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PALM BEACH COUNTY, FLORIDA

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MEMORANDUM

TO: Honorable Chair and Members of the School Board
Michael J. Burke, Superintendent
Chair and Members of the Audit Committee

FROM: Teresa Michael, Inspector General *TM*

DATE: June 28, 2023

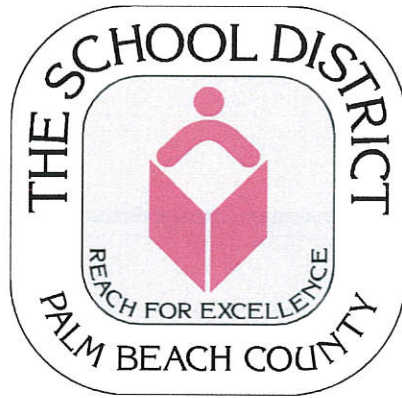
SUBJECT: Transmittal of Final Investigative Report:
23-0024-I Inlet Grove Community High School

Attached please find a copy of the Palm Beach County School District Office of Inspector General (OIG) Final Report of OIG Case 23-0024-I related to Information Technology Security. On May 5, 2023, the School District of Palm Beach County, Office of Inspector General (OIG) received an email complaint alleging that Inlet Grove Community High School (IGCHS) Founder and Chief Executive Officer/President, Dr. Emma Banks harassed an employee into providing her login credentials to the Student Information System (SIS). Additionally, during the investigation the OIG received an additional allegation that Inlet Grove Management improperly used SIS in violation of law and District Policy to recruit potential future students attending other Palm Beach County public schools.

The OIG investigation concluded the allegations were **substantiated**.

In accordance with School Board Policy 1.092.9.b.iv., on June 12, 2023, the draft of this investigation was provided to Dr. Emma Banks and Assistant Principal Scott McDermott for a response. On June 20, 2023, the OIG received a response from Dr. Banks and on June 28, 2023 the OIG received a response from Mr. McDermott, which are attached in their entirety to this report of investigation.

The findings of this report were referred to the Office of Charter Schools and Home Education for action deemed appropriate.



OIG CASE NUMBER 23-0024-I

Inlet Grove Community High School

TYPE OF REPORT: FINAL

DATE OF REPORT: June 28, 2023



Teresa Michael

**Teresa Michael, Inspector General
Office of Inspector General
School District of Palm Beach County**

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Office of Inspector General

Report of Investigation 23-0024-I

EXECUTIVE SUMMARY

From May 5, 2023, through May 30, 2023, the Office of Inspector General (OIG) conducted interviews and reviewed pertinent documentation and records related to an allegation against Inlet Grove Community High School Founder and current Chief Executive Officer/President Dr. Emma Banks. Specifically, Banks allegedly violated School District Policies 2.50.7. and 9.e and 3.29.4. 6. 12.c and The Charter Agreement between the School Board of Palm Beach County and Inlet Grove Community High School, Inc. by harassing an employee into providing her login credentials to the District's Student Information System (SIS). Additionally, during the investigation the OIG was provided with the additional allegation that Inlet Grove Assistant Principal Scott McDermott improperly used SIS in violation of law and District Policy to recruit potential future students attending other Palm Beach County public schools.

Dr. Banks admitted to asking and obtaining Ms. Colombo's SIS password. Due to conflicting testimony the OIG was not able to ultimately determine with certainty how K. McDermott obtained Colombo's password; however, based on testimony from Colombo, Brown, K. McDermott, and S. McDermott, it is clear K. McDermott used Colombo's password to access SIS.

Assistant Principal Scott McDermott admitted to using SIS to recruit potential future students that were attending other Palm Beach County Public Schools.

The investigation concluded the allegations were **Substantiated**.

On June 8, 2023, the OIG forwarded a copy of the draft report to Dr. Banks and Assistant Principal Scott McDermott for a response. Dr. Banks responded on June 20, 2023, and Scott McDermott responded on June 28, 2023. Dr. Banks' and Scott McDermott's responses are attached in their entirety (**Exhibit 1**) and (**Exhibit 2**).

RECOMMENDATIONS

The OIG recommends that this report be forwarded to the Director of Charter Schools and Home Education for action deemed appropriate.

INVESTIGATIVE PREDICATE

On May 5, 2023, the School District of Palm Beach County, Office of Inspector General (OIG) received an email complaint alleging that Inlet Grove Community High School (IGCHS) Founder and Chief Executive Officer/President.¹ Dr. Emma Banks harassed an employee into providing her login credentials to the Student Information System (SIS). Additionally, during the investigation the OIG received an additional allegation that Inlet Grove Management improperly used SIS in violation of law and District Policy to recruit potential future students attending other Palm Beach County public schools. An investigation into the matter was opened.

On May 8, 2023, OIG Director of Investigations (DOI) Oscar Restrepo was assigned the complaint for investigation.

The OIG investigation concluded that the allegations were Substantiated. The investigation findings of the allegations will be discussed in detail later in this report.

BACKGROUND

Inlet Grove High School was founded in 2003 by Dr. Emma Banks. Dr. Banks served as the CEO and Principal for 17 years.

Inlet Grove offers a variety of educational opportunities, including college preparatory and Career Academies. The school also offers College Board Advanced Placement Program, STEM and a technology program. Inlet Grove is an A Rated School.

IGCHS is not a traditional charter school, rather it is one of two “conversion charter” schools in the Palm Beach County School District (PBCSD). A conversion charter is a previous district-run school that is now overseen by a private governing board. IGCHS is currently leasing their building from PBCSD.

COMPLAINANT INTERVIEW

On May 8, 2023, a sworn recorded interview of Ms. Linda Colombo was conducted at Inlet Grove Community High School (IGCHS) in Riviera Beach, FL. The following represents actual and paraphrased statements made by “Colombo” as they relate to the Allegations:

Ms. Colombo stated she is currently a Data Processor II at IGCHS and has worked at IGCHS for approximately six years. Colombo previously worked at Riviera Beach Maritime Academy for approximately nine years. Colombo said she takes the district provided IT Security training every year and believes all IGCHS employees take this training, particularly those with access to SIS.

¹ Inlet Grove Website (www.inletgrovehs.com).

Regarding Allegation 1:

Colombo stated her job title allows her to have district-wide access in SIS and she believes she is the only IGCHS employee with this level of access. District-wide access allows her to access information regarding all students in the school district, while all other employees can only access information regarding IGCHS students. SIS provides student information such as grades, test scores, and emails.

