



USE CAUTION IN SCHOOL ZONES



Report Issued

September 2, 2026

**Audit Report No.
26-05**



**City of Cape Coral
City Auditor's Office**

P.O. Box 150027
Cape Coral, FL 33915-0027
239-242-3383

Cape Coral Police Department – Special Operations Bureau – School Speed Zone Program: Effectiveness, Compliance, and Financial Accountability Audit

Auditor In Charge: Andrea R. Russell, CPA, CFE, CIA, CGMA

Auditor: Jessica Pautz, CIA, MBA



TO: Mayor Gunter and Council Members

FROM: Andrea R. Russell, City Auditor *ARR*

DATE: September 2, 2026

SUBJECT: 26-05 Cape Coral Police Department - Special Operations Bureau -
School Speed Zone Program: Effectiveness, Compliance, and
Financial Accountability Audit

The City Auditor's Office conducted a performance audit of the Cape Coral Police Department's oversight of the school speed zone camera program. This audit is included in the City Auditor's FY26 approved Audit Plan. The audit was conducted in conformance with Generally Accepted Government Auditing Standards by the authority granted through City Ordinances 28-02 and 79-10.

We would like to express our sincere appreciation to the Cape Coral Police Department and Public Works Department management and staff for the courtesy, cooperation, and proactive attitude extended to the team members during the audit. If you have any questions or comments regarding this audit, please contact Andrea Russell at 242-3380.

C: Michael Ilczyszyn, City Manager
Connie Barron, Assistant City Manager
Mark Mason, Assistant City Manager
Aleksandr Boksner, City Attorney
Kimberly Bruns, City Clerk
Anthony Sizemore, Chief of Police
Matthew Campion, Deputy Chief
Dana Coston, Deputy Chief
Stephen Burkhart, Sergeant
Matt Williams, Public Works Director
William Corbett, Deputy Public Works Director
Pimolmas Tan, Traffic Engineering Manager
Sarah Evins, Special Projects Coordinator
Audit Committee

REPORT HIGHLIGHTS

26-05 Cape Coral Police Department – Special Operations Bureau – School Speed Zone Program: Effectiveness, Compliance, and Financial Accountability Audit

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OBJECTIVES

- 1.To assess whether controls are adequately designed and operating effectively to provide appropriate oversight of the school speed zone program.
- 2.To assess whether school speed zone cameras, lights, and signage comply with applicable federal, state, and local laws, statutes, and ordinances, and are operating as intended.
- 3.To determine if revenue collected from the school speed zone program is allocated in accordance with applicable state statutes and ordinances.

WHY THIS MATTERS

The School Zone Speed Zone program administered by the Cape Coral Police Department (CCPD) was designed to protect students from speed related accidents. We evaluated whether there is proper oversight and that equipment and signage is operational and installed according to specifications through audit procedures. In addition, audit procedures can help verify funds collected are allocated as required by laws and regulations. This audit provides independent assurance CCPD is properly overseeing the program and meets statutory requirements; desired outcomes; and ensures the program is fair and worthy of the public's trust.

ACCOMPLISHMENTS

- 1.Consistent daily automated speed enforcement at 17 school campuses across the City.
- 2.The camera detection technology has led to a significant behavior change in drivers resulting in a reduction in speeds within the designated school zones and increased pedestrian safety.
- 3.Utilization of speed camera technology has allowed sworn officers to spend more time on crime prevention and other higher priority calls.

WHAT WE FOUND

The City Auditor's Office conducted a performance audit of CCPD's administration of the school speed zone camera program and collaboration with Public Works. This audit is included in the City Auditor's FY26 approved Audit Plan. CCPD and Public Works follow several federal, state, and local laws and regulations to maintain speed camera areas and to issue citations.

Overall, we found that CCPD and Public Works have established processes to administer the school speed zone camera program. However, we identified opportunities to strengthen internal controls and improve the consistency of program oversight. Specifically, we noted improvements are needed in the following areas:

- Monitoring and oversight of the speed detection system by CCPD and Public Works
- Internal procedures for the approval of Notice of Violations

These deficiencies may increase the risk that system performance issues or changes in operating practices are not identified, documented, or addressed in a timely and consistent manner. While improvements are needed in these areas, we did not identify any material control deficiencies during the audit.

