FLORIDA DEPARTMENT OF EDUCATION
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Office of Inspector General
CPALMS Grant

Report #A-2425DOE-011 **April 2026**

Executive Summary

In accordance with the Department of Education's Fiscal Year (FY) 2025–2026 Audit Plan, the Office of Inspector General (OIG) conducted an audit of the CPALMS (Collaborate, Plan, Align, Learn, Motivate, Share) Maintenance and Enhancement Grant and associated Memorandum of Agreement (MOA) between the Florida Department of Education (FDOE) and Florida State University (FSU).

During this audit, we noted that, in general, FSU provided services in compliance with the grant and MOA, and FSU and FDOE have sufficient controls in place. However, we identified instances where improvements should be made to strengthen some of these controls. Specifically, we identified grant funds expended on services that occurred outside the approved grant agreement period and unexpended funds that were not reverted and reallocated in accordance with statutory requirements. We also noted that the Bureau of Standards and Instructional Support (BSIS) grant manager did not reconcile grant funds in accordance with statutory requirements. The *Audit Results* section below provides further detail on each instance.

[redacted][1]

The CPALMS Maintenance and Enhancement Grant for FY 2023–2024 totaled $5,375,000.00. In reviewing grant related expenditures, the OIG identified total expenditures of $4,010,096.99 (74.6% of total grant funds) classified as "Consultants and Stipends" expenditures, $873,333.72 (16.24% of total grant funds) classified as Faculty and Staff expenditures, and $491,507.48 (9.14% of total grant funds) consisting of all other expense categories including other personnel services, employee benefits, travel, materials and supplies, and printing and duplication. Of

[1] The redacted portions of this report have been classified as confidential in accordance with Section 282.318(4)(g), Florida Statutes, and are not available for public distribution. Copies of the unredacted final report will only be delivered to authorized individuals. All individuals wishing to view or obtain a copy of the unredacted final report must submit a written request to the Office of Inspector General, including contact information and a detailed explanation of the reason for the request.

note, the OIG identified $3,888,641.00 (72.3% of total grant funds) within the Consultants and Stipends classification that FSU paid to [redacted] for cloud hosting as well as core platform operations. [redacted]

Scope, Objectives, and Methodology

The scope of this engagement included review of the CPALMS Maintenance and Enhancement Grant (Project Number 371-99635-4S001; TAPS Number 24A084), including expenditures, deliverables, security controls, and grant management policies and procedures. We established the following objectives for the engagement:

1. To review grant management activities performed by BSIS for compliance with applicable laws;
2. To determine whether FSU provided services in accordance with the grant and MOA terms; and
3. To determine whether payments and expenditures were made in accordance with applicable laws and grant and MOA terms.

To accomplish these objectives, we reviewed applicable laws, rules, and regulations; interviewed relevant department and FSU staff; and examined policies, procedures, and supporting documentation. Our methodology included:

- Reviewing applicable grant management criteria and statutes to verify that BSIS met the required grant management responsibilities;
- Reviewing both "required" and "as-needed" CPALMS Maintenance and Enhancement Grant deliverables (A1–C15) and requests, along with associated completion products;
- Reviewing evidence of deliverable completion, including system uptime and maintenance logs, screen captures, and posting dates to verify fulfillment;
- Reviewing the MOA to confirm that activities and deliverables aligned with the stated purpose and requirements;
- Reviewing a sample of invoices and supporting documentation to ensure expenditures were reasonable, allowable, appropriately allocated, and aligned with the approved budget;
- Reviewing a sample of time and attendance records, payroll registers, and payroll allocations to verify proper distribution of personnel costs;
- Reviewing payroll expenditures for alignment with the approved budget;
- Reviewing funding allocations to ensure that at least 50 percent of any additional investments are directed toward specific content requests made by FDOE, as required by the MOA; and
- Reviewing available System and Organization Controls (SOC) 2 reports.

Background

The CPALMS (Collaborate, Plan, Align, Learn, Motivate, Share) platform is developed and maintained by Florida State University (FSU) to support Florida's academic standards, course descriptions, instructional materials adoption, and the dissemination of instructional resources for teachers, students, and school districts across the state. The Bureau of Standards and Instructional Support (BSIS) within FDOE oversees all CPALMS-related grants, including monitoring performance, approving deliverables, and ensuring compliance with applicable statutory and grant requirements.