Colombo stated that when a student applies to the school, the student goes through an application process which includes Colombo accessing the applicant's student information in SIS. Colombo said that this year they have been falling behind regarding the application process as she is the only employee that can access this information. She said that on or about May 3, 2023, Dr. Banks requested her username and password for her SIS account. Colombo said that Banks planned to provide her (Colombo) with another employee to assist in the application process and that employee would use Colombo's username and password. Colombo noted that the help was warranted, but that she did not know why Banks did not make a request for district-wide SIS access for another employee be added to their existing profile instead of requesting Colombo's login information.

Colombo stated she did not want to provide the information and told Banks that it was a breach of IT security. Banks then told her she was required to have the username and password of all employees for all the accounts they access at IGCHS. Colombo stated that she "felt harassed" as Banks was adamant about the situation. Colombo continued that Banks said "If you do not want to give that information to me, I am going to have to see about making some staffing changes." Colombo stated she interpreted this as a threat to her job. Colombo said she eventually gave Banks her username and password on a "Sticky."

Colombo said that Banks asked for her login information twice. Colombo changed the password after the first request as she believed what Banks did was not right. Colombo changed it again when Banks approached Colombo a second time and told her that Administrative Assistant Kim McDermott could not gain access to SIS using Colombo's password. Colombo noted that K. McDermott is Banks' daughter as well as Assistant Principal Scott McDermott's wife. Colombo stated she changed her password again and provided it to Banks a second time. **INVESTIGATOR'S NOTE: This is contradicted by Banks who denied asking Colombo for her password a second time.** Colombo noted that before providing the password she changed it to make it easier for those who will use it to remember. These changes caused IT security to flag and lock her account. Colombo then contacted the IT Service Desk to remove the lock on her SIS account. IT released the lock on her account and told Colombo that there were multiple changes to her password. Colombo noted she corresponded with IT employee, Adrian Greaves. Greaves told Colombo he would contact her due to potential security violations. Colombo stated she then spoke to Greaves regarding the security violations and Greaves submitted a ticket on Colombo's behalf.

Regarding Allegation 2:

Colombo stated that beyond the application review process, she uses SIS for recruiting students at Assistant Principal Scott McDermott's (S. McDermott) direction. She added that she "screens students" based on their grades and test scores. Colombo explained she accessed and searched SIS for students eligible to enroll at IGCHS. She then provides a list of eligible students along with the students' email addresses, to S. McDermott. Colombo said S. McDermott then sent recruiting emails to these prospective students. Colombo said that she provided S. McDermott with this information at least twice per year.

On June 6, 2023, a follow-up sworn recorded interview of Ms. Linda Colombo was conducted at the Office of Inspector General in West Palm Beach, FL. The following represents actual and paraphrased statements made by "Colombo" as they relate to the Allegations:

Regarding Allegation 1:

Colombo re-iterated that Howard Brown initially asked for her SIS password. She refused to give Brown her password and told him to speak to Banks regarding the matter. There were no witnesses present when Brown asked Colombo for her password. Colombo said Banks then asked her for her password on two occasions. There were no witnesses present either time Banks asked Colombo for her password. ***Investigator's note: Banks denied asking Colombo for her password a second time.*** In response to Banks' testimony that she threw away the password provided by Colombo to Banks, Colombo said Banks did not dispose of the paper Colombo wrote her password on in front of Colombo. Colombo stated she is not aware of anyone else other than K. McDermott using her SIS password.

Colombo explained that IGCHS has an external program online used for student applications called "School Admin." This program replaced paper-based applications and allows students to input all of their information when submitting an application to IGCHS. Colombo continued that after the student has submitted an application, she will receive a notification email that informs her an application had been submitted. She then opens the School Admin program and if the student attends a PBCSD public school, she will then use SIS to pull the student's information such as test scores, grades, and discipline history. Colombo said this information is then uploaded into School Admin with the student's application. K. McDermott was instructed to assist Colombo with this process as she was falling behind in her work.

Regarding Allegation 2:

Colombo explained that a former employee (unknown name) discovered a method the school could use to obtain student information on students that attend PBCSD public schools. She could generate an "advanced report" on the students at IGCHS, from there Colombo stated she would change the school's name to a public school then generate

an “advanced report” on students that do not attend IGCHS. Colombo said some information included on an “advanced report” would be the student’s name, student ID, test scores, parent’s name and email address. She explained that Assistant Principal, Scott McDermott (S. McDermott) would tell which schools he wanted Colombo to conduct an “advanced report” on. Colombo stated these directions were given verbally.

When recruiting students, Colombo stated she first generated an advanced report in SIS as directed by S. McDermott. She then input the information she was instructed to retrieve such as student names, students IDs, parent names, parent emails, ESE status, and test scores. Colombo then created a spreadsheet with the information and provided it to S. McDermott. Colombo said S. McDermott oversees the recruitment of students through SIS and directs Colombo to generate the “advanced reports.” S. McDermott will then specifically choose students that meet the school’s criteria and send them a letter requesting them to apply. Colombo continued that IGCHS also recruits students by having open houses, she added that the letters that are sent out to recruit students are usually sent with an invitation to open house. Colombo states she typically generates this report for S. McDermott in the spring after testing has finished and in the winter. Colombo said she has recruited students this way for approximately two years.

Colombo stated when she became the backup data processor at IGCHS she submitted an E-support ticket to the PBCSD Information Technology department. She was told by the IGCHS administration to request district-wide access. Colombo stated that she believes the recruiting of students through SIS would be a FERPA violation.

Colombo said that Banks is aware of this recruiting process because Banks is heavily involved with the day-to-day operations of the school. Colombo stated Banks makes hiring decisions, salary decisions, and “runs the school.” Colombo also said Banks consistently talks about the number of students at the school, making staffing decisions, and money.

ALLEGATIONS

Inlet Grove Community High School Founder and Chief Executive Officer Dr. Emma Banks harassed an employee into providing her login credentials to the Student Information System (SIS). Additionally, during the investigation the OIG received the additional allegation that Inlet Grove Assistant Principal Scott McDermott was using SIS to recruit potential future students that were attending other Palm Beach County public schools.

School District Policy 2.50.7 Third Party Use of Technology states,

“7. Third Party user account/passwords with the District or with another entity approved by the District can be used as set forth in the Manual to:

- a. Electronically sign District documents by e-signature.*

- b. *Provide access to the Third Party's personal information.*
- c. *Make binding legal obligations.*
- d. *Access District files or records.*

All passwords are to be treated as sensitive and confidential information and shall not be shared with anyone but the Third Party to whom they were assigned. All users are responsible for all activity that occurs for user accounts that have been assigned to them. (Emphasis added.)