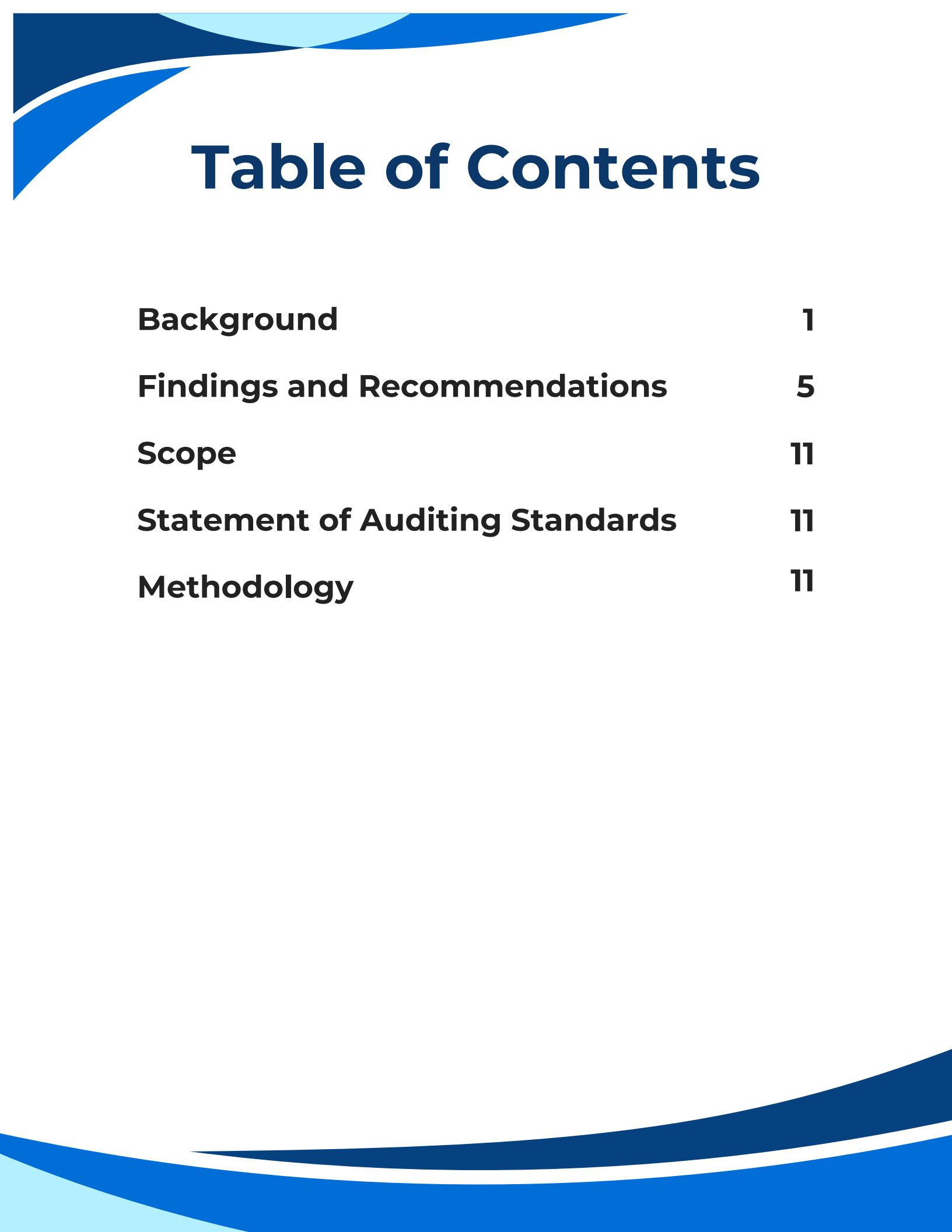


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Background



The City of Cape Coral (City) has established reduced speed areas in school zones to protect students, staff, and motorists traveling near public, charter, and private schools within the city limits. As the City and the Lee County School District expanded, school speed zones were established around most schools following completion of an approved traffic study. Posted limits range from 15 to 20 miles per hour during designated hours on school days. Prior to camera installation, these zones relied on flashing beacons, pavement markings, school zone signage, and traditional officer enforcement to remind drivers to slow down when children are present. By 2024, the City had more than 20 schools with school speed zones. School speed zone designation is determined by conducting a traffic study and obtaining approval by the Florida Department of Transportation (FDOT) for state roads, and City Council for local roads. The City is only responsible for creating, maintaining, and overseeing City designated school zones.



On July 1, 2023, the Florida Legislature adopted House Bill 657 - Enforcement of School Zone Speed Limits authorizing local governments to use automated speed detection systems for civil enforcement in school zones. Ordinance 39-24 Article XVI – School Zone Speed Enforcement adopted by City Council on June 5, 2024, established the City’s school speed camera program (Program). On September 6, 2024, City Council adopted Resolution 214-24 approving a contract with a third-

party vendor to provide a photo enforcement solution. The contract provided for camera installation in predetermined school speed zones. Revenues from the Program are restricted to public safety and related uses as provided by state law¹. This policy decision marked a shift from exclusively officer initiated enforcement to a hybrid model combining automated detection with officer review.

The graphic features the Cape Coral logo on the left and a camera icon on the right. The title "Cape Coral School Zone Schools" is prominently displayed, followed by the tagline "SAFER STREETS. STRONGER SCHOOLS. PROTECTING OUR COMMUNITY." Below this, 17 schools are listed in three columns, each with a numbered icon and a school name. At the bottom, three safety messages are presented with corresponding icons: a shield for "SLOW DOWN IN SCHOOL ZONES", a family for "WATCH FOR CHILDREN AT ALL TIMES", and a heart for "THANK YOU FOR HELPING KEEP OUR STUDENTS SAFE".

School Number	School Name
1	Ida S. Baker High
