OFFICE OF THE CHIEF AUDITOR

INTERNAL AUDIT REPORT

STUDENT DISCIPLINE PROCESS AUDIT

To be presented to the:

Audit Committee
On July 16, 2026

The School Board of Broward County, Florida
August 19, 2026

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TABLE OF CONTENTS

Transmittal Letter 1

Executive Summary 2

Objectives 7

Background 8

Scope and Methodology 11

Findings & Observations:

- Finding 1 13
- Finding 2 16
- Finding 3 18
- Finding 4 20
- Finding 5 22
- Finding 6 24
- Finding 7 27
- Finding 8 29
- Finding 9 32
- Finding 10 36
- Finding 11 39
- Finding 12 41

Observation 1 44

Observation 2 44

Observation 3 45

Appendices:

Appendix I – District Cabinet Responses 47

Appendix II – SBBC Policy Links 57

Appendix III – Administrative Definitions for Discipline 58

Appendix IV – Florida Administrative Code Rule 6A-1.0017 School Environmental Safety Incident Reporting (SESIR) 67

TRANSMITTAL LETTER

July 9, 2026

Members of the School Board of Broward County, Florida
Members of the School Board Audit Committee
Dr. Howard Hepburn, Superintendent of Schools

In accordance with the School Board of Broward County, Florida ("SBBC" or "District") Audit Plan for the 2025-2026 school/fiscal year, the Office of the Chief Auditor ("OCA") conducted an audit of the District's Student Discipline Process for the 2025-2026 school year, covering the period from January 6, 2026, through March 13, 2026, to assess the District's compliance with discipline policies and procedures following the transition of the discipline process to FOCUS since the prior audit (2024[1]).

Our report is organized into the following sections:

Executive Summary	Brief description of the audit subject area, audit scope and methodology, scope limitations, and results
Objectives	Goals for the audit
Background	Summary of the audit subject area and the impact to the District and District personnel responsibilities
Scope and Methodology	Audit scope and approach, significant procedures, and the OCA's and District Management's responsibilities
Findings & Observations	Findings and observations noted during the audit and improvement recommendations related to the audit subject area
Appendices	Supplemental documents

We would like to thank all those who assisted the OCA in this compliance audit.

Respectfully Submitted,

Mark Magli, Chief Auditor
Office of the Chief Auditor

[1] The Student Discipline Process audit report, issued on September 26, 2024, was transmitted by the Audit Committee on October 24, 2024, and received by the Board on November 13, 2024.

EXECUTIVE SUMMARY

The OCA conducted a review of the Student Discipline Process for secondary schools during the 2025–2026 school year, covering the period from January 6 through March 13, 2026 (the "audit period"), following the District's transition to the FOCUS system at the beginning of the school year. The review assessed whether discipline referrals and incidents were processed, documented, and reported in accordance with District policies and State of Florida requirements[2].

The review focused on discipline violations documented for grades 6 through 12 (collectively referred to as "secondary schools"), excluding charter schools, and was limited to incidents required by law to be reported to the Florida Department of Education ("FDOE"). These incidents are reported through the FDOE's School Environmental Safety Incident Reporting ("SESIR") system.

The audit covered seventy-four (74) secondary schools, excluding specialized centers to ensure a balanced sample. A total of 22,121 referrals were analyzed for processing completeness, and a sample of 100 Discipline Incidents from a population of 1,656, resulting in 124 referrals, was selected for detailed testing.

Overall, the audit identified control and compliance weaknesses across multiple stages of the discipline process, including referral processing, incident documentation, execution of disciplinary actions, and SESIR reporting. The key issues identified included unprocessed referrals, incomplete or insufficient documentation to support disciplinary decisions, inconsistencies in applying discipline actions in accordance with the Discipline Matrix, and gaps in required notifications and support service referrals. Additionally, errors in SESIR incident linkage and overreporting were noted, along with control weaknesses related to monitoring and enforcing disciplinary requirements.

Despite the District's transition to the FOCUS system and implementation of training for administrators, several findings reflect recurring issues identified in the prior audit (2024), particularly in the areas of processing completeness, documentation quality, and compliance with SESIR incident numbering requirements.

The OCA concluded that improvements are needed to strengthen internal controls over the discipline process, ensure timely processing of referrals, and enhance the accuracy and reliability of discipline records. Key areas for improvement include strengthening accountability for referral processing, enhancing documentation standards, and improving monitoring of compliance with required disciplinary actions and reporting requirements. Addressing these areas will improve the accuracy, completeness, and reliability of discipline data, support effective student behavior management, and ensure compliance with District policies and State regulations.

Summary of Results

The OCA identified twelve (12) findings and three (3) observations. Summaries of the findings and observations are outlined in Tables 1 and 2 below. A detailed listing of the results is included in the "Findings & Observations" section of this report.

[2] Applicable requirements are referenced in the Background section on page 8

EXECUTIVE SUMMARY (continued)

Table 1. Summary of Findings

Findings			Risk	Details	Responsible Party
Referrals	**1**	**Discipline Referrals Not Processed**	**High**	1,992 of 22,121 referrals (9%) were not processed; of these,116 (6%) contained indicators of potential SESIR violations. *This is a repeat issue from the prior audit (4% in 2023).*	School Culture & Student Support School principals
Incidents	**2**	**Discipline Incidents Without Corresponding Referrals**	**Medium**	4 of 100 incidents selected for review (4%) did not have corresponding discipline referrals in the system.	School Culture & Student Support
	3	**Insufficient Incident Descriptions**	**Medium**	35 of 124 referrals (28%) lacked narrative details to validate the assigned discipline code. *This is a repeat issue from the prior audit (16% in 2023).*	School Culture & Student Support School principals
	4	**Inaccurate Discipline Code Assignment**	**Medium**	7 of 124 referrals (6%) were assigned discipline codes not supported by incident details. *This is a repeat issue from the prior audit (3% in 2023).*	
Disciplinary Actions – Suspension	**5**	**Inconsistent Assignment of Suspension Days**	**Medium**	5 of 124 referrals (4%) were assigned suspension days that did not align with the Discipline Matrix.	
	6	**Incomplete Attendance Documentation**	**High**	23 of 124 referrals (19%) were missing one or more assigned suspension days in the student attendance record. *This is a repeat issue from the prior audit (10% in 2023).* 58 of 94 students assigned Alternative to External Suspension (“AES”) (62%) were not registered at Second School (“AES school”) in FOCUS.	

EXECUTIVE SUMMARY (continued)

Table 1. Summary of Findings (continued)

Findings			Risk	Details	Responsible Party
Disciplinary Actions – Notifications	7	**Deficient Documentation of Notifications**	High	Parent Contact was not documented in FOCUS for 68 of 124 referrals (55%). Hope Scholarship notification could not be confirmed for 27 of 54 applicable referrals (50%).	School Culture & Student Support School principals
	8	**Failure to Implement Required Notice to District Authorities**	High	Immediate Notification Form for the Regional Office and District Security Operations Center (DSOC) was not implemented in FOCUS. Schools did not notify required authorities in 96 of 108 applicable cases (89%), and in 5 of 108 cases (5%), an outdated form was issued.	School Culture & Student Support
Disciplinary Actions – Support Services	9	**Deficient Documentation of Referrals to Support Services**	High	Mental Health referrals were not documented in FOCUS for 64 of 87 applicable cases (74%). Substance Abuse Counseling documentation was missing in 5 of 10 applicable cases (50%). Collaborative Problem-Solving Team ("CPST") referral documentation was missing in 9 of 21 applicable cases (43%).	School Culture & Student Support School principals
Disciplinary Actions – Probations	10	**Missing Probationary Contract Notices**	High	Substance Probation Contract ("SPC") notices were missing in 2 of 16 applicable cases (13%). Alternative Probationary Contract ("APC") notices were missing in 14 out of 24 applicable cases (58%). *This is a repeat issue from the prior audit (11% and 50% respectively in 2023).*	Student Prevention & Wellness Initiatives School Culture & Student Support School principals

EXECUTIVE SUMMARY (continued)

Table 1. Summary of Findings (continued)

Findings			Risk	Details	Responsible Party
Disciplinary Actions – BIP	11	**Failure to Initiate Required BIP Recommendation**	Medium	1 of 2 applicable referrals (50%) lacked the required recommendation for a Behavior Intervention Program ("BIP").	School Culture & Student Support School principals
SESIR	12	**SESIR Incident Numbering Errors**	High	11 of 124 referrals (9%) were incorrectly linked to SESIR incident numbers, resulting in overreporting 6 of 96 incidents (6%) to the FDOE. *This is a repeat issue from the prior audit (3% in 2023).*	

The OCA assesses the risk of findings primarily based on the likelihood of occurrence and the potential impact of negative events in the audited area. The preliminary assessment is further adjusted using professional judgment, including consideration of control criticality, the presence of compensating controls, and whether the deficiency involves regulatory requirements or data integrity. Figure 1 below provides a description of the risk ratings used to determine the overall rating for each finding.

Figure 1. Risk Ratings

Rating	Description
High	Findings indicate a high likelihood of occurrence and/or significant impact, including potential violations of laws, regulations, or policies; inaccuracies in reporting; or failures of key controls. These issues may be systemic or pervasive and require immediate management attention to mitigate significant risk exposure.
Medium	Findings indicate a moderate likelihood and/or impact and may result in noncompliance, operational inefficiencies, or inconsistent execution of controls. These issues represent control weaknesses that could escalate if not addressed as soon as possible.
Low	Findings indicate a low likelihood and limited impact, typically involving isolated or minor control deficiencies. These issues can generally be addressed through routine process improvements and are unlikely to result in significant adverse outcomes.

EXECUTIVE SUMMARY (continued)

Table 2. Summary of Observations

Observations			Details	Responsible Party
Disciplinary Actions	1	**Control Weakness in Monitoring and Enforcing Suspension Waiver Compliance**	In one (1) instance, the case manager did not reassign conditionally waived suspension days after the student failed to complete the substance abuse counseling program required under the terms of the waiver.	Student Prevention & Wellness Initiatives
	2	**Insufficient Documentation of Law Enforcement Consultations**	Although administrators documented the outcomes of consultations or reports to law enforcement in the system, they did not document whether they conducted required law enforcement consultations within the referral in two (2) instances.	School Culture & Student Support
	3	**Incorrect Implementation of Prescribed BTA Protocol**	In one (1) instance, the administrator's action of consulting the BTA Chair did not align with the Discipline Matrix, which required completion of the Behavior Threat Assessment ("BTA") Protocol for a third occurrence of a "Fight – Medium" incident[3].	School Culture & Student Support

[3] The Discipline Matrix categorizes fighting incidents into three levels: "Fight – Major Mutual," "Fight – Medium," and "Minor Altercation." The first two are classified as SESIR-level incidents, while Minor Altercation is not. Each level carries distinct consequences as outlined in the Discipline Matrix.

OBJECTIVES

The purpose of this audit was to assess the District's compliance with Policies 5090 and 5100 and the FDOE's SESIR requirements following the transition of the discipline process to the FOCUS system since the prior audit.

The specific objectives of this audit were to:

- Obtain an understanding of the procedures for documenting student discipline in FOCUS and any changes to the District's student discipline process since the prior audit.
- Review the requirements of the state law and SBBC policies, procedures, and established practices related to student discipline.
- Determine whether discipline referral processing was finalized in accordance with required procedures.
- Assess whether supporting documentation for disciplinary records is complete, accurate, and sufficient to adequately substantiate and justify the disciplinary actions taken.
- Verify that disciplinary violations were correctly recorded and that the corresponding disciplinary actions and interventions were fully and accurately executed in accordance with policies and procedures.
- Verify that documented disciplinary records were appropriately reported to the state in accordance with the FDOE's SESIR requirements.
- Determine whether improvements to procedures and established practices are warranted and provide recommendations to District administration.

BACKGROUND

The District's student discipline process is governed by SBBC Policy 5090, *Code of Student Conduct*. This policy establishes the rules that all students are expected to follow. The interventions and consequences for each rule violation ("disciplinary actions") are outlined in the *Administrative Discipline Matrix* incorporated within Policy 5090. Rules related to disciplinary action, suspension, and expulsion are set forth in Policy 5100, *Suspension and Expulsion.* Policy 5090 and Policy 5100 (the "discipline policies") are updated as needed to ensure alignment with Florida statutes and/or to incorporate clarifications where warranted. For the 2025-26 school year, amendments to the discipline policies were approved on June 17, 2025; July 29, 2025; and October 14, 2025, for Policy 5090, and on June 17, 2025, for Policy 5100.

The School Culture and Student Support ("SC&SS") Department within the Student Services Division is responsible for managing the discipline policies. In addition, SC&SS maintains the *Administrative Definitions for Discipline*, a schedule of definitions dictated by state law and regularly updated to reflect legislative changes.

Discipline violations are classified into two categories:

1. State-reported violations
2. Local violations

State-reported violations, also referred to as SESIR-level violations (e.g., battery, major campus disruptions, threats, substance abuse, weapons possession, fighting, tobacco use), are reported to the FDOE in accordance with the requirements of Florida Administrative Code Rule 6A-1.0017, *School Environmental Safety Incident Reporting (SESIR)*. The District tracks local violations (e.g., cheating, tardiness, skipping class, dress code violations) but does not report them to the FDOE, as they do not meet SESIR reporting requirements.

The District records violations at all levels in its student information system, FOCUS. The system incorporates Discipline Matrix codes and SESIR reporting requirements within its Discipline module. School-based administrators are granted access only to their assigned school portal. Through this portal, administrators can access discipline-related alerts and reports to monitor and manage discipline referrals, incidents, and associated consequences. Administrators can also access FOCUS support resources through the "Focus Resource Hub" link available on the portal homepage. These resources include the FOCUS *Discipline Guides*, which provide technical guidance aligned with District procedures.

BACKGROUND (continued)

Process Overview

Teachers or administrators report discipline violations by creating a referral, which routes to a principal or assistant principal ("administrator") for action. When a user creates a referral, the system generates an alert in the administrator's portal.

The administrator reviews the referral and determines the appropriate next step. The administrator may close the referral without action, return it to the originator for corrections or additional information, or proceed with processing the referral for disciplinary action.

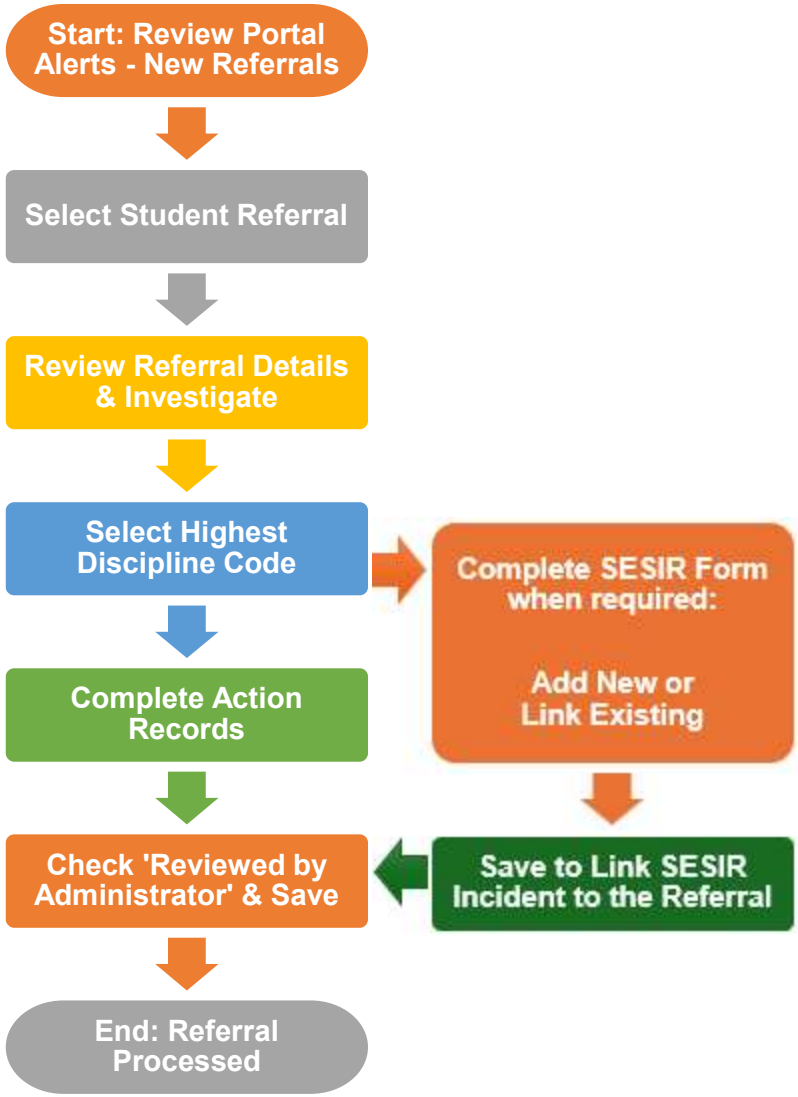
During the processing, the administrator assigns the discipline code that best fits the violation. When a student commits multiple violations during the same incident (e.g., smoking in the restroom while skipping class), the administrator must determine and assign the highest, or governing, discipline code (e.g., smoking in this scenario).

If the selected discipline code requires SESIR reporting, the system generates an alert prompting the administrator to complete the SESIR form. Upon completion, the system links the SESIR incident (or "discipline incident") to the referral and assigns a unique incident number that corresponds to the SESIR record.

The administrator then assigns a combination of administrative consequences and/or interventions ("actions") configured in the system for the selected incident code. For example, a fighting incident may result in a parent conference, referral to mental health services, and out-of-school suspension. The system assigns these actions based on the highest discipline code, the student's grade level, and the number of prior occurrences during the school year, in accordance with the Discipline Matrix.

When multiple students participate in the same incident (e.g., fighting), and the incident meets SESIR criteria, the administrator must link all related referrals to a single SESIR incident to ensure they share one common incident number.

Figure 2. Referral Processing Overview (*prepared by OCA*)



BACKGROUND (continued)

Each school in the District oversees the discipline process at its site and maintains the related records. Most disciplinary actions are handled at the school level, while certain actions require District-level involvement per Policy 5100. For example, the SC&SS Department's Expulsions Office processes expulsion and the Behavior Intervention Program ("BIP") recommendations. The Student Services Division's Student Prevention & Wellness Initiatives ("SP&WI") Department provides counseling services and manages probationary substance and expulsion abeyance contracts. Additionally, SC&SS reviews and approves changes to disciplinary records, delivers training, provides resources, and supports schools in administering the discipline process.