Further District Policy 2.50.9.e states,

“9. Compliance. -- *When using District technology resources, applications, and databases, in addition to adhering to the standards set forth in the Manual and above in this Policy:*

e. All third parties who have access to or may have access to personally identifiable student information shall adhere to all standards included in the Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. § 1232g; the Individuals with Disabilities Education Act (IDEA) and its regulations at 20 U.S.C. § 1417(c) and 34 C.F.R. § 300.623; Fla. Stat. §§ 1002.22 and 1002.221; School Board Policy 5.50, and other applicable laws and regulations, as they relate to the release of student information. Third parties shall not use access to student records information for personal gain and shall use and release student information only as authorized by law. Third parties cannot, by any means, take, obtain, receive, acquire, or capture any District data, metadata, or information from any District system for any purpose without written consent from the District.”

School District Policies 3.29.4, 3.29.6 and 3.29.12.c governing Acceptable Use of Technology by Employees, state,

“4. The District authorizes employees to use District technology resources, software applications, and databases for the employees' assigned responsibilities when allowed by an appropriate District representative. Employees shall use these resources to enhance job productivity in performance of District business. Principals and District department directors are to follow District standards to ensure accountability of their staff's use of these resources to support academic and business functions.”

“6. All passwords are to be treated as sensitive and confidential information and shall not be shared with anyone but the employee to whom they were assigned, unless otherwise authorized by Board policy. Employees are responsible for all activity that occurs for user accounts that have been assigned

to them as well as any e-signatures that are attributed to their account.” (Emphasis added).

“12. **Compliance.** -- When using District technology resources, software applications, and databases, in addition to adhering to the standards set forth above in Sections 3 and 4:

c. All employees who have access to or may have access to personally identifiable student information shall adhere to all standards included in the Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. § 1232g; the Individuals with Disabilities Education Act (IDEA) and its regulations at 20 U. S.C. § 1417(c) and 34 C.F.R. § 300.623; Fla. Stat. §§ 1002.22 and 1002.221; School Board Policy 5.50; and other applicable laws, rules, and regulations, as they relate to the release of student information. Employees shall not use access to student records information for personal gain and shall use and release student information only as authorized by law.”

The Charter Contract between the School Board of Palm Beach County and Inlet Grove Community High School, Inc., further govern IGCHS’ use of student’s information and the technology used to access it.

“The School may not request prior to acceptance of the application or through the application process or otherwise, information regarding the student’s academic history, record of standardized testing performance, juvenile or disciplinary history or status, a student’s Individual Education Plan (IEP) or other information regarding a student’s special needs, except as stated below in Section 3, H, 3.c.” Quoting IGCHS Charter Contract, Section 3, D.7 – Eligible Students

“The School’s employees and agents accessing District technology must sign the District’s Third-Party Internet/Intranet Acknowledgment and Consent form PBSD 2359² at: <http://www.palmbeachschools.org/Forms/Documents/2359.pdf>. **By signing this form, the school’s employees and agents agree to follow School Board Policy 2.50-Third Party Use of District Technology.** Additionally, the School must provide these employees and agents with technology security awareness training and provide the Sponsor proof of said training on request.” Quoting id at Section 10 – Human Resources (emphasis added).

WITNESS INTERVIEWS

On May 8, 2023, a sworn recorded interview of Kimberly McDermott was conducted at IGCHS in Riviera Beach, FL. The following represents actual and paraphrased statements made by “K. McDermott” as it relates to the Allegations:

² The OIG attempted to obtain a Third-Party Internet/Intranet Acknowledgment and Consent form that was signed by anyone at IGCHS. The OIG found that neither IT security nor the Charter School Office keep a copy of this form on file.

Regarding Allegation 1:

K. McDermott explained that she has worked at the school for 12 years. She took a year off and returned at the end of June 2022. Her main responsibilities are handling anything to do with juniors and seniors along with being a graduation coach. She is currently training the new data processor and is a backup for that position. In addition, she helps with administrative and the front office duties.

K. McDermott stated that she has “data processing access” for IGCHS, but does not have district-wide access. When asked if McDermott had ever helped Colombo with her duties, she said, “Recently, yes.” Safe Schools Manager/Interim Principal Howard Brown asked her on Wednesday May 3, 2023, to help Colombo because she was behind. Brown told her “She (Colombo) was overwhelmed with her work duties and we have to get our recruitment up to par because we’re really behind this year.” K. McDermott indicated Brown told her he asked Colombo who she would be comfortable with assisting her and she said McDermott, since she has always helped with recruitment. K. McDermott said, “He (Brown) gave me her login credentials to pull the student data that we needed for the applicants that we had.” When asked if Mr. Brown gave her the passcode she answered, “Yes the first time.” She used the credentials to help on that Wednesday, but on Thursday she was unable to login, so she informed the administration.

K. McDermott stated that it seemed that Colombo was frustrated with what McDermott had done, so a meeting was held to address the process Colombo wanted McDermott to use. K. McDermott said the following Friday (May 5, 2023) Colombo handed her the login information to continue to work on admissions. When asked if the login information was written down when Brown gave it to her, she answered, “Yes, it was written down on a blue sticky note.” When asked if she asked Colombo for the login information, K. McDermott responded, “So, me and Mr. Brown went into her office and Mr. Brown basically said Kim is here to help you with admissions, what do you need her to do?” K. McDermott stated that Colombo handed her a stack of applicant files she wanted her to work on. McDermott then asked “How should I go about processing them?” Colombo then wrote down her SIS password and replied, “Here’s my login and you have my PeopleSoft.” McDermott responded, “No I don’t, I shredded that information.” Then Colombo wrote her login information down on a piece of paper.

K. McDermott stated she worked on the admissions and placed the login information in a safe place. K. McDermott said, “When I came in this morning and learned about this, I politely went to Mr. Brown and said I’m going to give you the admissions and I decline to work on it. Can you please ask Linda to change her password; I don’t want to have access; and I shredded the sticky note she gave me.” K. McDermott ended the interview saying, “The only reason I got involved is because it was requested of me.”

On May 25, 2023, a follow-up sworn recorded interview of Kimberly McDermott was conducted at IGCHS in Riviera Beach, FL. The following represents actual and paraphrased statements made by “K. McDermott” as it relates to the Allegations:

Regarding Allegation 1:

K. McDermott confirmed that the first time she received Colombo's SIS password on May 3, 2023, it was given to her by Brown on a "teal" sticky note. K. McDermott explained that when she logged into Colombo's SIS account, she first gathered student records such as grades and testing history. ***INVESTIGATOR'S NOTE: This is contradicted by Brown who denied giving the password to K. McDermott.***

K. McDermott stated that she received Colombo's password to SIS a second time when Colombo gave K. McDermott her password in the presence of Brown. K. McDermott said she assisted Colombo for two days by using Colombo's SIS password to gather student information for students that had already applied to IGCHS. K. McDermott said that Colombo was about 70 to 80 applicants behind in her work which led to K. McDermott assisting Colombo. K. McDermott said she was able to assist Colombo by "Clearing out about 70 student applications."

