, monthly mandatory training sessions for assistant principals are performed to further educate school administrators on the most recently updated guidance from the District. These meetings also provide a forum to discuss ongoing discipline challenges and trends, as well as to address concerns or answer questions regarding the application of the Student Discipline Policies. Attendance is tracked using a newly implemented 'exit ticket' system comprising of general questions from the topic presented.

There are a variety of educational, training, and awareness programs that are ongoing within the District. These range from bully investigations, behavioral management, Focus navigation, compliance updates, and ESE reporting, to unique cases that may involve specific student groups requiring additional procedures per existing regulations. Core training curriculum is intended to educate stakeholders, including teachers, staff, bus drivers, and other District personnel of the existing discipline standard operating procedures. Specialized SESIR training sessions are provided by Student Services to the site team responsible for the submission of student behavior and SESIR data and school administrators responsible for capturing the SESIR data through the student referral process.



VOLUSIA COUNTY SCHOOLS

Background (Continued)

Revised 2024-25 Roles and Responsibilities

Per our review of the Student Discipline Policies and discussion with various staff members, we have outlined our understanding of the updated current roles and responsibilities of primary stakeholders as it pertains to student discipline.

Schools

- School staff are responsible for documenting and reporting behavioral violations through a referral.
- The school administrator reviews the referral and investigates as needed, assigns appropriate disciplinary consequence, and documents any additional information in the student information system, Focus.
- The principal is ultimately responsible for disciplinary consequence assigned.
- Other designated school personnel may perform a review of student records, assessments, and investigations to determine compliance with VCS policies prior to the issuance of disciplinary consequence.

Student Services

- Administer Student Discipline Policies and Procedures.
- Provides training and resources to school staff.
- Monitors ongoing behavior violations and provide consultation to schools as needed.
- Supports investigations including ESE, Threat Assessment, Title IX, and Bullying.
- Review, process, and approve expulsion recommendations and supporting documentation.

Superintendent Chief Academic Officer Executive Director of Exceptional Student Education Exceptional Student Education Coordinators Student Services Coordinators

Exceptional Student Education ("ESE")

- Supports students who meet the criteria of one or more of the categories of disabilities and/or meet the eligibility for gifted services.
- Develops, coordinates, and revises Behavior Intervention Plans, Individualized Education Programs and Manifestation Determination reviews.
- Analyzes ESE-related data and prepares reports as required by the Florida Department of Education ("FLDOE").
- Designated ESE Assistant Principals ("AP") are located at middle and high schools to provide immediate support and assistance to ESE related incidents.

School Board

- Determines the overall district-wide discipline policies that align with Federal and State regulatory guidance.
- Retains sole legal authority to expel a student. The School Board may accept, reject, or request an amendment to the Superintendent's recommendation.

Law Enforcement

The District maintains individual law enforcement School Safety Officer Agreements with the Volusia County Sheriff and various municipalities within Volusia County to document the understanding of the Student Resource Deputies ("SRD") contract agreement and scope of work expectations. Additionally, Florida Statute 985.04 provides requirements for the notification and sharing of criminal information involving District students with law enforcement through an interagency agreement. The District has an active Schools Resource Deputy agreement with the Sheriff's Office which is valid between July 1, 2024-June 20, 2026 and it includes documented responsibility for maintaining records for SRD training pursuant to newly enacted F.S. 1006.12.

VOLUSIA COUNTY SCHOOLS

Background (Continued)

Revised 2024-25 Disciplinary Consequences

At the beginning of the 2024-25 school year, Student Services released a newly developed and refreshed Discipline Matrix to provide for greater guidance and equitable standards of discipline across the District. This updated matrix now details minimum consequences contingent on both the severity and frequency of an incident. A student who has multiple repeat offenses may receive additional consequences to a student that is a first offender for the same type of incident. The table below provides an overview of the disciplinary actions that may be implemented in response to student behavior violations:

Most Severe Disciplinary Consequences

Level IV – Minor Offenses

- Behavioral contract
- · Cafeteria restriction
- Conference with student
- Community service in lieu of suspension
- Detention
- Extended detention
- In-school suspension
- Loss or suspension of privileges including extracurricular events/activities
- Mediation
- Parent/guardian conference
- · Parent/guardian visitation
- Problem solving team/multi-tiered
- · system of support team
- Restitution
- Saturday school
- Student services referral (i.e. school counselor, school social worker or school psychologist)
- Suspension
- Suspension from the bus
- Time out
- Warning
- · Work detail

Level III - Intermediate

- Behavioral contract
- Cafeteria restriction
- Community service in lieu of suspension
- · Concern of harm referral
- Detention
- Extended detention
- In-school suspension
- Loss of privileges: extracurricular events/activities
- Mediation
- Parent/quardian conference
- Parent/guardian visitation
- Problem Solving Team
- Restitution
- Saturday school
- Student services referral (i.e., school counselor, school social worker or school psychologist)
- Suspension
- Suspension from the bus
- · Suspension of privileges
- Time out
- Tobacco citation or Online
- Tobacco Class
- Warning
- Work detail

Level II - Major I Offenses

- Assignment to an alternative education program
- · Civil citation program
- Community service in lieu of suspension (Not appropriate for all Level III Offenses - consult with the District Office)
- Confiscation
- Concern of harm referral
- Expulsion recommendation from school or bus
- In-school suspension
- Problem Solving Team
- Restitution
- Saturday school
- Student services referral (i.e., school counselor, school social worker or school psychologist)
- Suspension from school or bus (suspension must be considered for the possession of a common pocketknife)
- Suspension from driving/vehicle restriction
- Threat Assessment

Level I - Major II Offenses

- Administrative assignment to an alternative education program
- Expulsion (pending expulsion, students will be suspended & will lose all privileges pertaining to extracurricular events & activities).
- · Concern of harm referral
- Restitution
- Student Services Referral (i.e., school counselor, school social worker or school psychologist)
- Threat Assessment

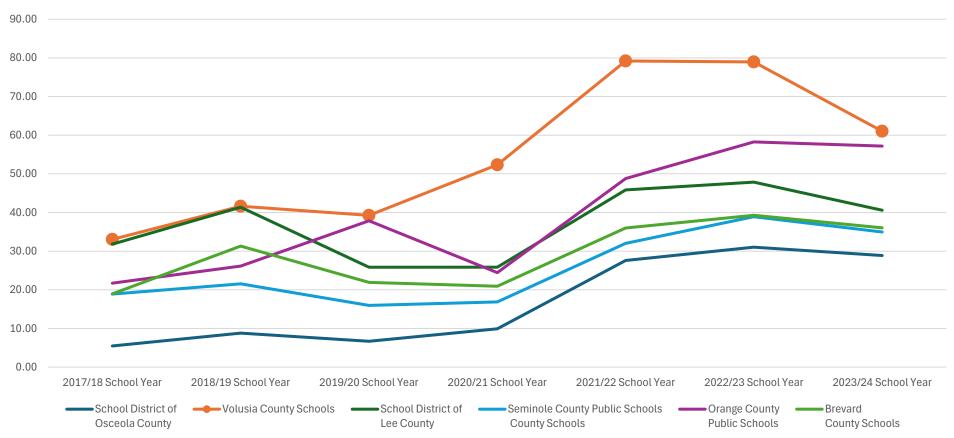
VOLUSIA COUNTY SCHOOLS

Background (Continued)

Comparable School Districts

The Florida Department of Education publicly reports collected SESIR data for all school districts within the state on its website. At the time of this report, the most recently available data is from the 2023/24 school year. Of all Florida public school student's Pre-K through 12th grade, total enrollment was 2,872,309. Volusia County Schools accounted for a total enrollment of 62,742, which is 2.18% of the total state enrollment amount. In this same reporting period, statewide SESIR violations totaled 106,952, of which VCS accounted for 3,829 violations or 3.58% of all reported SESIR violations. The chart below identifies the most recent publicly available seven (7) years of SESIR violation data for VCS as well as for several comparable counties.

Student Behavior Incidents per 1,000 FTE *Data obtained from FLDOE database





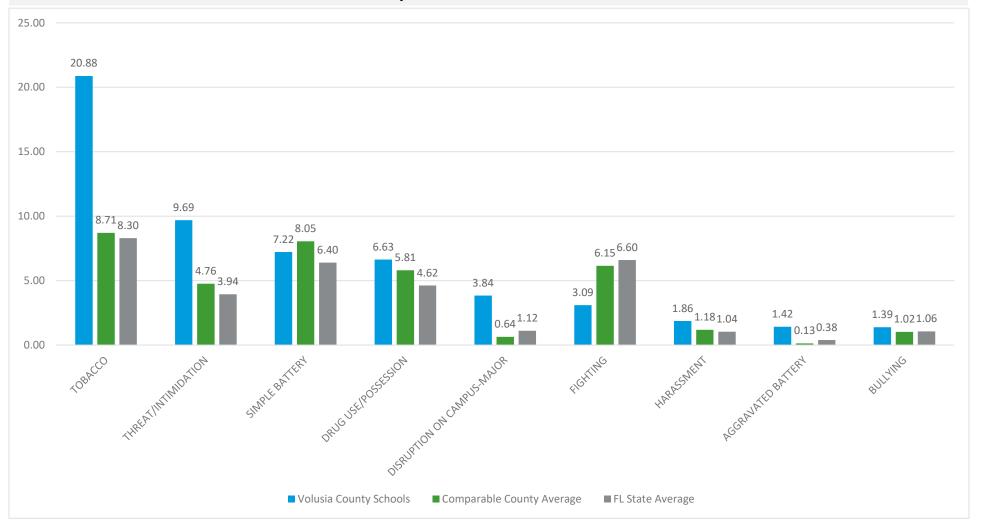
Background (Continued)

Comparable School Districts (Continued)

SESIR Infractions by Category – Comparable Counties

The following table represents the most common SESIR violations that comprise 95% of total reported VCS SESIR infractions. The table compares the results to the number of total SESIR infractions per every 1,000 FTE, by category, reported by comparable counties and the Florida State average.

Data obtained from the FLDOE database for the 2024 academic year.



COUNTY SCHOOLS

Background (Continued)

Focus Dashboard

The below screenshot shows an example of Focus' reporting and monitoring dashboards, built from the data queries resulting from student information. The below dashboard shows discipline referral volume, daily averages, locational information, and behavioral corrective actions. These dashboards can be viewed on a per school level or at an aggregate view of the entire District.