SESIR-level discipline data is transmitted to the FDOE through FOCUS. The District's Information Technology ("IT") Department is responsible for managing this process. Any reporting errors the FDOE identified and returned to the District are posted by IT to each school's FOCUS portal. The IT Department also distributes weekly reports to school-based Information Management Technicians ("IMTs") to notify them of required actions. Schools are responsible for reviewing and correcting all SESIR data errors.

Prior Audit

The OCA previously reviewed the student discipline process for the 2017-18, 2019-20, 2021-22, and 2022-23 school years. During those periods, discipline was processed using the District's proprietary electronic Discipline Management System ("DMS") and subsequently recorded in the District's student information system, the Total Educational Resource Management System ("TERMS"). The audit report was issued on September 26, 2024, transmitted by the Audit Committee on October 24, 2024, and received by the Board on November 13, 2024. The report identified the following issues for the most recent year reviewed (2022–23):

- Processing was not finalized for **4%** of sampled discipline referrals.
- Documentation of incidents and disciplinary actions was insufficient for **38%** of samples.
- Incident descriptions were inadequate to determine the appropriateness of the selected incident code in **3%** of samples.
- Incident coding was inaccurate in **3%** of samples.
- Documentation of suspension days was incomplete in **6%** of samples.
- Required documentation for certain disciplinary actions (e.g., contracts, agreements, or referrals) was missing in **24%** of samples.
- Incident identifier numbers used for reporting SESIR incidents to the FDOE were assigned incorrectly in **3%** of samples.
- SESIR errors were not corrected for incidents rejected by the FDOE in **3%** of samples.

Transition to FOCUS

The discipline process transitioned from the former proprietary systems to FOCUS at the beginning of the 2025–26 school year. Training on the new processes and procedures was provided for school-based administrators in July 2025. Access to FOCUS Discipline module functions is tied to training completion. The SC&SS Department verifies that administrators completed the required training prior to approving access to the Discipline module in FOCUS.

SCOPE AND METHODOLOGY

The review focused on discipline referrals and discipline incidents documented for secondary schools from January 6, 2026, through March 13, 2026. There are eighty-six (86) secondary schools in the District, excluding charter schools, and including twelve (12) technical, community, Exceptional Student Education ("ESE"), or disciplinary centers. To ensure more balanced representation, these specialized schools were excluded from the population, resulting in seventy-four (74) schools selected for testing ("test schools").

The OCA obtained referrals and discipline incidents data recorded in FOCUS for the 2025-2026 school year to date:

- "District Level - Referral Listing" report generated from FOCUS on March 13, 2026, provided by the IT Department.
- "Discipline Incidents" report downloaded, by OCA, from the Discipline module in Focus on March 13, 2026.

There were 22,121 total referrals for the test schools during the audit period. All referrals were analyzed to assess processing completeness.

The processed referrals resulted in a total of 1,656 discipline incidents recorded for the test schools during the audit period. The OCA selected a random sample of 100 of those incidents for a detailed review. Table 3 below summarizes the total number of incidents selected for testing, grouped by SESIR incident type and school level.

Table 3. Sample SESIR Incident Data for Test Schools (*period from January 6, 2026, through March 13, 2026*)

SESIR Incident Type	Center	High	Combo (6-12)	Middle	Total
Alcohol Possession and/or Use				1	**1**
Disruption on Campus - Major (Disorderly Conduct)		1		2	**3**
Drug Possession and/or Use (excluding alcohol)	3	14	1	4	**22**
Drug Sales and/or Distribution (excluding alcohol)		1			**1**
Fighting (serious mutual combat or mutual altercation only)		6	1	13	**20**
Other Major Unclassified Offenses* **Drug Paraphernalia and Electronic Devices (offensive)*	1	1		3	**5**
Physical Attack		6		5	**11**
Sexual Harassment				1	**1**
Sexual Offenses (Other)		2		1	**3**
Tobacco Possession and/or Use	2	24	1	5	**32**
Unsubstantiated Bullying				1	**1**
Total	**6**	**55**	**3**	**36**	**100**

SCOPE AND METHODOLOGY (continued)

The sampled Discipline Incidents were matched to corresponding student referrals to obtain student and disciplinary action details. Matching referrals were identified for 96 sample incidents, resulting in a total of 124 referrals reviewed in detail.

The procedures used to satisfy our objectives in this review included the following:

- Reviewed the District's discipline policies for the audit period to ascertain the guidelines for the disciplinary process and identify any changes to requirements since the prior audit.
- Interviewed staff associated with the discipline process at the district level.
- Reviewed relevant FOCUS guides to understand the procedures for documenting discipline violations electronically.
- Reviewed the District's *Administrative Definitions for Discipline* maintained by the SC&SS Department.
- Reviewed and analyzed existing departmental procedures and staff training materials for the discipline process during the audit period.
- Analyzed all referrals for the test schools to assess processing completeness.
- Reviewed descriptions for unprocessed Referrals to determine whether any potential SESIR violations existed.
- Matched sampled discipline incidents to referral and student data.
- Reviewed and analyzed descriptions of each reported discipline incident in the sample to determine whether they met the definition of the highest discipline code selected, which drives the corresponding disciplinary actions.
- Reviewed and analyzed supporting documentation for the actions assigned, per the *Administrative Discipline Matrix*, for each discipline incident in the sample and determined whether these actions were properly administered by all responsible personnel and complied with by the student.
- Obtained data used in reporting SESIR incidents to the FDOE and traced sampled discipline incidents to the data to determine whether all SESIR incidents in a sample were reported to the FDOE as required.

Note: The review and comparison analysis of discipline incident descriptions against incident code definitions was conducted in collaboration with the SC&SS Department, which provided subject matter expertise in the interpretation of disciplinary scenarios.

The review was conducted in accordance with Generally Accepted Government Auditing Standards. The standards require that the audit is planned and performed to obtain sufficient, appropriate evidence to provide a reasonable basis for the findings and conclusions based on the audit objectives. The evidence obtained provided a reasonable basis for the findings and conclusions based on the audit objectives. The OCA is responsible for providing recommendations to improve operations, strengthen internal controls, and comply with the requirements of laws, rules, and regulations in matters selected for review. The District's management is responsible for implementing corrective actions and complying with applicable laws, regulations, and School Board policies and procedures.

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FINDINGS & OBSERVATIONS

Audit Findings

High | **Finding 1** | **Discipline Referrals Not Processed**

Criteria

SBBC Policy 5090 Section VIII(B) states that school discipline should be "timely." Per the FOCUS *School Administrator Discipline Guides* and the *Administrator Procedures Training (Summer 2025)* presentation, when a discipline referral is entered into FOCUS for violations that may warrant administrative disciplinary action, administrators are expected to review each referral to determine whether further action is warranted and, when necessary, process the referral to create a discipline record and assign appropriate consequences. Per School Culture and Student Support informal instruction, administrators are expected to address discipline referrals within two (2) school days unless extenuating circumstances exist.

Condition

The OCA reviewed the "District Level – Referral Listing" report, which included discipline referrals with a "Processed" identifier representing various status conditions (closed, returned, and processed), and noted that it also contained referrals with a blank "Processed" identifier. Further analysis showed that these referrals included a mix of records, some with assigned highest discipline codes and corresponding disciplinary actions, and others lacking evidence of review or completion. Accordingly, the OCA deemed that referrals without an assigned highest discipline code had not been processed to completion. Overall, **1,992 (9%) of the 22,121 discipline referrals reviewed for the test schools during the audit period remained unprocessed in the system.**

Additionally, the OCA identified that **116 (6%) of the 1,992 unprocessed referrals had descriptions indicating potential SESIR-level violations** (e.g., battery, fighting, drug paraphernalia, sexual misconduct, or major campus disruption). Because these referrals were not documented as fully processed or investigated, OCA could not verify whether these incidents constituted serious violations or required disciplinary action.

Cause

There is no formally documented timeframe requirement for processing discipline referrals. The existing guidance, provided by the FOCUS *School Administrator Discipline Guides* and the *Administrator Procedures Training (Summer 2025)* presentation, does not establish required timelines. As a result, staff's reliance on informal expectations (e.g., addressing referrals within two school days) has led to inconsistent practices, as well as limited monitoring and controls to ensure that all referrals are reviewed and processed in a timely manner.

High	Finding 1	Discipline Referrals Not Processed (continued)

Effect

The breakdown in the documentation of review and processing of discipline referrals resulted in 9% of referrals remaining unaddressed. As a result, there is a risk that referrals requiring disciplinary action may not be captured in student discipline records, SESIR-level violations go unaddressed, and discipline data becomes incomplete or inaccurate. This impairs reporting and oversight and increases the risk of repeated or escalating student misconduct resulting from delayed or missed intervention.

Recommendation

The OCA recommends that School Culture and Student Support Department:

- Develop and formally document clear processing requirements, in days, for reviewing and processing discipline referrals, aligned with Policy 5090 expectations for "timely" discipline.
- Update the FOCUS *School Administrator Discipline Guides* and administrator training materials to include specific processing timelines, reporting expectations, and example references, and provide ongoing refresher training for administrators.
- In coordination with IT, assess system capabilities and explore available options within FOCUS to flag unprocessed referrals and generate automated alerts or escalation notifications for referrals not reviewed or processed within the required timeframe, where feasible.
- Require periodic administrative review of referral status to monitor outstanding referrals, prioritizing those with narratives suggesting potential SESIR-level violations, to ensure timely investigation and appropriate action.

The OCA recommends that principals ensure timely review and completion of all discipline referrals documented in FOCUS for their location.

Management Response

The District's review of Finding 1 determined that the transition to FOCUS introduced significant workflow changes affecting discipline processing and documentation practices. The finding highlights opportunities to strengthen consistency in referral review, investigation, disposition, and completion processes across schools. The District did not identify evidence of a systemic breakdown in the student discipline framework; rather, the finding reflects the need for continued refinement, monitoring, and reinforcement of established expectations within a new operational environment.

High	Finding 1	Discipline Referrals Not Processed (continued)

Management Response (continued)

To address the finding, the Department of SC&SS will update and enhance guidance, training materials, and support resources to further clarify referral-processing timelines, documentation requirements, and case-completion procedures within FOCUS. The Department of SC&SS, in collaboration with the Department of Information Technology (I.T.) and the FOCUS team, will continue to strengthen monitoring and reporting processes, identify outstanding referrals, and evaluate opportunities to enhance system notifications and administrative oversight capabilities. Additionally, the Department of SC&SS, in collaboration with the Regional Directors, will conduct periodic reviews of referral processing to ensure referrals are processed in a timely manner, and administrators are provided with ongoing, targeted support.

Medium | Finding 2 | Discipline Incidents Without Corresponding Referrals

Criteria

SBBC Policy 5090, Appendix C Administrative Discipline Matrix, states that documentation in the Student Information System is required for all violations requiring administrative action. Per the FOCUS *School Administrator Discipline Guide* Admin Processes a Referral with SESIR, when a discipline referral is processed in FOCUS and the assigned discipline code requires SESIR reporting, a SESIR form must be completed. Upon completion, the form must be saved, which generates a discipline incident linked to the corresponding referral through a unique incident number. This linkage is required to ensure that all SESIR incidents are supported by referral records and can be traced to associated student and disciplinary action details.

Condition

OCA reviewed the FOCUS "Discipline Incidents" report and identified that **4 (4%) of the 100 sampled incidents did not have corresponding discipline referrals in the system**. This condition limits the ability to review and verify incident details, including the appropriateness of the classification and any associated disciplinary actions.

Cause

The discrepancies appear to be due to inconsistent data entry practices, system processing issues, or the potential deletion of discipline referrals after the associated SESIR incidents were created, leaving incidents without corresponding referral records.

Effect

The absence of corresponding discipline referrals for SESIR incidents—whether due to incomplete data entry, system issues, or the potential deletion of referrals after incident creation—limits the ability to verify the accuracy and completeness of reported incidents. This includes confirming proper classification and associated disciplinary actions. As a result, records may be incomplete or unsupported, reducing data reliability and increasing the risk of noncompliance with reporting requirements. Additionally, the lack of traceability weakens oversight and accountability over the discipline process.

Recommendation

The OCA recommends that the School Culture and Student Support Department implement controls to ensure that all SESIR incidents are properly linked to corresponding discipline referrals in the system and that such referrals are retained and maintained for all SESIR incidents. This may include:

Medium	Finding 2	Discipline Incidents Without Corresponding Referrals (continued)

Recommendation (continued)

- Enhancing system validation rules to prevent retention of SESIR incidents without a corresponding referral.
- Implementing system controls or logs to restrict, monitor, and track the deletion or modification of discipline referrals once a related SESIR incident has been created.
- Establishing procedures to ensure that discipline referrals cannot be deleted without also addressing the linked SESIR incident.
- Conducting periodic reconciliations between SESIR incidents and discipline referrals to identify and resolve identified discrepancies.

Management Response

The District's review of the four exceptions identified in Finding 2 determined that each involved a unique record-linking or system-processing circumstance rather than a common process issue. The exceptions included:

- One incident involved an unsubstantiated bullying record. Unsubstantiated bullying must be reported to the State per the SESIR rule; however, it is not tied to a student's disciplinary record.
- One incident involved a sexual offense in which a SESIR linking issue prevented the proper association between the incident and referral record.
- One incident involved a simple battery referral in which a system-related issue affected the creation of the SESIR record.
- One incident involved two separate fighting incidents that resulted in a duplicate referral/incident association issue.

While the District did not identify evidence of a systemic breakdown in discipline processes or controls, the finding reflects opportunities to strengthen data validation, monitoring, and record-linking procedures.

To address the finding, the Department of SC&SS will collaborate with I.T. and the FOCUS team, as appropriate, to review the identified circumstances, strengthen monitoring processes, and conduct periodic data validation reviews designed to identify and resolve referral-to-incident discrepancies in a timely manner.

Medium | Finding 3 | Insufficient Incident Descriptions

Criteria

The Collective Bargaining Agreement between the Broward Teachers Union Education Professionals and the School Board of Broward County, Florida ("BTU-EP Contract") Article 11, Section H states, "When a student is referred for disciplinary action, the employee shall furnish the principal or designated representative, as promptly as teaching obligations will allow, with full particulars on the problem or incident in writing, utilizing the student referral form." Additionally, per the FOCUS *Teacher Discipline Guides*, the referral must include a clear and detailed description of the incident in the *Reason for Referral* field. Administrators may also document supplemental information in the *Investigative Notes* section, as appropriate.

Condition

Although all referrals reviewed included incident descriptions, **35 (28%) of the 124 reviewed referrals lacked narrative details** to support or validate the assigned discipline code. Most of these insufficient descriptions were associated with **fighting incidents**, where the event narratives lacked key details to substantiate the severity level, such as whether injuries were minor or whether adult intervention was required.

Cause

The condition appears to result from inconsistent adherence to narrative detail documentation requirements, as well as lack of standardized expectations and oversight regarding the level of detail required in referral narratives.

Effect

Insufficient referral documentation of narrative details limited the ability to verify that the discipline codes were appropriately assigned and consistently applied. This increased the risk of inaccurate reporting and inconsistent disciplinary practices. Additionally, inadequate documentation may weaken administrative decision-making and reduce the District's ability to support disciplinary actions if challenged.

Recommendation

The OCA recommends that principals ensure staff document all relevant facts, circumstances, and each student's involvement in the incident to support the discipline code selected in FOCUS.

Medium	Finding 3	Insufficient Incident Descriptions (continued)

Recommendation (continued)

The OCA recommends that the School Culture and Student Support Department reinforce training on documentation expectations to ensure that referral narratives consistently contain sufficient detail to support discipline code determination to promote consistent, reliable, and appropriate disciplinary decisions.

Management Response

The District's review of Finding 3 revealed that several of the referral narratives and supporting documentation within the audit sample did not consistently contain sufficient detail to clearly distinguish among the three fighting classifications established in the District's Administrative Definitions for Discipline: Minor Altercation/Confrontation, Fighting–Medium, and Fighting–Major Mutual Combat. These classifications are differentiated by factors such as the nature and extent of physical contact, the severity of injuries, whether first aid or medical attention was required, and whether staff intervention was necessary to stop the altercation.

In several of the records reviewed, the referral narrative simply indicated that students were "fighting" without documenting the specific circumstances needed to distinguish among the three classifications. As a result, the documentation available for review did not always clearly reflect the factors supporting the selected discipline code or provide sufficient detail to independently validate the classification assigned.

To address the finding, the SC&SS Department will continue to strengthen guidance, training, and technical assistance related to referral narratives, investigative documentation, and use of the Administrative Investigation Notes feature within FOCUS. Additionally, the Department of SC&SS, in collaboration with the Regional Directors, will conduct periodic reviews of referral narratives to ensure sufficient documentation exists to substantiate the disciplinary code applied. Administrators are provided with ongoing, targeted support from the Department of SC&SS.

Medium | Finding 4 | Inaccurate Discipline Code Assignment

Criteria

Rule 6A-1.0017 establishes definitions for SESIR-level incidents, and SBBC Policy 5090 definitions are aligned with this rule. These definitions are also reflected in the *Administrative Definitions for Discipline* schedule, which provides detailed descriptions for each discipline code programmed into FOCUS. Per the School Culture and Student Support Department's informal instruction, administrators are expected to reference this schedule when assigning discipline codes during referral processing to ensure the discipline assigned is appropriate for the infraction.

Condition

The OCA noted that in **7 (6%) of the 124 referrals reviewed, incident descriptions did not align with the definition of the assigned discipline codes**, resulting in discipline coding inaccuracies.

Cause

The condition appears to result from inconsistent application of established discipline definitions and insufficient use of the *Administrative Definitions for Discipline* schedule during referral review and processing. Additionally, the absence of formalized guidance or training may contribute to variability in how administrators interpret and apply discipline code criteria.

Effect

Assigning discipline codes that are not supported by incident descriptions increases the risk of inaccurate SESIR reporting and misclassification of student behavior, potentially resulting in noncompliance with state reporting requirements and limiting the District's ability to implement appropriate interventions.

Recommendation

The OCA recommends that principals reinforce expectations for administrators to consistently reference the *Administrative Definitions for Discipline* schedule when reviewing and assigning discipline codes.

Medium	Finding 4	Inaccurate Discipline Code Assignment (continued)

Recommendation (continued)

The OCA recommends that School Culture and Student Support Department:

- Formalize and communicate guidance on the use of the *Administrative Definitions for Discipline* schedule to ensure the consistent application of definitions.
- Implement a monitoring process to identify and address inaccurate discipline code assignments.

Management Response

The District's review of the identified exceptions in Finding 4 revealed opportunities to strengthen consistency in the selection of local discipline codes when similar behaviors may fall within multiple coding categories. The review identified circumstances involving THC-related incidents, distinctions between fighting and battery classifications, and incidents involving multiple behaviors in which the documented conduct could support more than one discipline code. In these instances, the records reviewed did not consistently demonstrate the rationale for the specific code selected or clearly reflect the factors supporting the governing discipline classification.

