



Sheryl G. Steckler
Inspector General

OFFICE OF INSPECTOR GENERAL PALM BEACH COUNTY



Inspector General
Accredited

Date: October 22, 2013
To: Inspector General Committee
From: Sheryl Steckler
Inspector General
Subject: Office of Inspector General Accomplishments June 2010 to Present

On May 21, 2009, a Grand Jury, in response to a number of high profile convictions of County and Municipal officials, issued a Presentment containing a number of recommendations intended to address public corruption and improve public governance in Palm Beach County. Among its numerous recommendations was that the County adopt an Ethics Ordinance, an Ethics Commission, and an "independent Office of Inspector General or Performance and Chief Compliance Officer."

In response, on December 15, 2009, the Board of County Commissioners (BOCC) adopted its original Inspector General Ordinance (2009-049) providing for an Inspector General who was to be chosen by a "selection committee" comprised of the commission on ethics, the public defender, and the state attorney. The Inspector General (IG) was to have jurisdiction over the operations of the BOCC and any special district or municipality which voluntarily chose to enter into a contract with the IG.

The Commission on Ethics was then established, its members appointed, and the "selection committee" initiated a broad based search for an Inspector General. With approximately 100 applications, I was selected for an interview. During my interview, I spoke about my commitment and qualifications to build this new office from the ground up, obtain Inspector General Accreditation, and implement automation and a web site. What I also portrayed to the IG Selection Committee was a person willing to be the "Peoples" Inspector General. I was selected, negotiated compensation based on oversight of solely the BOCC and its departments and contractors, and instrumentalities, and signed a four year contract to be your first Inspector General commencing on June 28, 2010.

Approximately 3 weeks after I began my duties, the BOCC adopted Ordinance 2010-19 which placed on the November 2, 2010 ballot, a proposal to require an independent Inspector General in the County Charter and to extend the Office of Inspector General (OIG) authority and responsibility to oversee the government of any municipality in which a majority of the voters approved the amendment. In the November 2010 election, over 72% of the voters approved the ballot amendment, as did a majority of the voters in each of the county's 38 municipalities. Three additional entities subsequently came under OIG jurisdiction via contract: Solid Waste Authority (November 2010-present), Health Care District (January 2012-June 2013); and Children's Services Council (January 2012-present). Since being selected as Inspector General, OIG jurisdiction went from one entity (BOCC) to 41 entities.

"Enhancing Public Trust in Government"

PO Box 16568, West Palm Beach, FL 33416-6568
Email: inspector@pbcgov.org Website: <http://www.pbcgov.com/oig/>
Office: (561) 233-2350 Hotline: (877) 283-7068 Fax: (561) 233-2370

Even with the additional jurisdictions, I have exceeded the deliverables in my original contract as shown in detail in the attachment. It is also worth noting that the accomplishments of the OIG were achieved despite a number of obstacles. During the past three and a half years, I built the operation from scratch, as I had committed to do. Manuals, forms, position descriptions, performance expectations, web site, processes and procedures were all created. These accomplishments were noted as exceptional during a review by the Commission on Florida Law Enforcement Accreditation, Inc. (CFLEA). A budget was outlined and staff was hired; as I determined the need and as resources were available. I recognized early on that laying the office's foundation was a priority to meet whatever challenges lay ahead and therefore spent much of the early days building that foundation.

The OIG currently has 23 (57.5%) of the 40 anticipated staff that will be hired once the funding is provided. It is important to note that since the responsibility to oversee the 38 municipalities was added, the Office has never been provided the funding specified under the Ordinance. To date, the OIG has received over 1,025 written correspondences and released 84 reports with Questioned and Identified Costs of over \$10.6 million. We have recommended 279 improvements of which 224 (80%) have been implemented and 36 (13%) are in process. In October 2012, we began calculating the Cost Avoidance savings if the entities implement our recommendations. In FY2012, Cost Avoidance totaled \$5.7 million. All specifics relating to these statistical data can be found on our website at <http://www.pbcgov.com/oig/>. As required by Ordinance, FY2011 and FY2012 Annual Reports can be found at: <http://www.pbcgov.com/oig/archreports.htm>.