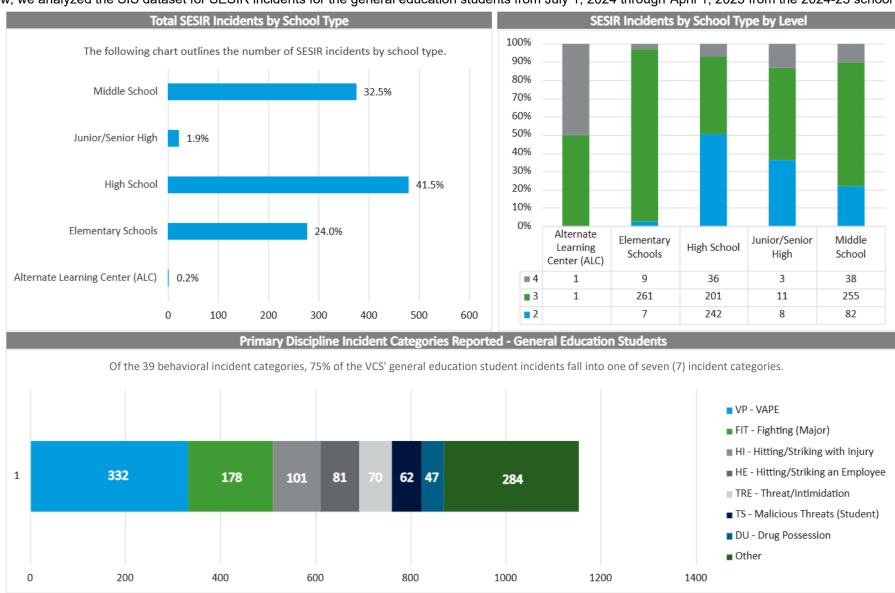
*Data was obtained from the Focus for the 2024-25 school year. Note that while Focus uses the terminology 'Infractions', VCS' Student Discipline Policies refers to 'Violations.' Data is unaudited.



Background (Continued)

General Education SESIR Snapshot

Below, we analyzed the SIS dataset for SESIR incidents for the general education students from July 1, 2024 through April 1, 2025 from the 2024-25 school year.



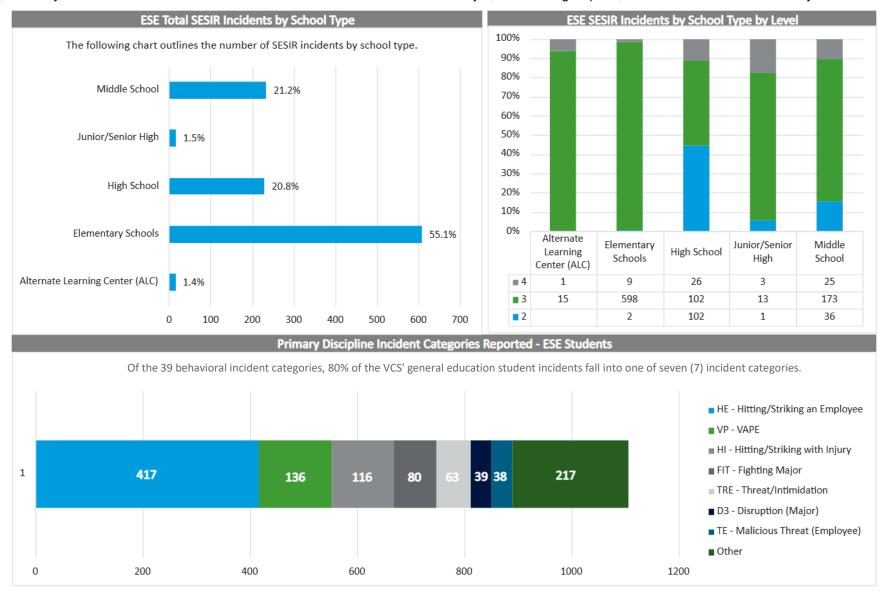
^{*} Note that while Focus uses the terminology 'Infractions', VCS' Student Discipline Policies refers to 'Violations.' Data is unaudited.



Background (Continued)

ESE SESIR Snapshot

Below, we analyzed the SIS dataset for SESIR incidents for the ESE students from July 1, 2024 through April 1, 2025 from the 2024-25 school year.



^{*}Note that while Focus uses the terminology 'Infractions', VCS' Student Discipline Policies refers to 'Violations.' Data is unaudited.

Report Date: May 7, 2025



Objectives and Approach

Objectives

The primary objective of this internal audit was to re-evaluate the District and the Schools' compliance with the Student Discipline Policies and Florida regulations.

Approach

Our approach consisted of the following phases:

Understanding and Documentation of the Process

The first phase of this internal audit consisted primarily of inquiry and walkthroughs in an effort to obtain an understanding of the District's current operating policies and procedures, monitoring functions, and control structures as they relate to the processes within our scope, including any additions or changes that occurred since the originally issued internal audit in March of 2024. The following was performed as part of this phase:

- Conducted interviews with the appropriate representatives to discuss the scope and objectives of this audit and obtain preliminary data,
- Reviewed the applicable Board policies, procedures, and reports related to this project
- Performed walkthroughs to gain a detailed understanding of the function and assess the design of the District-wide student discipline process; and
- Developed a work plan to evaluate compliance with District-wide student discipline policies based on the information obtained through our review, inquiry, and walkthrough procedures.

Evaluation of the Process and Controls Design and Testing of Operating Effectiveness

The purpose of this phase was to evaluate and assess the design of the process and test the operating effectiveness of key internal controls. We utilized sampling and other auditing techniques to meet our audit objectives. Our sample population was selected from a dataset population provided by Student Services from Focus. The dataset represented all referrals documented in the SIS during the 2024-25 school year. Our sample was selected on a pro-rated basis for general education and exceptional student education SESIR incidents.

Our total sample size was fifty (50) referrals across three (3) elementary schools, eight (8) middle schools, and four (4) high schools. We judgmentally selected student discipline referrals representing a variety of discipline violation classifications, grade levels, and violation dates. Emphasis was placed on more severe behaviors however all severity levels were covered in our testing. No individual student was sampled more than once.

We conducted the following testing and other procedures as deemed necessary

- Determined compliance with policy, regulations, and procedures as it pertains to student discipline within the District;
 - Selected a sample of fifty (50) SESIR violation referrals from the 2024-25 school year, including both twenty-five (25) ESE and twenty-five (25) general education students, and evaluated compliance with student disciplinary consequences that can be imposed on students, as specified in the Student Discipline Policies, requirements approved by the school board. Procedures included the following:
 - Verified Discipline Referral form was completed for all input fields, including related elements and injury-related elements;
 - Verified documentation to evidence all disciplinary consequence completions;
 - Evaluated the completeness of the discipline referral documentation; and
 - Evaluated the timeliness between the actual violation date and the violation documentation date.



Objectives and Approach (Continued)

Approach (Continued)

Evaluation of the Process and Controls Design and Testing of Operating Effectiveness (Continued)

- O Selected a sample of twenty-five (25) ESE student SESIR behavioral infractions and evaluated compliance with DOE Rule 6A-6.03312(3) through (5) because of disciplinary removal of students with disabilities through verification of the following:
 - Performance of Functional Behavioral Assessment (FBA) was documented as required under F.A.C Rule 6.03312(3)(c) 1-2;
 - Performance of Functional Behavioral Assessment was timely (before the 11th day of suspension, as applicable);
 - Performance of Behavioral Intervention Plan (BIP) was documented as required under F.A.C Rule 6.03312(3)(c)1-2;
 - Performance of Behavioral Intervention Plan for change of placement was timely (before the 11th day of suspension, as applicable);
 - Performance of Manifestation Determination Review was timely (within 10 days of any decision to change the placement of student);
 - Performance of an IEP Review was documented (as applicable); and
 - Performance of student's file was reviewed and documented.
- Evaluated whether student discipline-related reporting is accurate and timely submitted, based on the requirements described in Florida DOA Rule 6A-1.0017 School Environmental Safety Incident Reporting (SESIR);
- Documented the reporting structure and employee roles for the student discipline process;
- Performed data analytics to benchmark student discipline metrics to comparable school districts; and

Reporting

At the conclusion of this internal audit, we summarized our findings into this written report. We have reviewed the results with appropriate Management personnel and have incorporated Management response into this report.

Report Date: May 7, 2025



Observations Matrix

1. Student Discipline Policy Non-Compliance

Risk Rating: Moderate

Status: Open

Original Observation

In our performance of detailed testing of sixty-six (66) sampled SESIR referrals, we noted sixty-four (64) samples, or 96.7%, did not assess the minimum expected mandatory disciplinary consequences as outlined through the discipline matrix. Thus, we identified non-compliance with the Student Discipline Policies which resulted in the under-discipline of both ESE and general education students per the District's discipline matrix requirements.

Per Section 1415(k)(1)(B) of IDEA and 34 C.F.R. 300.519, a behavior intervention plan and functional behavior assessment are expected to be completed and considered in the application of disciplinary consequences for ESE students when recommended by the school psychologist, counselor, or designated administrator. Additionally, DOE Rule 6A-6.03312 stipulates that if ten (10) out-of-school suspension days are accumulated by an ESE student over the duration of a school year, a functional behavioral assessment is required to be performed. In instances where ESE students are permitted a lesser out-of-school suspension term, this threshold may not be exceeded and an FBA would not be performed as required.

The District has established a discipline matrix that outlines each behavioral violation and the mandatory and optional disciplinary consequences to violations of the Student Discipline Policies (See Appendix A). Principals at each school site are responsible for accurately identifying the student behavior violation and implementing each mandatory disciplinary consequence to the behavioral violation. Principals may additionally elect to select other optional disciplinary consequence as identified within the Student Discipline Policies. As a result, multiple disciplinary consequences may be performed for each violation of the Student Discipline Policies. The matrix provides that per School Board Policy 208, a student's IEP or 504 plan must be considered when determining the disciplinary consequence. In addition, per the settlement agreement with the United States Department of Justice, the District must consider whether any behavioral violation is a manifestation of a disability for all students qualified as a student with a disability.

Without consistent application of the mandatory disciplinary consequences assigned to each behavior violation, the District risks un-equitable application of discipline amongst students. While modifications to the mandatory disciplinary consequences to account for a manifestation of a disability for students with disabilities may be permitted, the District does not currently maintain documentation to substantiate the allowability of deviation from the Student Discipline Policies within Focus for students with disabilities, and therefore an audit trail is not maintained.

Original Recommendation

It is possible that the culture of under-disciplining we noted in our audit was cultivated inadvertently and was in response to the District's DOJ settlement. The culture must be righted to comply with District policies, while still maintaining compliance with the DOJ settlement. We recommend that the District uphold and enforce the minimum discipline standards as defined within its Discipline Policies as aligned with the discipline matrix. These expected disciplinary consequences should be clearly communicated to the sites to determine equitable treatment between students.

