



FLORIDA DEPARTMENT OF HEALTH
OFFICE OF INSPECTOR GENERAL

SAFETY PAPER AT FLORIDA TAX COLLECTOR OFFICES
FOR BIRTH CERTIFICATION

Report # R-1415DOH-027 • December 9, 2015

Purpose of this project:

We wanted to review the Department of Health's (Department) efforts to monitor accountability of safety paper at the Florida Tax Collector (TC) offices. Specifically we reviewed:

- The initial on-boarding process to include site visits, memorandum of understanding (MOU), training, and other associated processes before a TC may begin issuing birth certificates.
- Efforts related to monitoring and auditing of safety paper usage by TCs.
- Efforts related to the physical security and inventory of safety paper transferred to and maintained by TCs.

What we examined:

We examined Chapter 64V-1, *Florida Administrative Code (F.A.C.)*; Chapter 382, *Florida Statutes (F.S.)*; the Chief Deputy Registrar Operations Manual (COM), December 2014 Revision; the *Correspondence Accounting System (CAS) Training Manual V 6.0*; and the *Tax Collector's Office Vital Statistics Operations Manual (TOM)*, February 2015 version.

Additionally, we reviewed training presentations, birth certificate volume tracking reports by TC location, interviewed key management and staff, and interviewed Chief Deputy Registrars (CDRs). During CDR interviews, we assessed TC performance; average hours spent monitoring and assisting TC staff; frequency of site visits; physical security; and location(s) viability. Further, we examined a list of participating TCs and selected MOUs; letters of authorization; inventory logs; and safety paper transfers (DH form 1941).

Background:

Pursuant to Chapter 322.135, *F.S.*, the Florida Department of Highway Safety and Motor Vehicles shall authorize TC's by interagency agreement to serve as it's agent for the provision of specified driver's license (DL) and identification (ID) card services. Additionally, in 2010, Florida began issuing "REAL ID" compliant DL and ID cards. The REAL ID Act, passed by Congress in 2005 established minimum DL and ID issuance security standards. In order to comply with the standards, a State shall at minimum be presented with and verify certain documents before issuing a DL or ID to a person. One piece of the required documentation is an original or certified copy of the person's birth certificate.

Chapter 382.003, *F.S.*, states, "The department shall establish an Office of Vital Statistics under the direction of a State Registrar for the uniform and efficient registration, compilation, storage, and preservation of all vital records in the state." Because of the REAL ID requirement, the TC's and the Department have established a partnership that exists to substantially improve services to the public by offering the ability to complete both the certified birth certificate and DL and/or ID transaction in one location. As a result, the first TC began issuing birth certificates in 2013.

As of November 3, 2015 there were 35 counties with 107 TC locations issuing birth certificates.

ISSUES AND RECOMMENDATIONS

Our review did not identify any material issues related to the on-boarding process (See Exhibit 1, Page 5), MOUs, the training process or materials, or any other associated processes applied before a TC is to begin issuing birth certificates. Furthermore, the overall control framework (See Exhibit 2, Page 6) appears to provide reasonable assurance that safety paper usage and security are sufficient.¹ However, we identified some non-compliance at the county level that may necessitate actions. In addition, we have included an observation at the end of this report that does not require management's response

1. Safety Paper Inventory Logs did not always capture the required data fields.

- The "Memorandum of Understanding Between the Tax Collector and the Florida Department of Health" standard template requires the "TC maintain supply of safety paper, monitor inventory, account for issuance, run e-Vitals safety paper usage report daily, run e-vitals voided safety paper report weekly and if there is a void incident, the void report must be run that day..."
- The TOM requires performance of a physical inventory of safety paper at the same time every month.
- Attachment A in the TOM provides a sample of an Inventory Log. Attachment A includes the required data fields as further supported in the COM.
- CDR's and TC's also may create their own log for inventory purposes. However, any log created must contain the following columns: safety paper type (8 ½ x 11), name of office and county, range of numbers inventoried, date inventory performed, name of who performed the inventory, status of inventory (i.e. used, open, sealed, or destroyed).
- "Opened" and/or "Sealed" safety paper that is not input into a printer "DocSequence" at the beginning of the workday will not be reflected in the *Safety Paper Usage* and *Void Reports* and is only accounted for on the monthly inventory.