2	Challenger Middle
3	Diplomat Middle
4	Mariner Middle
5	Trafalgar Middle
6	Cape Elementary
7	Diplomat Elementary
8	Gulf Elementary
9	Oasis Charter Elementary (North)
10	Patriot Elementary
11	Pelican Elementary
12	Skyline Elementary
13	Trafalgar Elementary
14	Heritage Charter Academy
15	St. Andrew Catholic School
16	Nicaea Academy
17	Cape Coral Christian School

Cameras were installed in 17² of the City’s school zones to enforce reduced speed limits for public, charter, and private schools³. The Program officially launched on March 1, 2025, and went live on March 31, 2025, under the branding “Protecting Our Kids”; initially operating under a 30-day warning period where drivers traveling in excess of 10 miles per hour over the school zone speed limit received warnings but no civil fine.

Oversight and Maintenance

Both CCPD and Public Works have responsibilities for oversight and maintenance of the cameras and school zones. CCPD utilizes General Order (GO) C-7, School Zone Speed Camera Program, and Public Works references FDOT, School Zone Speed Detection System Placement and Installation Specifications (January 7, 2026); FDOT Speed Zoning Manual; and the Federal Highway Administration (FHWA) Manual on Uniform Traffic Control Devices for Streets and Highways.

¹ FSS 316.1896(5)(a)(b)(c)(d)(e) specifically states allowable allocation of funds collected from penalties assessed through the speed detection program.

² Cameras were only placed if the traffic study performed supported significant noncompliance with reduced speed limits posted for the established school zone. Thereby explaining the difference in zones versus where cameras were installed.

³ The City is only responsible for creating, maintaining, and overseeing City designated school zones.

According to the vendor contract, there are certain daily, monthly, and annual reporting requirements. To ensure equipment is functioning properly, automatic daily calibrations are performed on all cameras. The vendor is also required to perform monthly technician site visits and have third party calibration reports completed annually. Daily reports are only reviewed as part of the support for any Notice of Violations (NOVs) where the registered owner has requested an administrative hearing. Monthly and annual reports are available to help provide oversight of the program. While CCPD is responsible for the administration of the Program, and issuance of NOVs and Uniform Traffic Citations (UTCs); the Public Works Department is responsible for physical maintenance of the areas around cameras and school speed zone signage.