The relationship between FDOE and FSU regarding CPALMS is governed by a Memorandum of Agreement (MOA) originally executed in October 2012, which establishes joint ownership of CPALMS intellectual property, defines responsibilities for maintenance and sustainability of the platform, and sets terms for commercialization and distribution of any residual margin generated through CPALMS-related activities.

For FY 2023–2024, FDOE awarded $5,375,000.00 to FSU under the CPALMS Maintenance and Enhancement Grant, consisting of a recurring $2,375,000.00 appropriation and an additional $3,000,000.00 appropriated by the Legislature under the General Appropriations Act to complete maintenance, cover data costs, and disseminate high-quality instructional and educational materials for teachers, parents, and students to use. CPALMS enables teachers to plan their instruction, collaborate, and engage in online professional development courses. The approved budget and program period for the grant was July 1, 2023, through June 30, 2024.

Audit Results

Finding 1: The OIG identified three grant expenditures for services that occurred outside of the grant performance period and unspent grant funds that were not refunded to the state agency in accordance with statutory requirements.

Section 215.971(1)(d)-(f), Florida Statutes, requires that a recipient of federal or state financial assistance, "expend funds only for allowable costs resulting from obligations incurred during the specified agreement period." The statute further requires that "any balance of unobligated funds which has been advanced or paid must be refunded to the state agency" and "any funds paid in excess of the amount to which the recipient or subrecipient is entitled under the terms and conditions of the agreement be refunded to the state agency." The Request for Application (RFA) further states that program funds must be used solely for activities that directly support the program purpose, priorities, and expected outcomes during the program period, and all expenditures must be consistent with the approved application and applicable laws and regulations.

In addition, Section B of the FDOE Project Application and Amendment Procedures for Federal and State Programs (Green Book) requires that, "Amendment requests must be received by the Department in substantially approvable form prior to the end date of the project indicated on the Project Award Notification form (DOE 200)." The Green Book further requires that any request for an amendment to revise the project period must be received on or before the end date of the current approved project period.

The approved grant program period for the FY 2023-2024 CPALMS Maintenance and Enhancement Grant was initially July 1, 2023, through June 30, 2024. Amendment 1, effective March 25, 2024, extended the program period through August 15, 2024. Subsequently, FDOE executed Amendment 2, effective November 6, 2024, further extending the program period through June 30, 2025. However, as this amendment occurred well after the Amendment 1 grant period end date of August 15, 2024, Amendment 2 did not comply with the Green Book requirements for amending the project period. Therefore, the August 15, 2024, grant period end date remained the authorized end date for the FY 2023-2024 grant period.

Based on a review of invoices and payment records, the OIG identified $567,475.30 in expenditures for services that occurred after the amended August 15, 2024, program end date using FY 2023–2024 grant funds. Specifically, the OIG identified two vouchers totaling $565,770.40 to [redacted], for cloud hosting services that occurred after August 15, 2024. In addition, FSU made a payment totaling $1,704.90 to Upwork Global, LLC, for subscription services rendered between August 6, 2024, and September 5, 2024. While the service period began prior to the end of the amended grant period, the majority of the service period occurred after August 15, 2024.

Further, FSU reported total disbursements of $5,116,947.10 and an undisbursed balance of $258,052.90 on the DOE 399 Final Report submitted September 6, 2024. Although HB 5001, the General Appropriations Act, authorized the reversion and reallocation of appropriated funds for Fiscal Year 2024-2025, the parties did not follow the statutory process to return the unexpended balance to the department for reallocation. Instead, FSU retained the $258,052.90 and relied on the department's approval communicated through email correspondence and an inappropriately amended budget document to support continued use of the funds.

FSU management explained that, while awaiting FDOE execution of the subsequent CPALMS award, they anticipated that remaining FY 2023–2024 funds would be available through an approved extension and could be expended in FY 2024–2025. Based on prior award processing timelines, FSU stated that they did not expect the new fiscal year funding to be executed before the end of December 2024. FSU requested approval to prepay four months of cloud hosting costs to cover the anticipated funding gap until execution of the new award, noting that, [redacted]. Additionally, FSU requested to retain and expend in FY 2024-2025 the unspent $258,052.90 from FY 2023-2024. Although FDOE provided approval for the prepayment request and the retention of unspent funds, the services funded were rendered outside the amended program period.