I am extremely proud of our accomplishments over the last 40 months. The Office, under my leadership, has achieved everything I committed to during my interview and much more. I appreciate all the support that members of the community have provided over the years. To change a culture does not happen overnight.

In closing, as you know my contract runs through Friday, June 27, 2014. After thoughtful consideration with my family, I am unable to commit to another four year contract and as such will not be seeking a renewal of my contract to continue as the Inspector General of Palm Beach County beyond June 27, 2014.

I would like to thank the members of the Inspector General Committee who selected me as their first Inspector General. Looking ahead to FY2014-15, it is critical that the OIG start preparing for its Re-Accreditation from the Commission on Florida Law Enforcement Accreditation, Inc., as well as the Office's Peer Review which will be performed by the Association of Inspectors General. During the remaining time under my contract, I will continue to strengthen this Office's relationships with elected officials and government employees under our jurisdiction, the business and community stakeholder groups, and the citizens of Palm Beach County. I will remain steadfast and focused on "*Enhancing Public Trust in Government.*"

I look forward to presenting the Six Month Status Report at our scheduled public meeting on Thursday, February 6, 2014.

Yours Truly,



Sheryl G. Steckler,
Inspector General

Inspector General Contract Term
Inspector General Sheryl Steckler's comments are in Italics.

ARTICLE XII. INSPECTOR GENERAL

Sec. 2-422. Office created and established.

The inspector general shall head the office of inspector general. The organization and administration of the office of inspector general shall be independent to assure that no interference or influence external to the office of inspector general adversely affects the independence and objectivity of the inspector general.

The Inspector General has a four-year contract beginning June 28, 2010-June 27, 2014. Deliverables in the Inspector General's contract coincide with the Inspector General Ordinance.

The original jurisdiction of the Office of Inspector General was solely the Board of County Commissioners and its departments and instrumentalities. The Solid Waste Authority contracted with the OIG in November, 2010; the 38 municipalities were added in June, 2011; Health Care District contracted with our Office from January 2012-June 2013; and Children's Services Council voluntarily came under our jurisdiction in January, 2012. The addition of these jurisdictions did not result in a renegotiation of my contract even though the responsibilities significantly increased.

Further, the following three requirements were added to the Inspector General Ordinance in June 2011, as a result of my suggestions during the Drafting Committee sessions. These requirements are designed to provide the public with assurance that the "external experts" in the inspector general field will review our office and confirm that the office follows appropriate standards.

- *Audits - "be conducted in accordance with the current International Standards for the Professional Practice of Internal Auditing as published by the Institute of Internal Auditors, Inc., or where appropriate, in accordance with generally accepted governmental auditing standards."*
- *Investigations - "comply with the General Principles and Standards for Offices of Inspector General as published and revised by the Association of Inspectors General."*
- *Accreditation - "develop and adhere to written policies in accordance with the accreditation standards set forth by the Commission on Florida Law Enforcement Accreditation, Inc."*

Below are the achievements of the formation of the Office of Inspector General, Palm Beach County.

Evaluation Tool – 7 Criteria with 42 Elements

This Evaluation Tool was adopted by the Inspector General Committee on September 23, 2013, and finalized the following day. This tool is not part of my contract; however, because it is important for future Inspector General Applicants to understand the manner in which they will be evaluated, a copy of this tool is attached and posted on the OIG website under Career Opportunities.

Criteria

- ✚ IG Ordinance 2011-009 Directives & AIG Standards
 - 10 Elements
- ✚ Leadership
 - 5 Elements
- ✚ Professionalism
 - 7 Elements
- ✚ Accountability
 - 4 Elements
- ✚ Communication
 - 6 Elements
- ✚ Reporting Procedures/Notifications Compliance
 - 6 Elements
- ✚ Outreach
 - 4 Elements

IG ORDINANCE 2011-009 DIRECTIVES & AIG STANDARDS

Sec. 2-426. Physical facilities and staff.

(2) The inspector general shall have the power to appoint, employ, and remove such assistants, employees and personnel, and establish personnel procedures as deemed necessary for the efficient and effective administration of the activities of the office of inspector general.