Regarding Allegation 2:

K. McDermott said that when processing student applications, they look in SIS at certain student information such as schedules, grades, test history, and discipline history as students must meet a certain criterion to attend the school. She then uploads this paperwork to "School Admin", which is the program that they use for their admissions. K. McDermott continued that to identify potential students, a student will apply and then based on this student's application, the school will then go into SIS to gather the student's information. She explained that they only gather student information from SIS when a student applies to IGCHS.

When asked if they recruit non-student applicants, K. McDermott stated that to her knowledge they do not. She stated she is only aware of gathering student information once a student has applied. ***INVESTIGATOR'S NOTE: This is contradicted by S. McDermott who admitted IGCHS uses SIS to recruit students.*** K. McDermott further explained that IGCHS will go to other schools for recruitment as well as hosting events at IGCHS for recruitment.

On May 8, 2023, a sworn recorded interview of Howard Brown was conducted at IGCHS in Riviera Beach, FL. The following represents actual and paraphrased statements made by "Brown" as it relates to the Allegations:

Regarding Allegation 1:

Mr. Brown stated his official job title is Safe Schools Manager of IGCHS, but he is currently serving as the Interim Principal of IGCHS. He has been working at IGCHS for approximately a year and a half. Brown previously worked in the district's Transportation Department and was employed by the district for approximately 12 years.

Brown stated that he never requested Linda Colombo's username or password for her SIS account. Brown added that he had heard that CEO/Founder Emma Banks requested Colombo's password. Brown was not sure what level of access Colombo had in SIS, but believes she could have a higher access level because she processes all student applicants. Brown stated that he has school-wide access in SIS, meaning he can only see student information for those that attend IGCHS. Brown told Colombo to ask Banks to provide documentation asking for her password and Colombo responded that she was uncomfortable doing that.

On May 25, 2023, a follow-up sworn recorded interview of Howard Brown was conducted at IGCHS in Riviera Beach, FL. The following represents actual and paraphrased statements made by "Brown" as it relates to the Allegations:

Regarding Allegation 1:

Brown stated that he did not ask Linda Colombo for her SIS username and password. Brown explained that Colombo said that Founder/CEO Emma Banks asked Colombo for her SIS password.

Brown reiterated that he brought K. McDermott to Colombo to assist her with student applicants. The OIG explained that K. McDermott had previously stated Brown gave her Colombo's password on a piece of paper; however, Brown denied giving McDermott a piece of paper with Colombo's password. Brown said that Colombo gave him a piece of paper with her password, but he returned this piece of paper to Colombo and told her to work it out with K. McDermott. Brown said he did not look at the piece of paper and he explained to Colombo that McDermott was there to assist her with student applicants. Brown stated he then left the room. He stated that he was not involved at that point and this was the only event that occurred involving him and Colombo's password. Brown continued that Banks did not give him Colombo's password. ***INVESTIGATOR'S NOTE: This is contradicted by K. McDermott who testified that Brown gave her Colombo's SIS password on May 3, 2023 and Colombo who testified Brown asked her for her password.***

Regarding Allegation 2:

Brown said that he was not involved in the process of using SIS to recruit students to IGCHS. He believes IGCHS uses SIS to gather student information after the student has applied to the school. Brown denied that IGCHS uses SIS to gather student information to then send emails or letters to recruit students that may be a good fit for the school. Brown confirmed that the school does not look at student information in SIS unless the student has applied to IGCHS. ***INVESTIGATOR'S NOTE: This is contradicted by S. McDermott and Colombo who admitted IGCHS uses SIS to recruit students.*** Brown stated that IGCHS uses social media, their school website, and go to community events to recruit students.

On May 22, 2023, a sworn recorded interview of P.J. D'Aoust was conducted at the Office of Inspector General in West Palm Beach, FL. The following represents actual and paraphrased statements made by "D'Aoust" as it relates to the Allegations:

Regarding Allegation 1:

D'Aoust said that he received Linda Colombo's initial complaint from Information Technology (IT) employee Adrian Greaves. The department then held a meeting as IT was not sure how this issue related to charter schools. D'Aoust explained that IGCHS is not a traditional charter school, rather it is one of two "conversion charter" schools in the Palm Beach County School District (PBCSD). A conversion charter is a previous district-run school that is now overseen by a private governing board. IGCHS is currently leasing the building from the PBCSD and uses PBCSD machines. D'Aoust explained that a traditional charter would have their own IT employees and their own network, but they also use SIS as it is a sponsored system used to calculate Full Time Equivalent (FTE) and other data elements required by the State of Florida. D'Aoust continued that traditional charter schools are limited to school-wide access only, meaning they can only see their students rather than the district-wide access. District view is given to district schools and district administrators who D'Aoust believed were required to sign policy 3.29 before receiving access.

D'Aoust further believed that conversion charters do not have district-wide access and they were never included in groups normally granted that access. D'Aoust said all IGCHS teachers have SIS access including the other conversion charter school (SouthTech Academy) as well. He stated that the employees could have requested additional access (including district-wide access) as the district rarely denies access. D'Aoust stated he did not know why someone would share their password for others to gain access and speculated the only reason would be because the person seeking access did not want to fill out the required form. D'Aoust stated that sharing passwords is not allowed and this is something everyone knows.

Regarding Allegation 2:

It was explained to D'Aoust that an IGCHS employee had district-wide access in SIS and had used this level of access to search for students from district schools they believe may qualify for IGCHS. The OIG then explained IGCHS administrators solicited the students discovered through district-wide SIS searches to apply to. When asked if he believed this practice was a problem, D'Aoust explained that he was not aware of this being a policy violation, but that by reviewing student records that do not attend IGCHS, the school could be in violation of the Family Educational Rights and Privacy Act (FERPA). D'Aoust also stated that typically the district procedure is that no one should be able to view student records unless they have educational interest in the student. D'Aoust explained IGCHS relies heavily on recruiting, but the way the school identified and solicited students via district-wide SIS searches was potentially a FERPA violation due to IGCHS lacking an educational interest in these students.