Through discussion with Student Services, we understand that the nature of Elementary student behavioral violations is generally understood to be less severe, and consideration is encouraged to minimize the disciplinary consequence's effect on classroom learning. If the District desires, VCS could consider bifurcating into Elem/Secondary matrices for increased flexibility. Any updated matrix should be reinforced with training and monitoring as the expectation of the minimum disciplinary consequence(s) associated with each categorized behavioral violation to maintain a consistency in minimum level of disciplinary consequence to identify student violations.

We understand that there is no 'one size fits all' approach to discipline, and as school principals' ultimately determine the disciplinary consequences administered, the discipline matrices should be used as a standardized minimum of disciplinary consequences. Principals maintain the responsibility to identify appropriate levels of disciplinary consequence situational and dependent on each behavior violation, and thus may increase discipline appropriately beyond the minimum standards of the matrices.

Report Date: May 7, 2025



Observations Matrix (Continued)

1. Student Discipline Policy Non-Compliance (Continued)

Management's Response: May 2025

Response:

Volusia County Schools has taken significant steps to reframe the student discipline process in a way that balances accountability with professional autonomy. The streamlined approach supports principals in exercising their leadership roles rather than functioning solely as policy enforcers. The updated Discipline Matrix is designed not only to ensure compliance with School Board policy and legal mandates, but also to empower school administrators with structured discretion—particularly when addressing the nuanced needs of students with disabilities.

By implementing this matrix, principals are equipped with a protected framework that supports their professional judgment, offers a consistent foundation for decision-making, and ensures equity and transparency in the application of disciplinary consequences. The framework preserves flexibility where legally required (such as in cases involving students with IEPs or 504 plans), while clearly defining mandatory minimum standards to reduce inconsistencies in disciplinary outcomes. Importantly, administrators now select from multi-tiered intervention options, have the authority to implement alternative consequences for unique situations, and are supported by a system that favors coaching and leadership development over punitive compliance checks.

To reinforce proper implementation, the District will conduct mandatory, in-person discipline training for all school administrators on July 28 and 29, 2025. These sessions will include in-depth guidance on the revised matrix, FOCUS documentation protocols, and legal requirements surrounding student discipline and disability protections. Beginning September 15, 2025, monthly virtual meetings will be held to provide ongoing updates, reinforce expectations, and address emerging guestions from the field.

Starting in September, random discipline audits will be embedded within the district's existing Culture Walks. These visits will include a review of school-level referral practices, alignment with the matrix, and documentation quality. Each school will receive a written action plan summarizing findings and outlining areas for improvement, which will also be shared with district leadership for transparency and support. To promote continuous monitoring, the District Discipline Team will meet bi-weekly to review referral trends and audit outcomes using standardized data reports compiled by the Discipline Confidential Secretary.

Additionally, quarterly disproportionality reviews will be conducted to evaluate discipline data by student subgroups and ensure equitable application of consequences across the district. These findings will be incorporated into board updates and used to inform targeted interventions. A corrective action protocol is being finalized for schools that demonstrate recurring non-compliance, which will include coaching, progress monitoring, and follow-up audits.

The District is also enhancing FOCUS functionality to better track instances where deviations from the matrix are necessary for students with documented disabilities. This will allow for an audit trail that distinguishes legally permissible discretion from inconsistent enforcement. Finally, a Code of Student Conduct review is currently underway with a working group of school-based administrators meeting weekly. This group will propose revisions to strengthen clarity and alignment with the revised discipline matrix by the start of the 2025-26 school year.

Through these collective efforts, Volusia County Schools is building a more consistent, equitable, and educationally sound discipline system—grounded in policy, supported by data, and led by empowered school administrators.

Responsible Party: Executive Director of Graduation Assurance and Student Services

Estimated Completion Date: August 2025

Report Date: May 7, 2025



Observations Matrix (Continued)

1. Student Discipline Policy Non-Compliance (Continued)

Internal Audit Review

The District has revised the Discipline Matrix that outlines each behavioral violation and corresponding minimum consequence based on the frequency of occurrence. Additionally, this updated matrix further defines infractions categorically by assigning them to one of four priority levels of increasing severity. As severity and frequency of occurrence increase, so does the minimum standard of discipline (See **Observation #5** and **Appendix A**). Principals at each school site remain the primary responsible party for accurately identifying the student behavior violation and implementing each mandatory disciplinary consequence to the behavioral violation and have the support of a school-based ESE Assistant Principal on-site at each Middle and High School to assist with ESE requirements.

As a part of our review, we examined fifty (50) sampled referrals from unique incidents across various infraction and discipline types. We reviewed these referrals for meeting the minimum standard of discipline as defined per the updated FY24/25 Discipline Matrix. Of the fifty (50) sampled incidents, we identified thirteen (13) samples, or 26%, in which the discipline administered did not meet the minimum standard set forth by the Discipline Matrix and there was no formal documentation retained for ESE students with disabilities to evidence that a review of the incident had been performed and due to a behavioral manifestation a consequence different from the Matrix was determined to be appropriate. All thirteen (13) samples were of students classified as ESE. Of these thirteen (13) samples:

- Eleven (11) were students with disabilities
- Two (2) were gifted students

As such, this observation remains open.

Report Date: May 7, 2025



Observations Matrix (Continued)

2. Retention of Discipline Documentation

Risk Rating: Moderate

Status: Open

Original Observation

Specific disciplinary consequence steps and statutory requirements apply to ESE students in administering discipline. In addition to the standard referral and notice of suspension (as applicable). ESE students may require the following:

Exceptional Student Education

- 1. A Behavioral Intervention Plan ("BIP") is expected to be completed if identified as appropriate by ESE coordinators to address learning difficulties for ESE students:
- 2. A Functional Behavioral Assessment ("FBA") is expected to be completed if identified as appropriate by ESE coordinators or if ten (10) out-of-school suspension days are accumulated during a school year; and

These documents are currently expected to be uploaded and retained in Focus, with a physical copy additionally retained with the student's file at each school. Of our sampled twenty-five (25) referrals of ESE students, we noted the following:

Four (4), or 16% of our sample population did not initiate, upload, or retain a paper copy of an FBA as required by statute.

Without appropriately identifying the need for an FBA and completion of the FBA after a significant change of placement for the student, the District is out of compliance with statute.

Discipline Documentation

In addition to an electronic referral entered within Focus, all schools are encouraged by management to retain a physical copy of the District referral, with a copy provided to the student and parent to serve as an official communication and notice regarding the student's involvement in a behavioral violation. There is not currently a District-wide policy for the distribution of referral documents to the parent or guardian of the child (see Observation #4). As a result, the distribution of the referral varies by school, but in most instances, a physical copy is sent home with the student for the parental guardian. Schools may also send home an additional copy of the referral either by mail or by email. Finally, schools may attempt to reach the guardian by phone to notify them of the violation. The referral contains two fields, one for the signature and date by the administrator and one for the signature and date of the guardian to attest to the receipt of the referral.

For instances that result in an out-of-school suspension, a physical copy of the Notice of Suspension form is printed and sent home to the guardian in addition to the referral. Notices of Suspension are not retained electronically within Focus. This document does not contain a field for the guardian to sign, however, it does denote the attempted methods of communication to reach the guardian, the period of suspension, and a field for the signature and date by the principal, as well as the contact should the guardian wish to dispute the charges.

Report Date: May 7, 2025



Observations Matrix (Continued)

2. Retention of Discipline Documentation (Continued)

Original Observation (Continued)

Although outlined as a requirement for disciplinary consequence within the Student Discipline Policy we noted in our performance of detailed testing that the parental and student conferences were rarely recorded as being conducted within Focus. The results of our detailed testing are as follows:

The following exceptions were identified across the sixty-six (66) samples for general education and ESE population students.

Referrals:

- Thirty (30), or 45.5% of our sample selection did not retain a copy of the physical referral issued to the student; and
- Thirty-two (32), or 48.5% of our sample selection retained a copy of the physical referral that was incomplete. Of these:
 - Seventeen (17) were missing a parental signature;
 - o Thirteen (13) were missing a school administrator signature; and
 - o Twelve (12) were missing both a parental and school administrator signature.

Notice of Suspension:

- Twenty-one (21) or 31.8% of our sample selection did not retain a physical copy of the notice of suspension issued to the student; and
- Five (5) or 7.6% of our sample selection retained a copy of the notice of suspension that was incomplete, missing the principal or administrator signature as well as the details of the attempted communication to the parental guardian.

Parental Conferences:

- Forty-eight (48) or 72.7% of our samples did not retain evidence or document a parent conference occurring when required by the discipline matrix; and
- Fifty-one (51) or 77.3% of our samples did not retain evidence or document a student conference occurring when required by the discipline matrix.

To facilitate communication between the school and the parental guardian, maintain accurate student records, and establish a clear and consistent audit trail, accurate records should be kept as they relate to the student's behavioral violation. Without complete document retention, the District risks being unable to support the appropriateness of the disciplinary consequences taken to address each behavioral violation.

Original Recommendation

In order to optimize the retention of disciplinary consequence and referral documents, we recommend the District explore existing Focus capabilities as a document repository and establish standard operating procedures (see Observation #4) to standardize the electronic document retention practice. Additionally, fields should be added to designate when conferences with parents and students occurred, as well as outcome of each conference.

