

Ron DeSantis

Governor

■ ■

Barbara Palmer

Director

■ ■

State Office

■ ■

4030 Esplanade Way

Suite 380

Tallahassee

Florida

32399-0950

■ ■

(850) 488-4257

Fax:

(850) 922-6456

■ ■

Toll Free:

(866) APD-CARES

(866-273-2273)

May 6, 2022

Barbara Palmer, Director  
Agency for Persons with Disabilities  
4030 Esplanade Way, Suite 380  
Tallahassee, FL 32399-0950

Re: OIG No. 220315-01-FUP, 6-month status follow-up on Auditor General (AG) Report No. 2022-057, Agency for Persons with Disabilities (APD) - Prior Audit Follow-up - Operational Audit

Dear Director Palmer:

As required by Section 20.055(6)(h), Florida Statutes, the corrective action status report for AG Report No. 2022-057, APD - Prior Audit Follow-up - Operational Audit is attached. The report details the current status of each recommendation. Our office did not perform detailed testing as typically done in an audit. Detailed testing will be performed by the Auditor General in future scheduled operational audits of the Agency.

Please contact me if you have any questions.

Sincerely,

*Erin Romeiser*

Erin Romeiser  
Inspector General

Enclosure

cc: Gina Herron, Chief of Staff  
Rose Salinas, Deputy Director of Budget, Planning, and Administration  
Aares Williams, Contract Administrator  
Melissa Hurst, Director of Support Services  
Sue Taylor, Finance & Accounting Director  
Clarence Lewis, Deputy Director of Operations  
Lorena Fulcher, Chief of Consumer Supports  
Sriram Kommu, Chief Information Officer (CIO)  
Mike Soddors, Deputy CIO/Information Security Manager

External:

Melinda M. Miguel, Chief Inspector General

Sherrill F. Norman, Auditor General

[JLAC@leg.state.fl.us](mailto:JLAC@leg.state.fl.us)

Status of Corrective Actions for AG Report No. 2022-057, APD - Prior  
Audit Follow-up - Operational Audit

---

<b>Finding No. 1</b>	As similarly noted in prior audit reports, most recently in our report No. 2017-204, Agency records did not always adequately evidence client eligibility for iBudget and Individual and Family Supports program services.	<b>Status Open</b>
----------------------	--	------------------------

Recommendation	We again recommend that Agency management take steps to ensure that client eligibility documentation is properly maintained to facilitate the Agency’s verification of, and enhance management’s assurance related to, client eligibility for iBudget and IFS Program services.
----------------	---

Management Response	Lorena Fulcher, Chief of Consumer Supports, provided the following response on April 22, 2022:
---------------------	--

APD drafted, is currently obtaining feedback from Regional offices, and has plans to subsequently issue a memo to APD staff that outlines a uniform process for addressing situations where APD identifies that an existing client’s eligibility information is missing from the Central Record.

Anticipated Completion Date	July 1, 2022
-----------------------------	--------------

---

<b>Finding No. 2</b>	The Agency had not established policies and procedures addressing all Agency administrative support functions. A similar finding was noted in our report No. 2017-204.	<b>Status Open</b>
----------------------	--	------------------------

Recommendation	We again recommend that Agency management establish policies and procedures addressing all administrative support functions. Such policies and procedures should reflect current Agency operating practices; address the requirements established by State law, rules, and other guidelines; and provide benchmarks against which compliance can be measured.
----------------	---

Management Response	Rose Salinas, Deputy Director of Budget, Planning, and Administration, provided the following response on April 29, 2022:
---------------------	---

The Agency has assembled a comprehensive listing of policies and procedures to be addressed and has prioritized them accordingly. Many are either in progress or have been drafted and reviewed. There is a bi-weekly meeting of the policies and procedures group to track progress to ensure the Agency is working toward completing all necessary procedures.