FDOT Speed Zoning Manual Chapter 15 provides specific details regarding the establishment and maintenance of school zones specific to Florida. In addition, the FHWA Manual on Uniform Traffic Control Devices for Streets and Highways provides the national standard for installation of traffic control devices, signage, pavement markings and any other items that are located within the Right of Way. Part 7 of the FHWA manual applies specifically to school areas. Public Works performs all maintenance and installation in accordance with the FDOT and FHWA requirements.



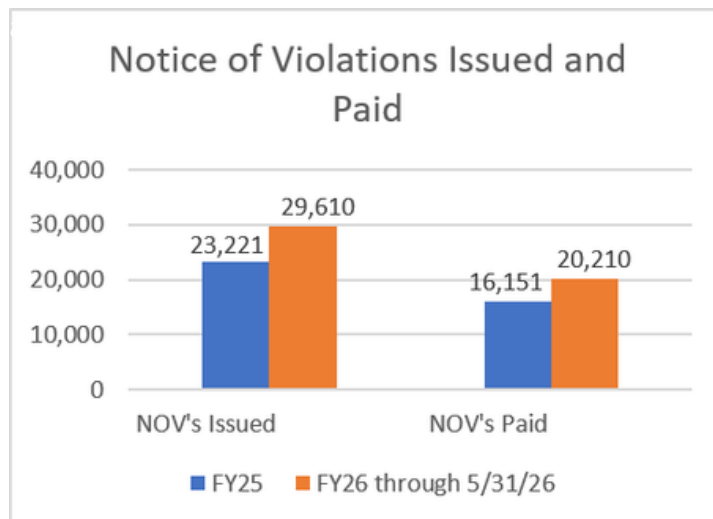
Review and Enforcement

Effective March 31, 2025, the City concluded the 30-day trial period and began to issue NOVs with a \$100 civil penalty to the registered owners of vehicles recorded traveling in excess of 10 miles per hour over the posted school zone speed limit during active enforcement hours. Traffic Infraction Enforcement Officers (TIEO) review potential violation data received from the third-party vendor. As part of the review, TIEO's validate image, video, and supporting owner and vehicle information collected by the vendor. An NOV is issued to the registered owner of the vehicle via mail. The registered owner has 30 days to pay, submit an affidavit to appeal the NOV, or

request a hearing. If the registered owner fails to respond, a UTC may be issued. UTCs require further review and approval by the Special Operations Sergeant prior to issuance. If a registered owner requests a hearing, they must appear in local traffic court. Appealed NOV's may also be subject to additional administrative fees. Upon conclusion of the hearing, the Local Hearing Officer issues a final administrative order including disposition of the NOV and what costs, if any, the petitioner is expected to pay. Costs do not exceed \$250 per violation.