SUBJECT INTERVIEWS

On May 8, 2023, a sworn recorded interview of Scott McDermott was conducted at IGCHS in Riviera Beach, FL. The following represents actual and paraphrased statements made by “S. McDermott” as it relates to the Allegations:

Regarding Allegation 1:

S. McDermott stated he is the Assistant Principal at IGCHS. He has been working at IGCHS for approximately 15 years and has been the Assistant Principal for approximately seven years.

S. McDermott stated he has not asked Linda Colombo for her username and password for her SIS account. He stated he does not think CEO/Founder Emma Banks requested Colombo to provide her username and password. S. McDermott stated his wife, Kim McDermott (K. McDermott) works at IGCHS and he believes her official title is “Administrator Assistant.” S. McDermott explained that in order to help Colombo with admissions, he believes that K. McDermott or someone else may have asked Colombo for her SIS password. S. McDermott was unable to confirm who specifically had asked Colombo for her password. He continued that K. McDermott has used Colombo’s password to assist her in admissions recently. S. McDermott stated he has access to his own SIS account, but only has school-wide access, meaning he is only allowed to view information of students that attend IGCHS. S. McDermott noted he is aware of the information that is accessible with district-wide access.

On May 25, 2023, a follow-up sworn recorded interview of Scott McDermott was conducted at IGCHS in Riviera Beach, FL. The following represents actual and paraphrased statements made by “S. McDermott” as it relates to the Allegations:

Regarding Allegation 2:

S. McDermott explained that every employee is involved with recruiting students to some degree. He said that he is responsible for the open houses as well as mail-outs.

S. McDermott explained that IGCHS uses SIS to recruit 8th grade students going into 9th grade as well as 7th grade students that may be eligible for the school’s “Skipper Program.” This allows a 7th grade student to skip 8th grade and go straight to 9th grade as long as certain criteria are met. S. McDermott explained Colombo, after searching SIS district-wide, provided him a list of students in 7th or 8th grade that may be eligible to attend IGCHS. S. McDermott then sends a letter to all the students on this list inviting the student to apply because they may meet the school’s criteria. S. McDermott said that if you are a student in 7th grade or 8th grade and you live near the area of the school then the school will recruit those students via regular mail. He also said that they will sometimes email students.

S. McDermott explained that everyone has to apply on the school's application portal in which they create an account, upload documents, and include their academic information such as grades, test history, and disciplinary record. S. McDermott said the information uploaded by the student is confirmed by requesting documentation from the student, such as a report card.

S. McDermott explained that IGCHS will send an email to recruit students once a year. IGCHS will also mail two recruitment letters to students. He believes one letter is sent in January and the second letter is sent in May. S. McDermott said they do not have a system that can track the number of students recruited from emails or letters. He stated they also recruit students through community events such as parades, boat shows, and medical conferences.

On May 8, 2023, a sworn recorded interview of IGCHS CEO Dr. Emma Banks was conducted at IGCHS in Riviera Beach, FL. The following represents actual and paraphrased statements made by "Banks" as it relates to the Allegations:

Regarding Allegation 1:

When asked if she asked Linda Colombo for her username and password for district-wide SIS access, Banks stated, "I never asked her for her user name, but I did ask her about her passcode." Banks stated she could have had the same access as Colombo, but she is very busy and assigned the duty of working with SIS to Colombo. Banks said Colombo was behind in her work, so Banks suggested other staff members help her. Banks explained that Colombo was the only person with district-wide SIS access, so she had to ask her for the passcode. Colombo did not want to give it to her. Banks stated that she told Colombo she really wanted to help her catch up with the enrollments saying, "If they come after you, I will tell them to come after me because I asked you." At that point Colombo gave Banks her information.

Banks explained that before Colombo gave her the login information she (Banks) made the following comment to Colombo, "Because if we don't get enough students in here, I've got to make a hard decision that I don't want to make."

Banks added, "I always tell my administrative staff when we meet, if we don't have enough students we can't operate. If you don't help me get students in here I gotta make a hard decision, Years ago, we didn't have enough students and I had to tell everybody I had to cut their salary and within the contract it says I can lay you off and I can go down on the salary if we don't have enough money. My job is to try to keep everybody employed and that's all I said to them."

When asked for clarification as to why Banks wanted access to the district-wide SIS System, Banks stated that the access to SIS that Colombo was limited to only Colombo. Banks understood that Colombo has district-wide access and they needed to access information for new applicants. Banks said, "To be honest I never used it, I never went in." Banks then explained that in the past she would put someone in charge and share

the access even though she would never go into the system, but would have access in the case of an emergency.

When asked how many times Banks asked Colombo for her password, she said, "One time." The OIG asked who she shared it with and Banks said, "I didn't give it to nobody, when she gave it to me as I was walking out, I took it and tore it up." When asked how Kim McDermott obtained access, Banks said, "I didn't know she had it."

The OIG advised Banks that according to Colombo and Scott McDermott she (K. McDermott) used the password to help. When asked if the password was torn up how did K. McDermott get access. Banks replied, "I don't know I didn't give it to her. For my understanding from this morning, Linda (Colombo) gave it to her." Banks went on to say she asked Colombo for her passcode to use herself and not for anyone else to use, nor did she tell Colombo to give her passcode to anyone else. Banks stated she never spoke to K. McDermott about her accessing to the SIS System.

The OIG informed Banks that Colombo testified she gave the access information to Banks twice, to which Banks responded, "That's a lie, she only gave it to me one time." The OIG also informed her that Colombo changed her password and Banks stated she was not aware of that since she only gave it to her once on a blue piece of paper and reiterated that she tore up the information.

On May 25, 2023, a follow-up sworn recorded interview of IGCHS CEO Dr. Emma Banks was conducted at IGCHS in Riviera Beach, FL. The following represents actual and paraphrased statements made by "Banks" as it relates to the Allegations:

Regarding Allegation 1:

Banks explained that during a staff meeting she became aware that Linda Colombo was falling behind processing student applicants. Banks said Interim Principal Howard Brown told her he would ask Colombo for her SIS password in order to provide Colombo assistance. Banks said Brown asked Colombo for her SIS password, but Colombo refused to give it to him. ***INVESTIGATOR'S NOTE: This is contradicted by Brown's testimony that he did not ask Colombo for her password, but supported by Colombo's testimony that Brown asked Colombo for her password.*** Per Banks, Brown asked Banks to ask Colombo for her SIS password. Banks admitted that she went to Colombo and asked her for her SIS password. Banks continued that Colombo at first refused to give Banks the password, but Banks said that after pleading with Colombo, Colombo gave Banks her SIS password on a piece of paper. Banks said she told Colombo that if they do not have enough students, "she will have to make some hard decisions."