Anticipated Completion Date	December 31, 2022
-----------------------------	-------------------

---

<b>Finding No. 3</b>	As similarly noted in our report No. 2017-204, the Agency did not conduct required contract monitoring activities during the period July 2019 through January 2021.	<b>Status Open</b>
----------------------	---	------------------------

Recommendation	We again recommend that Agency management ensure that required contract monitoring activities are completed in accordance with State law, DFS
----------------	---

Status of Corrective Actions for AG Report No. 2022-057, APD - Prior  
Audit Follow-up - Operational Audit

Management Response guidelines, and Agency procedures.  
Aares Williams, Contract Administrator, provided the following response on April 26, 2022:

- 1) The Agency has identified, reclassified, and created Position Descriptions for Contract Monitoring positions.
- 2) Risk Assessments are currently being conducted on active contracts.
- 3) Based on the Risk Assessment a Monitoring Schedule will be established for the upcoming fiscal year.
- 4) Monitoring Activities such as desk audits are being conducted on active contracts.

Anticipated Completion Date

- 1) Additional monitoring staff are onboard by June 30, 2022.
- 2) Risk Assessments shall be conducted on all active contracts by June 30, 2022
- 3) Monitoring Schedule for Fiscal Year 2022-2023 will be established by July 31, 2022
- 4) Monitoring activities shall be conducted on the following terms:
  - a. Desk audits to be completed on all active contracts with findings will be presented to the Contract Manager by June 30, 2023.
  - b. High-risk vendors shall receive on-site monitoring visits and findings will be presented to their attention by June 30, 2023.
  - c. Moderate-Risk vendors shall receive on-site monitoring visits and findings will be presented to their attention by June 30, 2024.
  - d. Low-Risk vendors shall receive on-site monitoring visits and findings will be presented to their attention by June 30, 2025.

---

<b>Finding No. 4</b>	Agency controls over contract payments continue to need improvement.	<b>Status Open</b>
----------------------	--	--------------------

Recommendation	We again recommend that Agency management enhance controls to require that, prior to approving invoices for payment, contract managers obtain and review all required records and reports and verify that the invoiced amounts are allowable and properly calculated. We also recommend that Agency management ensure that contract payments are correctly recorded in FLAIR and FACTS and enhance invoice payment and processing controls to promote compliance with statutory prompt payment requirements.	
----------------	--	--

Management Response	Aares Williams, Contract Administrator, provided the following response on April 26, 2022:  Form CA-46 (Invoice Verification Packet) is being utilized by Contract Administration Staff to ensure that services, reports, and other required contract terms have been verified prior to approving invoices for payment.  The Disbursements Unit consistently meets with Contract Administration Staff to ensure statutorily required prompt payment laws are followed and payment information is accurately entered into Flair and FACTS.	
---------------------	---	--

Anticipated Completion Date	June 30, 2022	
-----------------------------	---------------	--

Status of Corrective Actions for AG Report No. 2022-057, APD - Prior  
Audit Follow-up - Operational Audit

---

<b>Finding No. 5</b>	The Agency could not always provide documentation evidencing that contracts for transportation services had been negotiated at the most cost-effective rate. A similar finding was noted in our report No. 2017-204.	<b>Status Open</b>
----------------------	--	------------------------

Recommendation	We recommend that Agency management enhance controls to ensure that Agency records evidence that transportation services contracts were awarded at the most cost-effective rates.	
----------------	---	--

Management Response	Aares Williams, Contract Administrator, provided the following response on April 26, 2022: <ol style="list-style-type: none"><li>1) The Transportation Rate Negotiation Packet has been developed and is currently being reviewed for final edits and implementation.</li><li>2) Contract Administration Staff shall receive technical assistance on the form and its intended purpose.</li></ol>	
---------------------	--	--

Anticipated Completion Date	July 31, 2022	
-----------------------------	---------------	--

---

<b>Finding No. 6</b>	The Agency did not always accurately or timely post contract information to the Florida Accountability Contract Tracking System.	<b>Status Open</b>
----------------------	--	------------------------

Recommendation	We recommend that Agency management enhance controls to ensure the timely posting of accurate contract and procurement information and documentation to FACTS in accordance with State law and DFS guidance.	
----------------	--	--

Management Response	Aares Williams, Contract Administrator, provided the following response on April 26, 2022: <ol style="list-style-type: none"><li>1) The FACTS Entry Checklist is currently being developed by Contract Administration staff.</li><li>2) Upon completion and approval of the FACTS Entry Checklist the bureaus Procedures (CA OP 8-001) will be updated to reflect the new FACTS entry process.</li></ol>	
---------------------	---	--