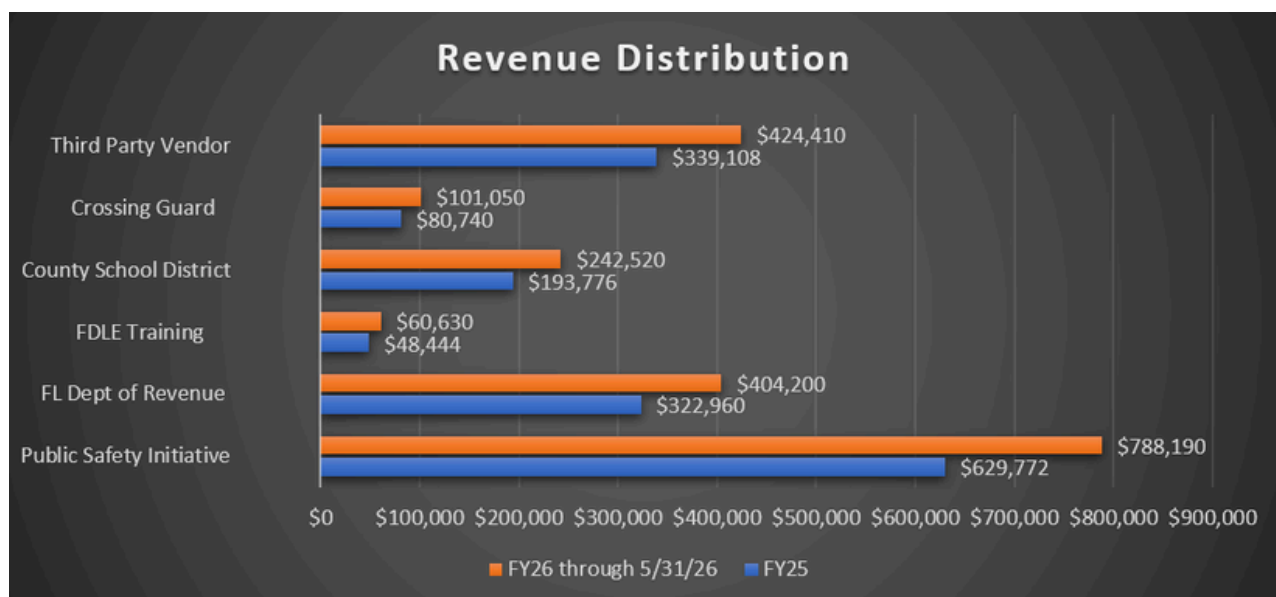
Revenue

NOVs result in a \$100 civil penalty but do not result in driver's license points when paid; however, if an NOV is not paid within 30 days, a law enforcement officer reviews and determines if a UTC should be issued. A UTC includes additional fees



and will result in points on the offenders' driver's license. Revenue collected is shared between the City and the vendor and was first distributed to the City beginning May 2025. The payment included funds collected from NOV's beginning March 31, 2025. The City's portion of revenue is determined by Florida State Statue (FSS) 316.1896 and is restricted to public safety uses such as administering speed

detection systems, traffic safety improvements, and the School Crossing Guard Recruitment and Retention Program. The main objective of the program is to enhance safety in school zones by reducing speeding and increasing driver awareness. Revenue is considered a secondary benefit that helps fund related public safety initiatives.



Findings and Recommendations

FINDING 2026-01: Monitoring and Oversight of Speed Detection System

Rank: High

Condition:

City personnel rely on several documents to support the effective administration of the speed detection system. Monitoring and oversight are key components of program administration and include a list of school zones and their reduced speed time requirements; annual third-party calibration reports; and monthly visits by technicians from a third-party vendor.

School Zone Camera Inventory

Ordinance 39-24⁴ lists 17 schools with speed detection zones while GO C-77⁵ lists 16. This difference is due to a clerical error from Nicaea Academy of Cape Coral, which has since been renamed Thrive Academy and has had a speed camera installed.

Reporting from Contractor

Resolution 214-24 and the third party vendor contract outline two reporting

requirements: (1) monthly technician site visits to perform preventative maintenance and (2) annual calibration testing as required by FSS 316.1906(3), Radar speed-measuring devices; speed detection systems; evidence, admissibility. To test compliance with reporting requirements, we requested a sample of monthly technician visits along with the third-party

Oversight of Speed Detection Program



Vendor performs monthly technician visits and annual calibrations, but CCPD oversight processes are not yet formalized.

⁴ Ordinance 39-24 will be updated by the City Attorney's Office to reflect recent changes in camera locations for the 2026/2027 school year. Traffic studies and other related procedures were in process at the time of the audit and a timeframe for updates was not available.

⁵ See Finding 2026-02 for other updates needed to GO C-77.

calibration reports for FY25 and FY26. For both requirements, CCPD had not requested or maintained this information prior to this audit; however, the third party vendor complied with the terms of the contract and completed the annual reports in May 2025. At the time of testing, reports for the current school year were in progress. An accurate list of cameras with the assigned locations is important so that CCPD can perform monitoring processes.

