

6-Month Follow-up Status of Corrective Actions Florida Fish and Wildlife Conservation Commission Invasive Aquatic Plant Management

Auditor General Report Number: 2026-023

Auditor General Report Number: 2023-154



Follow-up Project Number 26-0001

March 19, 2026

Percy Griffin
Inspector General

Carey Bryce
Director of Auditing

Florida Fish and Wildlife Conservation Commission
Office of Inspector General

Auditor General Report # 2026-023 Finding 1: Herbicide Inventory Controls	
Finding Summary:	Commission controls did not promote adequate control, safeguarding, or accounting for herbicide inventories.
Recommendation:	The Florida Auditor General recommend that Commission management establish policies and procedures for the management of the herbicide inventory and enhance controls to ensure an appropriate separation of duties and that Commission records evidence complete and accurate inventory information, including usage and public purpose, the appropriateness of inventory adjustments and management review thereof, periodic reconciliations and physical inspections, and the maintenance of reasonable inventory balances.
Management's Response:	FWC accepts and recognizes the audit team's finding through the thorough operational audit of the FWC, with specific emphasis on the FWC's Aquatic Invasive Plant Management program. Below is FWC's response to the audit team's finding: FWC agrees with the finding and has been aware of some shortcomings of the current herbicide inventory process and has been working on a digital herbicide inventory module (database) for several years. Among other improvements, the module will enhance FWC's ability to manage inventory and improve herbicide tracking. This module is currently in testing and is expected to be fully implemented by March of 2026. The herbicide inventory system will maintain a balance of all inventories, maintain Purchase Order prices for each item, and act as a central location for herbicide order requests, approvals, vendor fulfillment, proof of delivery, and the approval of invoices for payment. The system will improve tracking and accountability by incorporating the following: • A "requestor" role and an "approver" role, where the herbicide is requested for a certain work site and approved by a manager in Tallahassee. The approvals will be logged in the database in perpetuity. • An "upload" section that requires a signed receipt of delivery before the system allows the user to close out the order. This step will precede invoice payments. • Maintaining any adjustments to the inventory, with the username of the person who made the inventory adjustment and justification (e.g. "Due to bad weather, the last 10 gallons of herbicide were unable to be used during the treatment, so this has been returned to inventory"). Additionally, to improve oversight of inventory stored at vendor warehouses, FWC will include in future contracts that we can inspect inventory at any time to reconcile on-hand inventory with our records for remaining balances and staff will implement annual inspections. These inspections combined with the new

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	inventory tracking system and in conjunction with our current financial penalties process for vendors that fail to deliver products and formulations as requested will improve controls and oversight of herbicide inventory.
Management's Follow-up Response:	The herbicide inventory module that was described in our initial response is being implemented. We are scheduled to have all vendors in the system by the end of March 2026 and will be fully operational. In-person inspections of warehouses are scheduled for late April and early May.
FWC OIG Evaluation:	
Implementation Status:	Partially Implemented
Auditor's Comments:	To verify that the new herbicide system resolves all the Auditor General's concerns, Internal Audit will perform a system walkthrough after March 31, 2026, including a demonstration of how each finding has been addressed. This finding will remain open until the system is fully operational and a walkthrough can be completed. IPM Management has provided the dates and site locations for the upcoming onsite inspections for 3 of the 5 warehouses. The remaining two inspections are still being scheduled. The full inspection schedule will be forwarded once it is finalized. Although IPM management provided a draft of the herbicide inventory management policies and procedures, the document lacked several key elements necessary for it to be fully functional. Effective policies and procedures should include clear guidelines, defined expectations, and structured processes that support consistent employee actions and ensure organizational compliance.

Auditor General Report # 2026-023 Finding 2: Procurement Controls	
Finding Summary:	Commission procurement controls need enhancement to better promote and document compliance with State law.
Recommendation:	The Florida Auditor General recommends that Commission management ensure that all procurements are conducted and documented in accordance with State law.
Management's Response:	FWC agrees with the finding and acknowledges that the current process may be improved and understands the importance of adhering strictly to these rules to ensure transparency, fairness, and accountability in the agency's procurement practices. FWC recognizes negotiation may be more advantageous to the state, and moving forward, will take necessary steps to use best efforts to negotiate

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	and report such instances via PUR 7200 to OMS when the agency receives less than two responsive bids, proposals, or replies.
Management's Follow-up Response:	Negotiations are being held and reported quarterly via the PUR 7200.
FWC OIG Evaluation:	
Implementation Status:	Fully Implemented
Auditor's Comments:	Internal Audit (IA) reviewed FWC Procurement process to comply with F.S. 287.057(6) beginning in October 2025, after the Auditor General published their report. We found that the Procurement section has a file which contains a reminder for quarterly PUR 7200 forms submission, along with a bid log to capture all bid situations that require a PUR 7200. Finally, IA examined the nine instances, beginning October 2025, in which FWC received fewer than two responsive bids, proposals, or replies. Of the nine timely submissions, two did not result in contracts—one because FWC issued a notice to withdraw, and the other because negotiations did not lead to an agreement. Each PUR 7200 submitted included the required justification information and where applicable, an explanatory email regarding the absence of negotiations. Based on these corrective actions and documentation, IA considers this finding closed.