Anticipated Completion Date	July 31, 2022	
-----------------------------	---------------	--

---

<b>Finding No. 7</b>	Agency controls over property records, dispositions, and inventories continue to need improvement.	<b>Status Open</b>
----------------------	--	------------------------

Recommendation	We recommend that Agency management enhance property management controls to: <ul style="list-style-type: none"><li>• Ensure that Agency property records include for each property item, including disposed items, the information required by DFS rules.</li><li>• Establish a surplus property review board.</li><li>• Ensure a complete physical inventory of Agency property is annually conducted.</li></ul>	
----------------	---	--

Status of Corrective Actions for AG Report No. 2022-057, APD - Prior  
Audit Follow-up - Operational Audit

Management Response      Melissa Hurst, Director of Support Services, provided the following response on April 28, 2022:

Physical Inventory is currently being conducted. Management has sent out a list of to all Agency property custodians to complete a physical property inventory which is due to State Office by 04/29. The information will be compiled into one report which will be submitted to DFS no later than 06/30.

Anticipated Completion Date      June 30, 2022

**Finding No. 8**      The Agency did not always timely record property items to Agency property records.      **Status Open**

Recommendation      We recommend that Agency management establish property management policies and procedures that include a time frame for recording property acquisitions to Agency property records and ensure that Agency property records are timely updated for property acquisitions.

Management Response      Melissa Hurst, Director of Support Services, provided the following response on April 28, 2022:

Property Management Procedures and Policies are currently being edited to incorporate language for reporting and tagging newly acquired property items.

Anticipated Completion Date      September 1, 2022

**Finding No. 9**      Agency user access privilege controls for Agency systems continue to need enhancement to better prevent and detect inappropriate access to the systems.      **Status Open**

Recommendation      We recommend that Agency management strengthen controls to ensure that:

- Periodic reviews of IT system user access privileges are adequately performed and documented in Agency records.
- Information related to deactivated iConnect system access privileges is maintained and all IT user access privileges are deactivated immediately upon a user’s separation from Agency employment.
- FLAIR user access privileges are limited to promote an appropriate separation of duties and requiring that, where incompatible access privileges are necessary, compensating controls be established and documented.

Management Response      Mike Soddors, Deputy Chief Information Officer/Information Security Manager, and Rose Salinas, Deputy Director of Budget, Planning, and Administration, provided the following responses on April 25, 2022 and April 29, 2022 respectively:

- 1) The agency is working toward obtaining the Information Governance technology capabilities necessary to address these recommendations.

Status of Corrective Actions for AG Report No. 2022-057, APD - Prior  
Audit Follow-up - Operational Audit

- 2) Axiom Pro procedures have been updated to perform quarterly review of users requiring users to respond via email request if they still need access to the system. If no response is received, those user accounts are deactivated.
- 3) As for FLAIR, the Agency still accepts the risk of allowing some users update capabilities to incompatible functions. At this time, we have not identified effective compensating controls to assist in mitigating this risk.

Anticipated Completion Date

- 1) Unknown
- 2) Completed January 2022
- 3) Agency accepts the risk.

**Finding No. 10** As similarly noted in prior audit reports, most recently in our report No. 2017-204, Agency travel reimbursement requests were not always adequately supported or paid in accordance with the requirements of State law. **Status Open**

Recommendation To ensure compliance with State law and DFS rules, we again recommend that Agency management ensure that, prior to reimbursement, the reasonableness and allowability of claimed mileage be verified and documented in Agency records. In addition, we recommend that Agency management enhance travel policies and procedures to specify the nature and extent of trip log reviews and audits and how the reviews and audits should be documented.

Management Response Sue Taylor, Finance & Accounting Director, provided the following response on April 15, 2022:  
The agency is in the process of rewriting the travel policy and procedures to include instructions for supervisors on how to review travel documentation for accuracy and reasonableness. It will also include a section on home as headquarters explaining the process and expectations for the traveler to keep their position description updated and how to provide to disbursements.  
  
The agency has provided in house training to staff on verification of complete information on mileage logs and has ongoing training with employees on how to accurately complete mileage/trip logs.  
  
The agency has provided in house training to staff to assure verification of addresses on position descriptions stay updated to match travel reimbursements.

Anticipated Completion Date December 2022