

Mission:

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



Ron DeSantis
Governor

Scott A. Rivkees, MD
State Surgeon General

Vision: To be the Healthiest State in the Nation

June 25, 2021

Scott A. Rivkees, MD
State Surgeon General
4052 Bald Cypress Way
Tallahassee, Florida 32399

Dear Dr. Rivkees:

Enclosed is our internal audit report # A-2021-002A, *Selected Primary Care Office Contracts, Including a Contract with Florida Association of Free and Charitable Clinics, Inc.* The report provides an independent evaluation of contract COREL's deliverables and contract manager compliance with applicable laws and Department policies and procedures.

The audit was conducted by Kyle Erickson, MBA, CIGA, Senior Management Analyst II, and supervised by Mark H. Boehmer, CPA, Director of Auditing.

Management agreed with the one 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. The Provider was offered an opportunity to respond as well. The Provider's response can be found in Appendix B of the report.

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

Sincerely,

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

MJB/kfe
Enclosure

cc: Melinda M. Miguel, Chief Inspector General, Executive Office of the Governor
Lisa Norman, CPA, Office of the Auditor General
Shamarial Roberson, DrPH, MPH, Deputy Secretary for Health
Mark H. Boehmer, CPA, Director of Auditing



FLORIDA DEPARTMENT OF HEALTH
OFFICE OF INSPECTOR GENERAL

SELECTED PRIMARY CARE OFFICE CONTRACTS,
INCLUDING A CONTRACT WITH FLORIDA ASSOCIATION
OF FREE AND CHARITABLE CLINICS, INC.

Report # A-2021-002A • June 25, 2021

Purpose of this project:

Our Fiscal Year 2020-21 *Audit Plan* has focused on different areas of contracting, including contract management, provider monitoring, and examining in detail the documentation of selected contracts. We identified contracts in the Department of Health's (Department, DOH) Primary Care Office (PCO) to review and determine appropriate contract management has been performed and deliverables agree with each contract.

Specific to this project, we selected the Department's contract with Florida Association of Free and Charitable Clinics, Inc. (FAFCC, Provider) to determine whether:

- Deliverables and overall goals of the contract were completed.
- The Department's Contract Manager (CM), as well as FAFCC were in compliance with applicable laws and Department policies and procedures.

What we examined:

We examined Contract COREL with FAFCC that was executed July 22, 2016 and with renewals, ended June 30, 2020.¹

Summary of results:

While nothing came to our attention that led us to believe FAFCC did not complete the deliverables outlined in the contract, we identified the following issue management should address related to CM compliance:

- The Department's CM File for Contract COREL was missing pertinent contract documentation.

Additional details follow below. Management's response to the issues noted in this report may be found in **Appendix A**. The Provider was given the opportunity to respond with a written comment to be included in the report, pursuant to Florida law.² The Provider's response may be found in **Appendix B**.

BACKGROUND

The mission of the Department's PCO, within the Division of Public Health Statistics and Performance Management, Bureau of Community Health Assessment, is to work collaboratively with federal, state and local resources to improve access to primary care for the medically underserved. The PCO continuously assesses the statewide primary care, dental and mental health needs of the medically underserved, coordinates shortage designations and provides technical assistance and collaboration to improve access to care.

¹ We also examined the PCO's contract CORHA with Nova Southeastern University, Inc., published under Report # A-2021-002B.

² Section 20.055(6)(e), Florida Statutes

The PCO provides United States Department of Health and Human Services, Health Resources & Services Administration (HRSA) technical assistance to community-based providers of comprehensive primary care services in areas that lack an adequate number of health care providers or have populations facing barriers to care.

The PCO applies for funding from HRSA to continue the coordination of local, state and federal resources contributing to improving access to primary care services and health professional workforce availability for underserved populations. The project is intended to address the needs of the nearly 10 million Floridians who live in areas with insufficient access to primary care.

The PCO manages a legislative appropriation contract that provides capacity building and patient care to over 100 free and charitable clinics in Florida. Contract COREL is funded by a legislative appropriation of \$10 million to support the Provider's member clinics through a grant program to expand capacity and surrounding support in delivering services and sustain operations as well as expand service to uninsured Floridians. This appropriation provides for clinic capacity to increase medical, dental and behavioral health to low-income and uninsured Floridians.³

The grant and General Revenue funding that supports the programs and functions of the PCO are vital to maintaining physicians and ancillary care clinicians in practice, assuring health care facilities maintain proper designation status, and supporting functions that operate to form a seamless system of health planning and delivery of care to medically underserved Floridians.