As a result, the prepayment of services for a future fiscal year using prior-year grant funds does not comply with Section 215.971(1)(d)–(f), Florida Statutes. While FSU sought and received approval to prepay these costs, the statute requires that grant expenditures be incurred during the specified agreement period and that any unobligated funds be refunded to the state agency for proper reallocation.

Recommendation

We recommend that FSU and FDOE ensure grant funds are expended only for obligations incurred within the approved agreement period and that any unobligated or excess funds are refunded to the state agency in accordance with Section 215.971(1)(d)–(f), Florida Statutes. We further recommend that any future grant amendments are executed in compliance with Green Book requirements.

BSIS Management Response

Concur. FSU requested and BSIS provided approval via email for these expenditures before the grant year ended. If approval of prepaid hosting costs was not provided, there would be a break in service for CPALMS, meaning districts would not be able to access the Course Code Directory and teachers would not be able to access their course descriptions, standards and benchmarks, and resources for the classroom. Funding for this project continued via an amendment through June 30, 2025, however there was a gap in time between the original end date and the amendment begin date. The Green Book states that amendment requests must be received in a substantially approvable form prior to the project end date, the email described in this response could be considered "substantially approvable." The department acknowledges the amendment procedures outlined in the Green Book were not followed and will strengthen procedures to ensure amendments follow the requirements outlined in the Green Book. The anticipated completion date is ongoing.

FSU Management Response

FSU disagreed with Finding 1, asserting that the questioned expenditures were incurred in good-faith reliance on FDOE's Amendment 2 extending the project period through June 30, 2025. FSU asserted that it submitted the amendment request at FDOE's direction due to delays in executing the subsequent-year award and that recipients must rely on formally issued award documents. FSU also emphasized continuity of service concerns for the statewide CPALMS platform and obtained written approval by the department to prepay services. Finally, FSU contended the previously reported unobligated balance should not constitute as excess or unallowable funds subject to reversion because it was expended during the amended period. FSU acknowledged Finding 2 is an FDOE issue and stated it did not identify actions FSU failed to perform under statutory requirements. Refer to the attached[2] for FSU's full Management Response to this audit.

Inspector General's Rebuttal

Notwithstanding FSU management's assertion that all costs were "incurred within this revised and formally authorized project performance period," Amendment 2 was not executed in compliance with the Green Book, because it was submitted and approved after the end of the previously authorized grant period of August 15, 2024, as identified in the finding. The Green Book requires that any request to revise the project period be received in substantially approvable form on or before the end date of the current approved project period. On November 7, 2024, the Department transmitted an updated award letter to FSU, effective November 6, 2024, extending the program period and advised FSU to provide updated budget documentation

[2] See Attachment A

to support the amendment. FSU submitted a revised budget narrative to support the amendment on November 9, 2024. FSU management asserted that the Green Book permits the Department to waive minor irregularities; however, our office determined that extending a grant period months after its expiration and contrary to Green Book requirements does not constitute a "minor irregularity." Finally, correspondence provided to our office included an email from FSU, dated August 7, 2024, acknowledging the pending August 15, 2024, grant period end date and requesting the prepayment of future services using prior fiscal year grant funds. This communication requesting to prepay for future services did not constitute a request to formally amend the grant.

With respect to the unexpended balance of $258,052.90 reported on the DOE-399 Final Report submitted September 6, 2024, our office determined that these funds should have been reverted to the Department for reallocation in accordance with statutory requirements. The subsequent expenditure of these funds during FY 2024–2025 was predicated on the same untimely amendment and does not excuse the requirement to return unobligated funds at the close of the authorized grant period. In addition to the statutory requirement, the FDOE Project Award Notification, Terms and Special Conditions states, "Any unexpended general revenue funds must be returned by check issued to the Florida Department of Education, with the final expenditure report." Accordingly, the finding and related recommendations stand as presented.

Finding 2: The BSIS grant manager did not reconcile funds in accordance with statutory requirements.

Section 215.971(1)(d), Florida Statutes, provides that recipients may "expend funds only for allowable costs resulting from obligations incurred during the specified agreement period." Section 215.971(2)(b)–(c), Florida Statutes, makes grant managers responsible for, "monitoring and documenting recipient or subrecipient performance, reviewing and documenting all deliverables for which payment is requested by the recipient or subrecipient, and providing written certification by the grant manager of the agency's receipt of goods and services." The grant manager must also, "reconcile and verify all funds received against all funds expended during the grant agreement period and produce a final reconciliation report. The final report must identify any funds paid in excess of expenditures incurred by the recipient or subrecipient."