It is important to note; however, that the District's review also determined that the THC-related exceptions did not result in inaccurate SESIR reporting. Although the most precise local discipline code was not consistently selected, the local discipline codes that were applied rolled up to the appropriate SESIR reporting category, resulting in accurate reporting of the incidents to the Florida Department of Education.

To address the finding, the Department of SC&SS will continue to provide a dedicated support line for administrators to receive expert, on-the-spot guidance and technical assistance as well as strengthen training related to the Administrative Definitions for Discipline, discipline code selection, SESIR reporting requirements, and documentation standards. Specific emphasis will be placed on distinguishing among commonly confused discipline categories, identifying the governing discipline code when multiple behaviors occur within a single incident, and ensuring that referral narratives and investigative documentation clearly support the selected classification.

Additionally, the Department of SC&SS, in collaboration with the Regional Directors, will continue to conduct periodic reviews of discipline records to identify trends, provide targeted support, and promote consistent application of discipline definitions across schools.

Medium | Finding 5 | Inconsistent Assignment of Suspension Days

Criteria

SBBC Policy 5090, Appendix C states, "The Administrative Discipline Matrix sets forth the guidelines for assessing consequences for violations of School Board policies. It further states:

"In accordance with Rule 6A-1.0017, F.A.C., school administrators have the discretion to deviate from these guidelines by assessing an appropriate consequence other than stated in the Matrix if they determine that there are mitigating or aggravating circumstances. In circumstances that do not involve drugs/substances or incidents that rise to expulsion or behavior intervention through progressive discipline, principals may deviate by one level when applying consequences per the Discipline Matrix. For incidents associated with drugs/substances and those with progressive discipline that rise to a recommendation for expulsion or behavior intervention, the school principal must seek approval from the Superintendent, or designee to deviate from the prescribed consequences."

Condition

The OCA noted that **5 (4%) of the 124 referrals reviewed were assigned suspension days that did not align with the Discipline Matrix**.

- One (1) incident involved a tobacco vape violation in which the student received 4 fewer days of suspension than prescribed by the Discipline Matrix. The reason for this deviation was not documented in the referral.

- Four (4) incidents were drug-related, in which students received suspensions that exceeded the number of days prescribed by the Discipline Matrix by 2–4 days. The OCA requested but did not receive documentation for any request, or approval, for these deviations from the Superintendent or his designee.

Cause

The condition appears to result from insufficient adherence to established guidance regarding the application of the Discipline Matrix and documentation of deviations. Additionally, there may be a lack of awareness or enforcement of requirements to obtain approval for deviations related to drug or substance-related incidents, as well as the guidelines for adequate documentation to support justification for such deviations.

Medium	Finding 5	Inconsistent Assignment of Suspension Days (continued)

Effect

Failure to align suspension durations with the Discipline Matrix, or to properly document and approve deviations, increases the risk of inconsistent disciplinary practices and noncompliance with SBBC Policy 5090. This may result in inequitable student consequences, reduced transparency in disciplinary decision-making, and potential challenges to the appropriateness of disciplinary actions.

Recommendation

The OCA recommends that principals reinforce adherence to the Discipline Matrix and ensure that any deviations are appropriately justified and documented within the referral record.

The OCA recommends that the School Culture and Student Support Department strengthen guidance and training on Discipline Matrix application, including documentation requirements and approval protocols for deviations, to promote consistent and compliant disciplinary practices.

Management Response

The District's review of the identified exceptions in Finding 5 found opportunities to strengthen consistency in the application of consequence ranges for certain drug-related offenses, the review of prior disciplinary history when progressive discipline applies, and documentation supporting approved deviations from the Discipline Matrix. The exceptions reviewed reflected variances in consequence application and supporting documentation rather than deficiencies in the underlying disciplinary framework.

To address the finding, the Department of SC&SS will continue to strengthen guidance, training, and technical assistance related to application of the Administrative Discipline Matrix, review of disciplinary history, and documentation requirements when deviations from prescribed consequences are approved. The Department of SC&SS will also review current monitoring practices and available reporting tools to support consistency in disciplinary consequence assignment.

High | Finding 6 | Incomplete Attendance Documentation

Criteria

Per the FOCUS *School Administrator Discipline Guides*, administrators are required to select all applicable disciplinary actions associated with the assigned discipline code when processing a referral. Administrators must also accurately enter the action start and end dates, or alternatively, the start date and duration of the action.

For suspensions, the student's attendance record is automatically updated with the applicable attendance code from the start date through the end date of the action. This attendance code is visible to teachers and cannot be modified.

Additionally, per the *Administrator Procedures Training (Summer 2025)* presentation, students assigned to Alternative to External Suspension ("AES") must be enrolled in FOCUS in the AES Center as a second school.

Condition

The OCA reviewed student attendance records in FOCUS and compared the documented suspension days to the number of suspension days recorded in the referral action records. The review showed that **23 (19%) of the 124 referrals were missing one or more assigned suspension days in the student attendance record**.

Additionally, the OCA identified 94 referrals in which students were assigned AES and subsequently reviewed their enrollment records in FOCUS. The OCA noted that **58 (62%) of these students were not enrolled in the AES Center as a second school**, as required.

Cause

The condition appears to result from inconsistent data entry practices and insufficient adherence to the established procedures for recording disciplinary actions and enrollment in FOCUS. Additionally, a potential system limitation may exist when referrals are not entered on the same day the incident occurred. If the incident date is entered incorrectly or retroactively, the system may not accurately align disciplinary actions with attendance records. Furthermore, there may be a lack of oversight and verification controls to ensure alignment between referral action records, attendance records, and AES enrollment requirements.

High	Finding 6	Incomplete Attendance Documentation (continued)

Effect

Inaccurate recording of suspension days and failure to properly enroll students in AES may result in incomplete or inconsistent student records, reducing the reliability of attendance and discipline data. This increases the risk of noncompliance with District procedures, may impact reporting accuracy, and may limit the District's ability to monitor and support appropriate student interventions.

Recommendation

The OCA recommends that the School Culture and Student Support Department:

- Collaborate with the IT Department to evaluate potential system limitations related to incident date entry in FOCUS, particularly when referrals are entered after the date of occurrence and determine whether any system enhancements or controls are needed to ensure accurate alignment between disciplinary actions and attendance records.

- Strengthen the guidance and training on FOCUS data entry requirements and AES enrollment procedures to promote accuracy and consistency.

The OCA recommends that principals:

- Review discipline-related training materials with staff and ensure that all students assigned to AES are properly enrolled in FOCUS with the AES Center identified as a second school, as required.

- Implement a review process to verify that all assigned suspension days are accurately reflected in the student attendance records and that AES placements are properly recorded.

Management Response

The District's review of Finding 6 found that the identified discrepancies resulted from a combination of attendance coding, suspension-processing workflows, and AES enrollment documentation. The requirement to enroll AES students in a second school was introduced as part of the District's transition to FOCUS and represented a significant change from prior processes. Before the implementation of FOCUS, attendance and student information were managed through established communication processes between the student's home school and the AES site. As a result, while second-school enrollment records were not consistently reflected within FOCUS, the absence of a second-school enrollment record does not, by itself, indicate that attendance was not taken or that educational services were not provided.

High	Finding 6	Incomplete Attendance Documentation (continued)

Management Response (continued)

To address the finding, the Department of SC&SS, in collaboration with I.T. and the FOCUS team, will review existing workflows related to suspension processing, attendance coding, and AES enrollment procedures. The Department of SC&SS will also strengthen guidance, training, and monitoring processes to promote consistency in record-keeping and ensure alignment between disciplinary actions, attendance records, and AES enrollment documentation.

High | Finding 7 | Deficient Documentation of Notifications

Criteria

SBBC Policy 5090, Appendix C, requires documentation in the student information system and parent contact for all violations requiring administrative action. Section VIII(C) states that parent contact or conference is mandatory for all offenses. Section VIII(B) further states that students subjected to qualifying incidents are eligible to transfer to another public school with capacity or to receive a scholarship to enroll in an approved private school under the Hope Scholarship Program, and that school district personnel are responsible for notifying families of this option.

Additionally, per the Administrator Procedures Training (Summer 2025), administrators must document parent contact attempts and notify families of eligibility for the Hope Scholarship Program. Per the School Culture and Student Support Department's informal instruction as reported to the OCA by the department's staff, administrators are expected to document the completion of required actions and interventions in the *Explanation/Notes* for *Required Interventions* section of the referral.

Condition

Parent Notifications. The OCA reviewed the Student Documentation module in FOCUS for all students in the sample, as well as the *Required Interventions* section of the referrals. **Parent contact was not documented in FOCUS for 68 (55%) of the 124 referrals reviewed**. After follow-up with schools, the administrators subsequently documented parent contact in FOCUS for 30 of the 68 instances. For the remaining cases, schools indicated that parent contact was made via phone, email, or letter; however, this communication was not documented in FOCUS.

Hope Scholarship Notifications. The OCA requested evidence of Hope Scholarship Program notifications from schools. However, the notification **could not be verified for 27 (50%) of the 54 applicable referrals**. In these 27 instances, school administrators either indicated that a notice was not issued or failed to provide supporting documentation in 15 cases, and did not respond to the audit request for the remaining 12 cases.

Cause

The condition appears to result from inconsistent documentation practices and insufficient adherence to established requirements for recording parent contact and Hope Scholarship notifications in FOCUS. Additionally, reliance on verbal communication without creating corresponding system documentation and a lack of standardized expectations or oversight contribute to incomplete records.

High	Finding 7	Deficient Documentation of Notifications (continued)

Effect

Failure to properly document parent contact and Hope Scholarship Program notifications reduces transparency and limits the District's ability to demonstrate compliance with SBBC Policy 5090. This increases the risk of noncompliance with statutory requirements, weakens audit trails, and may result in disputes or challenges regarding whether families were appropriately notified of disciplinary actions and available options.

Recommendation

The OCA recommends that principals ensure:

- All parent contact attempts and outcomes are consistently documented in FOCUS in accordance with policy requirements.
- Documentation of Hope Scholarship Program notifications, including the method and date of the notification, are maintained in FOCUS for all applicable incidents.

The OCA recommends that the School Culture and Student Support Department formalize guidance on documentation requirements for disciplinary actions and interventions. For example, the department may consider formalizing existing expectations by updating the FOCUS *School Administrator Discipline Guides* and training materials to include guidance on documenting the completion of required actions and interventions in the *Explanation/Notes* for *Required Interventions* section of the referral.

Management Response

The District's review of Finding 7 found opportunities to strengthen documentation practices related to parent notifications and Hope Scholarship notifications. While notification records were not consistently available within FOCUS, the finding primarily reflects opportunities to improve documentation, record retention, and consistency in the application of notification procedures. The review also identified opportunities to strengthen awareness of the circumstances requiring Hope Scholarship notification and to ensure supporting documentation is consistently maintained.

To address the finding, the Department of SC&SS will strengthen guidance, training, and technical assistance related to parent contact documentation, Hope Scholarship notification requirements, use of FOCUS notification tools, and maintenance of supporting records. The Department of SC&SS will also review existing procedures and documentation expectations to promote consistency and improve documentation.

High | **Finding 8** | **Failure to Implement Required Notice to District Authorities**

Criteria

SBBC Policy 5090, Appendix C, states, "The Administrative Discipline Matrix sets forth the guidelines for assessing consequences for violations of School Board policies." Section VIII(C) further specifies that certain rule violations require prescribed consequences as outlined in the Discipline Matrix. Completion of the Immediate Notification Form for the Regional Office and the District Security Operations Center ("DSOC") is specified in the Discipline Matrix for most SESIR-level infractions. Additionally, per the *Administrator Procedures Training (Summer 2025)*, administrators must "Notify District Security Operations Center (DSOC) for serious incidents."

Condition

The OCA reviewed the *Required Interventions* section of referrals in FOCUS for a sample of incidents where completion of an "Immediate Notification Form for Regional Office and DSOC" was required under the Discipline Matrix. The OCA determined that **Immediate Notification Form for the Regional Office and DSOC was not implemented in FOCUS**. Instead, the list of applicable actions programmed into FOCUS for these incidents included an "Immediate Notification Form (SIU[4])", which reflects a legacy form from the prior system, DMS.

During initial interviews, the School Culture and Student Support Department staff stated that the updated notification form could not be implemented in FOCUS. As a result, schools were advised to notify DSOC via phone, email, or a designated Microsoft Teams channel in lieu of completing the form. However, after following up with the tested schools, the OCA determined that this alternative process was not consistently followed.

Schools reported inconsistent practices and differing interpretations of the requirement. Most schools indicated they were advised that tobacco-related incidents should not be reported through the Teams channel, as it is reserved for more serious incidents such as threats and emergencies. Other schools indicated that a notification was not required, some continued to use the outdated SIU form, and others did not respond to the audit's request. As a result, the OCA determined that **in 96 (89%) of 108 applicable cases the schools did not notify the appropriate authorities as required**. The OCA identified that **in 5 (5%) of 108 cases, the schools used an outdated form**.

Cause

The condition appears to result from system limitations within FOCUS, including the continued reference to a legacy SIU Immediate Notification Form that has not been updated to reflect current requirements for notification to the Regional Office and DSOC. Additionally, the

[4] Special Investigative Unit

High	Finding 8	Failure to Implement Required Notice to District Authorities (continued)

Cause (continued)

lack of a standardized, system-integrated process, together with inconsistent and evolving guidance on alternative notification methods, contributed to confusion among school administrators and inconsistent implementation of required notifications.

Effect

Failure to consistently notify the Regional Office and DSOC, as outlined in the Discipline Matrix, increases the risk of noncompliance with SBBC Policy 5090. However, the recognized inconsistent implementation also suggests potential misalignment between policy requirements and operational practices.

Without clearly defined and feasible notification processes, schools may apply varying interpretations of requirements, that could result in inconsistent reporting and reduced reliability of incident escalation procedures. Additionally, if notification requirements are broader or not aligned with the severity of incidents, they may strain existing communication channels and reduce the effectiveness of DSOC monitoring and response efforts.

Collectively, these conditions reduce transparency and accountability and may limit the District’s awareness of student safety concerns.

Recommendation

The OCA recommends that the School Culture and Student Support Department collaborate with the District Security Operations Center (DSOC) management to reassess the purpose and scope of the notification requirements outlined in the Discipline Matrix. This reassessment should determine whether notifications to the Regional Office and DSOC are necessary for all applicable SESIR-level incidents, including lower-risk incidents such as tobacco vape violations.

Based on this assessment, the Department should determine whether revisions to the Discipline Matrix are warranted or whether the notification process should be modified to better align with operational needs.

Management Response

The District's review of Finding 8 revealed that notification practices have evolved over time and training guidance, system functionality, and existing policy language are not fully aligned. The previously used Immediate Notification Form referenced in the Discipline Matrix was not

High	Finding 8	Failure to Implement Required Notice to District Authorities (continued)

Management Response (continued)

incorporated into FOCUS because operational practices evolved to utilize alternative notification methods. As a result, supporting documentation demonstrating that notifications occurred was not consistently available for verification.

To address the finding, the Department of SC&SS will collaborate with the Safety, Security & Emergency Preparedness Division, the District Safety Operations Center (DSOC), and I.T. to review existing notification requirements, workflows, documentation procedures, and related policy language. The Department of SC&SS will also strengthen guidance and training to ensure notification expectations and documentation requirements are clearly communicated and consistently implemented.

High | Finding 9 | Deficient Documentation of Referrals to Support Services

Criteria

SBBC Policy 5090, Appendix C, states, “The Administrative Discipline Matrix sets forth the guidelines for assessing consequences for violations of School Board policies.” Section VIII(C) further specifies that certain rule violations require prescribed consequences as outlined in the Discipline Matrix. Referrals to support services—such as Mental Health Services (e.g., School Counselor, School Social Worker, Family Therapist) and School-based Collaborative Problem Solving (“CPST”)/Response to Intervention (“RtI”) Team (“CPST referral”)—are prescribed by the Discipline Matrix for certain SESIR-level infractions.

SBBC Policy 5100 further requires that students suspended for a first offense involving the purchase, use, possession, or being under the influence of mood-altering or unauthorized substances, including alcohol, be referred to the District’s substance abuse case manager to coordinate an appropriate counseling program.

Additionally, the Collective Bargaining Agreement between the Broward Teachers Union Education Professionals and the School Board of Broward County, Florida (“BTU-EP Contract”) , Article 11, Section I states, "Individual records will be maintained by the principal or his/her designee on student discipline.” Per the Administrator Procedures Training (Summer 2025), administrators are responsible for adhering to the Discipline Matrix and maintaining accurate documentation of discipline incidents and the associated interventions implemented for the students.

Condition

The OCA reviewed the Student Documentation and School Social Work (“SSW”) modules in FOCUS for all students in the sample incidents where referral to support services was prescribed by the Discipline Matrix. Additionally, the *Required Interventions* section of the discipline referrals was also reviewed. For cases where support services referrals were not documented in FOCUS, the OCA requested supporting evidence from the schools to verify that applicable referrals were made. Based on the review, the OCA determined that documentation for these interventions was missing, as specified below.

Mental Health Services. **Referrals to Mental Health Services were not documented in FOCUS for 64 (74%) of the 87 applicable cases tested**. After the OCA followed up with the tested schools, administrators subsequently documented the referrals in FOCUS for 14 of the 64 incidents. For the remaining 50 incidents, schools indicated that 30 referrals were made via phone, email, letter, or in person; in 12 cases, school administrators failed to provide supporting documentation; and in 8 cases, no response to the audit request was received.

High	Finding 9	Deficient Documentation of Referrals to Support Services (continued)

Condition (continued)

CPST Referrals. The OCA requested evidence of the CPST referrals from schools. **Supporting documentation was not provided in 9 (43%) of the 21 applicable cases**. In six (6) instances, schools provided evidence of alternative interventions (e.g., a social worker conference). In three (3) instances, no evidence was provided to demonstrate that a referral to CPST was made.

Substance Abuse Counseling. Substance abuse case managers document referrals to, and refusals of, counseling or treatment programs for students involved in drug and substance related violations using either a paper-based Referral for Substance Abuse Counseling Form, entries in the SSW module in FOCUS, or both. The OCA requested evidence of counseling referrals from substance abuse case managers for cases not documented in FOCUS. **Supporting documentation was not provided for 5 (50%) of the 10 applicable cases**. In three (3) instances, referrals to services were recorded in FOCUS only after the audit request.

Cause

The condition appears to result from deficiencies and a lack of clarity in documented procedures and system limitations related to the recording and tracking of required interventions. During the review of disciplinary policies, procedures, and training materials, the OCA identified lack of formal guidance regarding expectations for documenting interventions, including support service referrals, in FOCUS.