DETAILED RESULTS AND RECOMMENDATION

While nothing came to our attention that led us to believe FAFCC did not complete the deliverables outlined in the contract, we identified the following issue management should address related to CM compliance.

The Department's Contract Manager File for Contract COREL was missing pertinent contract documentation.

- DOHP 250-14-19, *Contractual Services*, explains the CM's file is the Department's official record of contract performance. It must be maintained for six years following contract closeout or the resolution of any pending action, whichever is later. It is a chronological file of all pertinent information related to a contract from the time of award to closeout.
- The CM's file was missing the executed grant agreement between the Provider and:
 - UHI Community Care Clinic⁴ for the second year of the contract (July 1, 2017 through June 30, 2018)
 - Good Samaritan Health Clinic of Pasco, Inc. for the fourth year of the contract (July 1, 2019 through June 30, 2020)
- The CM described difficulty with transferring voluminous amounts of files from the Provider via email. Bandwidth limitations led to several files not making it to the CM's file.

³ Ch. 18-009, §3 at 451, Laws of Florida

⁴ Owned by Universal Heritage Institute, Inc.

- Failure to maintain a complete contract file could hinder the CM's ability and responsibility to enforce the performance of the contract terms and conditions.

We recommend the Division of Public Health Statistics and Performance Management ensure its contract managers maintain complete contract files in accordance with the DOHP 250-14-19, Contractual Services.

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.

Kyle F. Erickson, MBA, CIGA, Senior Management Analyst II, conducted the audit under the supervision of Mark H. Boehmer, CPA, Director of Auditing.

Our methodology included reviewing Florida law; DOHP 250-14-19, *Contractual Services*; applicable documentation; and contract manager files. We interviewed key management, the CM, and the Provider.

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 Community Health Assessment for the information and documentation they provided, and for their cooperation throughout the project. We also thank FAFCC for its staff's time and cooperation for the project.

Copies of 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:

inspectorgeneral@flhealth.gov

Phone:

850-245-4141

APPENDIX A: MANAGEMENT RESPONSE

	Recommendation	Management Response
1	We recommend the Division of Public Health Statistics and Performance Management ensure its contract managers maintain complete contract files in accordance with the DOHP 250-14-19, Contractual Services.	<p>We concur.</p> <p>The Department's Office of Contracts has tools and resources developed specifically for department contract managers to be able to maintain complete and accurate contract files in accordance with DOHP 250-14-19, Contractual Services. The division will pull the Office of Contracts' developed Contract Review Checklist and utilize it to review and audit each of its contracts for accuracy and completeness. Each of the division's existing contracts will undergo this process and each contract file will be reviewed by a supervisor and an Attestation signed by that supervisor attesting as such.</p> <p><i>Contact:</i> Debbie Reich</p> <p><i>Anticipated Completion Date:</i> July 30, 2021</p>

APPENDIX B: PROVIDER'S RESPONSE



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6-22-21

Mark H. Boehmer
Director of Auditing
Office of Inspector General
Florida Department of Health
4052 Bald Cypress Way, Bin A-03
Tallahassee, FL 32399-1704

Mr. Erickson:

The Florida Association of Free and Charitable Clinics (FAFCC) thanks the Office of the Inspector General for the presentation of preliminary findings and recommendations for the audit A-2021-002. We are pleased to hear that there were no major findings of non-compliance by FAFCC over the five plus years it has been overseeing the grant program.

We pride ourselves on the accountability and professionalism that is put into the program and our operations. We will continue to hold ourselves to the highest standards in our performance to ensure the funds are expended exactly as they were intended.

FAFCC has used a secure, cloud based system to store all COREL contract deliverables. We deal with hundreds if not thousands of documents and files throughout the course of a grant cycle. Our ability to leverage technology that is readily available allows the organization the capability to readily respond to requests like the ones made during this recent audit. FAFCC strongly encourages the Department of Health to increase its use of cloud based systems for contracted services so deliverables are securely submitted and received.

The FAFCC staff would like to thank Kyle, Mark, and Ashlea for their consummate professionalism throughout the audit process.

Regards,

Nicholas X. Duran

FAFCC, headquartered in Coral Gables, is a 501c3 tax-exempt organization whose mission is to represent and support not-for-profit community-based and faith-based clinics and networks that provide healthcare services at little or no charge to low-income, uninsured and underserved Floridians. Our federal tax ID number is 46-3502696.