During our review, BSIS management was unable to provide reconciliation documentation for all funds expended under the CPALMS Maintenance and Enhancement Grant. Additionally, no supporting documentation was provided to show that FSU returned any unspent or excess funds to FDOE. BSIS management indicated that, due to the type of grant awarded, FSU is only required to submit a DOE 399 Final Report at the end of the grant year. BSIS management further specified that they conduct a thorough review of all close-out documentation to ensure alignment to the grant requirements prior to submitting the information to the Comptroller's Office. However, the BSIS grant manager did not perform the statutorily required reconciliation of all grant funds received and expended under the CPALMS Maintenance and Enhancement Grant. BSIS management confirmed that BSIS does not prepare a separate reconciliation report, explaining that the responsibility for such documentation is held with the FDOE Comptroller's Office. As a result, BSIS relied on the submission of the DOE-399 Final Report and the FDOE Comptroller's Office without conducting the required reconciliation.

Not conducting a formal reconciliation is not only a violation of statute but also increases the risk that grant funds could be expended on unallowable expenses, could be expended for expenses outside the grant period, or could go unexpended and not be reverted to the state agency as required by statute.

Recommendation

We recommend the BSIS grant manager reconcile and verify all funds received against all funds expended during the grant agreement period and produce a final reconciliation report in accordance with statutory requirements.

BSIS Management Response

Concur. BSIS works in collaboration with the Office of the Comptroller to ensure all reporting (both programmatic and fiscal) is submitted by Department policy. The primary responsibility of BSIS is to ensure that all programmatic reporting is submitted, reviewed, and meets the expectations agreed upon in the application. The Office of the Comptroller reviews the fiscal report documentation to ensure that all funds are reconciled. This collaboration includes working with program offices to resolve discrepancies between reported expenditures and approved grant budgets. The department acknowledges this area needs to be strengthened and will coordinate with program offices to ensure expenditure reports are reviewed and reconciled by program staff. The anticipated completion date is ongoing.

Closing Comments

The Office of Inspector General would like to recognize and acknowledge the Bureau of Standards and Instructional Support and staff, as well as Florida State University's staff, for their cooperation and assistance during this audit. Our fieldwork was facilitated by the support provided by all personnel involved.

To promote accountability, integrity, and efficiency in state government, the OIG completes audits and reviews of agency programs, activities, and functions. Our audit was conducted under the authority of section 20.055, F.S., and in accordance with the generally accepted Government Auditing Standards, published by the U.S. Government Accountability Office. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. The audit was conducted by Ayah Mahdy and supervised by Bradley Rich, Audit Director.

Please address inquiries regarding this report to the OIG's Audit Director by telephone at 850-245-0403. Copies of final reports may be viewed and downloaded via the internet at https://www.fldoe.org/about-us/office-of-the-inspector-general/audit-reporting-products.stml. Copies may also be requested by telephone at 850-245-0403, by fax at 850-245-9419, and in person or by mail at the Department of Education, Office of the Inspector General, 325 West Gaines Street, Suite 1201, Tallahassee, FL 32399.

Attachment # A

April 9, 2026

Mike Blackburn
Inspector General
Florida Department of Education
325 West Gaines Street, Suite 1201
Tallahassee, Florida 32399-0400

Dear Inspector General Blackburn:

Florida State University (FSU) submits this correspondence as its formal management response to Finding 1 identified in the Florida Department of Education (FDOE) Office of Inspector General CPALMS Grant Audit Report (Report #A-2425DOE-011). After careful review, FSU respectfully disagrees with this finding.

FSU asserts that all questioned expenditures in Finding 1 were incurred in good-faith reliance on Amendment 2 to the CPALMS Maintenance and Enhancement Grant, which was issued and approved by the Florida Department of Education (FDOE) and extended the agreement period through June 30, 2025. All costs cited by the Office of Inspector General were incurred within this revised and formally authorized project performance period.

Section 215.971(1)(d), Florida Statutes, requires that recipients expend funds only for allowable costs resulting from obligations incurred during the specified agreement period. In this instance, the specified agreement period relied upon by FSU was Amendment 2, as detailed in the FDOE Project Award Notification (DOE 200), which was a formal, legally binding contractual modification that amended the project end date to June 30, 2025. FSU acted in compliance with the operative award document issued by FDOE and did not independently modify or extend the grant period.