Additionally, system functionality limitations contributed to the condition. Automatic notification features that existed in prior systems and alerted case managers to applicable referrals, were no longer available in FOCUS. As a result, there was no standardized, system-driven process to ensure that substance abuse case managers were notified of all applicable cases requiring follow-up.

Although the School Culture and Student Support Department indicated that lists of substance related incidents were periodically distributed to case managers, these lists were limited in scope and did not consistently include all relevant incident types. Consequently, case managers may not have been aware of all cases requiring intervention, increasing the likelihood that referrals and related documentation were incomplete or not maintained.

Effect

Insufficient documentation of required referrals and interventions reduces the District's ability to demonstrate compliance with SBBC Policy 5090, Policy 5100, and established procedures. This weakens audit trails and limits transparency into whether students received the required services and support.

High	Finding 9	Deficient Documentation of Referrals to Support Services (continued)

Effect (continued)

Gaps in the notification and tracking processes may result in missed or delayed referrals to critical support services, including mental health and substance abuse counseling. This may negatively impact student outcomes and the District's ability to provide timely interventions. Additionally, incomplete or inconsistent documentation reduces the reliability of discipline and intervention data used for monitoring, reporting, and decision-making.

Recommendation

The OCA recommends that the School Culture and Student Support Department:

- Formalize procedures for documenting disciplinary actions and required interventions, including clear expectations for recording referrals to support services in FOCUS.
- Collaborate with the IT Department to evaluate FOCUS system capabilities and to determine whether enhancements (e.g., automated notifications, workflow triggers, or referral tracking mechanisms) can be implemented to ensure diligent case manager awareness and follow-up.
- Review and enhance processes for communicating drug and substance related incidents to case managers, ensuring that all applicable incident types are consistently identified and communicated.
- Strengthen training and monitoring practices to promote consistent documentation and verification of required interventions across schools.

The OCA recommends that principals ensure that all required referrals and interventions are both completed and documented in the student discipline record, in accordance with policy and procedural requirements.

Management Response

The District's review of Finding 9 found opportunities to strengthen referral workflows, documentation practices, and communication processes associated with mental health referrals, substance abuse referrals, and other required interventions. The review also identified workflow changes associated with the transition to FOCUS, including the loss of certain automated notifications and increased reliance on manual

High	Finding 9	Deficient Documentation of Referrals to Support Services (continued)

Management Response (continued)

communication and documentation processes. As a result, supporting records demonstrating that referrals and interventions occurred were not always consistently available for review.

To address the finding, the Department of SC&SS will collaborate with Student Services and Mental Health Department and I.T. to review referral, notification, and documentation procedures, strengthen communication workflows, clarify documentation expectations, and evaluate opportunities for additional system supports. The Department of SC&SS will also continue to reinforce guidance related to documentation of required referrals and interventions.

High | Finding 10 | Missing Probationary Contract Notices

Criteria

SBBC Policy 5100, Section III, states that a student may be assigned a Substance Probation Contract ("SPC") for repeat drug and substance abuse offenses. The policy further states, "The student shall complete the requirements of the SPC while at a regular school program. The District substance abuse case manager shall refer the student for participation within a District-approved treatment program with a certified addiction professional, place the student on a SPC and monitor that the student remains in compliance with the terms of the SPC. If the student violates/breaches the terms of the SPC by committing another SBBC Policy 5100, Section III violation for any drug or substance, not including nicotine, synthetic nicotine, or paraphernalia during the term of the SPC, then the student shall be issued a ten-day suspension with a mandatory recommendation for a District behavior intervention program."

For non-drug and non-substance abuse offenses, SBBC Policy 5100, Section IV states, "the student may be placed on an Alternative Probationary Contract ("APC") in lieu of recommending the Behavior Intervention Assignment. This APC shall allow the student to continue attending school under the terms of the Notice of Alternative Probation. The APC shall remain in effect for one (1) year from the date of the qualifying incident. If the student violates the APC by committing another eligible offense of Section IV of this policy, such violation shall result in a recommendation for assignment to a District behavior intervention program or expulsion."

Condition

The OCA noted that documentation for probationary contracts was not consistently maintained:

- Substance Probation Contract (SPC) notices were missing for **2 (13%) of the 16 applicable cases**.
- Alternative Probationary Contract (APC) notices were missing in **14 (58%) of the 24 applicable cases**.

As a result, there was insufficient evidence to verify that students were formally placed on probationary contracts in accordance with SBBC Policy 5100, Sections III and IV as required.

Cause

The identified deficiencies are primarily due to the lack of system automation, and a reliance on manual processes and interdepartmental coordination. School administrators must manually generate APC Notices in FOCUS since the system does not automatically generate notices or provide alerts when they are required.

High	Finding 10	Missing Probationary Contract Notices (continued)

Cause (continued)

Additionally, FOCUS does not provide automated alerts or notifications to District case managers; therefore, the SPC Notices process relies on periodically distributed lists of drug and substance related incidents. This reliance increases the risk of delays, omissions, and inconsistent follow-through in case managers' review and initiation of SPC Notices.

Effect

As a result of these process gaps, probationary contract notices were not consistently issued or documented, which led to noncompliance with SBBC Policy 5100, Sections III and IV. The absence of required documentation limits the ability to verify that students were formally placed on SPCs or APCs and that applicable procedures were followed. This lack of consistency increases the risk of inequitable application of disciplinary measures and weakens accountability. Additionally, incomplete documentation reduces the reliability of the audit trail needed to monitor student compliance with the probationary terms and support effective oversight.

Recommendation

The OCA recommends that the School Culture and Student Support Department:

- Coordinate with the IT Department to explore feasible system enhancements within FOCUS, including automation or system-generated alerts/reminders to prompt administrators when APC notices are required.
- Coordinate with the IT Department to determine whether enhancements (e.g., automated notifications, workflow triggers, or referral tracking mechanisms) can be implemented to ensure appropriate case manager awareness and follow-up.
- Establish standardized procedures and guidance for the generation and documentation of APC notices within FOCUS.
- Implement periodic monitoring controls to ensure APC notices are generated and documented in compliance with SBBC Policy 5100.

High	Finding 10	Missing Probationary Contract Notices (continued)

Recommendation (continued)

The OCA recommends that the Student Prevention & Wellness Initiatives Department:

- Maintain consistent documentation of SPC notice issuance and supporting evidence within FOCUS.
- Coordinate with SC&SS and school administrators to establish a practical process to ensure that all applicable cases are identified and processed in a timely manner.

The OCA recommends that principals reinforce staff accountability and provide oversight to ensure APC notices are generated in FOCUS and properly documented for all applicable cases.

Management Response

The District's review of Finding 10 found opportunities to strengthen communication workflows, documentation practices, and record-retention procedures associated with Substance Probation Contracts (SPCs) and Alternative Probation Contracts (APCs). The review also identified workflow changes associated with the transition to FOCUS, including the elimination of certain automated notifications previously available in the District's former discipline system. As a result, supporting documentation demonstrating issuance of required contracts was not consistently available for review.

To address the finding, the Department of SC&SS will review current procedures related to probationary contract issuance, notification, documentation, and record retention. The Department of SC&SS will also strengthen guidance and training related to communication workflows, maintenance of supporting records, and documentation of required actions within FOCUS.

Medium	Finding 11	Failure to Initiate Required BIP Recommendation

Criteria

SBBC Policy 5100 requires that students be recommended for assignment to a District Behavior Intervention Program ("BIP") in accordance with the Discipline Matrix outlined in SBBC Policy 5090. Under a BIP, the District assigns a student to a specialized behavior intervention program rather than allowing the student to remain at the home school. When a student's offense is designated for BIP under the Discipline Matrix, the school must submit a complete recommendation package to the School Culture and Student Support Department's Expulsions Office.

Condition

The OCA identified that **1 (50%) of the 2 applicable referrals lacked the required recommendation for a Behavior Intervention Program (BIP)**, despite the incident being designated for BIP under the Discipline Matrix.

Cause

The deficiency appears to be due to inconsistent adherence to established procedures for identifying and processing incidents requiring BIP recommendations. This may be further influenced by limited oversight and a lack of clear controls to ensure that qualifying incidents are properly reviewed and referred in accordance with the Discipline Matrix.

Effect

Failure to recommend eligible students for a BIP results in noncompliance with SBBC Policy 5100 and may lead to inconsistent application of disciplinary actions. Additionally, students who require intensive behavioral intervention may not receive appropriate support, increasing the risk of repeated misconduct and weakening the effectiveness of the District's disciplinary framework.

Recommendation

The OCA recommends that school principals reinforce staff accountability and provide oversight to ensure that BIP recommendations are submitted to the Expulsions Office for all applicable cases.

Medium	Finding 11	Failure to Initiate Required BIP Recommendation (continued)

Recommendation (continued)

The OCA recommends that the School Culture and Student Support Department:

- Establish review or oversight controls (e.g., district-level checks) to verify that required BIP recommendation packages are submitted in accordance with policy and timely.

- Provide training or guidance to school-based administrative staff on the requirements for BIP referrals under the Discipline Matrix and SBBC Policy 5100.

Management's Response

The District's review of Finding 11 found that the identified exception was associated with a gap in the documented progression of required disciplinary interventions. Specifically, documentation supporting issuance of the student's prior APC could not be verified during the review. As a result, a new APC was issued following the subsequent qualifying incident rather than initiating the next intervention in the progressive discipline sequence.

To address the finding, the Department of SC&SS will continue to strengthen guidance, training, and monitoring related to progressive discipline requirements, including documentation and verification of probationary contracts and related interventions. The Department of SC&SS will also reinforce procedures designed to ensure that required interventions are documented and readily verifiable within the student discipline record.

High | Finding 12 | SESIR Incident Numbering Errors

Criteria

Florida Administrative Code Rule 6A-1.0017, *School Environmental Safety Incident Reporting (SESIR)* requires reporting of the SESIR-level incidents (e.g., battery, major campus disruptions, threats, substance abuse, possession of weapons, fighting, tobacco use) to the FDOE. Rule 6A-1.0017(5)(a) states that "SESIR is an incident-based reporting system, which means that a single incident is reported, even where there are multiple offenders or victims, or multiple incidents that occur within one episode".

To satisfy SESIR reporting requirements, the District utilizes a SESIR incident number as the unique identifier for each reportable incident. This number is generated when the SESIR form is completed and saved during referral processing in FOCUS. Per the FOCUS *School Administrator Discipline Guide* Admin Processes a Referral with SESIR, when a discipline incident involves multiple students, referrals for all students involved in the incident must be linked to a single SESIR incident during processing. This ensures that all the related referrals share a common incident number.

Condition

The OCA identified SESIR incident numbering errors that affected reporting to the FDOE. In some instances, the OCA noted that administrators created a new SESIR incident record for each additional student involved in the single event. Most of these instances involved fighting, for which separate SESIR incident forms were created for each individual student rather than linking all the related referrals to a singular SESIR incident number as prescribed. As a result, one or more additional incidents were reported for the single event.

The OCA identified that **11 (9%) of the 124 referrals reviewed were incorrectly linked to SESIR incident numbers**. As a result, **6 (6%) of the 96 sample incidents were overreported**[5] to the FDOE due to duplicated incident records.

Cause

The condition appears to result from inconsistent application of the District's procedures during the referral processing, specifically a lack of adherence to the requirement to link multiple student referrals to a single SESIR incident for the same event. This indicates a potential gap in administrator understanding or training related to incident-based reporting.

[5] As reported on SESIR Survey R.
Survey R is a monthly operational upload used for continuous monitoring throughout the year. The final, certified record of incidents for the academic year is reported on Survey 5. This comprehensive, end-of-year data submission for the school year 2025-26 is due to the FDOE on July 24, 2026, with final updates and amendments due by October 31, 2026.

High	Finding 12	SESIR Incident Numbering Errors (continued)

Cause (continued)

Additionally, system control limitations within FOCUS contributed to the condition. The District's reporting system did not detect or prevent the creation of duplicate SESIR incident records for the same event, nor did it prompt users to link related referrals to an existing incident number. The absence of automated validation controls and insufficient oversight increased the likelihood of improper incident creation and inaccurate reporting.

Effect

Incorrect linking of SESIR incident records and the resulting creation of duplicate incidents reduced the accuracy and reliability of discipline data reported to the state. This increased the risk of noncompliance with Florida Administrative Code Rule 6A-1.0017, which requires incident-based reporting.

Overreporting incidents may distort the District's SESIR data, potentially affecting state reporting, trend analysis, and decision-making related to student discipline and safety. Additionally, the absence of system controls to prevent or detect duplicate incident creation weakens data integrity and increases the likelihood of ongoing reporting inaccuracies.

Recommendation

The OCA recommends that principals ensure administrators consistently link all referrals associated with a single incident to one SESIR incident number, in accordance with SESIR requirements and the FOCUS *School Administrator Discipline Guide* Admin Processes a Referral with SESIR.

The OCA recommends that the School Culture and Student Support Department:

- Strengthen training on SESIR incident based reporting requirements, with particular emphasis on linking multiple student referrals to a single incident record.
- Collaborate with the IT Department to evaluate and implement, where feasible, system enhancements within FOCUS to prevent or detect duplicate SESIR incident creation, such as validation prompts, duplicate detection controls, or required linkage workflows.
- Consider implementing periodic monitoring or data validation procedures to identify and address SESIR incident numbering errors and ensure ongoing accuracy of state reporting.

High	Finding 12	SESIR Incident Numbering Errors (continued)

Management Response

The District's review of Finding 12 found that the identified exceptions involved the creation of separate SESIR incident records for students involved in the same event rather than linking all related referrals to a single SESIR incident. The finding reflects opportunities to strengthen consistency in the application of existing incident-linking procedures and quality-control processes. The review also determined that the affected records can be corrected prior to final submission to the Florida Department of Education.

To address the finding, the Department of SC&SS will continue to reinforce SESIR incident-linking requirements through training, written guidance, technical assistance, and ongoing monitoring. The Department of SC&SS will also strengthen review processes and targeted follow-up when SESIR reporting exceptions are identified.

FINDINGS & OBSERVATIONS

Audit Observations

Observation 1 | Control Weakness in Monitoring and Enforcing Suspension Waiver Compliance

SBBC Policy 5100 includes provisions allowing for partial suspension waivers for certain substance abuse related offenses (first offense only), contingent upon the student's verified agreement to participate in a counseling program. Per the policy, failure to complete the required counseling must result in reinstatement of the original suspension days.

Based on the review of samples eligible for suspension waivers, the OCA noted that in one (1) instance, reduced suspension days were not reinstated after a student failed to complete the required substance abuse counseling program. This indicates a control weakness in monitoring and enforcing compliance with the terms of suspension waivers.

Process Improvement Recommendation

The OCA recommends that the Student Prevention & Wellness Initiatives Department strengthen monitoring controls to ensure that students who do not complete required counseling have their original suspension days reinstated in accordance with policy and established procedures. This may include implementing follow-up procedures, in coordination with the School Culture and Student Support Department, or periodic reviews to verify compliance with waiver conditions.

Observation 2 | Insufficient Documentation of Law Enforcement Consultations

The Discipline Matrix requires school-based administrators to consult with law enforcement for all SESIR-level incidents; however, FDOE Rule 6A-1.0017(9) does not require formal reporting to law enforcement for certain incidents—such as Bullying, Harassment, Sexual Harassment, and Tobacco—unless they include specified reportable related elements. Current District procedures require administrators to document only the outcomes of consultations or reports to law enforcement. As a result, administrators do not always document whether they performed the required consultations for SESIR incidents that do not require reporting under FDOE rules.

Specifically, when administrators record an outcome of "Not Reported to Law Enforcement," they do not indicate whether they completed the consultation required by the Discipline Matrix. Although administrators recorded outcomes of consultations or reports to law enforcement in the system, they did not always document within the referral that the consultation occurred. In two (2) instances, OCA could not determine whether administrators conducted the required consultation for incidents with an outcome recorded as "Not Reported to Law Enforcement." This limitation reduces OCA's ability to verify compliance with Discipline Matrix requirements.

Observation 2 | Insufficient Documentation of Law Enforcement Consultations (continued)

Process Improvement Recommendation

The OCA recommends that the School Culture and Student Support Department enhance documentation requirements within FOCUS to clearly capture evidence of law enforcement consultations for all SESIR incidents, including those not required to be reported. This may include updating procedures and guidance to reinforce the requirement to document the completion of law enforcement consultations in the *Explanation/Notes* for *Required Interventions* section of the referral.

Observation 3 | Incorrect Implementation of Prescribed BTA Protocol

The Discipline Matrix requires consultation with the Behavior Threat Assessment ("BTA") team chair ("BTA Chair") for certain incidents and the completion of the BTA Protocol for others, depending on the nature and frequency of the offense.

In one (1) instance, the administrator's action of consulting the BTA Chair did not align with the Discipline Matrix requirements, which specified completion of the BTA Protocol for a third occurrence of a "Fight – Medium" incident. This indicates a discrepancy between prescribed procedures and actions taken, limiting assurance that required threat assessment protocols are consistently applied.

Process Improvement Recommendation

The OCA recommends that the School Culture and Student Support Department provide additional guidance and training to school-based administrators to reinforce the distinction between when consultation with the BTA Chair is required versus when full implementation of the BTA Protocol is mandated under the Discipline Matrix. This may include developing quick reference materials or decision-support tools to promote consistent application of BTA requirements.

Management Response to Observations 1 - 3

The District appreciates the observations identified by the Office of the Chief Auditor and concurs that opportunities exist to strengthen documentation, monitoring, and procedural consistency within certain areas of the student discipline process.

The District's review found that the observations primarily relate to documentation practices, workflow consistency, and verification of required actions rather than deficiencies in the underlying discipline framework. In several instances, supporting records were not consistently available

Management Response to Observations 1 - 3 (continued)

to demonstrate compliance with established procedures, while other observations identified opportunities for greater clarity and standardization of existing processes.

To address these observations, the Department of SC&SS, in collaboration with appropriate District departments and the FOCUS team, will review existing guidance, training materials, documentation procedures, and monitoring practices. Particular attention will be given to strengthening documentation and record-retention practices, clarifying procedural requirements, reinforcing distinctions between related processes, and providing targeted guidance and technical assistance to support consistent implementation.

APPENDIX I

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BROWARD
County Public Schools

DR. ANGELA R. FULTON
DEPUTY SUPERINTENDENT

PHONE: 754-321-2100 **EMAIL:** afulton@browardschools.com

DATE: July 6, 2026

TO: Mark Magli, Chief Auditor
Office of the Chief Auditor

FROM: Dr. Angela R. Fulton
Deputy Superintendent

SUBJECT: **RESPONSE TO THE 2026 STUDENT DISCIPLINE PROCESS AUDIT**

This correspondence acknowledges receipt of the 2026 Student Discipline Process Audit and the comprehensive management response submitted by the Chief Student Services Officer addressing the audit findings and recommended corrective actions. The audit findings have been reviewed with district leadership, and the identified opportunities for improvement have been discussed with the departments responsible for implementation. The management response submitted by the Office of Student Services outlines a comprehensive plan to strengthen student discipline processes, documentation, monitoring, training, and system utilization.