Equipment Requirements and Monitoring

Public Works is responsible for maintenance and installation of signage in school speed zones and follows the FDOT, School Zone Speed Detection System Placement and Installation Specifications (January 7, 2026). As part of audit testing,



we visited three school zones to review existing signage and confirm placement in accordance with requirements. We noted that two of the three school zones had signage that did not comply with FDOT requirements. One sign was located 78 feet from the school crosswalk sign, which is less than the required 100 feet. The other sign was more than 100 feet (318 feet) from the school crosswalk sign. One sign was also turned away from oncoming traffic, thereby obstructing the view of the sign, which can lead to legal challenges under FSS 316.0776(3)(a)⁶. FDOT's *School*

Zone Speed Detection System Placement and Installation Specifications states: "For all school zones where an SDS is to be installed, a ground-mounted Speed Limit Photo Enforced sign assembly ... shall be installed 100 feet prior to the furthest most upstream point of the existing S1-1 school zone warning sign. In cases where other signs exist within this area, engineering judgment should be applied to determine the appropriate location of the Speed Limit Photo Enforced sign assembly." While the standard allows for engineering judgement, Public Works did not have any documentation to support these deviations. Documenting the engineering rationale for regulatory deviations is critical to defending against potential challenges to NOVs.

Resolution 214-24 states: "The City shall ensure that cameras in City maintained right of ways shall remain free of obstructions from other roadway infrastructure and foliage which includes the areas around the cameras." While Public Works

⁶ FSS 316.0776, Traffic infraction detectors; speed detection systems; placement and installation, (3) (a) supports defense against camera signs that face away from the roadway which hinders the public notification that an individual is entering a speed detection zone.

performs periodic inspections, the department lacks a defined follow-up process to ensure identified issues are sufficiently corrected. For instance, during our review we noted that one of the three school zones had a sign warning drivers they were entering a camera detection zone facing away from traffic. A lack of follow-up on identified issues can result in noncompliance with state laws and increase the liability for the City.

Criteria:

- FSS 316.1906(3)
- FSS 316.0776(3)(a)
- Resolution 214-24
- Ordinance 39-24
- GO C-77
- Third party vendor Contract
- FDOT, School Zone Speed Detection System Placement and Installation Specifications, (January 7, 2026)

Cause:

- CCPD does not maintain a consolidated and up to date internal listing of school zones with speed detection camera information
- Lack of CCPD monitoring and oversight procedures
- Lack of defined procedures for monitoring and oversight performed by Public Works
- Noncompliance with FSS 316.1906(3) and third party vendor contract
- Noncompliance with FDOT requirements for sign installation

Effect:

- No oversight of all speed detection locations
- Increased risk of issuing inaccurate NOVs due to malfunctioning equipment
- Delay in contractor reporting with FY26 reports
- Increased liability for issuing NOVs in areas where equipment is not maintained
- Motorists are not properly informed of speed zones

Recommendations

2026-01a:

CCPD: Update General Order C-77 to clarify roles and responsibilities and accurately reflect CCPD's monitoring and administrative procedures.

* * *

2026-01b:

PUBLIC WORKS: Develop policies and procedures for Public Works to document compliance with FDOT and local requirements for signage in school speed zones.

Management Response and Corrective Action Plan:

2026-01a Select one of these boxes:

☒ Agree ☐ Partially agree* ☐ Disagree*

***For partially agree or disagree a reason must be provided as part of your response.**

2026-01a

The General Orders and Written Directives will be updated to ensure that the audit recommendations are achieved.

2026-01a Management Action Plan Coordinator:
Chief of Police

2026-01a Anticipated Completion Date: 12/31/2026

* * *

2026-01b Select one of these boxes

☒ Agree ☐ Partially agree* ☐ Disagree*

***For partially agree or disagree a reason must be provided as part of your response.**

2026-01b

Develop policy and procedure for sign and school zone maintenance.