We recommend the Bureau of Vital Statistics continue to provide ongoing outreach and training to Local Registrars, Chief Deputy Registrars, and Tax Collectors regarding the importance of capturing all required data fields on the physical inventory log.

2. Two Chief Deputy Registrars were unable to provide Letters of Authorizations for each location.

- The TOM requires authorized TC personnel to receive and immediately verify the audit control numbers on safety paper transferred by the CDR. Furthermore, the authorized TC personnel must document the audit control numbers on the TC inventory log and the DH form 1941.
- The TOM requirements above are further supported in the COM. It states, "Authorized personnel only, preferably vital statistics staff, must make receipt of delivery of the shipment of safety paper." It further states, "A Letter of Authorization must be provided to the state office, listing those staff authorized to receive/sign for safety paper; a new letter must be submitted any time there is a change in recipients; one is either added or deleted."
- Based on a survey of eight CDR's, two of the reasons attributed to the condition included a CDR was new to the position and instances of recently implemented TC locations. The formal Letter of Authorization helps to ensure both parties, the Department and the TC, are

¹ We did not perform physical verification of safety paper management and storage at the TC location.

accountable for the management and physical security of safety paper during secure transit and storage.

We recommend the Bureau of Vital Statistics ensure the Tax Collectors submit a new Letter of Authorization upon implementing birth certificate issuance at a new location.

In addition, we recommend the Bureau of Vital Statistics communicate with the Local Registrars, Chief Deputy Registrars, and the Tax Collectors the importance of submitting a new Letter of Authorization upon changes of staff authorized to receive and sign for safety paper.

Also, we recommend the Bureau of Vital Statistics consider incorporating a step within their various monitoring efforts to help ensure Chief Deputy Registrars only deliver safety paper to individuals authorized to receive safety paper for the Tax Collector location at the time of delivery.

OTHER OBSERVATIONS

Some of the participating Tax Collector locations issue very few certified birth certificates. As of September 2015, eleven TC locations averaged one or less certifications a week; and many others issue less than five. The low utilization of the birth certification service offered by a TC may be impacted by many contributing factors:

- The primary factor, as indicated by survey of select CDRs, is TC location proximity to a County Health Department (CHD) location. If geographically nearby, citizens may choose to use the CHD because the TC is allowed an additional surcharge/convenience/service fee of \$6.25 per request.
- Other factors that can contribute to a low utilization of birth certification services at a TC location include: poor marketing of the service, low utilization of DL and ID services, hours of operation, and only recently implementing the birth certification service offering at a location.

Birth certificate issuance at TC locations can substantially improve services to the citizens when well utilized. However, the certification service introduces a certain level of risk to both the Department and the TC via privileges to confidential information, as well as management and security of safety paper, which could be used to perpetrate identity theft and/or false support of citizenship. Additionally, the MOU standard template requires the Department assume the cost associated with Citrix Licenses².

The Department, as the statutory owner of Florida vital statistics, must make many operational decisions including determining whether a TC location with low birth certification applications is viable. Viability can be defined as the ability of the initiative to work as intended and is measured by its long-term financial survival and operational sustainability.

The Office of Inspector General supports the State Registrar's efforts to assess the utilization of certified birth certificate issuance at Tax Collector locations, as well as efforts to fairly determine viability and take appropriate actions to adjust service offering at locations deemed not viable.

² In order to connect to the e-Vitals system, the Tax Collector users must have the most current Citrix Receiver installed on their computer.

SUPPLEMENTAL INFORMATION

Section 20.055, *Florida Statutes*, charges the Department's Office of Inspector General with responsibility to provide a central point for coordination of activities that promote accountability, integrity, and efficiency in government.