Banks added that after she received Colombo's password, she "tore it up and put it in the garbage." Because she was not going to use it. She continued that she left the room and did not talk to Colombo about her SIS password again. Banks said she did not know K. McDermott had Colombo's password. Banks said she was not aware that K. McDermott

was helping Colombo until later on because she is the CEO and was not involved in every aspect of the school.

Banks denied giving Brown a sticky note with Colombo's SIS password. Banks said she was not aware of a sticky note other than the one Colombo had given her which she threw in the garbage. Banks explained that Colombo was behind on processing student applicants as her job was to gather student information in SIS such as grades and testing history for students that applied to IGCHS. Per Banks, this was done to determine if the student met the criteria to attend IGCHS.

Regarding Allegation 2:

Banks stated she goes to the flea market, schools, Walmart, and attends community events to recruit students. Banks said she did not know Colombo had district-wide access in SIS. ***INVESTIGATOR'S NOTE: This is contradicted by Banks' testimony during her first interview where she said she understood that Colombo had district-wide access and they needed to access information for new applicants.*** After learning that Colombo had district-wide access in SIS, Banks contacted Chief Financial Officer, Heather Frederick to report it and to take away Colombo's district-wide access in SIS. Banks said she does not know if Colombo or if Assistant Principal Scott McDermott use SIS to recruit students. Banks further stated that if Colombo and S. McDermott were using SIS to recruit students, she was not aware because she does not oversee them or give them job duties. Per Banks, this is done, instead, by the principal.

ADDITIONAL INFORMATION

The OIG contacted Chief Financial Officer Heather Frederick to confirm if Dr. Banks had contacted her in regards to removing district-wide access to SIS from Colombo. Ms. Frederick confirmed that Dr. Banks did contact her to "self-report" that one of her employees had district-wide access to SIS and Dr. Banks wanted the access removed. Ms. Frederick added that Superintendent Michael Burke had contacted her before Dr. Banks called her regarding this issue. Mr. Burke asked Ms. Frederick to check if anyone at IGCHS had district-wide access to SIS. Ms. Frederick found that there was an employee at IGCHS that had district-wide access to SIS. Ms. Frederick removed the district-wide access from the employee at IGCHS and checked all other charter schools to determine if any other charter schools had district-wide access. Ms. Fredrick found there were some (she estimated there were five additional charter schools with district-wide access to SIS) and had the district-wide access removed for charter schools that had the district-wide access.

RECORD REVIEWS

The OIG reviewed seventy Excel Spreadsheets³ provided by Colombo that she prepared on November 28, 2022 and May 9, 2023, then provided to S. McDermott. She used her district-wide SIS access to view student information from other schools. The information was used to send recruiting letters to those students identified as meeting IGCHS criteria. The review revealed that IGCHS accessed SIS information as part of their recruiting process for students from the following schools:

HIGH SCHOOLS

Dwyer High School	Jupiter High School
Palm Beach Gardens High School	Palm Beach Gardens High School
Seminole Ridge High School	

MIDDLE SCHOOLS

Jupiter Middle School	BAK Middle School of the Arts
Bear Lakes Middle School	Congress Middle School
Christa McAuliffe Middle School	Conniston Middle School
Crestwood Middle School	Don Estridge High Tech Middle School
Emerald Cove Middle School	Hidden Oaks K-8
Howell Watkins Middle School	Independence Middle School
Jaega Middle School	John F. Kennedy Middle School
Lantana Middle School	North Grade K-8
Lake Worth Community Middle School	Okeeheelee Middle School
Osceola Creek Middle School	Palm Springs Middle School
Roosevelt Middle School	The Conservatory School
Tradewinds Middle School	Village Academy
Watson B. Duncan Middle School	Wellington Landings Middle School
Western Pines Middle School	Woodlands Middle School
Western Pines Middle School	

CHARTER SCHOOLS

Renaissance Charter School at Cypress	Renaissance Charter School at Summit
Renaissance Charter School at Wellington	Renaissance Charter School at West Palm Beach
Renaissance Charter School at Central Palm	Palm Beach Virtual
L.C. Swain Middle School	Palm Beach Maritime Academy
Franklin Academy Boynton Beach	Franklin Academy Palm Beach Gardens
Gardens School of Technology Arts	Imagine Chancellor Charter School
Somerset Academy of the Arts	Somerset Academy JFK Charter
Somerset Academy Canyons	South Tech Preparatory Academy
SLAM Palm Beach	University Preparatory Academy
Western Academy Charter School	

³ The Excel Spreadsheets are not attached as Exhibits due the amount of confidential information contained therein and are available in the investigative for review.

OTHER SEARCHES

Family Empowerment Scholarship ⁴	Sy 21-22 Grade 8 Passing Algebra 1 EOC, Geometry EOC, Biology EOC, US History EOC
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The OIG also reviewed a document called "Recruitment Search Process" that was provide by Colombo, which detailed how searches are to be completed when recruiting students from other schools. The process used by IGCHS is as follows:

Recruitment Search Process

1. Click on Students then click on Advanced Report
2. Change School (top right-hand corner)
3. Click on More Search Options
4. Check boxes for 7 and 8
5. Go to Fields
6. Click on Student Demo then add:
 - a. Student ID Number
 - b. Grade
 - c. School
 - d. First Name
 - e. Middle Name
 - f. Last name
7. Click on Address and then add
 - a. Address
 - b. Address 2
 - c. City
 - d. State
 - e. Zip Code
8. Click on Primary Contact and then add
 - a. Primary Contact Email
9. Scroll down toward end of list and click on Test History
 - a. Click on Florida Standards Assessments
 - i. Click on FSA FSA ELA Reading Total Achievement Level Score
 - ii. Click on FSA FSA Mathematics Total Achievement Level Score
 - iii. Click on FSA FSA EOC Alg 1 Total Achievement Level Score
 - iv. Click on FSA FSA EOC Geometry Total Achievement Level Score
10. Click on Run Report.
11. Save as an Excel document.

⁴ The Family Empowerment Scholarship provides additional educational options for all K-12 students, such as attending a participating private school. Families apply and annually renew through one of the approved scholarship funding organizations (SFO), which are responsible for determining and distributing funding. FES EO also offers families of eligible students the option to receive a \$750 scholarship to provide transportation to a public school different from the school to which the student was assigned (FDOE Website).

12. Open Excel Document and change document type to Excel Workbook and save document.
13. DELETE initial Excel document (comma delimited document).