The District may also consider Focus capabilities to distribute referral and notice of suspension documentation electronically. Each document could be virtually signed by the appropriate administrator, timestamped, and then emailed or printed to be provided to the student and the parent/guardian without the need to reupload any documentation. The District may additionally consider Focus capabilities to provide electronic signature capabilities for submission of documents to parents or guardians, indicating the receipt of provided documents



Observations Matrix (Continued)

2. Retention of Discipline Documentation (Continued)

Management's Response: May 2025

The District will perform the following:

Response	Responsible Party	Updated Estimated Completion Date
Establish review team consisting of ESE specialists, discipline staff, and school administrators.	Executive Director of ESE	May 15, 2025
Develop audit tool to evaluate IEPs, discipline referrals, manifestation determinations, and behavior plans.	ESE Compliance Specialist & MTSS Coordinator	May 31, 2025
Select sample schools and students for documentation review (ensure diversity in school types and student needs).	ESE Coordinator & Student Services Representative	June 7, 2025
Conduct internal review of ESE and discipline documentation for selected sample.	Assigned Review Team Members	June 10 – June 28, 2025
Analyze data to identify trends, compliance issues, or disproportionality in discipline for SWDs.	Data Analyst & ESE Director Designee	July 5, 2025
Prepare summary report with findings, commendations, and required corrective actions.	Executive Director of ESE	July 15, 2025
Share report with district leadership, school-based leaders, and relevant stakeholders.	Executive Director of ESE	July 22, 2025
Develop action plan to address identified gaps (training, process changes, supports).	ESE Leadership Team & Student Services	August 1, 2025
Implement professional development for school teams on compliance, behavior documentation, and equitable practices.	Professional Learning Coordinator & ESE Specialists	August–September 2025
Monitor ongoing compliance through quarterly documentation checks and school support visits.	ESE Monitoring Team	Quarterly, starting October 2025



Observations Matrix (Continued)

2. Retention of Discipline Documentation (Continued)

Internal Audit Review

Discipline Documentation

The District has revised the expectation for the retention of referrals and notices of suspension to be electronically occurring within Focus, where previously physical copies of these documents were required to be retained by the schools with a wet signature by the administrator. This may appear as detailed notes from the administrator including methods of communication to the parent or guardian as well as dates and times of the communication and any in person conferences. Due to adjustments in the Discipline Matrix, the term and corrective action for 'Student Conference' is no longer an active option. Rather, when applicable, parent conferences may be required as per the updated matrix. We did not identify any instances of missing / undocumented referrals or documented communication of suspensions, when applicable. However, we did identify instances of missing information relating to documented communication to the parent or guardian. The results of our detailed testing are as follows:

• Of our fifty (50) sampled incidents, seven (7), or 14%, did not have documentation or detail to evidence communication and notification between the District and the parent or guardian.

Exceptional Student Education

As identified during the original internal audit, there are specific disciplinary consequence steps and statutory requirements that apply to ESE students when administering discipline. These documents are currently expected to be uploaded and retained in Focus, with a physical copy additionally retained with the student's file at each school. Of our sampled twenty-five (25) referrals of ESE students, we noted the following:

• One (1), or 4% of our sample population did not initiate a BIP and FBA as required by Statute.

As such, this observation remains open.



Observations Matrix (Continued)

3. Accuracy and Completeness of Discipline Documentation

Risk Rating: Moderate

Status: Open

Original Observation

A referral contains multiple data fields to capture necessary information about the student and situation, including violation location, violation date, time, SESIR related elements, and a narrative of the event by the school staff. In our performance of detailed testing, we noted the following instances of incorrect or inconsistent data entry:

Of the sixty-six (66) referral samples selected, fourteen (14), or 21.2% of our sample population were identified as missing one or more of the required fields, or the fields were completed incorrectly.

- Seven (7) or 10.6% of our sample population had an absent or insufficient narrative that did not adequately support the coded behavior;
- Two (2) or 3% of our sample population had a referral narrative that described behavior that did not agree with the selected SESIR behavior code;
- One (1) or 1.5% of our sample population where an ESE student was incorrectly classified as general education; and
- One (1) or 1.5% of our sample population where the date listed for the disciplinary consequence initiated and completed pre-dated the violation occurrence.

Prior to SESIR incident data reporting to the state, Student Services and ITS review data entries and performs edits as necessary to correctly and accurately report all SESIR incidents. However, during our testing, we identified instances in which these edits were only applied to the reported data sent to the State, and not corrected on the source referral documentation within Focus.

Three (3) samples or 4.5% of our sample population did not receive edits to the source referrals:

- Incident 588523 had a behavior violation code recorded as 'Forgery,' however, the incident type was recorded in the Focus referral as 'Other Major Unclassified Offenses'.
- Incident 602613 had a behavior violation code recorded as 'Forgery,' however, the incident type was recorded in the Focus referral as 'Other Major Unclassified Offenses'.
- Incident 603671 had a behavior violation code recorded as 'Cyberstalking,' however, the incident type was recorded in the Focus referral as Harassment.

Incorrect, incomplete, or inconsistent reporting of behavioral violations through referral data entry risks incorrect disciplinary consequences being administered per the discipline matrix. In addition, incorrect or unsupported behavioral coding of the violation may incorrectly categorize a locally-defined violation as SESIR, or vice-versa, and result in an incomplete audit trail to substantiate the reported data.

Original Recommendation

We recommend the District perform the following:

- Provide training to reinforce the requirement for all schools to determine that the information that is reported in Focus is accurate and that each behavioral code is sufficiently supported through violation narratives.
- Monitor Focus data on a regular basis for compliance, completeness, and accuracy and provide support to the schools in implementing the District's
 discipline policies and procedures.



Observations Matrix (Continued)

3. Accuracy and Completeness of Discipline Documentation (Continued)

Management's Response: May 2025

Response: The District will perform the following:

Implement refresher training on proper behavioral code selection with specific focus on:

- Distinguishing between major and minor fighting incidents
- · Accurate classification of hitting/striking with or without injury
- Proper coding of VAPE-related infractions vs. Other SESIR Defined

Develop a standardized protocol for documenting VAPE course compliance / non-compliance:

- Create a specific field in Focus for tracking VAPE course completion status
- Implement an automated flagging system for non-compliance cases requiring 45-day OCI
- Establish periodic review of VAPE-related disciplines to ensure proper documentation

Conduct quarterly data quality audits focusing on behavioral code accuracy:

- Implement a dual-review process for behavioral code assignment
- Create a reference guide with detailed examples of proper code classification
- Establish a correction protocol for identified coding errors

Responsible Party: Primary: District Discipline Coordinator. Secondary: School Discipline Data Entry Personnel Support, Discipline Administrator, Discipline Committee and Executive Director of Graduation Assurance of Student Services

Updated Estimated Completion Date:

- The ESE Department will receive a standard invitation for all discipline Discussions.
- The discipline team will meet bi-weekly to monitor discipline referrals and trends using data provided by the discipline confidential secretary. This will also be shared with the Executive Director of Graduation assurance of Students Services
- Training will begin at the VOLUSIA LEARNS Institute June 9-13. Information will also be provided at the mandatory in person discipline beginning of the year meetings on July 28 & 29. Virtual Discipline meetings used to update will begin September 15.
- Beginning in September, random discipline audits will be included with the current Culture Walks, during which a detailed action plan will be shared with the school as well as upper leadership
- Vape Course tracking will be completed by July 1st with the assistance of state reporting.

 Code of conduct review is currently underway with a group of school-based administrators, meeting weekly via TEAMS.



Observations Matrix (Continued)

3. Accuracy and Completeness of Discipline Documentation (Continued)

Internal Audit Review

Of the fifty (50) referral samples selected: we examined the sampled referrals for completeness and adequacy of necessary information to document the incident, including location, violation date, time, SESIR related elements, and a narrative of the event by the school staff.

- No instances were identified in which the narrative was insufficient or did not sufficiently substantiate the assigned discipline code;
- No instances were identified in which an ESE student was incorrectly classified as general education;
- No instances were identified in which the date listed for the disciplinary consequence initiated and completed pre-dated the violation occurrence;
- No instances were identified in which the incident did not receive edits to the source referrals.

We identified the following of incorrect or inconsistent data:

- Four (4) or 8% of our sample population was coded incorrectly and assigned to a behavioral code that did not agree to the provided narrative;
 - o Two (2) samples were coded 'Fighting Major' when should have been coded 'Fighting Minor'
 - o One (1) sample was coded 'Hitting and Striking with Injury' when should have been coded 'Hitting and Striking'
 - o One (1) sample was coded 'VAPE' when should have been coded 'Other SESIR Defined'
- Four (4) or 8% of our sample population where we were unable to identify the additional discipline of 45 days of OCI ("On Campus Intervention") as assigned due to student non-compliance of the VAPE course.

As such, this observation remains open.



Observations Matrix (Continued)

4. Standard Operating Procedures

Risk Rating: Moderate

Status: Open

Original Observation

The District maintains student discipline standard operating procedures ("SOP's") which are reviewed and updated on an annual frequency. There is opportunity to enhance existing written guidance for the performance of everyday activities within departments that support the discipline processes. Upon inspection of these procedures, we identified the following functions that are currently performed, but are not included as part of existing written guidance for Student Services and Schools:

Student Services Department-Level Procedures

- Review and approval of long-term suspension and expulsions;
- The performance, roles, and responsibilities in facilitating administrative hearings;
- The performance of school personnel training;
- · Ongoing violation and disciplinary consequence monitoring processes; and
- Communication cadence and practice with law enforcement.

School-Level Procedures

- Violation supporting documentation retention (see Observation #2);
- Distribution of referrals to students, parents, and guardians; and
- Timeliness expectations for referral entry and performance of disciplinary consequences.

Well-defined standard operating procedures are essential for promoting compliance with relevant laws, regulations, and policies governing discipline and disciplinary consequences. A lack of clear procedures increases the risk of non-compliance, leading to inconsistencies and inefficiencies in the management or application of student discipline related processes.

Original Recommendation

We recommend that the District perform a review of and enhance its existing standard operating procedure guidance to incorporate procedures currently performed that are not formally incorporated into SOP documentation and any additional processes that the District expands on in the future. Regular training and communication should accompany the implementation of standard operating procedures to facilitate staff members' understanding and adherence to the defined processes. Standard operating procedures should be reviewed and updated on a periodic basis to account for any changes in laws or regulations.



Observations Matrix (Continued)

4. Standard Operating Procedures (Continued)

Management's Response: May 2025

Response: The District will perform the following:

Prioritize the formalization of remaining procedures with particular focus on:

- Discipline documentation standards
- ESE-specific disciplinary protocols
- Behavioral code classification guidelines
- Parent/guardian communication requirements
- Intervention tracking mechanisms

Establish a systematic approach to procedure development:

- Create a standardized template for all operating procedures
- Develop a phased implementation schedule with clear deadlines
- Implement a review process to ensure consistency across all procedures
- Establish quality control measures for completed procedures

Ensure comprehensive stakeholder input:

- Include school-level administrators in procedure development
- Solicit feedback from ESE specialists on relevant protocols
- Incorporate discipline coordinators' practical insights

Responsible Party: Primary: Discipline Coordinator, Discipline Administrative Deans Support, School Representatives Oversight Discipline Committee, and Executive Director of Graduation Assurance of Student Services

Updated Estimated Completion Date:

The discipline team will meet bi-weekly to monitor referrals and trends using data provided by the discipline confidential secretary. This will also be shared with the Executive Director of Graduation assurance of Students Services. Information will also be provided at the mandatory training beginning of the year meetings on July 28 & 29. Virtual Discipline meetings used to update will begin September 15. Beginning in September, random discipline audits will be included with the current Culture Walks, during which a detailed action plan will be shared with the school as well as upper leadership.

