

Mission:

To protect, promote & improve the health of all people in Florida through integrated state, county & community efforts.



Ron DeSantis
Governor

Joseph A. Ladapo, MD, PhD
State Surgeon General

Vision: To be the Healthiest State in the Nation

January 6, 2023

Joseph A. Ladapo, MD, PhD
State Surgeon General
4052 Bald Cypress Way, Bin A-00
Tallahassee, Florida 32399

Dear Dr. Ladapo:

Enclosed is a report summarizing our review of the Department of Health's (Department) *Implementation and Revisions of Department Policies and Procedures*, Report # R-2223-003. This review evaluated the Department's processes used to update, distribute, and maintain its policies and procedures.

The review was conducted by Ashlea K. Mincy, CIGA, Assistant Director of Auditing, and supervised by Mark H. Boehmer, CPA, Director of Auditing.

Management agreed with the finding identified in the report. We will provide you a status update in six months detailing the progress management has made toward addressing the proposed corrective actions included in Appendix A of the report.

If you wish to discuss the report, please let me know.

Sincerely,

Michael J. Bennett, CIA, CGAP, CIG
Inspector General

MJB/akm
Enclosure

cc: Melinda M. Miguel, Chief Inspector General, Executive Office of the Governor
Samantha Perry, CPA, Office of the Auditor General
Cassandra G. Pasley, BSN, JD, Chief of Staff
Michele Tallent, Deputy Secretary for Operations
Kenneth A. Scheppe, MD, FAEMS, Deputy Secretary for Health
Mark Lander, Interim Deputy Secretary for County Health Systems
Brittany B. Griffith, Assistant Deputy Secretary for Operations
Mark H. Boehmer, CPA, Director of Auditing



FLORIDA DEPARTMENT OF HEALTH
OFFICE OF INSPECTOR GENERAL

IMPLEMENTATION AND REVISIONS OF DEPARTMENT
POLICIES AND PROCEDURES

Report # R-2223-003 • January 6, 2023

Purpose of this project:

Review the Department of Health's (Department) processes used to update, distribute, and maintain its policies and procedures.

What we examined:

- Selected Department policies and procedures, to determine compliance with DOHP 5-2-16, *Policies and Procedures Management* (Policy).
- The Department's process of notifying Department employees of policy changes.
- The Department's compliance with maintaining policies and procedures in accordance with the *General Records Schedule GS1-SL for State and Local Government Agencies* (GS1-SL).

Summary of results:

We determined through our review of selected policies and procedures that Department employees are generally notified of policy changes, and that policies and procedures are maintained in accordance with the GS1-SL. However, improvements can be made to update, distribute, and maintain the Department's policies and procedures.

Additional details follow below. Management's response to the issues noted in this report may be found in **Appendix A**.

BACKGROUND

Policies and procedures are critical to the successful functioning of the Department. Florida Administrative Code rule 60I-36.005(3)(e) provides that Department employees are required to abide by the law and applicable rules and Department policies and procedures.

A policy contains broad, directive statements of the Department's standards of operation regarding a specific issue. Policies help employees build knowledge, make decisions, and take action pursuant to the mission of the Department.

A procedure is a standard method used to implement a policy, providing a written directive describing approved steps for the performance of a particular act or sequence of acts. Procedures provide direction for implementing Department operations.

Each policy and procedure has an owner assigned by the division or office director that is responsible for maintaining the policy or procedure and responding to inquiries concerning the policy or procedure.

The Policy requires all divisions, offices, and county health departments (CHD) to post and maintain policy and procedure documents on the Department's InsideFLHealth intranet site. The Central Library was created on the InsideFLHealth intranet site to allow users easy access to organize files such as policies, procedures, and manuals.

DETAILED RESULTS AND RECOMMENDATIONS

Our review identified the following opportunity to improve the effectiveness of Department operations:

Improvements can be made to update, distribute, and maintain the Department's policies and procedures.