CONCLUSION

It was alleged that Inlet Grove Community High School Founder and Chief Executive Officer Dr. Emma Banks violated School District Policies 2.50.7. and 9.e and 3.29. 4., and 3.29.6, and 3.29.12.c and the charter contract between the School Board of Palm Beach County and Inlet Grove Community High School, Inc. by harassing an employee into providing her login credentials to the Student Information System. Additionally, during the investigation the OIG was provided with the additional allegation that Inlet Grove Assistant Principal Scott McDermott improperly used SIS in violation of law and District Policy to recruit potential future students attending other Palm Beach County public schools.

In performing the instant investigation, the OIG applied the aforementioned authorities to the facts developed during witness interviews. Based on the substantive language of both polices, and the requirements of the charter contract, it was not necessary for the OIG to analyze whether IGCHS management, administrators, and staff were classified as third parties or District employees.

The actions and statements of all witnesses support the conclusion that neither the IT policy governing third parties, nor the IT policy governing employees, was followed as both require user accounts and *passwords be treated as confidential and sensitive information that shall not be shared with anyone*. See Board Policies 2.50.7 and 3.29.6.

Similarly, Board Policies 2.50.9.e and 3.29.12.c governing third parties' and District employees' access to personally identifiable student information are nearly identical. Both policies mandate adherence to federal, state, and local laws regarding access to, as well as use and release of, student information. The facts developed through witness interviews indicated the management, administrators, and staff of IGCHS, whether classified as third-parties or employees, were bound to follow the law regarding their use of District technology.

The charter contract between the School Board of Palm Beach County and IGCHS, Inc. mandates all School employees and students will be bound by Sponsor's computer policies and standards regarding data privacy and system security. See Charter contract, section 9.D.1. When this contract provision is read in conjunction with the charter contract section 10.R governing IGCHS' employees' obligation to execute a third party use of technology agreement when accessing District technology, the OIG concluded IGCHS management, administrators, and staff did not comply with both the charter agreement and District policies.

Regarding Allegation 1:

Dr. Banks admitted to asking for, and obtaining, Ms. Colombo's SIS password. Due to conflicting testimony, the OIG was not able to ultimately determine with certainty how K. McDermott obtained Colombo's password; however, based on testimony from Colombo, Brown, K. McDermott, and S. McDermott, it is clear K. McDermott used Colombo's password to access SIS and process student applications.

Based on the testimony obtained, the OIG determined that, despite a lack of evidence of "harassment" the allegation that Inlet Grove Community High School Founder and Chief Executive Officer/President Dr. Emma Banks violated School District Policies 2.50.7. and 2.50.9.e and 3.29.4., and 3.29.6., and 3.29.12.c and the charter contract between the School Board of Palm Beach County and Inlet Grove Community High School, Inc. by requesting and obtaining another employee's login credentials to the Student Information System was **Substantiated**.

Regarding Allegation 2:

During his May 25, 2023, interview, IGCHS Assistant Principal Scott McDermott admitted that he previously obtained, through the improper use of Linda Colombo's district-wide SIS access, lists of prospective 7th and 8th grade students that were later solicited to apply to IGCHS. As a means of identifying potential candidates for the "Skipper Program" or otherwise, McDermott reviewed personally identifiable student information, obtained through misuse of district-wide SIS access *before* students applied to IGCHS, and used that information to recruit potential future IGCHS students that were attending other Palm Beach County public schools.

Based on the testimony obtained, the OIG determined Inlet Grove Community High School Assistant Principal Scott McDermott violated School District Policies 2.50.7. and 9.e and 3.29.6 and 3.29.12.c and the charter contract between the School Board of Palm Beach County and Inlet Grove Community High School Inc., by improperly using SIS to identify and recruit potential future students that were attending other Palm Beach County Public Schools was **Substantiated**.

The evidentiary standard used by the School District of Palm Beach County OIG in determining whether the facts and claims asserted in the complaint were proven or disproven is based upon the preponderance of the evidence. Preponderance of the evidence is contrasted with "beyond a reasonable doubt," which is the more severe test required to convict a criminal and "clear and convincing evidence," a standard describing proof of a matter established to be substantially more likely than not to be true. OIG investigative findings classified as "substantiated" means there was sufficient evidence to justify a reasonable conclusion that the actions occurred and there was a violation of law, policy, rule, or contract to support the allegation. Investigative findings classified as "unfounded" means sufficient evidence to justify a reasonable conclusion that the actions did not occur and there was no violation of law, policy, rule, or contract to substantiate the allegation. Investigative findings classified as "unsubstantiated" means there was insufficient evidence to justify a reasonable conclusion that the actions did or did not occur and a violation of law, policy, rule, or contract to support the allegation could not be proven or disproven.

ATTESTATION

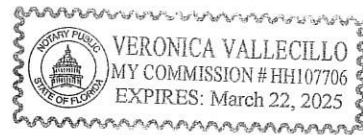
I, the undersigned, do hereby swear, under penalty of perjury, to the best of my personal knowledge, information, and belief, the contents of this report are true and accurate; and I have not knowingly or willfully deprived or allowed another to deprive, the subject of the investigation of any rights contained in Sections 112.532 and 112.533, Florida Statutes. This investigation was conducted pursuant to School District Policy 1.092, Inspector General, and in accordance with applicable Principles and Standards for Offices of Inspectors General as published by the Association of Inspectors General.


Oscar Restrepo, Director of Investigations

**STATE OF FLORIDA
COUNTY OF PALM BEACH**

Sworn to (or affirmed) and subscribed before me this 28 day of June, 2023, by Oscar Restrepo, Director of Investigations for the School District of Palm Beach County, Office of Inspector General, who is personally known by me.

Signature of Notary Public
 Notary Public or Law Enforcement Officer



This investigation was conducted by Oscar Restrepo, supervised and approved by Inspector General Teresa Michael. The investigation was conducted in accordance with guidance from the Association of Inspectors General handbook and within standards as prescribed by Commission for Florida Law Enforcement Accreditation.

Approved by:  Date: 6/28/2023
Teresa Michael, Inspector General

EXHIBIT LIST

Response from Dr. Emma BanksExhibit 1
Response from Assistant Principal Scott McDermott.....Exhibit 2

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OIG File



Oscar Restrepo <oscar.restrepo@palmbeachschools.org>

23-0024-I

3 messages

Oscar Restrepo <oscar.restrepo@palmbeachschools.org>
 To: Emma Banks <emma.banks@pbcharterschools.org>

Mon, Jun 12, 2023 at 2:07 PM

Dr. Banks,

Please find attached the draft report of our investigation for your response.

Feel free to call with any questions or concerns.