The audit identified control and compliance weaknesses across several stages of the student discipline process, including referral processing, documentation, application of disciplinary actions, monitoring, and SESIR reporting. While several findings represent recurring opportunities identified in the prior audit, the District's transition to the FOCUS Student Information System introduced new workflows and documentation requirements that continue to require refinement and reinforcement. These findings reinforce the importance of strengthening internal controls, standardizing procedures, and maintaining consistent oversight to ensure districtwide fidelity and compliance.

As Deputy Superintendent, I fully support the corrective actions outlined by the Chief Student Services Officer and will continue providing executive oversight to ensure these improvements are implemented with fidelity and sustained over time. Executive oversight will focus on strengthening internal controls that support timely referral processing, accurate documentation, consistent implementation of disciplinary procedures, and reliable reporting.

Particular emphasis will be placed on:

- Strengthening administrator training and guidance related to discipline procedures, documentation standards, and compliance expectations.
- Enhancing districtwide monitoring, quality assurance, and accountability processes through collaboration among Student Services, Regional Teaching and Learning leadership, and school administrators.
- Supporting continued refinement of FOCUS workflows, reporting capabilities, and system functionality in partnership with Information Technology.
- Reinforcing the use of discipline data, documentation reviews, and compliance monitoring to identify trends, provide targeted support, and ensure corrective actions are implemented consistently across schools.

Regional Teaching and Learning Directors will continue partnering with the Office of Student Services to monitor implementation, review discipline data, provide targeted coaching and technical assistance, and reinforce accountability for the consistent application of District policies and procedures. These collaborative efforts will include ongoing monitoring and periodic reviews to ensure corrective actions are sustained and support continuous improvement across all schools.

The District appreciates the Office of the Chief Auditor's work in identifying opportunities to strengthen our systems. The recommendations contained in the audit provide valuable guidance as we continue improving our internal controls, refining operational practices, and reinforcing high standards of accountability. We remain committed to fully implementing the corrective actions outlined by the Chief Student Services Officer to strengthen consistency, transparency, and compliance while ensuring fair and equitable student discipline practices that support safe learning environments for all students.

Thank you for your continued partnership and collaboration in supporting continuous improvement throughout Broward County Public Schools.

ARH:sl

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County Public Schools

SAEMONE HOLLINGSWORTH, CHIEF STUDENT SERVICES OFFICER
OFFICE OF STUDENT SERVICES

PHONE: 754-321-1660 **EMAIL:** saemone.hollingsworth@browardschools.com

July 6, 2026

TO: Dr. Angela R. Fulton
Deputy Superintendent

FROM: Saemone Hollingsworth
Chief Student Services Officer

SUBJECT: **RESPONSE TO THE 2026 STUDENT DISCIPLINE PROCESS AUDIT**

Executive Summary of the Discipline Audit Management Response

The Chief Auditor's Office recently completed a review of student discipline practices during the first year of implementation of the FOCUS student information system. The findings reflect opportunities to strengthen consistency, documentation, training, monitoring, and system utilization.

Many of the findings relate to documentation practices and the ability to consistently demonstrate compliance, rather than evidence that required disciplinary actions were not occurring. The Student Services Division and Department of School Culture and Student Support (SC&SS) along with school administrators and Regional Directors are actively implementing improvements to ensure student discipline processes remain fair, consistent, transparent, and aligned with Board policy and state requirements. Specifically, the Department of SC&SS has restructured department resources to provide more ongoing monitoring and on-the-spot assistance for school administrators when processing disciplinary referrals to ensure accurate completion of all referrals, assignment of appropriate consequences, and implementation of required interventions. To do this, a dedicated support line via Microsoft Teams is available Monday through Friday to provide real-time assistance. Additionally, random fidelity checks of school-based discipline processing to review fidelity of implementation will be conducted for each school on a quarterly basis with observations shared with school principals and Regional Directors.

Summary of Key Findings and Improvement Actions

Discipline Referral Processing and Timeliness

Finding: The audit identified opportunities to improve the timely review, investigation, disposition, and closure of discipline referrals.

Actions Underway and Next Steps:

- Update District guidance and training regarding referral processing expectations.
- Utilize FOCUS reports to identify outstanding referrals and unresolved cases.
- Provide targeted technical assistance to schools when delays are identified.
- Conduct routine monitoring reviews to ensure consistent implementation across schools.
- Strengthen accountability measures to support timely completion of disciplinary actions.

Documentation Quality and Consistency

Finding: Documentation practices could be further standardized to enhance the District's ability to consistently demonstrate compliance, support disciplinary determinations, and maintain clear audit trails. Areas requiring improvement include investigative narratives, parent notifications, intervention documentation, safety notifications, and administrative notes.

Actions Underway and Next Steps:

- Establish standardized documentation expectations and checklists for administrators.
- Continue to provide targeted training and reinforcement on investigative narratives, referral documentation, and required notifications to strengthen consistency and compliance in practice.
- Reinforce use of Administrative Investigation Notes and other FOCUS documentation tools.
- Conduct quality assurance reviews of discipline records and supporting documentation.
- Increase administrator coaching to promote consistency and clarity in documentation.

Discipline Coding Accuracy

Finding: Some incident classifications and discipline codes were not fully supported by documented incident details, particularly in a limited number of coding categories.

Actions Underway and Next Steps:

- Provide refresher training on discipline coding requirements and SESIR classifications.
- Reinforce distinctions between fighting, battery, and other frequently misclassified incidents.
- Develop coding reference materials and decision-support tools for administrators.
- Conduct targeted reviews of discipline records to identify and correct coding inconsistencies.
- Strengthen documentation expectations to ensure coding decisions are properly supported.

Application of the Discipline Matrix

Finding: The audit identified opportunities to improve consistency in assigning disciplinary consequences and documenting progressive discipline practices.

Actions Underway and Next Steps:

- Provide additional training on the Discipline Matrix and progressive discipline requirements.
- Reinforce expectations regarding suspension assignments and intervention requirements.
- Improve review of student disciplinary history across schools.
- Standardize documentation of approved deviations from the Discipline Matrix.
- Strengthen accountability through ongoing monitoring and support to ensure disciplinary consequences are implemented consistently and equitably across schools.

FOCUS Workflow Utilization

Finding: The transition from the previous Discipline Management System (DMS) to FOCUS introduced workflow changes that created implementation challenges for some discipline processes.

Actions Underway and Next Steps:

- Continue collaboration with Information Technology and FOCUS support teams.
- Enhance reporting tools and workflow efficiencies within the FOCUS platform, where feasible
- Provide focused training on referral processing, SESIR incident linking, intervention tracking, and notification processes.
- Utilize the established system-specific guides and resources available to administrators to ensure consistent implementation of disciplinary procedures and expectations.
- Reduce opportunities for user error through improved processes and monitoring.

Monitoring, Oversight, and Leadership Support

Finding: The audit highlighted the need for a stronger districtwide monitoring framework to support consistent implementation of discipline procedures.

Actions Underway and Next Steps:

- Establish regular districtwide discipline monitoring reviews using FOCUS reports and data dashboards.
- Expand training for Regional Teaching & Learning Directors on discipline procedures and compliance expectations.
- Strengthen school-level monitoring of referrals, coding accuracy, interventions, and documentation.
- Use discipline trend data to identify schools that may benefit from additional support, coaching, or technical assistance.
- Engage Principals and Regional Teaching and Learning Directors in ongoing data reviews to monitor implementation, reinforce expectations, and sustain continuous improvement efforts.

Moving Forward

The District is committed to continuous improvement and is actively strengthening training, documentation standards, monitoring systems, and administrative support structures. To address these findings and support continuous improvement, the District is implementing the following actions:

- Enhance Administrator Training: Provide comprehensive refresher training for school administrators focused on discipline coding, investigative documentation, referrals, notifications, progressive discipline requirements, and the consistent application of District procedures.
- Standardize Documentation Practices: Develop and implement clear documentation standards, guidance documents, checklists, and best-practice resources to support consistent use of referral narratives, investigation records, notifications, and other required documentation within FOCUS.
- Strengthen Districtwide Monitoring and Oversight: Establish regular discipline data reviews using FOCUS reports and dashboards to monitor compliance indicators, identify trends, and proactively address areas requiring additional support.
- Improve Referral Processing and Timeliness: Utilize FOCUS reporting tools to identify outstanding referrals and unresolved disciplinary actions, allowing for targeted support and timely intervention when needed.
- Expand Quality Assurance Reviews: Conduct routine reviews of discipline records, SESIR reporting, interventions, notifications, and supporting documentation to reinforce accuracy, consistency, and compliance with District expectations.
- Increase Leadership Support and Accountability: Provide specialized training for Regional Teaching and Learning Directors to strengthen their role in supporting principals, reviewing discipline trends, monitoring implementation, and ensuring corrective actions are sustained over time.
- Leverage Regional Teaching & Learning Leadership for Continuous Improvement: Engage Regional Teaching and Learning Directors in ongoing school reviews to identify schools that may benefit from additional coaching, technical assistance, or professional learning related to discipline procedures and documentation practices.
- Enhance FOCUS System Utilization: Continue collaboration with Information Technology and the FOCUS support team to improve reporting capabilities, streamline workflows, strengthen system functionality, and reduce opportunities for user error.
- Align Policies, Procedures, and Training Resources: Review and align District policies, operational procedures, training materials, and system processes to promote consistent implementation and expectations across all schools and departments.

These actions will strengthen documentation quality, improve monitoring and oversight, support consistent application of discipline procedures, and ensure schools receive the guidance and resources necessary to maintain fair, accurate, and compliant disciplinary practices.

Conclusion

The audit identified opportunities to strengthen consistency, documentation, training, monitoring, and oversight within the District's student discipline processes. The findings primarily reflect areas for continuous improvement in documentation practices, procedural implementation, and compliance monitoring, rather than systemic concerns with the District's overall discipline framework.

In response, the District is implementing targeted improvements, including enhanced administrator training, standardized documentation practices, strengthened monitoring and quality assurance processes, improved reporting tools, and expanded support from Regional Teaching and Learning Directors. These efforts will promote greater consistency, accountability, and understanding of discipline procedures across schools.

Through these actions, the District will strengthen data integrity, enhance transparency, improve compliance monitoring, and support the fair and consistent application of District policies and state requirements. The District remains committed to maintaining safe, supportive learning environments and continuously improving student discipline practices to better serve students, families, staff, and the community.

Introduction

The District appreciates the review conducted by the Office of the Chief Auditor and the opportunity to further strengthen student discipline processes, documentation practices, and operational consistency. The findings and observations presented in this report were carefully reviewed to identify opportunities for improvement and enhancements to existing procedures.
The responses that follow summarize the results of the District's review and outline actions that will be implemented by the Department of SC&SS, in collaboration with other District departments, to strengthen documentation, improve monitoring and reporting processes, enhance training and guidance, and promote consistent implementation of student discipline procedures. These actions are intended to support accurate recordkeeping, reliable data, clear documentation of required actions, and ongoing continuous improvement across the District's student discipline system.

Finding 1 District Response

The District's review of Finding 1 determined that the transition to FOCUS introduced significant workflow changes affecting discipline processing and documentation practices. The finding highlights opportunities to strengthen consistency in referral review, investigation, disposition, and completion processes across schools. The District did not identify evidence of a systemic breakdown in the student discipline framework; rather, the finding reflects the need for continued refinement, monitoring, and reinforcement of established expectations within a new operational environment.

To address the finding, the Department of SC&SS will update and enhance guidance, training materials, and support resources to further clarify referral-processing timelines, documentation requirements, and case-completion procedures within FOCUS. The Department of SC&SS, in collaboration with the Department of Information Technology (I.T.) and the FOCUS team, will continue to strengthen monitoring and reporting processes, identify outstanding referrals, and evaluate opportunities to enhance system notifications and administrative oversight capabilities. Additionally, the Department of SC&SS, in collaboration with the Regional Directors, will conduct periodic reviews of referral processing to ensure referrals are processed in a timely manner, and administrators are provided with ongoing, targeted support.

Finding 2 District Response

The District's review of the four exceptions identified in Finding 2 determined that each involved a unique record-linking or system-processing circumstance rather than a common process issue. The exceptions included:

- One incident involved an unsubstantiated bullying record. Unsubstantiated bullying must be reported to the State per the SESIR rule; however, it is not tied to a student's disciplinary record.
- One incident involved a sexual offense in which a SESIR linking issue prevented the proper association between the incident and referral record.
- One incident involved a simple battery referral in which a system-related issue affected the creation of the SESIR record.
- One incident involved two separate fighting incidents that resulted in a duplicate referral/incident association issue.

While the District did not identify evidence of a systemic breakdown in discipline processes or controls, the finding reflects opportunities to strengthen data validation, monitoring, and record-linking procedures.

To address the finding, the Department of SC&SS will collaborate with I.T. and the FOCUS team, as appropriate, to review the identified circumstances, strengthen monitoring processes, and conduct periodic data validation reviews designed to identify and resolve referral-to-incident discrepancies in a timely manner.

Finding 3 District Response

The District's review of Finding 3 revealed that several of the referral narratives and supporting documentation within the audit sample did not consistently contain sufficient detail to clearly distinguish among the three fighting classifications established in the District's Administrative Definitions for Discipline: Minor Altercation/Confrontation, Fighting–Medium, and Fighting–Major Mutual Combat. These classifications are differentiated by factors such as the nature and extent of physical contact, the severity of injuries, whether first aid or medical attention was required, and whether staff intervention was necessary to stop the altercation.

In several of the records reviewed, the referral narrative simply indicated that students were "fighting" without documenting the specific circumstances needed to distinguish among the three classifications. As a result, the documentation available for review did not always clearly reflect the factors supporting the selected discipline code or provide sufficient detail to independently validate the classification assigned.

To address the finding, the SC&SS Department will continue to strengthen guidance, training, and technical assistance related to referral narratives, investigative documentation, and use of the Administrative Investigation Notes feature within FOCUS. Additionally, the Department of SC&SS, in collaboration with the Regional Directors, will conduct periodic reviews of referral narratives to ensure sufficient documentation exists to substantiate the disciplinary code applied. Administrators are provided with ongoing, targeted support from the Department of SC&SS.

Finding 4 District Response

The District's review of the identified exceptions in Finding 4 revealed opportunities to strengthen consistency in the selection of local discipline codes when similar behaviors may fall within multiple coding categories. The review identified circumstances involving THC-related incidents, distinctions between fighting and battery classifications, and incidents involving multiple behaviors in which the documented conduct could support more than one discipline code. In these instances, the records reviewed did not consistently demonstrate the rationale for the specific code selected or clearly reflect the factors supporting the governing discipline classification.

It is important to note; however, that the District's review also determined that the THC-related exceptions did not result in inaccurate SESIR reporting. Although the most precise local discipline code was not consistently selected, the local discipline codes that were applied rolled up to the appropriate SESIR reporting category, resulting in accurate reporting of the incidents to the Florida Department of Education.

To address the finding, the Department of SC&SS will continue to provide a dedicated support line for administrators to receive expert, on-the-spot guidance and technical assistance as well as strengthen training related to the Administrative Definitions for Discipline, discipline code selection, SESIR reporting requirements, and documentation standards. Specific emphasis will be placed on distinguishing among commonly confused discipline categories, identifying the governing discipline code when multiple behaviors occur within a single incident, and ensuring that referral narratives and investigative documentation clearly support the selected classification.

Additionally, the Department of SC&SS, in collaboration with the Regional Directors, will continue to conduct periodic reviews of discipline records to identify trends, provide targeted support, and promote consistent application of discipline definitions across schools.

Finding 5 District Response

The District's review of the identified exceptions in Finding 5 found opportunities to strengthen consistency in the application of consequence ranges for certain drug-related offenses, the review of prior disciplinary history when progressive discipline applies, and documentation supporting approved deviations from the Discipline Matrix. The exceptions reviewed reflected variances in consequence application and supporting documentation rather than deficiencies in the underlying disciplinary framework.

To address the finding, the Department of SC&SS will continue to strengthen guidance, training, and technical assistance related to application of the Administrative Discipline Matrix, review of disciplinary history, and documentation requirements when deviations from prescribed consequences are approved. The Department of SC&SS will also review current monitoring practices and available reporting tools to support consistency in disciplinary consequence assignment.

Finding 6 District Response

The District's review of Finding 6 found that the identified discrepancies resulted from a combination of attendance coding, suspension-processing workflows, and AES enrollment documentation. The requirement to enroll AES students in a second school was introduced as part of the District's transition to FOCUS and represented a significant change from prior processes. Before the implementation of FOCUS, attendance and student information were managed through established communication processes between the student's home school and the AES site. As a result, while second-school enrollment records were not consistently reflected within FOCUS, the absence of a second-school enrollment record does not, by itself, indicate that attendance was not taken or that educational services were not provided.

To address the finding, the Department of SC&SS, in collaboration with I.T. and the FOCUS team, will review existing workflows related to suspension processing, attendance coding, and AES enrollment procedures. The Department of SC&SS will also strengthen guidance, training, and monitoring processes to promote consistency in record-keeping and ensure alignment between disciplinary actions, attendance records, and AES enrollment documentation.

Finding 7 District Response

The District's review of Finding 7 found opportunities to strengthen documentation practices related to parent notifications and Hope Scholarship notifications. While notification records were not consistently available within FOCUS, the finding primarily reflects opportunities to improve documentation, record retention, and consistency in the application of notification procedures. The review also identified opportunities to strengthen awareness of the circumstances requiring Hope Scholarship notification and to ensure supporting documentation is consistently maintained.

To address the finding, the Department of SC&SS will strengthen guidance, training, and technical assistance related to parent contact documentation, Hope Scholarship notification requirements, use of FOCUS notification tools, and maintenance of supporting records. The Department of SC&SS will also review existing procedures and documentation expectations to promote consistency and improve documentation.

Finding 8 District Response

The District's review of Finding 8 revealed that notification practices have evolved over time and training guidance, system functionality, and existing policy language are not fully aligned. The previously used Immediate Notification Form referenced in the Discipline Matrix was not incorporated into FOCUS because operational practices evolved to utilize alternative notification methods. As a result, supporting documentation demonstrating that notifications occurred was not consistently available for verification.