- The Policy requires policy owners to review and update policies and procedures at least once every two years, or within three months of issuing an action memorandum¹. Policy owners should revise policies and procedures if there are major changes to statutes, administrative rules, computer-based applications, Department reorganization, or other directives affecting the policy or procedure.
- There were 280 policies and procedures in the Central Library as of September 19, 2022, 61.4% of which had not been updated in the last two years. While the COVID-19 pandemic may have resulted in delays to some of these being reviewed, the average number of years since the outdated policies and procedures were last reviewed was approximately six and a half years.
- Thirty-six (36) policies from one particular division in the Central Library were unsigned and dated August 23, 2013. Signed versions dated between October and November 2020 were provided upon our request; however, these versions were not posted in the Central Library.
- Some policies and procedures were not maintained in the Central Library. Policies and procedures from only five of the 67 CHDs were identified in the Central Library.
- The Policy explains the Office of the Chief of Staff monitors the policies and procedures maintained on the InsideFLHealth intranet site, ensures policies have been properly reviewed and approved prior to posting in the Central Library, and observes last reviewed dates to ensure policy owners review policies and procedures at least once every two years.
- The monitoring process needs improvement to ensure policy owners review policies and procedures at least once every two years. The Department's operations may not be effectively implemented when its monitoring processes to update, distribute, and maintain its policies and procedures are not sufficient.
- The Department also does not have a centralized, organized manner to maintain outdated policies and procedures for instances that an outdated version needs to be referenced. Previous versions of policies and procedures may be needed for audits, investigations, or other legal purposes reviewing actions taken prior to a policy or procedure update.

We recommend the Office of the Chief of Staff implement additional controls to improve its process to monitor policies and procedures maintained on the InsideFLHealth intranet site to ensure all Department policies and procedures have been timely reviewed, updated, distributed, and maintained.

We also recommend the Office of the Chief of Staff develop a centralized, organized manner to maintain outdated policies and procedures.

¹ An action memorandum provides urgent updates to policies and procedures but does not replace them.

SUPPLEMENTAL INFORMATION

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

Ashlea K. Mincy, CIGA, Assistant Director of Auditing, conducted the review under the supervision of Mark H. Boehmer, CPA, Director of Auditing.

Our methodology included reviewing applicable law, policy, and procedures; reviewing select Department policies and procedures; and interviewing management and staff regarding their processes and procedures.

This project was not an audit, as industry-established auditing standards were not applied. Internal Audit Unit procedures for the performance of reviews were followed and used during this project. This project was conducted in compliance with Quality Standards for Inspections, Evaluations, and Reviews by Offices of Inspector General as recommended by *Principles and Standards for Offices of Inspectors General*, Association of Inspectors General.

We want to thank management and staff in the Department's Office of the Chief of Staff and deputy secretaries, division directors, and bureau chiefs for the information and documentation they provided, and for their cooperation throughout the project.

All final reports are available on our website at www.FloridaHealth.gov (search: internal audit). If you have questions or comments, please contact us by the following means:

Address:

4052 Bald Cypress Way, Bin A03,
Tallahassee, FL 32399

Email:

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APPENDIX A: MANAGEMENT RESPONSE

	Recommendation	Management Response
1	<p><i>We recommend the Office of the Chief of Staff implement additional controls to improve its process to monitor policies and procedures maintained on the InsideFLHealth intranet site to ensure all Department policies and procedures have been timely reviewed, updated, distributed, and maintained.</i></p>	<p>We concur.</p> <p><i>The Department is reviewing its policy-related processes and infrastructure to determine potential areas for improvement, including this report. The Department has created a position to oversee the management of the Department's policies and ensure compliance with the Department's policy on policies. The Department filled this position on December 19, 2022.</i></p> <p><i>In addition, the Department will:</i></p> <ul style="list-style-type: none"> <i>• Implement an improved monitoring process to address the Department's timeliness for reviewing and updating policies. This may include a notification system for policy review deadlines.</i> <i>• Improve its workflow for accomplishing policy reviews.</i> <i>• Improve the completeness and correctness of its repository for active policies.</i> <i>• Investigate methods to improve its distribution of policies.</i> <p><i>The Department began investigating software solutions in November 2022, that may be assistive in accomplishing these tasks.</i></p> <p>Contact: Michele Tallent</p> <p><i>Anticipated Completion Date: December 29, 2023</i></p>
2	<p><i>We also recommend the Office of the Chief of Staff develop a centralized, organized manner to maintain outdated policies and procedures.</i></p>	<p>We concur.</p> <p><i>The Department will implement a repository for policies that are no longer effective. This repository will be designed consistent with the Department's document retention requirements, as well as its needs for litigation, investigations, and audits.</i></p> <p><i>The Department began investigating software solutions in November 2022, that may be assistive in accomplishing this task as well as the tasks responsive to Recommendation 1, above.</i></p> <p>Contact: Michele Tallent</p> <p><i>Anticipated Completion Date: December 29, 2023</i></p>