Thank you

Case #: 23-0024-I Date Rcv'd: 6/27/23
 Received From: Dr. Banks
 Description: 20-Day Response

Exhibit #: 1
 Redactions: Yes No

—
 Oscar Restrepo, CIG, CFE, CIGI
 Director of Investigations
 Office of Inspector General
 Palm Beach County School District
 3300 Forest Hill Blvd., Suite C-310
 West Palm Beach, FL 33406
 (561) 434-8183 Office
 (561) 785-9805 Cell Phone

2 attachments

E Banks 20 Day Letter.pdf
 338K

23-0024-I Draft Report.pdf
 1370K

Emma Banks <emma.banks@pbcharterschools.org>
 To: Oscar Restrepo <oscar.restrepo@palmbeachschools.org>
 Cc: Mike Burke <mike.burke@palmbeachschools.org>, Teresa Michael <teresa.michael@palmbeachschools.org>, PJ
 D'Aoust <pj.d'aoust@palmbeachschools.org>

Tue, Jun 20, 2023 at 11:40 AM

Good morning Mr. Restrepo:

I am responding to your draft copy of your finding. As I informed you I DO ADMIT that I ask Mrs. Linda Colombo for her password and I DO NOT ADMIT I BULLY and HARRASS HER. I HAVE NEVER in my 57 years in education bully or harrass any one..

I had no idea what her password entailed. I even called IT and asked if I could have SIS, and to geve me the sam access she had, not knowing she had district access. I though I was during a good deed by asking her to help her catch up on her work, but apparently not. Mr. Brown came to me and said that Linda was behind in putting the new students into SIS and we need to help her. I think the next day he came and said I asked her for her password but she would not give it to him. He ask if I would ask her and I said I would. I went over to her office and said, Linda would you give me your password, I want to help you because I was informed by Mr. Brown that you were not getting the students in. She said "NO", I said would you please, because if we don't have enough students I am going to have to make a hard decision which I don't want to. (I tell my staff all the time we need to recruit because if we don't have students I am going to have to make a hard decision either, cut salaries or lay some one off which I don't want to. I never said anything about making staff changes. I NEVER mention anything about Kim to Linda. How could she say I planned to prove her pass word to Kim when I don't get involved with data entry. The principal is in charge of that.

Linda did give me her password and as I was turning around I torn it up and put it in the trash. I was completley unaware of who had SIS, I know I used it once to get my granddaughter's grade. If IT look they will see I* never used it. I thought

Linda did give me her password and as I was turning around I torn it up and put it in the trash. I was completley unaware of who had SIS, I know I used it once to get my granddaughter's grade. If IT look they will see I* never used it. I thought it was for getting information for parents. Yes, I had heard about SIS and only four people were allowed to have it according to the principal. I never new what was all was involved because the principal is over that part.

I did call Heaher and I was talking about something else and I mention to her about what was happing to me. She did tell me that we were not allowed to have District Wide access and I said, PLEASE check our school and take what ever we have that we shouldn't have off because I do not want to get in trouble. I known when I was principal I use to givve Jack my pass word and I never new anything about what was all involved with District access,

The question to Linda should have been "WHERE DID SHE GET DISTRICT WIDE ACCESS FROM?"

Linda was upset with me before, because I as well as other administrators informed her about her boy friend Stephen Schiller who is my Human Resource person that they should not be sharing confindential information from HR about employees. Our verbal policies is no boy friend or girl friends in the work place. What you do outside is your business. She does not like the fact that administration keep telling her she can not tell people's salary and, their personal business pertaing to illness to other employees.

The sad thing is to say I bully and harassed her when she knew I did not. Now she tells me and another administrator that she was upset and she just said it, that's not OK with me and does not help me when you made a false statement to the OIG to have me investigated for something I did not do.or say, then she change and said at the time that you felt like it was a threat.

I have learned a lot from this , and I am glad, it was a valuable lesson. When employee get angry with you they will lie. In my 57 years in education, I have never had some one to just lie for no reason . That is a sick person who needs help.

Last but not least, would you please provide a workshop for charter schools so we can know the latest .

Thanks,

Dr. Emma Banks

[Quoted text hidden]

Regards,

*Dr. Emma Banks, Founder
Inlet Grove Community High School
Home of the Hurricanes
Office: 561.881.4639*

Emma Banks <emma.banks@pbcharterschools.org>

Tue, Jun 20, 2023 at 12:33 PM

To: Oscar Restrepo <oscar.restrepo@palmbeachschools.org>

Cc: Mike Burke <mike.burke@palmbeachschools.org>, Teresa Michael <teresa.michael@palmbeachschools.org>, PJ

D'Aoust <pj.d'aoust@palmbeachschools.org>

I forgot to add that it has come to my attention that Linda Colombo gave her peoplesoft number and password to several people to access her SIS account. Last summer when she was behind on processing schedules, she gave her login information to Mr. Valliere to help her. She also gave her login information to Mr. Guarn Sims to help her with admissions and Ms. Pientka. I feel like she is personally attacking me but not telling the whole truth. Why is Ms.Colombo not sharing that information with you on who she gave her SIS access information? These are just the people that I am aware of.

Thanks,

Dr. Emma Banks

[Quoted text hidden]

Case #: 23-cwy-I Date Rcv'd: 6/29/23
Received From: SCOTT McDERMOTT
Description: SUBJECT RESPONSE

June 27, 2023

Exhibit #: 1
Redactions: Yes _____ No ✓

Office of Inspector General

Case No. 23-0024-I Inlet Grove Community High School, IT Security Violation

Thank you for your time and attention in this matter. We appreciate the opportunity to address the allegation and acknowledge its significance in our growth as an organization and as individuals.

In response to Allegation 2, I would like to clarify that I have never had district-wide access to SIS (Student Information System). It was Ms. Colombo who informed me of her district-wide access and offered to provide the necessary information for student recruitment purposes. Regrettably, I mistakenly believed that, as Inlet Grove Community High School had this access, we were entitled to utilize the information in our recruitment efforts. I now understand that this was a mistake on my part.

I attribute this mistake, in part, to the lack of consistent training and the improper level of security granted to student information at Inlet Grove Community High School. However, I want to emphasize that these errors have been rectified, and our school has already implemented a corrective action plan to prevent any recurrence of such incidents.

I want to assure you that my actions were never driven by malicious intent. I was simply striving to fulfill my job assignments to the best of my ability, utilizing the available resources. My sole objective was to provide the best educational opportunities for the students of Palm Beach County.

Once again, I express my regret for the oversight and any concerns it may have caused. I assure you that we take this matter seriously, and we are committed to upholding the highest standards of student privacy and ethical conduct moving forward.

Sincerely,



Scott McDermott