To address the finding, the Department of SC&SS will collaborate with the Safety, Security & Emergency Preparedness Division, the District Safety Operations Center (DSOC), and I.T. to review existing notification requirements, workflows, documentation procedures, and related policy language. The Department of SC&SS will also strengthen guidance and training to ensure notification expectations and documentation requirements are clearly communicated and consistently implemented.

Finding 9 District Response

The District's review of Finding 9 found opportunities to strengthen referral workflows, documentation practices, and communication processes associated with mental health referrals, substance abuse referrals, and other required interventions. The review also identified workflow changes associated with the

transition to FOCUS, including the loss of certain automated notifications and increased reliance on manual communication and documentation processes. As a result, supporting records demonstrating that referrals and interventions occurred were not always consistently available for review.

To address the finding, the Department of SC&SS will collaborate with Student Services and Mental Health Department and I.T. to review referral, notification, and documentation procedures, strengthen communication workflows, clarify documentation expectations, and evaluate opportunities for additional system supports. The Department of SC&SS will also continue to reinforce guidance related to documentation of required referrals and interventions.

Finding 10 District Response

The District's review of Finding 10 found opportunities to strengthen communication workflows, documentation practices, and record-retention procedures associated with Substance Probation Contracts (SPCs) and Alternative Probation Contracts (APCs). The review also identified workflow changes associated with the transition to FOCUS, including the elimination of certain automated notifications previously available in the District's former discipline system. As a result, supporting documentation demonstrating issuance of required contracts was not consistently available for review.

To address the finding, the Department of SC&SS will review current procedures related to probationary contract issuance, notification, documentation, and record retention. The Department of SC&SS will also strengthen guidance and training related to communication workflows, maintenance of supporting records, and documentation of required actions within FOCUS.

Finding 11 District Response

The District's review of Finding 11 found that the identified exception was associated with a gap in the documented progression of required disciplinary interventions. Specifically, documentation supporting issuance of the student's prior APC could not be verified during the review. As a result, a new APC was issued following the subsequent qualifying incident rather than initiating the next intervention in the progressive discipline sequence.

To address the finding, the Department of SC&SS will continue to strengthen guidance, training, and monitoring related to progressive discipline requirements, including documentation and verification of probationary contracts and related interventions. The Department of SC&SS will also reinforce procedures designed to ensure that required interventions are documented and readily verifiable within the student discipline record.

Finding 12 District Response

The District's review of Finding 12 found that the identified exceptions involved the creation of separate SESIR incident records for students involved in the same event rather than linking all related referrals to a single SESIR incident. The finding reflects opportunities to strengthen consistency in the application of existing incident-linking procedures and quality-control processes. The review also determined that the affected records can be corrected prior to final submission to the Florida Department of Education.

To address the finding, the Department of SC&SS will continue to reinforce SESIR incident-linking requirements through training, written guidance, technical assistance, and ongoing monitoring. The Department of SC&SS will also strengthen review processes and targeted follow-up when SESIR reporting exceptions are identified.

District Response to Observations 1-4

The District appreciates the observations identified by the Office of the Chief Auditor and concurs that opportunities exist to strengthen documentation, monitoring, and procedural consistency within certain areas of the student discipline process.

The District's review found that the observations primarily relate to documentation practices, workflow consistency, and verification of required actions rather than deficiencies in the underlying discipline framework. In several instances, supporting records were not consistently available to demonstrate compliance with established procedures, while other observations identified opportunities for greater clarity and standardization of existing processes.

To address these observations, the Department of SC&SS, in collaboration with appropriate District departments and the FOCUS team, will review existing guidance, training materials, documentation procedures, and monitoring practices. Particular attention will be given to strengthening documentation and record-retention practices, clarifying procedural requirements, reinforcing distinctions between related processes, and providing targeted guidance and technical assistance to support consistent implementation.

Conclusion

The District appreciates the work of the Office of the Chief Auditor and views this audit as an important opportunity to strengthen student discipline processes, documentation practices, and system-wide consistency. The District remains committed to maintaining a fair, consistent, and transparent student discipline process that complies with School Board policy, collective bargaining requirements, and state reporting obligations. The corrective actions identified in response to this audit are intended to strengthen documentation, improve consistency, enhance accountability, and ensure that disciplinary records accurately reflect the actions taken to support student safety, student accountability, and positive school environments.

Corrective Actions
In response to the audit, the Department of SC&SS, in collaboration with Information Technology, Student Services and Mental Health, Safety, Security & Emergency Preparedness, and other District partners, will implement a series of improvements designed to strengthen discipline processes and documentation.

These actions include but are not limited to:

- Updating guidance documents, training materials, and support resources.
- Enhancing monitoring and reporting processes within FOCUS.
- Strengthening documentation and record-retention practices.
- Reinforcing requirements related to discipline coding, disciplinary consequences, referrals, interventions, notifications, and probationary contracts.
- Reviewing and refining workflows affected by the transition to FOCUS.
- Conducting ongoing quality assurance reviews and targeted technical assistance to support consistent implementation across schools.

The District appreciates the audit team's recommendations and will use the findings to support continuous improvement efforts across the student discipline system.

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APPENDIX II – SBBC Policy Links

Policy 5090 Code of Student Conduct

https://schoolinfo.browardschools.com/bcpsweb/displaypdf.html?filename=Policy_5090.pdf

Policy 5100 Suspension and Expulsion

https://schoolinfo.browardschools.com/bcpsweb/displaypdf.html?filename=Policy_5100.pdf

APPENDIX III

Administrative Definitions for Discipline

Attendance Incidents

Class Cut (Skipping): Deliberate/willful refusal to attend an assigned class (in person or virtual) at designated/required time.	
Leaving Campus Without Permission: Unauthorized leaving of the school grounds or school-sponsored event.	
Out of Assigned Area: Willfully entering an area of campus not on a student's assigned schedule, other than a common resource area, without permission. These areas include but are not limited to athletic facilities, classrooms, offices, and restrooms/changing facilities. For this to apply to restrooms/changing facilities, students must first be asked by school personnel to leave and refuse to do so (F.S. §553.865(9)(a)).	
Tardiness, Habitual (5 or more in a marking period): A consistent/repeated failure to be in the required place of instruction at the assigned time.	
Truancy: Habitual absences from class or school when the reason or excuse provided for the absence does not meet the criteria for an excused absence as outlined in the Code of Student Conduct or Attendance policy.	

Rule Violation Incidents

Cell Phone Violation: The use of a wireless communication device, including but not limited to cell phones, headphones, AirPods, etc., during instructional time, defined as the time from the first bell of the day to the last bell.	
Cheating – Major: an act of academic dishonesty by a student who engages in unauthorized use, possession, coordination, promotion, marketing, sharing, distribution, publication, or duplication of tests/exams such as mid-terms, finals, end-of-course exams, or other standardized assessments. Cheating, Major also includes but is not limited to changing, giving, facilitating academic dishonesty, buying grades (seeking to or actual), selling grades (seeking to or actual), facilitating the transaction, sale, or purchase of grades or examples, paying someone to change grades, access to exams, or grades or to securing answers to an exam in any manner.	
Cheating – Minor (Grades 3-12): an act of academic dishonesty by a student who chooses to submit work that is not their own.	
Detention – Unserved Saturday: an unexcused absence from an assigned Saturday detention.	
Detention – Unserved: an unexcused absence from an assigned detention.	
Dress Code Violation: To dress or accessorize in a manner that violates the Code of Student Conduct or the approved school's dress code or uniform policy. Please note that consequences for dress code violations are outlined in F.S. §1006.07(2)(d)2.	
****Electronic Devices (Level III):** the use of an electronic device to possess, display, or transmit offensive images, images that depict nudity or sexual content, video voyeurism, or the use of an electronic device to capture said images or any other images of people that violate a reasonable expectation of privacy. This includes images generated using artificial intelligence (AI), commonly called "deep fakes." Deep fakes are defined as an image or video of another person in which their face or body has been digitally alteredso that they appear to be someone else, that is used maliciously or to spread false information. **(Reporting to law enforcement required.)**	
****Sexting (Level III):** as defined in F.S. §847.0141(1)(a), is knowingly using a computer, or any other device capable of electronic data transmission or distribution, to transmit or distribute to another, any photograph or video of any person, which depicts nudity as defined in F.S. §847.001(9). **(Reporting to law enforcement required.)**	

Disruptive Incidents

Defiance of authority: This infraction code can only be used after a student receives four or more referrals for disobedience/insubordination, when there is a deliberate refusal to physically attend or comply with the rules and requirements of in-school suspension, **OR** when there has been repeated cell phone violations (4th violation for K-5 and 5th violation for 6-12).
Discriminatory comments/actions: The use of discriminatory words, phrases, social media, actions/retaliation, gestures, symbols, or images that slander, demean, or are reasonably foreseeable to have a negative impact on an individual or community of people/group. This includes but is not limited to actions/comments related to one's gender, gender identity, gender expression, race, color, religion, ethnicity, national origin, political beliefs, marital status, age, sexual orientation, social and family background, language, pregnancy, or linguistic preference, or mental/physical disability, or other minority groups.
Disobedience/insubordination: Failure to obey a reasonable or repeated instruction/request of a staff member.
****Disruption on-campus – major (Level III):** Disruptive behavior that poses a serious threat to the learning environment, health, safety, or welfare of others and causes a major disruption of all or a significant portion of the campus, campus activities, school-sponsored events, or school bus transportation. To qualify as a major campus disruption, the event must stop the normal function of the campus/activity by calling a secure or lockdown code. **IMPAC Eligible Offense for Grades 6-12 (Reporting to law enforcement required.)**
Disruption on campus – minor: An act or event that occurs on campus, causing the interruption of a classroom or another localized area of the school without substantially disrupting the entire campus.
Disruptive (unruly) behavior: Unruly behavior or insubordinate conduct that disrupts the learning environment/school community.
Disruptive (unruly) play: Unruly play that interferes or disrupts the learning environment/school community
Distribution/sale of unauthorized materials (non-criminal): Unauthorized selling or distributing of materials not otherwise specified in the policy. This would include items such as candy, trinkets, toys, etc.
****False fire alarm or 911 call (Level III):** Without reasonable cause, an intentional phone call, emergency notification, ringing of bells/fire alarms, or an outcry that causes the placing of a false fire alarm or call for emergency services. **(Reporting to law enforcement required.)**
Falsification/misrepresentation (lying or forgery of signature): Intentionally providing false or misleading information, signature, or identification to a school staff member.
****Gambling (Level III):** The participation in any game of chance or skill for money, profit, or anything of value. **(Reporting to law enforcement required.)**
****Gang, or gang-like activity (Level III):** Student conducts, recruits, or participates on campus, formally or informally, to foster youth gang or gang-like activity. This activity may include an association or group of three (3) or more persons who engage in a pattern of youth or street gang or gang-like activity **and** have a common name or common identifying clothing, jewelry, buttons, colors, signs, symbols, or markings **with the intent** to threaten and/or present a danger to public order and safety. **(Reporting to law enforcement required.)**
Inciting a disturbance: The encouragement or contribution to any fight, disruption, and/or any violation of the Code of Student Conduct that is reasonably foreseeable to negatively impact a student's ability to learn, a teacher's ability to teach, or negatively impact the school community, school transportation or school-sponsored event. The incident is also applicable when off-campus conduct creates a nexus between the school community, impacting a student's ability to learn and a teacher's ability to teach or resulting in a disruption on the school campus, school transportation, or school-sponsored event. Encouragement/contribution includes but is not limited to knowingly recording, displaying, and posting an incident via an electronic device/social media, or through handwritten or verbal communication.
****Passing/producing counterfeit money or Forgery of Document/Signature (Level III):** Passing or producing counterfeit money or products; to fashion or reproduce the signature of another for fraudulent purposes on **official** documents. **(Reporting to law enforcement required.)**
Profanity – Use of insulting/obscene language: Use of insulting, abusive, profane, obscene, or vulgar language in any form (verbal, written, or gesture) to another student. Note: This does not apply to sexual gestures, which are classified as inappropriate touch/language/gesture.

Profanity directed towards a staff member: Use of insulting, abusive, profane, obscene, or vulgar language or conduct in any form (verbal, written, or gesture) directed toward an SBBC employee.
Prohibited/distracting items (possession/use): Possessing and/or using an item(s) designed as inappropriate or distracting and/or prohibited by the Code of Student Conduct.
****Trespassing (Level III):** To enter or remain on school grounds/campus, school transportation, or at a school-sponsored event, without authorization or invitation and with no lawful purpose for entry. Only incidents involving a student currently under suspension, expulsion, or other administrative incidents where any offender (student or non-student) was previously issued an official trespass warning by school officials or where any offender was arrested for trespass are required to be reported to SESIR. Trespass incidents that did not have a prior official warning, did not result in arrest, or did not involve students under suspension or expulsion should be reported as locally defined incidents according to district policies. In these instances, contact the Department of School Culture and Student Support **(Reporting to law enforcement required.)**

Substance Abuse/Drug Incidents

****Alcohol – Being Under the Influence (Level IV)**: Any student who attends school or a school-sponsored event while under the influence of alcohol. **IMPAC Eligible Offense for Grades 6-12** **(Reporting to law enforcement required.)**
****Alcohol – Sale/Attempted Sale/Transmittal (Level IV):** Sale, transmittal or distribution of alcohol or alcoholic beverages while on school grounds or at a school sponsored event. **(Reporting to law enforcement required.)**
****Alcohol – Use/Possession/Purchase (Level IV):** Possession, purchase, or use of alcohol or alcoholic beverages while on school grounds or at a school-sponsored event. Use means the person is caught in the act of using, admits to using, or is discovered, through investigation, to have used. **IMPAC Eligible Offense for Grades 6-12** **(Reporting to law enforcement required.)**
****Drug – Being under the influence of leaf marijuana and/or mood-altering substance:** Being under the influence of leaf marijuana/cannabis or other mood-altering substances or using an authorized over-the-counter medication in excess of the prescribed amount. **IMPAC Eligible Offense for Grades 6-12** **(Reporting to law enforcement required.)**
****Drug – Possession with Intent to Sell, Sale, Attempted Sale, and/or Transmittal of Leaf Marijuana (less than 20g) (Level II):** Possession of leaf marijuana/cannabis (less than 20g) with intent to sell/distribute/transmit. **(Reporting to law enforcement required.)**
****Drug – Purchase of Leaf Marijuana (Less than 20g) (Level II):** Purchase of leaf marijuana less than 20 grams. Purchase means the person is caught in the act of purchasing, or in the course of the investigation, admits to the purchase, or is discovered to have purchased while on school grounds, school-sponsored events, or school transportation. **IMPAC Eligible Offense (Not for Elementary)** **(Reporting to law enforcement required.)**
****Drug – Purchase of Other Mood-Altering Substances (Level II):** Purchase of any substance that is or may be detrimental to the user or others, including but not limited to hallucinogens/chemical intoxication, inhalants, over-the-counter medication taken in excess of the manufacturer's recommended dosage limit. Purchase means the person is caught in the act of purchasing, or, in the course of an investigation, admits to the purchase or is discovered to have purchased while on school grounds, school-sponsored events or school transportation. **(Reporting to law enforcement required.)**
****Drug – Purchase of Unauthorized Substance (Level II)**: Purchase of any narcotic, controlled substance, or when said drug/substance is purchased for chemical intoxication. Purchase means the person is caught in the act of purchasing, or, in the course of an investigation, admits to the purchase or is discovered to have purchased while on school grounds, school-sponsored events or school transportation. This includes any: • Substance/drug deemed illegal under Chapter 893 • Drug or controlled substance that constitute a felony under Florida Statute • Types of cannabis, including but not limited to marijuana and hemp, and derivatives of such, including but not limited to THC and CBD products **(Reporting to law enforcement required.)**
****Drug - Sale/Attempted Sale/Transmittal of Unauthorized Substance (Level II):** The manufacture, cultivation, sale, or distribution, or transmittal of any drug, leaf marijuana (greater than 20g), narcotic, controlled substance or substance represented to be a drug, narcotic, controlled substance, or determined as an unauthorized substance under School Board Policies 5090 and 5100. This includes drug possession with an

intent to sell.
(Reporting to law enforcement required.)

****Drug – Under the Influence of Unauthorized Substance (Level III)**: Any student who attends school or school-sponsored event subsequent to having used or ingested any unauthorized substance as defined under Chapter 893, F.S., and/or Policy 5100.

NOTE: Unauthorized substance/drug or controlled substance are items:

- Deemed to be illegal under Chapter 893;
- Constitute a felony under Florida Statutes;
- Derivates of the cannabis sativa plant, including, but not limited to, marijuana and hemp, and derivates of such, including, but not limited to THC and CBD products.
- Any prescription drug (not prescribed for the student who is possession of the medication) or any prescription medication that is unauthorized as part of Policy 6305 or 6305.1.

(Reporting to law enforcement required.)

****Drug – Use/Possession of Leaf Marijuana (Less than 20g) (Level III):** Use/possession of leaf marijuana less than 20 grams. Use means the person is caught in the act of using, admits to using, or in the course of the investigation is discovered to have used marijuana on campus. Possession is he knowing, intention, deliberate, or inadvertent control of the substance.
IMPAC Eligible Offense (Not for Elementary) (Reporting to law enforcement required.)

****Drug – Use/Possession of Other Mood-Altering Substances (Level III):** Substances such as hallucinogens/chemical intoxication, inhalants, over the counter medication taken in excess of the manufacturer's recommended
dosage limit that are or may be detrimental to the user or to others. **(Reporting to law enforcement required.)**

****Drug – Use/Possession of Unauthorized Substance (Level III):** Use/possession of any narcotic or controlled substance, including any of the following:

- Substance/drug deemed illegal under Chapter 893, F.S.
- Drug or controlled substance that constitutes a felony under Florida statute
- Types of cannabis, including but not limited to marijuana and hemp, and derivatives of such, including but not limited to THC and CBD products
- Prescription medication not prescribed for the student who is in possession of the medication, or any prescription medication not authorized by School Board Policy 6305 or 6305.1

(Reporting to law enforcement required.)

****Drug Paraphernalia - Use/Possession/Sale/Purchase/Transmittal (Level III):** Any equipment, product, or material of any kind, used, intended for use, or designed for use to aid in ingesting, inhaling or otherwise introducing any chemical, substance, or drug to enter into the human body (i.e., THC pod confirmed through test kit).
Note: If vapor device contains nicotine, please refer to the appropriate incident type EC-Tobacco-E- Cigarettes, Vapor Devices or Similar. **IMPAC Eligible Offense for Grades 6-12 (Reporting to law enforcement required.)**

Over-the-Counter Medication – Sale/Attempted Sale/ Transmittal: Sale, attempted sale, and/or transmittal of over-the-counter medication by a student to any other person.

Over-the-Counter Medication – Unauthorized Use/Possession/Purchase: Possessing or using unauthorized over the counter (non- prescription) medication without the appropriate, completed authorization form.