2026-01b Management Action Plan Coordinator:
Public Works Director

2026-01b Anticipated Completion Date: 12/31/2026

FINDING 2026-02 NOV Approval and TIEO Role

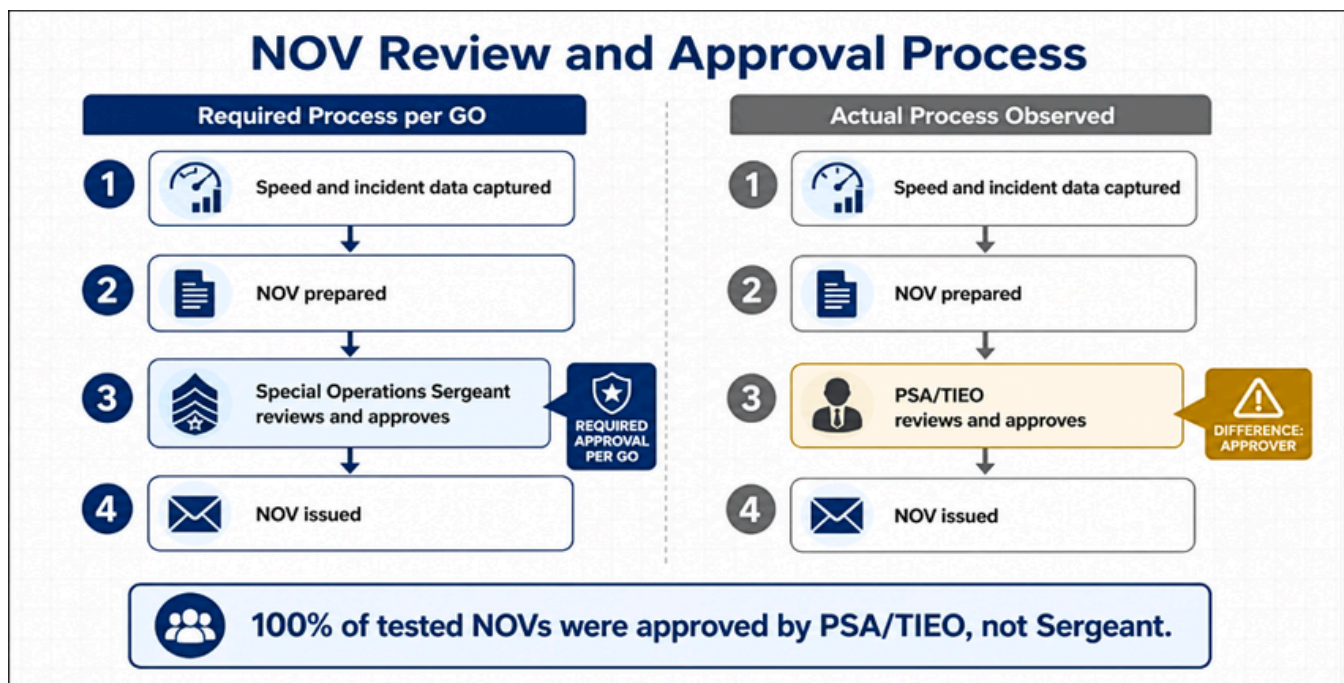
Rank: Medium

Condition:

FSS 316.640(5)(a) - Enforcement, authorizes police departments to designate employees as TIEOs and requires that TIEOs successfully complete instruction in traffic enforcement procedures and court presentation through the Selective Traffic Enforcement Program (STEP) before issuing citations. To support FSS 316.640(5)(a), the CCPD developed GO C-77- School Zone Speed Camera Program, that outlines program administration, procedures on how to issue a NOV, and the review and approval process.

All NOV's tested were issued in accordance with the requirements of FSS 316.1896 - Roadways maintained as school zones; speed detection system enforcement; penalties; appeal procedure; privacy; reports. However, GO C-77 requires the Special Operations Sergeant approval on NOV's. We noted that none of the NOV's had Supervisor approval prior to being issued. This is an internal requirement of the GO and does not represent noncompliance with the FSS.

Although the two TIEOs who approve and issue the NOV's completed the required training outlined in FSS 316.640(5)(a), this procedure does not follow internal processes.