Internal Audit Review

The District has developed a comprehensive VAPE Program guide for the facilitation and desired outcomes of the newly implemented course. This guide includes key counseling steps, instructional materials, and coaching techniques. Through conversations with management, we confirmed that many of the processes outlined within the original observation are still being developed as the District completes the transformations on student discipline, therefore the standard written procedural documents have not be finalized. As such, this observation remains open.

Report Date: May 7, 2025



Observations Matrix (Continued)

5. Formalized Monitoring Processes

Risk Rating: Moderate

Status: Open

Original Observation

During our review of the District's student discipline processes, we noted that evidence of centralized monitoring of the student discipline data is not currently formalized or retained. While Focus provides dashboard reporting and data visualization capabilities, the expectations for review of data by Student Services personnel, roles and responsibilities, and reporting requirements are not defined or documented. Data is analyzed on an ad hoc basis, on individual cases as needed/requested, or in response to specific questions/initiatives of stakeholders. Monitoring and reporting functions should include, but are not limited to:

<u>Disciplinary Consequences:</u> Through analysis of the population of violations in Focus, we noted behavior violations in which the documented disciplinary consequence(s) severity level did not appear to comply with the Student Discipline Policies. The documented disciplinary consequences were less severe than the observed behavior (see Observation #1). There is no formal centralized monitoring of the use of disciplinary consequences to identify outliers and perform follow-up on real-time incident management.

Reporting to Leadership/Board: VCS should define its key performance metrics and determine to whom and how often these performance metrics are reported. For example, metrics could include the time it takes to complete a referral, time it takes to assign and/or complete disciplinary consequence, disciplinary consequences taken for each behavior violation, violations by student (in quantity and severity), trends by school/school type/grade/etc., and more. These capabilities are currently present within Focus, but evidence of formal monitoring or reporting procedures is not retained.

<u>Timeliness of Process:</u> We noted in our detailed testing that there is no formal requirement or expectation for timeliness of completion of certain processes (see Observation #4). As a result, there is no documented formal centralized monitoring of the overall population of data for timeliness of the performance of these processes.

<u>Turnover and Vacancies in Key Roles:</u> As many school districts nationally face increased staffing challenges, it is necessary to be able to identify trends in key position turnover. The complexity of the student discipline process increases the risks around non-compliance for schools in which turnover in key roles occurs. There is no currently written guidance or expectation for Student Services to coordinate with Human Resources and Schools to identify turnover in student discipline related positions in a timely manner.

Monitoring Processes: It is the responsibility of Student Services to perform monitoring of all Focus data entries, however, current departmental standard operating procedures do not identify roles, responsibilities, and expectations for ongoing data monitoring (See Observation #4). Data may be analyzed on an inconsistent basis, on individual cases as needed/requested, or in response to specific questions/initiatives of stakeholders; however, VCS does not have overall defined performance metrics or formal reporting practices to leadership and the Board. Centralized monitoring and formalized reporting of student discipline data will provide transparency and consistency while assisting all parties in identifying trends and outliers that warrant further attention. Ongoing monitoring should include procedures to verify the accuracy and completeness of violation and disciplinary consequence data.

Original Recommendation

We recommend VCS define roles and responsibilities which includes a cadence for monitoring student behavior violations, disciplinary consequences and key metrics. Additionally, Student Services should coordinate with the Information Technology Services division to identify key data elements that need to be reported to each stakeholder group for a variety of monitoring purposes to communicate existing reports within Focus that can be utilized and accessed by VCS and school staff.



Observations Matrix (Continued)

5. Formalized Monitoring Processes (Continued)

Management's Response: May 2025

Response: The District will perform the following:

Complete development of remaining monitoring capabilities:

- Finalize disciplinary consequence tracking systems
- Implement process timeliness measurement tools
- Develop vacancy and turnover tracking mechanism

Formalize comprehensive procedures:

- Document dashboard usage protocols and establish data quality control measures
- Create formal procedures for report generation and distribution and develop training materials for system users

Responsible Party: Primary: Director of Student Services and Chief Information Officer. Secondary: Data Analytics Team Support, School Administrators Oversight, and Assistant Superintendent of Student Services

Updated Estimated Completion Date: Implementation will begin this summer with creating formal processes and develop training material. August administrators will be trained prior to back to school. Quarterly review and trainings will take place with all administrators.

Internal Audit Review

The District has made progress in its reporting and monitoring capabilities. As a part of its recent improvements to Focus, Student Services has worked collaboratively with ITS to develop advanced analytical dashboards and visualizations of key student and school benchmarks using the existing Focus student data. The District is now able to report on and monitor various critical metrics in a digestible visualization. Some of these metrics include:

- Student Demographics
- Discipline Incident Data and Discipline Enacted by Student, School, and District
- ESE BIP and IEP Electronic Access

The District has also established a formal process for regular reporting to the School Board on key discipline related trends and insights. Quarterly, Student Services will deliver to the Board information regarding the current status of discipline in the District, including total volume, frequent incident types, trends, projections, external factor influence, system updates, and various other aspects of discipline management. This regular communication helps maintain transparency with the Board and general public, allowing for leadership to make more informed decisions that closely address the identified data insights.

The following areas of District monitoring that are still in development:

- Disciplinary Consequences (See Observation #1)
- Timeliness of Process
- Turnover and Vacancies in Key Roles

Progress has been made in addressing the initially identified reporting gaps. However, there are still some areas that require further development as well as a comprehensive formalized procedure detailing requirements. As such, this observation remains open.



Appendix A – Revised 2024-25 Discipline Matrix

The following graphics detail the updated Discipline Matrix implemented at the start of the 2024-25 school year. The new matrix is structured to show discipline requirements that now are contingent on incident frequency.

2024-2025 Discipline Matrix

Level 1

Infraction Description	Code	1st Consequence	2nd Consequence	3rd Consequence	Subsequent Consequence
Bus Disturbance (Minor)	B1	PC, CO,	PC, CO, WI	PC, CO, WI, RR	BS – 1 DAY
Disruption (Minor)	Dl	PC, CO	PC, CO, BC, DE, IS	PC, CO, DE, PASS (Period)	PASS - 1 Day
Dress Code Violation	DC	PC, CO	PC, CO	PC, CO	Insubordination 1st
Eloping	EP	PC, CO	PC, CO	PC, CO	
False Document	FX	PC, CO, PASS	PC, CO, PASS	PC, CO, PASS	Gross Insubordination
Horseplay	HP	PC, CO	PC, CO	PC, CO	Insubordination 1st
School Rule	SR	PC, CO	PC, CO	PC, CO	Insubordination 1st
Tardy (T1-T7)	TA	PC, CO	PC, CO	PC, CO	
Vehicle Violation (Minor)	VO	PC, CO	PC, CO	PC, CO	

Level 1 Consequences

BC – Behavior Contract	ED – Extended Detention	RR – Restriction	TA – Threat Assessment
CO - Conference (Student)	IS – Time Out	PASS – In School Suspension	WI – Warning
CD - Contact District	PC - Parent Conference/Contact	SO – Out of School Suspension	XX – Contact Threat Management
DE – Detention	PM – Peer Mediation	SX – Suspension Pending Expulsion	VC-Vape Canvas Course
BS – Bus Suspension			

Level 2

Infraction Description	Code	1st Consequence	2nd Consequence	3rd Consequence	Subsequent Consequence
Bus Disturbance (Intermediate)	В2	PC, CO	PC, CO	PC, CO	
Cheating/Academic Dishonesty	CT	PC, CO, 0 CREDIT	PC, CO, 0 CREDIT	PC, CO, O CREDIT	
Disruption (Intermediate)	D2	PC, CO, PASS - 1 DAY	PC, CO, PASS - 2 DAYS	PC, CO, PASS - 3 DAYS	OSS - 1 DAY
Failure to Complete Com Service (District Assigned)	CX	PC, CO	PC, CO	PC, CO	
Gambling	GB	PC, CO, CD	PC, CO, CD	PC, CO, CD	
Insubordination	IN	PC, CO, PASS - 1 DAY	PC, CO, PASS - 2 DAYS	PC, CO, PASS - 3 DAYS	Gross Insubordination, SO - 1 DAY
Intro Foreign Substance (Non-Toxic) Into food or drink	NI	PC, CO, SO - 1 DAY	PC, CO, SO - 3 DAYS	PC, CO, S0 - 5 DAYS	SX

Per Policy 208: A student's IEP or 504 plan must be considered when determining the response to a disciplinary action.



Laser Light Possession	LL	PC, CO	PC, CO, PASS – 1 Day	PC, CO, PASS – 3 Days	If used, call the district
Matches/Lighter/Flammables	ML	PC, CO, XX	PC, CO, XX PASS – 1 Day	PC, CO, XX PASS – 3 Days	XX
No Show Detention	ND	PC, CO, PASS - 1 Day	PC, CO, PASS – 3 Days	PC, CO, PASS – 5 Days	
No Show Saturday	NS	PC, CO, PASS - 1 Day	PC, CO, PASS – 3 Days	PC, CO, PASS – 5 Days	
Possession Chem Spray (<5oz)	PS	PC, CO, TA SO – 5 Days	PC, CO, TA SO – 10 Days	PC, CO, SX, TA	If used – SX, TA
Profane Language (student)	PR	PC, CO, PASS – 1 Day	PC, CO, PASS – 3 Day	PC, CO, PASS – 5 Day	
Refusal Extended Detention	RD	PC, CO, PASS - 1 Day	PC, CO, PASS – 3 Days	PC, CO, PASS – 5 Days	
Refusal Saturday School	RX	PC, CO, PASS - 1 Day	PC, CO, PASS – 3 Days	PC, CO, PASS – 5 Days	
Scuffling	SH	PC, CO, SO 1-2 Days	PC, CO, SO 1-2 Days	PC, CO, SO 1-2 Days	
Tobacco	ТО	PC, CO, VC PASS – 1 Day	PC, CO, CD, 45 Day Alt Ed Placement	PC, CO, CD, 45 Day Alt Ed Placement	For ESE students - Contact ESE office for 2 nd and 3 rd offense
Toy Gun	TG	PC, CO, TA SI – 3 Days	PC, CO, TA, SO – 1 Day	PC, CO, TA SO – 3 Days	
Toy Knife	TK	PC, CO, TA SI – 3 Days	PC, CO, TA SO – 1 Day	PC, CO, TA SO – 3 Days	
Unauthorized Absence	UA	PC, CO, SI – 1 Day	PC, CO, SI - 3 Days	PC, CO, SI – 5 Days	
Unauthorized Area	UR	PC, CO, XX	PC, CO, XX	PC, CO, XX	
Unauthorized Class (Skipping)	UI	PC, CO, SI – 1 Day	PC, CO, SI – 3 Days	PC, CO, SI – 5 Days	SI – Periods missed
Unauthorized Event	UE	PC, CO, SX	PC, CO, SX	PC, CO, SX	
Vape	VP	PC, CO, VC PASS – 1 Day	PC, CO, CD, 45 Day Alt Ed Placement	PC, CO, CD, 45 Day Alt Ed Placement	For ESE students - Contact ESE office for 2 nd and 3 rd offense
Vape Usage	VU	PC, CO, VC, PASS 1-3 Days	PC, CO, CD, 45 Day Alt Ed Placement	PC, CO, CD, 45 Day Alt Ed Placement	
Vehicle Violation/Traffic Citation	TC	PC, CO	PC, CO	PC, CO	