Tobacco – Use/Possession/ Sale/Purchase/ Transmittal of Nicotine, Vapor Devices and/or Components of E-Cigarettes, Vapor Devices, or Similar: (Level IV) The possession, use, distribution, transmittal, or sale of nicotine, e-cigarettes, vapor devices and/or components of e-cigarettes, vapor devices or similar products on school grounds, at school-sponsored events, or on school transportation.

Tobacco – Use/Possession/Sale/Purchase/ Transmittal of tobacco and/or tobacco-related products (Level IV): The possession, use, distribution, transmittal, or sale of tobacco products on school grounds, at school-sponsored events, or on school transportation.

Acts Against Persons Incidents

****Aggravated Battery (Level I):** A battery where the attacker intentionally or knowingly causes more serious injury as defined in Rule 6A-1.0017(8)(g), such as great bodily harm, permanent disability, or permanent disfigurement; uses a deadly weapon; or where the attacker knew or should have known the victim was pregnant. **(Reporting to law enforcement required.)**
****Battery – Low Level:** To intentionally use physical force or violence against another resulting in no injury/harm (may include SBBC employee). The act must include all of the following elements: 1. Contact must be intentional and not incidental and not accidental 2. The contact must be without the consent of the victim 3. The contact must result in no injury or harm to the intended victim **(Reporting to law enforcement required.)**
Bullying (Level IV): Systematically and chronically inflicting physical hurt or psychological distress on another individual. As defined in F.S. §1006.147(3)(a), bullying may include but is not limited to, repetitive instances of teasing, social exclusion, threats, intimidation, stalking, physical violence, theft, harassment, public or private humiliation, or destruction of property. Behaviors defined as bullying must meet the criteria of being **Repeated**, be characterized by an **Imbalance of power**, and be **Purposeful** in nature. This includes cyberbullying.
False Accusation Against School Staff (Level III): Intentionally making a false accusation against a school staff member that could jeopardize the employee's employment, professional reputation, or certification.
****Fighting – Major Mutual Combat (Level III):** The mutual participation of two or more persons using force or physical violence that results in injury requiring professional medical attention. **IMPAC Eligible Offense for Grades 6-12** **(Reporting to law enforcement required)**
****Fighting – Medium (Level III):** mutual participation of two or more persons using force or physical violence (i.e., punching, slapping, kicking, striking, etc.) that may require physical intervention and/or results in injury requiring first aid. **IMPAC Eligible Offense for Grades 6-12** **(Reporting to law enforcement required)**
Harassment (Level IV): Any threatening, insulting, or dehumanizing gesture, use of data or computer software, or written, verbal or physical conduct that: • Places said person in reasonable fear of harm to their person or damage to their property; • Has the effect of substantially interfering with a student's educational performance, or an employee's work performance, or either's opportunities or benefits; • Has the effect of substantially negatively impacting their emotional or mental well-being; or • Has the effect of substantially disrupting the orderly operation of a school and/or District work environment.
****Hazing (Grades 6-12) (Level III):** As defined in F.S. §1006.135, hazing is any action or situation that endangers the mental or physical health or safety of a student at a school for purposes including but not limited to initiation or admission into or affiliation with any organization operating under the sanction of a school. Hazing includes, but is not limited to: • Pressuring, coercing, or forcing a student into: ○ Violating State or Federal law;   ○ Consuming any food, liquor, drug, or other substance; or   ○ Participating in physical activity that could adversely affect the health or safety of the student. • Any brutality of a physical nature, such as whipping, beating, branding, or exposure to the elements. **(Reporting to law enforcement required)**
Inappropriate touching/language/gestures: Unwanted verbal, physical, or offensive behavior by a student or others that causes minimal discomfort or humiliation.
Minor Altercation/Confrontation: Pushing or shoving that stops without physical intervention or on verbal command and does not result in injury or the need for first aid. Any use of force beyond pushing or shoving (i.e., punching, slapping, kicking, striking) will be considered a medium or major-level fight, depending on the level of injury sustained.
Mistreatment of Peers: words or actions made directly or indirectly toward another that causes harm/hurt feelings that may or may not have minimal effect of interfering with the student's educational performance, opportunities, or benefits. This includes electronic statements.

****Sexual Assault (Level II):** An incident that includes actual fondling, actual indecent liberties, or actual child molestation or threatened rape. Both males and females can be victims of sexual assault. **(Reporting to law enforcement required)**
Sexual Harassment (Level III): Unwelcome conduct of a sexual nature, such as sexual advances, requests for sexual favors, and other verbal, nonverbal, or physical conduct of a sexual nature. Examples of sexual harassment include but are not limited to the following verbal or nonverbal actions: • Graphic and written statements. • Statements made through computers, cellphones, and other devices connected to the Internet. • Unwelcome statements of a sexual nature. • Unwelcome solicitation or pressure for sexual activity. • Intentional brushing against, patting, or pinching of another's body. • Suggestive or obscene letters, notes, invitations, derogatory comments, slurs, jokes, epithets, unwanted physical contact, and blocking movements. • Leering with sexual overtones, gestures, display of sexually suggestive objects, posters, or cartoons.
****Sexual Misconduct and/or Indecent Exposure (Sexual Offense) (Level III):** Conduct that is crude and offensive in a sexual way (i.e., gestures, sexual activities), intentionally showing one's sexual organs in public, and/or engaging in other sexual contact, including intercourse, without force or threat of force. **(Reporting to law enforcement required)**
****Simple Battery on School Board Employee and Other Specified Categories (Level II):** An actual and intentional striking of another person against their will, or the intentional causing of bodily harm to an individual. This includes any School Board employee, Sports Official, Law Enforcement Officer, Firefighter, Emergency Medical Care Provider, Public Transit Employee or Agent, or Other Specified Officer (F.S. §§1006.13(5), 784.081, and 784.07). **(Reporting to law enforcement required)**
****Simple Battery (Level II):** An actual and intentional striking of another person against their will, or the intentional causing of bodily harm to an individual. **(Reporting to law enforcement required)**
****Threat/Intimidation – High (Level III):** An incident where there was no physical contact between the offender and victim, but the victim reasonably believed that physical harm could have occurred based on verbal or nonverbal communication by the offender. This includes nonverbal and verbal threats of physical harm, which are made in person, electronically, or through any other means. Incidents of threat/intimidation must include the elements of **intent**, **fear**, and **capability**. This code only applies when the behavior exhibited is that of a threat and there is a Behavioral Threat Assessment outcome of High, **BUT** the threat does not include the potential or actual use of a weapon. **(Reporting to law enforcement required)**
****Threat/Intimidation – Low:** An incident where there was no physical contact between the offender and victim, but the victim reasonably believed that physical harm could have occurred based on verbal or nonverbal communication by the offender. This includes nonverbal and verbal threats of physical harm which are made in person, electronically or through any other means. Threat/intimidation must include the elements of intent, fear, and capability. This code only applies when the behavior exhibited is that of a threat and there is a Behavioral Threat Assessment outcome of Low. **(Reporting to law enforcement required)**
****Threat/Intimidation – Medium (Level III):** An incident where there was no physical contact between the offender and victim, but the victim reasonably believed that physical harm could have occurred based on verbal or nonverbal communication by the offender. This includes nonverbal and verbal threats of physical harm which are made in person, electronically or through any other means. Threat/intimidation must include the elements of intent, fear, and capability. This code only applies when the behavior exhibited is a threat and there is a Behavioral Threat Assessment outcome of Medium. **(Reporting to law enforcement required)**
****Threat/Intimidation – Very High Level III):** An incident where there was no physical contact between the offender and victim, but the victim reasonably believed that physical harm could have occurred based on verbal or nonverbal communication by the offender. This includes nonverbal and verbal threats of physical harm which are made in person, electronically or through any other means. Threat/intimidation must include the elements of intent, fear, and capability. This code only applies when the behavior exhibited is that of a threat, and there is a Behavioral Threat Assessment outcome of High, **AND** the threat includes the potential or actual use of a weapon. **(Reporting to law enforcement required)**

Property Incidents
****Arson (Level I):** The intentional causing of damage to any dwelling, structure, or conveyance by fire or explosion. Arson is a Level I incident and should apply to the most serious events with damage. Fires that are not intentional, caused by accident, or do not cause damage (i.e., trash can fire, toilet paper fire, etc.) are not considered arson but may be disciplined under Starting a Fire on Campus. **(Reporting to law enforcement required)**
****Burglary – Unlawful Breaking/Entering into a School Facility or Property (Level II):** The unlawful entry into or remaining in a dwelling, structure, or conveyance intending to commit a crime therein. **(Reporting to law enforcement required)**
****Criminal Mischief/Damage to Property >$1,000 (Level III):** Willfully and maliciously damaging of any real or personal property belonging to another. This includes graffiti and or other acts of vandalism, resulting in damages of more than $1,000. **(Reporting to law enforcement required)**
Fire – Starting a Fire on Campus: Starting a fire on campus that does not result in damage to the school dwelling, structure, or conveyance (i.e., trash can fire, toilet paper fire, etc.).
****Larceny/Theft – Grand ≥$750 (Level III):** The unauthorized taking or concealing the property of another person, including motor vehicles, without threat, violence, or bodily harm. The item(s) value must be worth $750 or more. **(Reporting to law enforcement required)**
Larceny/Theft – Minor <$100: The unauthorized taking or concealing the property of another person, without threat, violence, or bodily harm. The item(s) value must be less than $100.
Larceny/Theft – Petty <$100-$750: The unauthorized taking or concealing the property of another person, without threat, violence, or bodily harm. The item(s) value must be over $100, but less than $750. **IMPAC Eligible Offense for Grades 6-12**
****Technology – Illegal Use (Computers or Networks) (Level III):** The illegal use of a computer including but not limited to breaking into restricted accounts or networks, modifying or destroying files/records without permission, illegally copying software, entering, distributing, or printing unauthorized files/records, and any other misuse or violation of the School Board's Technology Acceptable Use Policy 5306, Section 6. **(Reporting to law enforcement required)**
Technology – Inappropriate Use (Computers or Networks): Any act that violates the School Board's Technology Acceptable Use Policy 5306, Section 6, violates the social media guidelines found in the Code of Student Conduct and/or violates School Board Policies 5090 or 5100.
Vandalism/Damage to Property <$1,000: The intentional destruction, damage, or defacement of public or private/personal property without the consent of the owner or the person having custody or control of it, resulting in damages of less than $1,000. **IMPAC Eligible Offense for Grades 6-12**

Other Criminal Incidents
****Extortion (Level III):** The use of threat or intimidation verbally, written, or through electronic communication to obtain anything of value from another person. **(Reporting to law enforcement required)**
****False Report/Hoax (Level III):** Per F.S. §790.163, any person who makes a false report, with intent to deceive, mislead, or otherwise misinform any person, concerning the placing or planting of any bomb, dynamite, other deadly explosive, or weapon of mass destruction as defined in s. 790.166, or concerning the use of firearms in a violent manner against a person or persons, and/or in accordance with F.S. §790.164 concerning any act of arson or other violence to property. **(Reporting to law enforcement required)**
****Homicide (Level I):** The unjustified killing of one human being by another. **(Reporting to law enforcement required)**
****Kidnapping or Abduction/False Imprisonment (Level I):** forcibly, secretly, or by threat, confining, abducting, or imprisoning another person against his or her will and without lawful authority. **(Reporting to law enforcement required)**

****Robbery or Attempted Robbery (Level II):** The taking or attempted taking of money or other property from the person or custody of another, with the intent to permanently or temporarily deprive the person or owner of the money or other property under the confrontational circumstances of force, or threat of force or violence, and/or by putting the victim in fear. **(Reporting to law enforcement required)**

****Sexual Battery/Rape (Actual or Attempted) (Level 1):** Forced or attempted oral, anal, or vaginal penetration by using a sexual organ or an object simulating a sexual organ. Both males and females can be victims of sexual battery. **(Reporting to law enforcement required)**

****Threat to Kill/Mass Shooting (Level III):** Per F.S. §836.10, any person who sends, posts, transmits, or procures the sending, posting, or transmission of a writing or other record, including an electronic record, in any manner in which it may be viewed by another person, when in such writing or record the person makes a threat to kill or do bodily harm to another, or conduct a mass shooting or act of terrorism.
*An electronic record is defined as any record created, modified, archived, received, or distributed electronically that contains any combination of text, graphics, video, audio, or pictorial representation in digital form. This does not include a telephone call. **(Reporting to law enforcement required)**

****Weapons – Class A (Possessing/displaying/ using/ selling/transmitting) (Level II):** A firearm, instrument, or object that can inflict serious harm on another person or can place a person in reasonable fear of serious harm. Possession of a firearm or any instrument or object as defined by Section 790.001, F.S., that can inflict serious harm on another person or that can place a person in reasonable fear of serious harm.
This category includes, but is not limited to:

- Firearm, (whether operable or inoperable, loaded or unloaded) including, but not limited to, handgun, zip gun, pistol, rifle, shotgun, and starter gun, but excluding a BB gun, hard pellet gun, or airsoft gun.
    - Note that a student who wields or threatens with a BB gun, hard pellet gun, or airsoft gun is considered in possession of a weapon under Rule 6A-1.0017, F.A.C. These incidents shall be handled in accordance with possession of a Class A weapon under this policy and SBBC Policy 5100.
- Explosive propellants or destructive devices (operable or inoperable), including bombs
- Dirk
- Brass knuckles and/or metallic knuckles includes, but is not limited to, any device or instrument made of metal or other materials, designed to fit around the knuckles/fingers
- Billy club
- Tear gas
- Electric weapon or device including, but not limited to, stun gun and taser gun.
- Slungshot - is a striking weapon consisting of weight or other hard object affixed on a flexible handle or strap
- Chemical weapons or devices in a container with the capacity to hold more than 2 ounces
- Flare gun
- Ice pick
- Knife – Any knife that may inflict harm on another person or could be used to intimidate/threaten another person, including but not limited to fixed blade knives, regardless of size, switchblade knives, razor blades, or box cutters, but excluding blunt-bladed table knives and common pocketknives, defined as a folding knife with a blade of 3 ¾ inches or less. (see Class B weapons/items for other knives)
    - Note that a student who wields or threatens with a common pocketknife is considered in possession of a weapon under Rule 6A-1.0017, F.A.C. These incidents shall be treated consistent with possession of a Class A weapon under this policy and SBBC Policy 5100.

(Reporting to law enforcement required)

Weapons – Class B (Possessing/displaying/using/selling/transmitting):

- Chains (i.e., household, industrial)
- Pipe - a hollow cylinder or tube made of metal, wood, plastic, or similar material
- Other pointed instruments or sharp objects, other than school supplies (i.e., pencil, compass)
- Nunchakus, Chinese stars
- Chemical weapon or device such as pepper spray or mace in a container with the capacity to hold two (2) ounces or less of the chemical*
  *This does not apply to pepper spray/mace with the capacity to hold less than two (2) ounces if it was only possessed and not displayed, used, sold, or transmitted
- Ammunition and any component thereof, including, but not limited to bullets, shotgun shells, bullet casings and magazine clips
- Slingshot - a hand-held and hand-powered device consisting of a frame with attached rubber strap/straps, used for shooting objects
- Flammable liquids or combustible materials
- Projectile Device* - including, but not limited to, BB guns, hard pellet guns, and paint ball guns
  *Note: On a 1st offense only, for an elementary level student (Grades K-2), a projectile device shall not be categorized as a Class B weapon/item if the following conditions are met:
    - the projectile device was unloaded; and
    - the student was not in possession of ammunition for the projectile device.
- All other knives** made of any substance not categorized as Class A weapon
    - At the principal's discretion, a blunt-bladed, round-tipped knife, which is prohibited, shall not be categorized as a Class B weapon on the first offense, if all the following circumstances are met:
        - the item is used for the consumption of food as an eating utensil; and
        - the item presents no threat to the environment.
- Any instrument, tool, object, or substance used in a threatening manner toward another person.

Bus Behavior Incidents

Level One Violation: Eating/Drinking on bus. Failure to sit as assigned by bus driver.

Level Two Violation: Disrupting, distracting, disobeying the bus operator. Failure to utilize required safety equipment on the bus. Getting out of seat while bus is in motion. Loud talking, inappropriate remarks or spitting out of bus window at students, pedestrians, motorists.

Level Three Violation: Placing head, arms, and legs outside of window. Opening the emergency door while the bus is in motion. Opening or exiting emergency door when the bus is stopped unless directed by the bus operator. Threats against the bus operator, attendant, or passengers on the bus. Profanity directed at the bus operator or bus attendant. Fighting or smoking on the bus. Throwing objects out of the bus window or at the bus. Criminal Mischief/Vandalism of seats or other bus equipment. Boarding or attempting to board (also attempting to leave) a bus other than the student's assigned route or stop.

APPENDIX IV

6A-1.0017 School Environmental Safety Incident Reporting (SESIR).

(1) Purpose. The purpose of this rule is to set forth the requirements school districts and charter schools must use to report disruptive or criminal incidents to the Florida Department of Education so that the data can, in turn, be used in required state and federal reports, including EdFacts, the United States Department of Education, Office for Civil Rights Data Collection (required by 20 U.S.C. 3413(c)(1)), the Gun Free Schools Act report (required by 20 U.S.C. 7961(d) and (e)), the Every Student Succeeds Act report cards (required by 20 US.C. 6311(h)(1) and (2)), and state reports on Bullying and Harassment (required by Section 1006.147, F.S.). SESIR data is also used to design and evaluate interventions to provide a safe learning environment. SESIR is not a law enforcement reporting system.

(2) Definitions.

(a) "Allegation" means a claim or assertion that someone has committed a SESIR incident, typically made without proof and prior to an investigation.

(b) "Law enforcement action" means that official action was taken by a School Resource Officer (SRO) or local law enforcement officer in response to a SESIR incident, including but not limited to: an arrest, referral to a civil citation or similar prearrest diversion program authorized by Section 985.12, F.S., or initiation of an involuntary examination authorized by Section 394.463, F.S.

(c) "Locally-defined incident" means an incident that is a violation of a local code of student conduct, but does not meet the definition of any incident reportable to SESIR.

(d) "Rank order level" means a classification of incidents, from Level I to Level IV, that determines which incident must be reported when more than one incident occurs during a single episode. The rank order level of each incident is noted under the incident definitions found in subsection (7) of this rule.

(e) "Related element" means a factor that was present during or contributed to the incident but was not the main offense. All related elements that are applicable are required to be reported with SESIR incidents.

(f) "Reported to law enforcement" means that school district or charter school staff communicated with a School Resource Officer (SRO) or other law enforcement official about an incident. Reporting to law enforcement may not always result in law enforcement action being taken.

