

**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

May 12, 2022

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

Dear Dr. Ladapo:

Enclosed is our internal audit report # A-2122-002, *Bureau of Emergency Medical Oversight's Inspections of Emergency Medical Services*. The report provides an independent evaluation of the Department of Health's Emergency Medical Services inspections.

The audit was conducted by Janet C. Compton, Senior Management Analyst II, assisted 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 action 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  
Lisa Norman, CPA, Office of the Auditor General  
Kenneth A. Scheppke, MD, FAEMS, Deputy Secretary for Health  
Mike Mason, Assistant Deputy Secretary for Health  
Mark H. Boehmer, CPA, Director of Auditing

**Florida Department of Health****Office of Inspector General**

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FLORIDA DEPARTMENT OF HEALTH  
OFFICE OF INSPECTOR GENERAL

BUREAU OF EMERGENCY MEDICAL OVERSIGHT'S  
INSPECTIONS OF EMERGENCY MEDICAL SERVICES

Report # A-2122-002 • May 12, 2022

***Purpose of this project:***

Determine whether the Department of Health's (Department) Bureau of Emergency Medical Oversight (Bureau) complied with section 401.27, Florida Statutes; conducted Emergency Medical Services (EMS) inspections in compliance with section 401.35, Florida Statutes; and adhered to corrective action timeframes in compliance with Florida Administrative Code rule 64J-1.018.

***What we examined:***

The Bureau's inspection processes and procedures for EMS inspections and selected completed inspections for services conducted from July 1, 2017 through June 30, 2021.

***Summary of results:***

The Bureau generally complied with sections 401.27 and 401.35, Florida Statutes. There were no EMS inspection findings that required corrective actions in the sample we reviewed. The Bureau began to draft and implement written office procedures in June 2021 to supplement Florida law, when performing EMS inspections, which was subsequent to the period of inspections we reviewed.

Management should address a control weakness regarding inconsistencies in the inspection process that may have resulted from not having an internal standard operating manual during the scope of our audit.

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

## DETAILED RESULTS AND RECOMMENDATION

Our audit identified the following opportunity for the Bureau to improve effectiveness and efficiencies in its operations:

***1. Inconsistencies in the inspection process may have resulted from not having an internal standard operating manual during the scope of our audit.***

- Section 401.31, Florida Statutes, requires the Department to periodically and randomly inspect licensees to determine the continuing compliance of each EMS service provider, associated equipment and its personnel with the requirements of this part and Department rules.<sup>1</sup>

<sup>1</sup> Section 401.23(13), Florida Statutes, defines a licensee as any basic life support service, advanced life support service, or air ambulance service.

- Florida Administrative Code rule 64J-1.018(2), explains inspections of EMS providers shall be documented by the Department.
- The Bureau began to develop an inspection manual June 29, 2021, to ensure the Bureau's site review team is knowledgeable of the inspection process and as a guide and reference when conducting the site review of EMS providers, vehicles, and aircrafts. The Bureau did not have an official written documented inspection process prior to that. The scope of our audit ended June 30, 2021.
- We reviewed documentation of 50 randomly selected EMS inspections. While the Bureau conducted inspections in a manner similar to the requirements of the *2021 Inspection Manual* (Manual), we noted some inconsistencies:
  - Section 2 of the Manual explains new services will be inspected within 90 days of licensure. Fourteen (14) of the inspections we reviewed included new service providers, 11 of which were not inspected within 90 days of licensure. Some of the licenses were issued during the early days of the COVID-19 pandemic, which limited travel. Management explained that compliance with a 90-day timeframe can pose a challenge, as the Bureau has only one inspector for the entire state. The 90-day timeframe seems maximal for a new provider, so as to protect the public's safety.
  - Section 7 of the Manual explains a post inspection letter is to be prepared as part of the post inspection procedures. Thirty-eight (38) of the inspections did not include a post inspection letter.
  - Supervisory review of each inspection was not documented.

***We recommend the Bureau ensure inspections are conducted consistently and in accordance with the recently developed EMS Inspection Manual.***

## 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.

Janet C. Compton, Senior Management Analyst II, assisted by Ashlea K. Mincy, CIGA, Assistant Director of Auditing, conducted the audit under the supervision of Mark H. Boehmer, CPA, Director of Auditing.

Our methodology included a review of Florida law<sup>2</sup> and the *2021 EMS Inspections Manual*. We interviewed appropriate management and staff, and reviewed EMS inspection documentation.

This audit was conducted in conformance with *International Standards for the Professional Practice of Internal Auditing*, issued by the Institute of Internal Auditors, as provided by section 20.055(6)(a), Florida Statutes, and as recommended by Quality Standards for Audits by Offices of Inspector General (*Principles and Standards for Offices of Inspectors General*, Association of Inspectors General).

We want to thank management and staff in the Department's Bureau of Emergency Medical Oversight for the information and documentation they provided, and for their cooperation throughout the project.

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<sup>2</sup> Chapter 401, Florida Statutes; Florida Administrative Code

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

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**APPENDIX A: MANAGEMENT RESPONSE**

	Recommendation	Management Response
1	<p><i>We recommend the Bureau ensure inspections are conducted consistently and in accordance with the recently developed EMS Inspection Manual.</i></p>	<p>We concur.</p> <p>To ensure consistency in the EMS Provider inspection process, the EMS Section drafted an inspection standard operating manual in June 2021. This process was immediately implemented and will address any inconsistencies in the inspection process. The EMS Section has immediately implemented a supervisory review process for all compliance inspections. This plan will be developed into a standard operating procedure for the EMS Section. The EMS Section is currently restructuring the inspection process. Rather than relying on one inspector for the state, these duties will be delegated to six regional staff members. The process will be managed and coordinated out of Central Office with EMS inspections conducted by the regional staff.</p> <p><i>Contact: Mike Hall, EMS Administrator</i></p> <p><i>Anticipated Completion Date: June 30, 2022</i></p>