Level 2 Consequences

BC – Behavior Contract	ED – Extended Detention	RR – Restriction	TA – Threat Assessment
CO – Conference (Student)	IS – Time Out	PASS – In School Suspension	WI – Warning
CD – Contact District	PC – Parent Conference/Contact	SO – Out of School Suspension	XX – Contact Threat Management
DE – Detention	PM – Peer Mediation	SX – Suspension Pending Expulsion	VC-Vape Canvas Course



Level 3

Infraction Description	Code	1st Consequence	2nd Consequence	3rd Consequence	Subsequent Consequence
	Cour	PG GO VG	BG GO GD 45 D	PG GO GP 45 P	
Alcohol Possession	PA	PC, CO, VC, PASS – 1-3 Days	PC, CO, CD, 45 Day Alt Ed Placement	PC, CO, CD, 45 Day Alt Ed Placement	For ESE students - Contact ESE office for 2 nd and 3 rd offense
Alcohol Usage	AU	CO, PC, VC, CD, SO – 10 Days	CO, PC, CD, 45 Day Alt Ed Placement	CO, PC, CD, 45 Day Alt Ed Placement	For ESE students - Contact ESE office for 2 nd and 3 rd offense
Ammunition	AM	CO, PC, CD, TA	CO, PC, CD, TA	CO, PC, CD, TA	TA
Bullying	BY	CO, PC, TA, SO – 5 DAYS	CO, PC, TA, SO – 10 DAYS	CO, PC, TA, SX	Bullying packet must be completed for any incident
Burglary	BU	CO, PC, SX	CO, PC, SX	CO, PC, SX	
Bus Disturbance (Major)	В3	CO, PC, CD	CO, PC, CD	CO, PC, CD	
Cell Phone Possession	CP	CO, PC, PASS 1-3 Days	CO, PC, PASS 1-3 Days	CO, PC, PASS 1-3 Days	
Cell Phone (Recording)	CR	CO, PC, SO 1-5 Days	CO, PC, SO 1-5 Days	CO, PC, SO 1-5 Days	
Chemical Spray .5 oz - 2 oz	СН	CO, PC, SX, TA	CO, PC, SX, TA	CO, PC, SX, TA	If used or charged as weapon - SX, TA
Consensual Sex	CI	CO, PC, SO – 5 Days	CO, PC, SX	CO, PC, SX	
Cyberstalk	CY	CO, PC, TA SO – 5 Days	CO, PC, TA SO – 10 Days	CO, PC, TA, SX	
Disruption (Major)	D3	CO, PC, CD	CO, PC, CD	CO, PC, CD	
Drug Paraphernalia	DP	CO, PC, VC PASS – 1-3 Days	CO, PC, CD, 45 Day Alt Ed Placement	CO, PC, CD, 45 Day Alt Ed Placement	For ESE students - Contact ESE office for 2 nd and 3 rd offense
Drug Possession	DU	CO, PC, VC PASS – 1-3 Days	CO, PC, CD, 45 Day Alt Ed Placement	CO, PC, CD, 45 Day Alt Ed Placement	For ESE students - Contact ESE office for 2 nd and 3 rd offense
Electronic Tampering	ET	CO, PC, CD	CO, PC, CD	CO, PC, CD	
Extortion	EX	CO, PC, SX	CO, PC, SX	CO, PC, SX	
False Alarm	FA	CO, PC, SX	CO, PC, SX	CO, PC, SX	
False Reporting	FR	CO, PC, SX	CO, PC, SX	CO, PC, SX	
Fighting (Major)	FM	CO, PC, SO – 10 Days	CO, PC, SO – 10 Days	CO, PC, SX	
Fighting (Minor)	FI	CO, PC, SO – 3 Days	CO, PC, SO – 5 Days	CO, PC, SO – 10 Days	
Fireworks	FW	CO, PC, CD	CO, PC, CD	CO, PC, CD	
Forgery	FO	CO, PC, CD	CO, PC, CD	CO, PC, CD	
Grand Theft -\$750 or more	TH	CO, PC, SX	CO, PC, SX	CO, PC, SX	



Harassment	НА	CO, PC, TA, SO – 5 Days	CO, PC, TA SO – 10 Days	CO, PC, SO, TA, SX	Bullying packet must be completed for any incident
Hazing	HZ	CO, PC, TA, SX	CO, PC, TA, SX	CO, PC, TA, SX	Bullying packet must be completed for any incident
Hitting/Striking	HS	CO, PC, SO – 1-10 Days	CO, PC, SO – 10 Days	CO, PC, SO – 10 Days	
Hitting/Striking an Employee	HE	CO, PC, XX, SX	CO, PC, XX, SX	CO, PC, XX, SX	
Hitting/Striking with Injury	НІ	CO, PC, SO – 10 Days	CO, PC, SO – 10 Days	CO, PC, SO – 10 Days	
Inappropriate Touching	IT	CO, PC, SO – 5 Days	CO, PC, SO – 10 Days	CO, PC, SX	
Indecent Exposure	IE	CO, PC, SX	CO, PC, SX	CO, PC, SX	
Insubordination (Gross)	IN	CO, PC, SO – 3 Days	CO, PC, SO – 5 Days	CO, PC, SO – 10 Days	
Intro Foreign Sub (Toxic/Harmful) into food	TI	CO, PC, TA, SX	CO, PC, TA, SX	CO, PC, TA, SX	
Look-Alike Guns	LG	CO, PC, TA, SO – 10 Days	CO, PC, TA, SO – 10 Days	CO, PC, TA, SO – 10 Days	If charged as a weapon - SX
Look-Alike Knife	LK	CO, PC, TA, SO – 10 Days	CO, PC, TA, SO – 10 Days	CO, PC, TA, SO – 10 Days	If charged as a weapon - SX
Malicious Threats (Employee)	TE	CO, PC, TA, SX	CO, PC, TA, SX	CO, PC, TA, SX	
Malicious Threats (Students)	TS	CO, PC, CD, TA, SO – 3 Days	CO, PC, CD, TA, SO – 5 Days	CO, PC, CD, TA, SO – 10 Days	
Non-Prescription Distribution/Sale/Use	NP	CO, PC, CD	CO, PC, CD	CO, PC, CD	
Off-Campus Felony	OC	CO, PC, TA, SX	CO, PC, TA, SX	CO, PC, TA, SX	
Paintball/Air Soft Guns	PB	CO, PC, TA, SO – 5 Days	CO, PC, TA, SO – 10 Days	CO, PC, TA, SO – 10 Days	
Pornographic Materials	PM	CO, PC, SO – 5 Days	CO, PC, SO – 10 Days	CO, PC, SO – 10 Days	
Possession of Pocketknife	PK	CO, PC, TA, SO – 1-5 Days	CO, PC, TA, SO – 10 Days	CO, PC, TA, SO – 10 Days	
Principal/Criminal Act/Level	Р3	CO, PC, SX	CO, PC, SX	CO, PC, SX	
Profanity Directed to Staff	LS	CO, PC, SO – 3 Days	CO, PC, SO – 3 Days	CO, PC, SO – 3 Days	
Racial/Ethnic Slur	RS	CO, PC, SO – 5 Days	CO, PC, SO – 10 Days	CO, PC, SO – 10 Days	
Refusal to be Searched	RF	CO, PC, TA, SO – 10 Days	CO, PC, TA, SX	CO, PC, TA, SX	
Secret Society	SS	CO, PC, SX	CO, PC, SX	CO, PC, SX	
Sexual Harassment	XH	CO, PC, SO – 5 Days	CO, PC, SO - 10 Days	CO, PC, SX	
Synthetic/Count. Drugs Poss/Use	SU	CO, PC, SO – 10 Days	CO, PC, SX, CD, 45 Day Alt Ed Placement	CO, PC, SX, CD, 45 Day Alt Ed Placement	
Telecommunications Device Possession	TD	CO, PC	CO, PC	CO, PC	
Theft- Under \$750	PT	CO, PC, SO – 5 Days	CO, PC, SO – 10 Days	CO, PC, SO – 10 Days	
Toxic Plants Dist/Sale/Use	TP	CO, PC, SX	CO, PC, SX	CO, PC, SX	



Trespassing	TR	CO, PC, CD, XX, SO – 10 Days	CO, PC, CD, XX, SO – 10 Days	CO, PC, CD, XX, SO – 10 Days	
Vandalism Under \$1000	V3	CO, PC, SO – 10 Days	CO, PC, SO – 10 Days	CO, PC, SO – 10 Days	
Walkie-Talkies	WT	CO, PC, CD	CO, PC, CD	CO, PC, CD	

Level 3 Consequences

BC – Behavior Contract	ED – Extended Detention	RR – Restriction	TA – Threat Assessment
CO – Conference (Student)	IS – Time Out	SI – In School Suspension	WI – Warning
CD - Contact District	PC – Parent Conference/Contact	SO – Out of School Suspension	XX – Contact Threat Management
DE – Detention	PM – Peer Mediation	SX – Suspension Pending Expulsion	VC-Vape Canvas Course