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Prior Auditor General Report # 2023-154, Finding 1: Aquatic Plant Control Permits	
Finding Summary:	Commission controls for processing applications for aquatic plant control permits could be enhanced to better demonstrate the verification of property ownership, that site maps include all information required by Commission rules, and whether any conservation easements had been established in the area for which plant control was proposed.
Recommendation:	The Florida Auditor General recommends that Commission management enhance controls to ensure that Commission records evidence for all aquatic plant control permit applications the verification of property ownership, that completed site maps include the information required by Commission rules, and whether any conservation easements had been established in the area for which plant control was proposed.
Management's Response:	The Commission concurs with the Finding. Corrective Action: The State of Florida provides cadastral data online through County Property Appraisers websites. For no cost, persons can search for individual property records. The permitting section of the Invasive Plant Management Procedures Manual (Manual) will be updated to require staff to access county property appraisers' websites to confirm the names on the application match with the information provided by the property appraiser. Staff will be instructed to place a note on the record of the permit application confirming that this check has been completed. The review of property records will occur within 30 days of receiving the application. If the review shows a discrepancy, a Request for Additional Information (RAI) will be sent to the applicant requesting the applicant provide proof of riparian ownership as required by rule. Although Rule 68F-20.002 Florida Administrative Code (FAC) requires applicants for Aquatic Plant Control permits to provide a site map that includes specific information pertaining to the management site, IPM has determined that for the majority of the permits issued, these site maps provide little benefit in developing permit conditions. IPM biologists are required to conduct a site inspection for all new permits to positively identify target plants, determine site dimensions and identify those areas where control is authorized and those areas not to be controlled. The majority of permits issued have a site map that was created or modified by the IPM biologist and do not incorporate site maps submitted by the applicant. Aquatic plant control permits are issued to individual riparian property owners. The technical abilities of applicants vary greatly and creating and uploading a site map can be difficult. Requiring a site map for every application would place unnecessary burdens on the regulated public with limited value to the processing of a permit. There are some applications, for large or complicated projects, that requiring a site map for would benefit the permitting

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	process by speeding up review by IPM staff. These applications usually come from governments or developments with paid consultants capable of developing site maps. The IPM Section needs to have the flexibility to require site maps as necessary without requiring a site map for every application. If needed, a rule change could be pursued to remove the requirement to submit a site map. There is no known clearing house for information on the location and conditions of conservation easements. It would be time and cost prohibitive for IPM staff to search for this information for every application received. IPM relies on the applicant to provide this information for their property, however, there is no language in the current online application that prompts the applicant for this information. Modifying the permit application page to include a statement “Does a conservation easement exist on lands adjacent to the proposed aquatic plant management site Yes/No?” “If yes please upload a copy of the conservation easement.” A confirmed answer would be required to submit the application. If the applicant falsifies this information, language in subsection 68F-20.0075(1)(a) FAC allows FWC to revoke or modify the permit. Changes to the data entry screens for the aquatic plant control permit requires rule promulgation. The FWC is currently processing bids for a replacement to the current FWC Permit System which includes the aquatic plant control permitting. This issue will be addressed in the development of the new permit system and subsequent rule amendments. Per IPM management, no updates to the Manual have been completed. According to IPM management, “No, rule [68F-20.002 FAC site map] changes are approved by the Commission; staff are discussing with legal counsel the best options and if a rule change will be necessary or if we can use other discretionary mechanisms as part of our standard operating procedures.” Per IPM management, “The current permit system is not being updated as a new permit system is being developed. A contract has been awarded and development of a new FWC permit system that will include aquatic plant control permits.” (Open). Estimated Completion Date: March 31, 2024 (Manual) and May 2024 (FWC permit system).
Management's Follow-up Response:	The new online permit system is operational as of December 2025. It includes the requirement of an affirmative statement (check yes) that the application materials are accurate. It also includes a statement asking if a conservation easement exists on the adjacent lands. If yes, a copy of the easement is required. For site maps, permit applicants can include an option for FWC to assist with this and upload maps on their behalf. The Manual was completed and uploaded to the internal SharePoint in September 2025. Updates to the manual included new procedures to confirm ownership for aquatic plant control permits; guidance on suppliers, reporting, compliance and permitting for triploid grass carp; and new language to manage

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	access and integrity of the databases that track aquatic plant, upland plant, and triploid grass carp programs.
FWC OIG Evaluation:	
Implementation Status:	Partially Implemented
Auditor's Comments:	IPM Management submitted a copy of the Invasive Plant Management Operations Manual. The manual contains dated references and includes contact information for employees who have separated from the agency, and it does not describe mandatory training requirements or competency expectations. In addition, the manual lacks a revision history and documented management approval. This manual should be reviewed and updated annually to ensure it reflects current practices and personnel. Based on the screenshots provided, it is unclear how they demonstrate verification of property ownership or the inclusion of site maps with each application. Additionally, there is no evidence of a process to verify whether applicants upload sufficient documentation to confirm that conservation easements have been established for areas where aquatic plant control is proposed. This will need to be validated during the system walkthrough after March 31, 2026, including a demonstration of how each aspect of the finding has been addressed. This finding will remain open until the system is fully operational and the walkthrough is completed.

DISTRIBUTION, STATEMENT OF ACCORDANCE, AND PROJECT TEAM

Distribution List:

Roger Young, Executive Director
Rett Boyd, Assistant Executive Director
Jessica Crawford, Chief of Staff
George Warthen, Chief Conservation Officer
Melissa Tucker, Director, Division of Habitat and Species Conservation (HSC)
David Johnson, Deputy Division Director of Operations and Program Development, HSC
Sherrill Norman, CPA, Florida Auditor General
Joint Legislative Auditing Committee

Statement of Accordance:

This audit was conducted pursuant to Section 20.055, Florida Statutes. We conducted this audit in accordance with Generally Accepted Government Auditing Standards as published by the United States Government Accountability Office. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Project Team:

Alexis Wyche, CIGA, FCCM, Senior Internal Auditor
Carey Bryce, CIA, CIGA, PMP, ITIL 4 Foundation, FCCM, Director of Auditing
Percy Griffin, CIG, CIGI, Inspector General