(g) "School district" or "district" means a Florida school district, the Florida Virtual School (Section 1002.37, F.S.), the Florida School for the Deaf and Blind (Section 1002.36, F.S.), and Developmental Research (Laboratory) Schools (Section 1002.32, F.S.). All reporting requirements in this rule also apply to charter schools, pursuant to Section 1002.33(16)(b)10., F.S.

(h) "School personnel" means any person employed at a school, volunteering at a school on a temporary or permanent basis, or a third party that is contracted to provide services for the school.

(i) "Unsubstantiated" means that following an investigation, there is not enough evidence to demonstrate that the alleged incident occurred.

(3) Analysis of incidents.

(a) In order to determine whether an incident must be reported in SESIR, the following criteria must be met:

1. The incident meets one of the SESIR incident definitions listed in subsection (7); and

2. The incident occurred on a K-12 school campus, on school-sponsored transportation, during off-campus school-sponsored activities, or off campus where the incident is accomplished through electronic means, if the incident substantially disrupts the educational process or orderly operation of a school.

(b) SESIR incidents that meet the requirements of paragraph (3)(a) of this rule must be reported regardless of whether:

1.The incident was carried out by a student, a person other than a student, school personnel, or where the person who carried out the incident is unknown;

2.The victim of the incident is a student, a person other than a student, or where the victim is unknown;

3. The incident occurred when school was in session or not. SESIR incidents occur 365 days a year at any time of the day or night;

4. Disciplinary action is taken by the school district;

5. Law enforcement action is taken by an SRO or other law enforcement officer or agency;

6. The offender has the capacity to understand his or her behavior and the inappropriateness of his or her actions. However, where the offender is a student, school districts may take age, development, and disability into account when determining appropriate discipline; or

7. Criminal charges are filed by law enforcement. However, where criminal charges are issued, school districts should review to determine whether the type of incident reported should be modified.

(4) Requirement to report SESIR incidents.

(a) All incidents meeting the requirements of subsection (3) of this rule must be reported by school districts to the Department of Education.

(b) A school district must not report an incident which meets the requirements of subsection (3) of this rule as a locally-defined incident in lieu of reporting the incident to the Department of Education. Districts may only code an incident as a locally-defined incident if it does not meet one of the SESIR incident categories.

(c) SESIR incidents meeting the requirements of paragraph (3)(a) of this rule must be reported regardless of whether law enforcement action is taken or whether a student is disciplined.

(5) General SESIR reporting conventions.

(a) SESIR is an incident-based reporting system, which means that a single incident is reported, even where there are multiple offenders or victims, or multiple incidents that occur within one episode.

1. If there is more than one incident in a single episode, districts are required to report only one incident based upon rank order level, beginning with incidents that are classified as Level I.

2. If there are multiple incidents that have the same rank order level, districts must report the incident that caused the most injury or damage to property.

(b) When reporting a SESIR incident, districts are required to report all related elements as described in subsection (8) of this rule that are present or contribute to a reported incident. A related element must be reported even where it duplicates the incident. For example, when reporting an Alcohol incident, the Alcohol-related element must also be reported.

(c) School districts must report SESIR incidents to the Department during the survey periods and using the elements set forth in Rule 6A-1.0014, F.A.C., Comprehensive Management Information System.

(d) Where an incident involves students from multiple schools or districts, the school or district where the incident occurred is responsible for reporting the incident in SESIR.

(e) Except as provided in subsection (6), allegations that are unsubstantiated must not be reported in SESIR.

(6) Incident specific SESIR reporting conventions.

(a) For incidents of Bullying, Harassment, Sexual Harassment, Threat/Intimidation, and any other incident that is Bullying-Related, districts are required to report the Incident Basis and the Victim Basis, which identifies whether the incident is based upon the person's race, sex, disability, sexual orientation, or religion.

(b) Allegations of Bullying and Harassment that are not able to be substantiated after investigation must be reported in SESIR as Unsubstantiated Bullying and Unsubstantiated Harassment, respectively, pursuant to Section 1006.147(4)(k), F.S.

(c) Allegations of Sexual Assault or Sexual Battery by school personnel against any victim that are not able to be substantiated after investigation must be reported as Unsubstantiated Sexual Assault or Unsubstantiated Sexual Battery.

(d) For Unsubstantiated Sexual Assault, Unsubstantiated Sexual Battery, Sexual Assault, and Sexual Battery by school personnel, districts are required to report the following:

1. Responsibility: Districts must report whether they determined that a member of school personnel was responsible for the offense, was not responsible for the offense, or whether the determination remains pending. Districts must only report that the determination is pending when the final decision by the district remains unresolved at the end of the reporting period for Survey 5, as set forth in Rule 6A-1.0014, F.A.C.

2. Preliminary Action: Districts must report the action taken prior to any final disciplinary action or prior to termination. Reportable actions are:

a. Duty reassignment, which refers to the changing of placement from one position to another without promotion or demotion.

b. Resignation, which refers to a person formally giving up his job, and no longer being employed by the employer.

c. Retirement, which refers to a person leaving his career permanently.

d. No action taken prior to final disciplinary action or termination.

e. Other, which refers to other preliminary action taken not listed above.

(7) Incident definitions.

(a) Alcohol (Level IV): Possession, sale, purchase, distribution, or use of alcoholic beverages. Use means the person is caught in the act of using, admits to use or is discovered to have used in the course of an investigation. Alcohol incidents cannot be Drug-

related.

(b) Aggravated Battery (Level I): A battery where the attacker intentionally or knowingly causes more serious injury as defined in paragraph (8)(g) of this rule, such as: great bodily harm, permanent disability, or permanent disfigurement; uses a deadly weapon; or, where the attacker knew or should have known the victim was pregnant.

(c) Arson (Level I): To intentionally damage or cause to be damaged, by fire or explosion, any dwelling, structure, or conveyance, whether occupied or not, or its contents. Fires that are not intentional, that are caused by accident, or do not cause damage are not required to be reported in SESIR.

(d) Burglary (Level II): Unlawful entry into or remaining in a dwelling, structure, or conveyance with the intent to commit a crime therein.

(e) Bullying (Level IV): Systematically and chronically inflicting physical hurt or psychological distress on one or more students or employees. Bullying includes instances of cyberbullying, as defined in Section 1006.147(3)(b), F.S. Bullying may include, but is not limited to, repetitive instances of teasing, social exclusion, threats, intimidation, stalking, physical violence, theft, harassment, public or private humiliation, or destruction of property. If the physical harm or psychological distress is not the result of systematic or chronic behavior, evaluate for Harassment.

(f) Criminal Mischief (Felony Vandalism – $1,000 threshold) (Level III): Willfully and maliciously injuring or damaging by any means any real or personal property belonging to another, including, but not limited to, the placement of graffiti thereon or other acts of vandalism thereto. Incidents that fall below the $1,000 threshold are not reportable in SESIR, but instead should be reported as locally-defined incidents according to district policies.

(g) Disruption on Campus-Major (Level III): Disruptive behavior that poses a serious threat to the learning environment, health, safety, or welfare of others. Examples of major disruptions include bomb threats, inciting a riot, or initiating a false fire alarm.

(h) Drug Sale or Distribution (Level II): The manufacture, cultivation, purchase, sale, or distribution of any drug, narcotic, controlled substance or substance represented to be a drug, narcotic, or controlled substance.

(i) Drug Use or Possession (Level III): The use or possession of any drug, narcotic, controlled substance, or any substance when used for chemical intoxication. Use means the person is caught in the act of using, admits to use or is discovered to have used in the course of an investigation.

(j) Fighting (Level III): When two or more persons mutually participate in use of force or physical violence that requires either physical intervention or results in injury requiring first aid or medical attention. Lower-level fights, including pushing, shoving, or altercations that stop on verbal command are not required to be reported in SESIR.

(k) Grand Theft ($750 threshold) (Level III): The unauthorized taking of the property of another person or organization, including motor vehicles, valued at $750 or more, without threat, violence, or bodily harm. Incidents that fall below the $750 threshold are not reportable in SESIR, but instead should be reported as locally-defined incidents according to district policies. Thefts of property of any value that involve a use of force, violence, assault, or putting the victim in fear must be reported as Robbery.

(l) Harassment (Level IV): Any threatening, insulting, or dehumanizing gesture, use of data or computer software, or written, verbal, or physical conduct that places a student or school employee in reasonable fear of harm to his or her person or damage to his or her property; has the effect of substantially interfering with a student's educational performance, opportunities, or benefits, or has the effect of substantially disrupting the orderly operation of a school, including any course of conduct directed at a specific person that causes substantial emotional distress in such a person and serves no legitimate purpose. Instances of Harassment that are chronic or repeated in nature should be evaluated for Bullying or Bullying-related.

(m) Hazing (Level III): Any action or situation that endangers the mental or physical health or safety of a student at a school with any of grades 6 through 12 for purposes of initiation or admission into or affiliation with any school-sanctioned organization. Hazing includes, but is not limited to pressuring, coercing, or forcing a student to participate in illegal or dangerous behavior, or any brutality of a physical nature, such as whipping, beating, branding, or exposure to the elements.

(n) Homicide (Level I): The unjustified killing of one human being by another.

(o) Kidnapping (Level I): Forcibly, secretly, or by threat, confining, abducting, or imprisoning another person against his or her will and without lawful authority.

(p) Other Major Incidents (Level III): Any serious, harmful incident resulting in the need for law enforcement consultation not previously classified. This includes any drug or weapon found unattended and not linked to any individual; such incidents must be coded with the appropriate Related element (such as Drug-related or Weapon-related) and incident involvement must be reported as unknown.

(q) Robbery (Level II): The taking or attempted taking of money or other property from the person or custody of another with the intent to permanently or temporarily deprive the person or owner of the money or other property under the confrontational circumstances of force, or threat of force or violence, and/or by putting the victim in fear. A key difference in Grand Theft and Robbery is that Robbery involves violence, a threat of violence or assault, and putting the victim in fear.

(r) Sexual Assault (Level II): An incident that includes fondling, indecent liberties, child molestation, or threatened rape. Both males and females can be victims of sexual assault.

(s) Sexual Battery (Rape) (Level I): Forced or attempted oral, anal, or vaginal penetration by using a sexual organ or an object simulating a sexual organ, or the anal or vaginal penetration of another by any body part or foreign object. Both males and females can be victims of sexual battery.

(t) Sexual Harassment (Level III): Unwelcome conduct of a sexual nature, such as sexual advances, requests for sexual favors, and other verbal, nonverbal, or physical conduct of a sexual nature. Harassing conduct can include verbal or nonverbal actions, including graphic and written statements, and may include statements made through computers, cellphones, and other devices connected to the Internet. The conduct can be carried out by school employees, other students, and non-employee third parties.

(u) Sexual Offenses (Other) (Level III): Other sexual contact, including intercourse, without force or threat of force. Includes subjecting an individual to lewd sexual gestures, sexual activity, or exposing private body parts in a lewd manner.

(v) Simple Battery (Level II): An actual and intentional touching or striking of another person against his or her will, or the intentional causing of bodily harm to an individual.

(w) Threat/Intimidation (Level III): An incident where there was no physical contact between the offender and victim, but the victim reasonably believed that physical harm could have occurred based on verbal or nonverbal communication by the offender. This includes nonverbal threats and verbal threats of physical harm which are made in person, electronically or through any other means.

(x) Tobacco (Level IV): The possession, sale, purchase, distribution, or use of tobacco or nicotine products on school grounds, at school-sponsored events, or on school transportation by any person under the age of 21. Tobacco incidents cannot be Drug-related.

(y) Trespassing (Level III): To enter or remain on school grounds, school transportation, or at a school-sponsored event, without authorization or invitation and with no lawful purpose for entry. Only incidents involving a student currently under suspension or expulsion, or incidents where any offender (student or non-student) was previously issued an official trespass warning by school officials, or where any offender was arrested for trespass are required to be reported in SESIR. Trespass incidents that did not have a prior official warning, did not result in arrest, or did not involve students under suspension or expulsion should be reported as locally defined incidents according to district policies.

(z) Weapons Possession (Level II): Possession of a firearm or weapon as defined by Section 790.001, F.S., that can inflict serious harm on another person or that can place a person in reasonable fear of serious harm.

(8) Related element definitions.

(a) Alcohol-related: An incident is alcohol related if there is evidence that those involved in the incident were caught drinking at the incident or had been drinking, based on testing or investigation of a Law Enforcement Officer at the scene, or if they admit to drinking, or if the incident is somehow related to possession, use or sale of alcohol. Schools are not required to test for the presence of alcohol.

(b) Bullying-related: An incident is bullying related if the incident includes systematically and chronically inflicting physical hurt or psychological distress on one or more students or employees.

(c) Drug-related: An incident is drug related if there is evidence that those involved in the incident were under the influence of drugs at the time of the incident; if they admit to using or being under the influence of drugs; if drugs were in the possession of individuals involved in the incident, based on testing or investigation done by a law enforcement officer as a result of the incident; or if the incident is somehow related to possession, use or sale of drugs. Schools are not required to test for drug use.

(d) Gang-related: An incident is gang-related if gang affiliation/association caused the incident or was a contributing factor to action that happened during the incident.

(e) Hate Crime-related: All SESIR incidents motivated all or in part by hostility to the victim's real or perceived race, religion, color, sexual orientation, ethnicity, ancestry, national origin, political beliefs, marital status, age, social and family background, linguistic preference or mental/physical disability are required to be reported as Hate Crime-related.

(f) Hazing-related: An incident is hazing-related if the incident includes any action or situation that endangers the mental or

physical health or safety of a student at a school with any grades from 6-12 for purposes of initiation or admission into or affiliation with any school-sanctioned organization.

(g) Injury-related: All SESIR incidents that result in serious bodily injury are required to be reported as Injury-related. Less serious bodily injury means incidents which require immediate first aid or subsequent medical attention. More serious injuries include death or injuries with substantial risk of death, extreme physical pain, protracted and obvious disfigurement, and protracted loss or impairment of the function of a bodily member, organ, or mental faculty. Incidents where injury occurred, but first aid or medical attention is not needed, are not required to be reported in SESIR as Injury-related.

(h) Vaping-related: All SESIR incidents that involve the use of non-combustible vaping products, including electronic cigarettes, vapes and vape pens, or any electronic nicotine delivery system (ENDS) are required to be reported as Vaping-related, if the liquid used contains nicotine or a controlled substance. Schools are not required to test for nicotine or drugs in vaping devices. Incidents involving use or possession of vaping products that do not contain nicotine or controlled substances are not required to be reported in SESIR.

(i) Weapon-related: All SESIR incidents are required to be reported as Weapon-related where anyone involved possessed or used a firearm or weapon or if the incident was related to possession, use or sale of firearms or weapons, as defined in Section 790.001, F.S.

(9) Reporting law enforcement involvement. For each SESIR incident, a school district must report one of the following three (3) choices regarding law enforcement involvement:

(a) The incident was not reported to law enforcement because it was a petty act of misconduct that did not require law enforcement involvement according to policies developed by the district pursuant to Section 1006.13, F.S.

(b) The incident was reported to law enforcement and resulted in official law enforcement action being taken by an SRO or other law enforcement agency or official, as defined in paragraph (2)(b) of this rule.

(c) The incident was reported to law enforcement and did not result in official action being taken by an SRO or other law enforcement agency or official, as defined in paragraph (2)(b) of this rule.

(d) Required reporting to law enforcement.

1. School districts must report all SESIR incidents to law enforcement, except for Bullying, Harassment, Sexual Harassment, and Tobacco.

2. School districts must report all SESIR incidents to law enforcement, including Bullying, Harassment, Sexual Harassment, and Tobacco, where the incident includes one or more of the following related elements:

a. Alcohol-related;

b. Drug-related;

c. Gang-related;

d. Hate crime-related;

e. Hazing-related;

f. Injury-related, if the injuries are reported as more serious; and

g. Weapon-related.

3. This rule does not limit school districts and charter schools from reporting other incidents to law enforcement that are not listed in subparagraph (9)(d)1. and 2.

(10) Training required. Each district superintendent must designate persons responsible for SESIR reporting in the district, and ensure that all such persons receive the training found at http://sesir.org. SESIR training provided by Department staff can be used to satisfy the online training requirement. Charter schools must designate persons responsible for SESIR reporting in their school and must report their name, email address, and phone number to the district.

(11) Accountability for SESIR reporting. In order to enhance SESIR reporting, the persons or entity listed below have the following responsibilities:

(a) School principals. Each public school principal, including charter school principals or equivalent, must ensure that all persons at the school responsible for SESIR information participate in the training set forth in subsection (10) of this rule and must ensure that SESIR data is accurately and timely reported.

(b) School District Superintendents.

1. Each district superintendent must ensure that all persons responsible for reporting SESIR data have received the training required in subsection (10) of this rule, that any local district policies are consistent with the SESIR reporting requirements set forth

in this rule and Rule 6A-1.0014, F.A.C., and that the district timely and accurately reports SESIR incidents. Annually, superintendents must certify to the Department that these requirements have been met. The annual certification must include a statement that all charter school staff responsible for reporting SESIR data have received required training and that charter schools have required SESIR policies in place.

2. Each district superintendent must designate a district SESIR contact person and must annually report their name, phone number, and email address to the Office of Safe Schools at SafeSchools@fldoe.org. This information must be provided by August 1 each year and must be updated within five (5) school days when there is a change in the information provided.

(c) Office of Safe Schools. The Office shall conduct site visits at schools throughout the state, as well as conduct data reviews. The review must include school district policies, training records, school incident and school discipline records. Superintendents, principals and school safety specialists must fully cooperate with requests for information when the Office of Safe Schools is reviewing and evaluating districts for compliance with SESIR reporting.

(d) Commissioner of Education. If a district fails to report SESIR data by the survey deadlines, set forth in Rule 6A-1.0014, F.A.C., the Commissioner must request that the district school board withhold the superintendent's salary, pursuant to Sections 1001.51(12) and 1001.42(13)(b), F.S., until the SESIR data is reported. If there is cause to believe that a superintendent knowingly transmitted or caused to be transmitted false or incorrect information, the Commissioner shall cause the allegation to be investigated and refer the matter for disciplinary action pursuant to Section 1012.796, F.S., if the superintendent holds a license or certificate under Chapter 1012 and take action to enforce the forfeiture of the superintendent's annual salary.

Rulemaking Authority 1001.02(1), (2)(n), 1006.07(9), 1008.385(3) FS. Law Implemented 1001.212(8), 1001.42(13)(b), 1001.51(12), 1002.33(16)(b)10., 1006.07(9), 1006.135(2)(e), 1006.147(4)(k), 1006.147(6), 1008.385 FS. History–New 6-16-20, Amended 8-23-21, 1-17-23., 8-22-23