Level 4

Infraction Description	Code	1st Consequence	2nd Consequence	3rd Consequence	Subsequent Consequence
Alcohol, Attempted Sale	AA	PC, CO, VC, SO – 10 Days	PC, CO, 45 Day Alt Ed Placement	PC, CO, 45 Day Alt Ed Placement	For ESE students - Contact ESE office for 2 nd and 3 rd offense
Alcohol Distribution	AD	PC, CO, VC, SO – 10 Days	PC, CO, 45 Day Alt Ed Placement	PC, CO, 45 Day Alt Ed Placement	For ESE students - Contact ESE office for 2 nd and 3 rd offense
Assault on Employee	AE	PC, CO, TA, SX, CD	PC, CO, TA, SX, CD	PC, CO, TA, SX, CD	
Assault on Student	AP	PC, CO, TA, SX, CD	PC, CO, TA, SX, CD	PC, CO, TA, SX, CD	
Arson	AR	PC, CO, TA, SX, CD	PC, CO, TA, SX, CD	PC, CO, TA, SX, CD	
Alcohol Sale	AS	PC, CO, VC, SO – 10 Days	PC, CO, 45 Day Alt Ed Placement	PC, CO, 45 Day Alt Ed Placement	For ESE students - Contact ESE office for 2 nd and 3 rd offense
Battery on Employee	BE	PC, CO, TA, SX, CD	PC, CO, TA, SX, CD	PC, CO, TA, SX, CD	
Battery on Student	BS	PC, CO, TA, SX, CD	PC, CO, TA, SX, CD	PC, CO, TA, SX, CD	
Bomb Threat	ВО	PC, CO, TA SX, CD	PC, CO, TA, SX, CD	PC, CO, TA, SX, CD	
Drugs, Attempted Sale	DA	PC, CO, VC, SO – 10 Days	PC, CO, 45 Day Alt Ed Placement	PC, CO, 45 Day Alt Ed Placement	For ESE students - Contact ESE office for 2 nd and 3 rd offense
Drug Distribution	DD	PC, CO, CD, VC SO – 10 Days	PC, CO, CD, 45 Day Alt Ed Placement	PC, CO, CD, 45 Day Alt Ed Placement	For ESE students - Contact ESE office for 2 nd and 3 rd offense
Disorderly Conduct	DO	PC, CO, SX, CD	PC, CO, SX, CD	PC, CO, SX, CD	
Drugs, Sale	DS	PC, CO, VC, SO – 10 Days	PC, CO, CD, 45 Day Alt Ed Placement	PC, CO, CD, 45 Day Alt Ed Placement	For ESE students - Contact ESE office for 2 nd and 3 rd offense
Drug Use	DG	PC, CO, VC, SO – 10 Days	PC, CO, CD, 45 Day Alt Ed Placement	PC, CO, CD, 45 Day Alt Ed Placement	For ESE students - Contact ESE office for 2 nd and 3 rd offense
Explosives	ЕО	PC, CO, TA, SX, CD	PC, CO, TA, SX, CD	PC, CO, TA, SX, CD	



Firearm Distribution	FD	PC, CO, TA, SX, CD	PC, CO, TA, SX, CD	PC, CO, TA, SX, CD	
Firearm Possession	FP	PC, CO, TA, SX, CD	PC, CO, TA, SX, CD	PC, CO, TA, SX, CD	
Firearm Sale	FS	PC, CO, TA, SX, CD	PC, CO, TA, SX, CD	PC, CO, TA, SX, CD	
Firearm Use	FU	PC, CO, TA, SX, CD	PC, CO, TA, SX, CD	PC, CO, TA, SX, CD	
Homicide	НО	PC, CO, TA, SX, CD	PC, CO, TA, SX, CD	PC, CO, TA, SX, CD	
Kidnapping	KD	PC, CO, TA, SX, CD	PC, CO, TA, SX, CD	PC, CO, TA, SX, CD	
Principal/Criminal Act/Level4	P4	PC, CO, XX, SX, CD	PC, CO, XX, SX, CD	PC, CO, XX, SX, CD	
Riot	RI	PC, CO, SX, CD	PC, CO, SX, CD	PC, CO, SX, CD	
Robbery	RO	PC, CO, SX, CD	PC, CO, SX, CD	PC, CO, SX, CD	
Sexual Assault	XA	PC, CO, XX, SX, CD	PC, CO, XX, SX, CD	PC, CO, XX, SX, CD	
Sexual Battery	XB	PC, CO, SX, CD	PC, CO, SX, CD	PC, CO, SX, CD	
Synth. /Count. Drugs, Attempt Sale	SA	PC, CO, CD, VC, SO – 10 Days	PC, CO, CD, 45 Day Alt Ed Placement	PC, CO, CD, 45 Day Alt Ed Placement	
Synth. Count. Drug Distribution	SD	PC, CO, SX, CD, SO – 10 Days	PC, CO, CD, 45 Day Alt Ed Placement	PC, CO, CD, 45 Day Alt Ed Placement	
Weapon Use/BB	UB	PC, CO, TA, SX, CD	PC, CO, TA, SX, CD	PC, CO, TA, SX, CD	
Weapon Use/Knife	UK	PC, CO, TA, SX, CD	PC, CO, TA, SX, CD	PC, CO, TA, SX, CD	
Weapon Use/Other	UO	PC, CO, TA, SX, CD	PC, CO, TA, SX, CD	PC, CO, TA, SX, CD	
Vandalism over \$1000	V4	PC, CO, SX, CD	PC, CO, SX, CD	PC, CO, SX, CD	
Vehicle Theft	VT	PC, CO, SX, CD	PC, CO, SX, CD	PC, CO, SX, CD	
Weapon Possession/BB	WB	PC, CO, TA, SX, CD	PC, CO, TA, SX, CD	PC, CO, TA, SX, CD	
Weapon Possession/Knife	WK	PC, CO, TA, SX, CD	PC, CO, TA, SX, CD	PC, CO, TA, SX, CD	
Weapon Possession/Other	WO	CO, PC, TA	CO, PC, TA	CO, PC, TA	

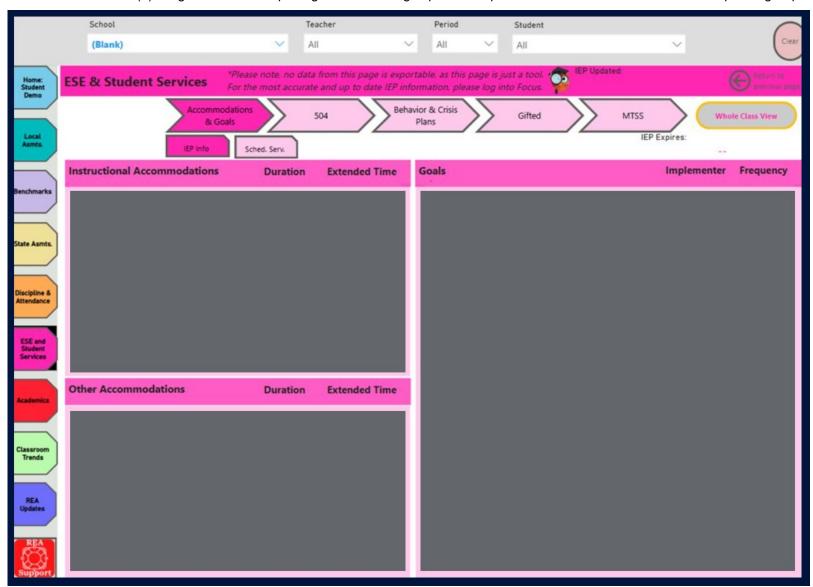
Level 4 Consequences

BC - Behavior Contract	ED – Extended Detention	RR – Restriction	TA – Threat Assessment
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DE – Detention	PM – Peer Mediation	SX – Suspension Pending Expulsion	VC-Vape Canvas Course



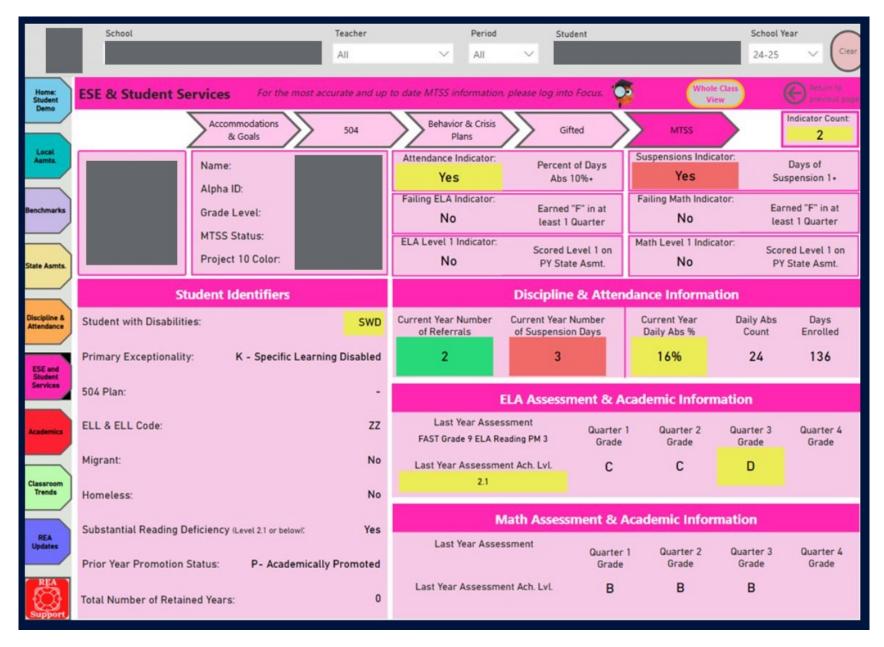
Appendix B – New Focus Dashboards

The following images show the District's newly created and implemented student information dashboards. These visuals are developed using existing data within Focus, displaying key metrics and benchmarks in a more digestible format. For the purposes of this report, only dashboards related to student discipline and SESIR data are included. The first three (3) images show new reporting and monitoring capabilities specific to ESE students and their corresponding requirements.