Michelle L. Weaver, CISA, Senior Management Analyst II, conducted the review under the supervision of Michael J. Bennett, CIA, Director of Auditing.

Our methodology included reviewing applicable laws, rules, policies, and procedures. Additionally, we mapped out the on-boarding and monitoring processes, interviewed key management and staff throughout the State, and reviewed documents supporting assertions of control adequacy.

This project was not an audit. Industry-established auditing standards were not applied. Internal Audit Unit procedures for the performance of reviews were followed and used during this project.

We want to thank management and staff in the Department's Bureau of Vital Statistics and the participating Chief Deputy Registrars for the information and documentation they provided, and for their cooperation throughout the review.

CONTACT INFORMATION

Copies of final reports are available on our website at: www.floridahealth.gov
(Search: internal audit)

If you have questions or comments related to the information provided in this report, please contact the Director of Auditing, Florida Department of Health by the following means:

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EXHIBIT 1

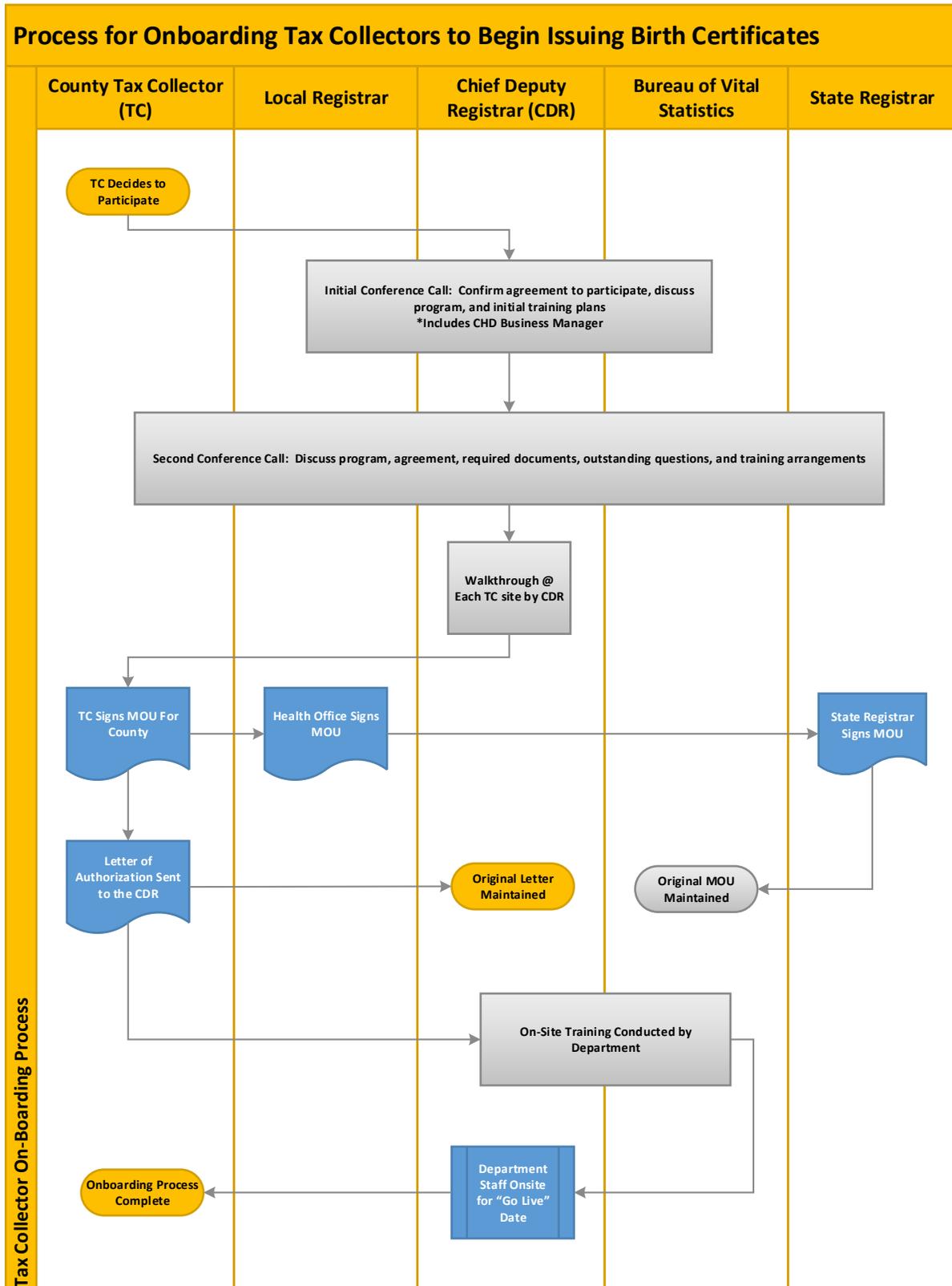
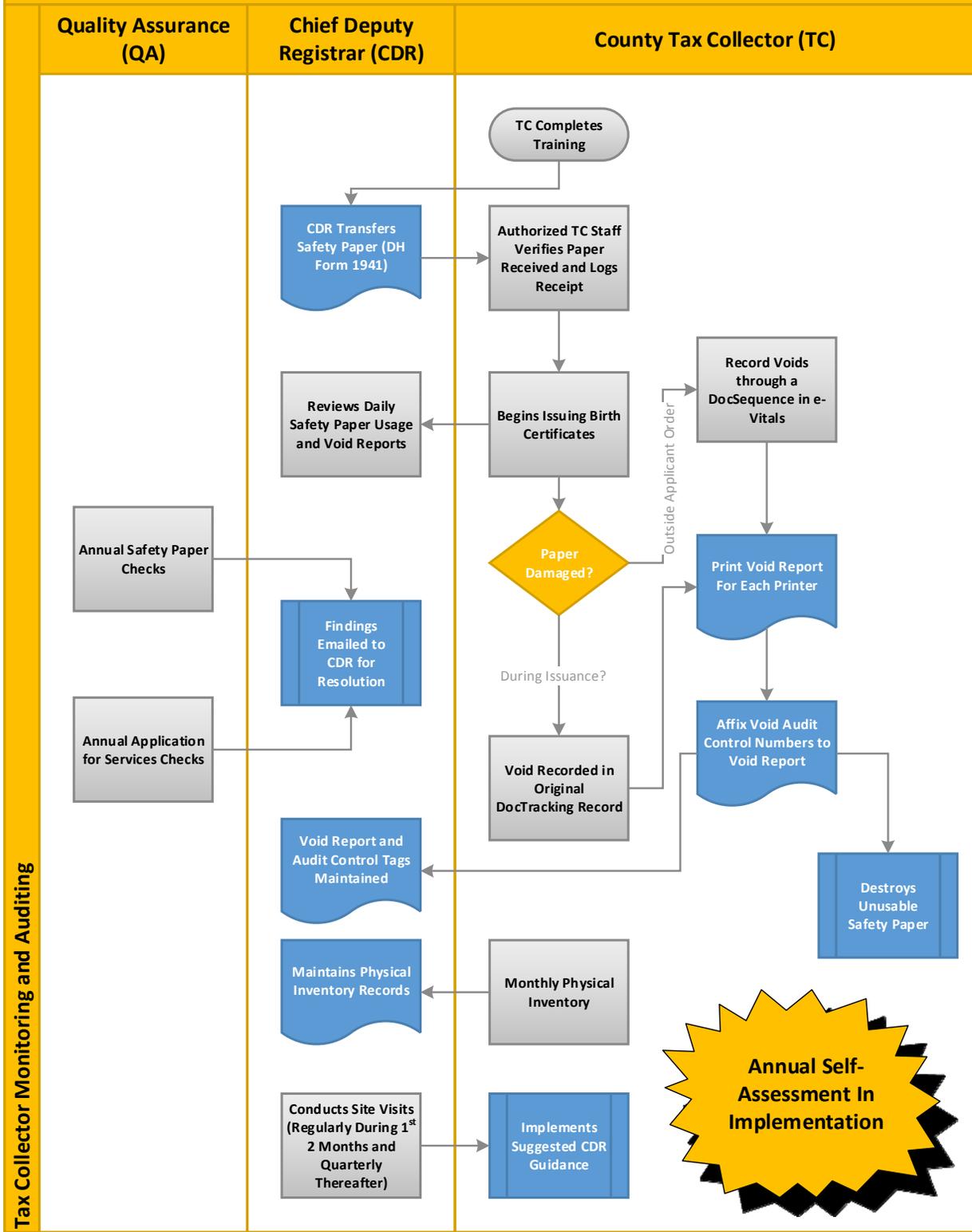