Criteria:

- FSS 316.640(5)(a)
- FSS 316.1896
- GO C-77

Cause:

- Noncompliance with GO C-77
- GO provides conflicting responsibilities with FSS.

Effect:

- Potential challenge to NOVs
- Potential confusion for TIEO responsibilities

RECOMMENDATION:

See Finding 2026-01a for additional updates needed to GO C-77.

Scope

Based on the work performed during the planning phase and the assessment of risk, the audit covers processes, policies, and procedures in place over the school speed zone camera program for FY25 and FY26 through May 31, 2026. To evaluate the processes in place, we reviewed departmental policies and procedures in conjunction with applicable laws and regulations.

Statement of Auditing Standards

We conducted this performance audit in accordance with Generally Accepted Government Auditing Standards. 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.

Methodology

To achieve the audit objectives and gain an understanding of the school zone speed program, we conducted interviews and walkthroughs with key staff in CCPD and Public Works. Original records, as well as copies, were used as evidence and verified through physical examination. Sample size and selection were based on the City Auditor's Office sampling methodology.

Objective 1: To assess whether controls are adequately designed and operating effectively to provide appropriate oversight of the school speed zone program.

To determine whether the City issued NOVs in accordance with FSS, GO's, and Public Works policies, the audit team selected a random sample of 40 NOVs for testing. The third party vendor's storage and reporting capabilities did not provide a complete listing of issued NOVs. Therefore, the audit team reviewed the contract, evaluated the third party vendor's system, and consulted with CCPD staff to identify an alternative population for testing controls over the NOV issuance process.

As a result, the audit team used hearing listings as the sampling population. The audit scope included 353 hearings. Based on the controls in place, the audit team tested 20 NOVs from each FY, for a total of 40 NOVs.

Methodology (continued)

The audit team reviewed training documentation for the TIEOs to determine whether they completed the training required by applicable regulations.

The audit team could not test vendor compliance with contractual and state regulatory requirements for annual equipment calibrations because CCPD had not obtained or reviewed the required calibration reports.

To determine whether CCPD submitted the required annual report to City Council in accordance with state regulations, the audit team reviewed the FY25 annual report issued after the program began operations.

Objective 2: To assess whether school speed zone cameras, lights, and signage comply with applicable federal, state, and local laws, statutes, and ordinances, and are operating as intended.

To determine whether CCPD and Public Works monitor school speed zone cameras, lights, and signage as part of program oversight, the audit team requested monthly third-party technician site visit reports required under the vendor contract. CCPD does not request, receive, or review these monthly reports; therefore, no testing could be performed.

The audit team reviewed Public Works inspection reports for the 2025/2026 school year to determine whether Public Works maintained school zones and ensured that cameras and signage remained free of obstructions, as required by state regulations and FDOT requirements.

To determine whether school zones with speed detection cameras comply with applicable legal maintenance requirements and sign and camera placement, the audit team judgmentally selected three locations to physically inspect.

Objective 3: To determine if revenue collected from the school speed zone program is allocated in accordance with applicable state statutes and ordinances.

Methodology (continued)

To determine whether CCPD allocated revenue from the school speed zone program in accordance with applicable state statutes and City ordinances, the audit team reviewed program revenue reports. The audit team judgmentally selected five weeks of revenue reports to test allocation of funds received.

To support the sample methodology described above to achieve the audit objectives, we discussed, obtained an understanding of, and observed the various software systems utilized by CCPD to obtain information. By doing this we deemed the data reliable for purposes of our audit objectives.

We also utilized data from the City's financial accounting system to verify revenue. The financial accounting system is tested by the external auditors as part of the Annual Comprehensive Financial Report. Based on the results of their procedures, no additional data reliance testing was deemed necessary.

Unless specifically stated otherwise, based on our selection methods and testing of transactions and records, we believe that it is reasonable to project our results to the population and ultimately draw our conclusions for testing, findings, and recommendations on those results. Additionally, for proper context we have presented information concerning the value and/or size of the items selected for testing compared to the overall population and the value and/or size of the exceptions found in comparison to the items selected for testing.