The FDOE Project Application and Amendment Procedures for Federal and State Programs (Green Book), Section B, provides that project amendments may be proposed by either the project recipient or the Department program manager and are effective upon Department approval and the issuance of an amended Project Award Notification. FDOE directed FSU to submit an amendment request to extend the period of performance to June 30, 2025, due to significant delays in executing the CPALMS grant for fiscal year 24-25. The completion percentage for the required major software overhaul was noted in the CPALMS Final Task Report dated August 15, 2024, which detailed the FDOE requirement to use residual funds that would be transferred to the new fiscal year budget. Amendment 2 was prepared, approved, and formally issued by FDOE, thereby establishing the controlling authorization for the project period. The Green Book places amendment approval authority exclusively with FDOE and does not assign grant recipients the responsibility to independently determine the timeliness of internal procedures for FDOE-issued amendments.

Further, the Green Book expressly states in Section A that the Department reserves the right to waive minor irregularities. To the extent the Office of Inspector General has concluded that Amendment 2 did not comply with internal timing requirements, such a determination relates to departmental processing procedures and does not negate the validity of the amendment, which was reasonably relied upon. At no point was FSU notified that Amendment 2 was invalid, withdrawn, or otherwise ineffective.

FSU notes that the need for project period extensions on CPALMS awards is directly driven by recurring delays in FDOE's issuance of subsequent-year grants. Historically, CPALMS awards have been issued several months after the start of the new fiscal year, often four to five months into the fiscal year. These delays create unavoidable funding gaps for a mission-critical, continuously operating statewide system. As a result, extensions to the prior-year award are necessary to ensure continuity of services and uninterrupted access for Florida's teachers, students, and school districts.

In this context, FSU's request for an amendment extending the project period, at FDOE's direction, and authorization to prepay critical costs was a prudent and necessary administrative action to bridge the gap caused by the delayed issuance of the subsequent award. The extension aligned program authority with the operational realities of maintaining CPALMS as a year-round platform and was consistent with past practice and Department approval.

FSU obtained explicit written approval from FDOE to prepay cloud hosting costs for services crucial to sustaining uninterrupted statewide access to CPALMS. These expenditures were incurred entirely within the timeframe of the amended agreement. Without this advance payment, the CPALMS platform – which includes various websites, apps, and technology services – would have faced a complete shutdown. Such a disruption would have prevented teachers and students from accessing essential resources that support their daily teaching and learning activities. Additionally, this situation could have posed various risks, including reputational damage to both FDOE and FSU.

FSU's actions were consistent with the principles of reasonable reliance and administrative regularity. As a state university receiving many FDOE-administered awards annually, FSU must rely on officially executed Project Award Notifications as authoritative. Requiring grant recipients to disregard or second-guess formally issued amendments would undermine orderly grant administration and introduce significant statewide compliance risk.

Accordingly, because all expenditures identified in Finding 1 were incurred within the amended and approved project period ending June 30, 2025, and with FDOE's explicit written approval, FSU maintains that these costs were allowable under Section 215.971, Florida Statutes, and consistent with the Green Book and the terms and conditions of the award as issued by FDOE.

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The Office of Inspector General's finding assumes an August 15, 2024, grant end date; however, this date was superseded by two FDOE-approved amendments extending the agreement period through June 30, 2025. Since the funds were expended for allowable costs incurred during the amended agreement period, the $258,052.90 identified as unobligated as of June 30, 2024, did not constitute excess or unallowable funds subject to reversion under Section 215.971(1)€-(f), Florida Statutes. FSU relied in good faith on formal FDOE approvals, amended budget documents, and written Department authorization to retain and expend these funds. Furthermore, the undisbursed balance was $61.81 on the final DOE-399 form for the agreement end date of June 30, 2025. It is crucial to note that FSU did not retain funds in excess of the total expenditures for this grant.

The University acknowledges that Finding 2 is an FDOE finding and that it does not indicate any actions that FSU failed to perform in accordance with statutory requirements.

FSU appreciates the Office of Inspector General's review and respectfully requests reconsideration of Finding 1 in light of the controlling Project Award Notification, the documented delays in award issuance necessitating extensions, and FSU's good-faith compliance with all Department approvals and statutory requirements.

Sincerely,

Angela Rowe

Digitally signed by Angela Rowe
Date: 2026.04.09 16:39:03 -04'00'

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Enclosure