EXHIBIT 2

Process for Monitoring and Auditing Safety Paper at Tax Collector Locations



APPENDIX A: MANAGEMENT RESPONSE

	Recommendation	Management Response
1	<p><i>We recommend the Bureau of Vital Statistics continue to provide ongoing outreach and training to Local Registrars, Chief Deputy Registrars, and Tax Collectors regarding the importance of capturing all required data fields on the physical inventory log.</i></p>	<p>We concur. Management action completed.</p> <ol style="list-style-type: none"> 1) The annual Chief Deputy Registrar (CDR) Self-Assessment Tool (SAT) has been revised to include County Health Department (CHD) satellite offices and all of the Tax Collector (TC) offices under their responsibility. 2) During the October 8, 2015 CDR monthly conference call we discussed the requirement for CDRs to monitor the TC Safety Paper Inventory Log during their quarterly site visit, as well as, the requirement that TCs use the Safety Paper Inventory Log found in the back of the TOM (Tax Collector Operations Manual). Furthermore, the CDRs were reminded to advise their TCs that completing the log is not enough; they must actually conduct a physical inventory. 3) The newly created TC SAT will be presented to all TC offices in January 2016 during our inaugural quarterly conference calls. Completing the Safety Paper Inventory Log on a monthly basis is included as an item on the TC SAT. 4) Reviewing and ensuring the accuracy and completeness of the TCs Safety Paper Inventory Log has been added to the CDR SAT. 5) Additional slides have been added to the TC PowerPoint training presentation to address maintaining and reviewing the TCs Safety Paper Inventory Log. <p><i>Contact: Ken Jones/Ana Goold</i></p>
2	<p><i>We recommend the Bureau of Vital Statistics ensure the Tax Collectors submit a new Letter of Authorization upon implementing birth certificate issuance at a new location.</i></p> <p><i>In addition, we recommend the Bureau of Vital Statistics communicate with the Local Registrars, Chief Deputy Registrars, and the Tax Collectors the importance of submitting a new Letter of Authorization upon changes of staff authorized to receive and sign for safety paper.</i></p> <p><i>Also, we recommend the Bureau of Vital Statistics consider incorporating a step within their various monitoring efforts to help ensure Chief Deputy Registrars only deliver safety paper to individuals authorized to receive safety paper for the Tax Collector location at the time of delivery.</i></p>	<p>We concur. Management action completed.</p> <ol style="list-style-type: none"> 1) The two Letters of Authorization exceptions identified during this review have been corrected by the CDRs. 2) During the October 8, 2015 CDR monthly conference call we discussed the requirement to have a Letter of Authorization for each TC location and to ensure the letter is updated each time there is a change in TC personnel. 3) The following item has been added to the TC SAT – “Authorization on file with CHD designating who is authorized to receive shipments of safety paper and only delivered to those on the list”. 4) The following item has been added on the CDR SAT – “During the past year, only CHD and TC (if applicable) authorized person, as shown on letter on file at state office, has receipted safety paper”. <p><i>Contact: Ken Jones/Ana Goold</i></p>