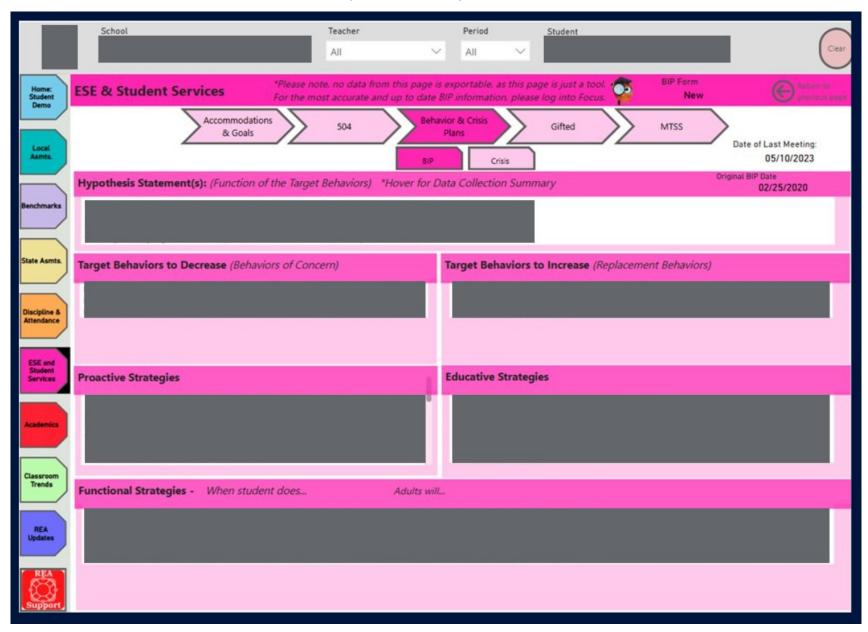


Appendix B – New Focus Dashboards (Continued)





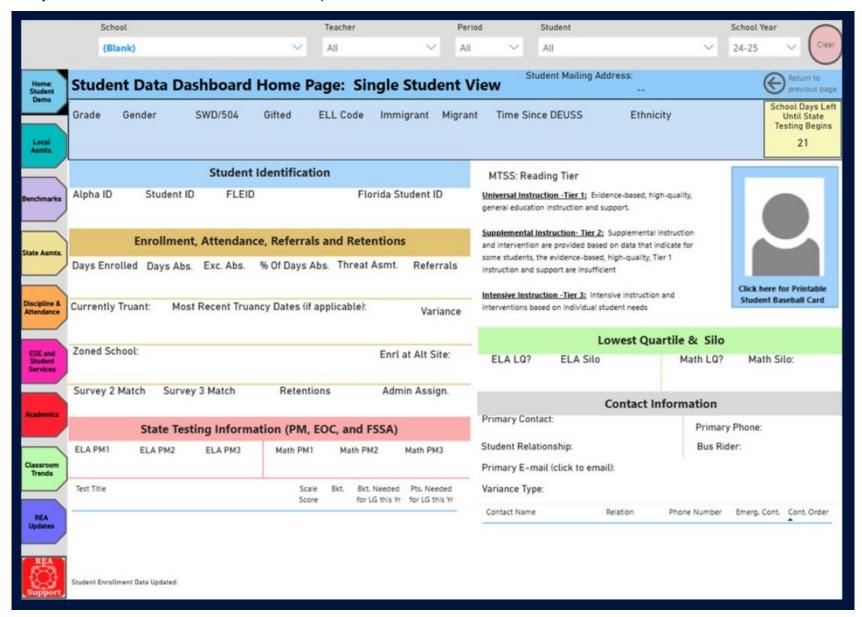
Appendix B - New Focus Dashboards (Continued)





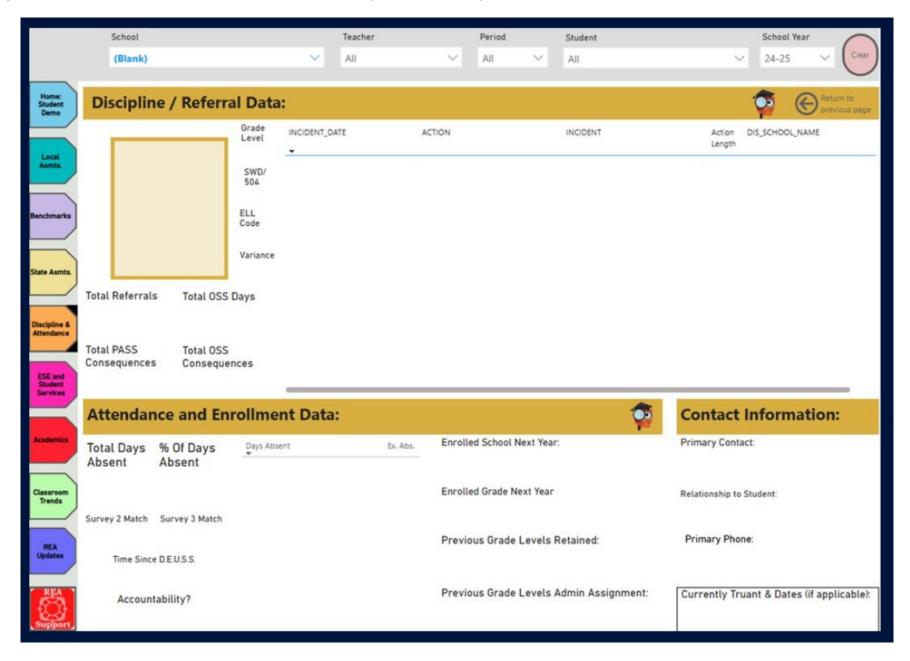
Appendix B – New Focus Dashboards (Continued)

The following three (3) images show a 'snapshot' of new student discipline data dashboards that the District has developed, allowing teachers and administrators to quickly view key student information in a centralized and clear platform.





Appendix B - New Focus Dashboards (Continued)





Appendix B - New Focus Dashboards (Continued)



VOLUSIA COUNTY SCHOOLS

Appendix C – SESIR Incident Definitions

The following graphic details the severity of each SESIR behavioral violation. Level I is considered the most severe student behavioral violations, while level IV is the least severe. The graphic to the write shows each SESIR violation and its coresponding code.

SESIR - Level IV

- Alcohol (ALC)
- Bullying (BUL)
- Harassment (HAR)
- Tobacco (TBC)

SESIR - Level III

- Disruption on Campus-Major (DOC)
- Drug Use/Possession Excluding Alcohol (DRU)
- Fighting (FIT)
- Hazing (HAZ)
- Grand Theft (STL)
- Sexual Harassment (SXH)
- Sexual Offenses (Other) (SXO)
- Threat/Intimidation (TRE)
- Trespassing (TRS)
- Criminal Mischief/Felony Vandalism (VAN)
- Other Major (OMC

SESIR - Level II

- Burglary (BRK)
- Drug Sale/Distribution (DRD)
- Simple Battery (PHA)
- Robbery (ROB)
- Sexual Assault (SXA)
- Weapons Possession (WPO)

SESIR - Level I

- Aggravated Battery (BAT)
- Arson (ARS)
- Homicide (HOM)
- Kidnapping (KID)
- Sexual Battery (SXB)

SESIR Violation	Abbreviation
Alcohol	ALC
Aggravated Battery	BAT
Arson	ARS
Bullying	BUL
Burglary	BRK
Criminal Mischief	VAN
Disruption on Campus – Major	DOC
Drug Sale/Distribution Excluding Alcohol	DRD
Drug Use/Possession Excluding Alcohol	DRU
Fighting	FIT
Grand Theft	STL
Harassment	HAR
Hazing	HAZ
Homicide	НОМ
Kidnapping	KID
Other Major Offense	OMC
Robbery	ROB
Sexual Assault	SXA
Sexual Battery	SXB
Sexual Harassment	SXH
Sexual Offenses	SXO
Simple Battery	PHA
Threat/Intimidation	TRE
Tobacco	ТВС
Trespassing	TRS
Weapons Possession	WPO

Most

Severe

Violations

COUNTY SCHOOLS

Appendix D – Local Incident Definitions

The District's locally defined behavior violations are displayed in the graphic below:

Level IV - Minor Offenses

- Bus disturbance-minor disruption on school sponsored transportation
- Class or school rule violation
- · Disruption-minor disruption or disturbance of a school activity, class, or campus
- · Dress code violation
- False document
- Horseplay
- Tardiness
- Vehicle Violation
- Any other violation which the principal may reasonably believe falls within this category which is not listed under the other three levels.

Level III – Intermediate Offenses

- Bus disturbance-considerable disruption on school sponsored transportation
- · Cheating/Academic dishonesty
- · Disruption-considerable disruption or disturbance of a school activity, class, or campus
- Failure to appear for Saturday school, detention, or extended detention
- Gambling
- Introduction of a foreign substance (non-harmful) into food or drink
- Laser lights
- · Matches, lighters, or other flammables
- Possession of chemical spray under 0.5 oz.
- Profane, obscene, or vulgar language or expression (in any language), either verbal, written, or by gesture directed at others
- · Unauthorized absence from class/leaving class, or leaving school grounds without permission
- · Vehicle violation-traffic citation
- Any other violation, which the principal may reasonably believe, falls within this category and is not listed
- · under the other three levels

Level II - Major I Offenses

- Ammunition-possession, or distribution
- Bus Disturbance major disruption on school sponsored transportation
- · Cyberstalk Drug paraphernalia-possession, use, or distribution of
- Electronic tampering Electronic device misuse
- Extortion
- · False alarm
- Fireworks- use, possession, or distribution of
- Forgery
- Hazing
- Hitting/Striking
- · Hitting/Striking an employee

Level II - Major I Offenses (Continued)

- · Hitting/Striking with injury
- · Inappropriate touching
- Indecent exposure
- Insubordination or defiance of authority
- Introduction of a foreign substance (toxic or harmful) into food or drink
- Knowingly filing or participating in filing a false report
- · Look Alike Guns use or possession
- Malicious threats of violence
- Non-prescription medication use, possession, distribution, or sale
- · Paintball and air soft guns-use and/or possession of
- Pornographic materials and communications including Internet material-possession, distribution, or
- display
- Possession of a chemical spray between 0.5 and 2 oz
- Possession of a common pocketknife
- Principal to a Level III Criminal Act
- · Racial, ethnic, or religious harassment or harassment based upon a disability
- Secret society organization, establishment, promotion, membership, participation in any secret society related activity or displaying or wearing any secret society organization or gang logo in any way disruptive
- · of the educational program. Synthetic/Counterfeit Drugs-use, possession or under the influence of
- Telecommunication devices the exhibition of, either by sight or sound, or use of during normal school
 hours or while riding school sponsored transportation unless approved by the bus operator or
 supervising teacher, permitted by district procedure, or permitted by district or school instructional
 programs.
- Theft
- · Toxic plants-use, possession, distribution, or sale
- Vandalism under \$1,000
- · Walkie-talkies, possession/use
- Any other violation which the principal may reasonably believe falls within this category & is not listed
- · under the other three levels.

Level I - Major II Offenses

- Assault on a school board employee
- Assault on a student(s)
- Battery on a school board employee
- Battery on a student(s)
- Bomb threat
- Disorderly conduct
- Explosives
- · Firearm distribution, sale, use, or willful possession
- Kidnapping
- · Principal to a Level IV Criminal Act
- Riot
- Synthetic/Counterfeit drug distribution, attempted distribution, sale, or attempted sale
- Vehicle theft
- · Any other violation which the principal may reasonably believe falls within this category and is not listed
- · under the other three levels

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