Due to funding constraints, our office is staffed at 57.5% of its approved compliment. See Personnel tab on our website at: <http://www.pbcgov.com/oig/personnel.htm>.

There is no specific requirement in my contract to professionally develop staff. However, Association of Inspector General (AIG) and Audit standards require staff to attain minimum training hours to maintain their certifications. All eligible staff attended the Association for Inspectors General Institutes professional development course and passed their tests to receive the appropriate certification.

There is no specific requirement in my contract for reviews of staff. The County typically does not provide annual performance reviews of its employees. However, my staff received performance expectations at the start of employment and evaluations annually, and whenever appropriate, personnel actions were taken.

ARTICLE XII. INSPECTOR GENERAL

Sec. 2-428. Reporting.

(1) Not later than December 31 of each year, the Inspector General shall prepare and publish a written annual report summarizing the activities of the office during the immediately preceding fiscal year ended September 30. The report shall be furnished to the inspector general committee, the county administrator and the Palm Beach County League of Cities, Inc., and posted on the inspector general's website. The report shall include, but need not be limited to: a description of significant abuses and deficiencies relating to the administration of programs and operations disclosed by investigations, audits, reviews, or other activities during the reporting period; a description of the recommendations for

corrective action made by the inspector general during the reporting period with respect to significant problems, abuses, or deficiencies identified; identification of each significant recommendation described in previous annual reports on which corrective action has not been completed; and a summary of each audit and investigation completed during the reporting period.

Annual reports published:

- December 7, 2011 http://www.pbcgov.com/OIG/docs/reportsinternal/Annual_Report_2011-FINAL%2012-7-2011.pdf; and
- December 14, 2012
http://www.pbcgov.com/OIG/docs/reportsinternal/Annual_Report_12_14_12.pdf

ARTICLE XII. INSPECTOR GENERAL

Sec. 2-429. Financial support and budgeting.

(3) The inspector general shall establish and maintain a fiscal year which coincides with that of the county. Beginning May 1, 2011, and every May 1 thereafter, the inspector general shall deliver to the board a budget request including a reasonable estimate of operating and capital expenditures and shall also include, but not be limited to, anticipated revenues from sources other than the county and municipalities, and funds estimated to be received but not expended in the current fiscal year. No later than April 1 of every year, the inspector general shall deliver a preliminary budget request to the Palm Beach County League of Cities, Inc., and be available to discuss the budget request with the League of Cities membership prior to May 1 of every year.

Each year, we complied with all of the Ordinance's specific requirements regarding our budget. Preliminary Budget Request letters were sent to League Members on March 30, 2012 and March 28, 2013, respectively; Inspector General Budget meetings were held with League of Cities on April 25, 2012 and April 24, 2013; and each year a timely budget request was submitted to the Board of County Commissioners. Letters can be found at: <http://www.pbcgov.com/oig/budget.htm>.

ARTICLE XII. INSPECTOR GENERAL

Sec. 2-423. Functions, authority and powers.

(1)....The office of inspector general shall develop and adhere to written policies in accordance with the accreditation standards set forth by the Commission on Florida Law Enforcement Accreditation, Inc.

See Commission on Florida Law Enforcement Accreditation, Inc. report, which demonstrates our office, met all requirements without exception:

http://www.pbcgov.com/oig/docs/reportsinternal/Palm_Beach_IG_Final_Report.pdf.

ARTICLE XII. INSPECTOR GENERAL

Sec. 2-423. Functions, authority and powers.

(13)The inspector general shall establish policies and procedures and monitor the costs of investigations undertaken. The inspector general shall cooperate with other governmental agencies to recover such costs from other entities involved in willful misconduct in regard to county or municipal funds.

We have been in full compliance. In addition to an Employee Handbook/Administrative Policies & Procedures manual and a New Employee Training & Orientation manual, each unit has its own specialized operating procedures manual. Additional employee attestation requirements are: Annual Independence from Impairments, Mission Statement and Core Values, OIG Employee's Pledge, IG Code of Ethics, and Security Agreement Form. In addition, we monitor the costs of investigations undertaken, and have at all times cooperated with other governmental agencies to recover costs from entities involved in willful misconduct in regard to local governmental funds.

ARTICLE XII. INSPECTOR GENERAL

Sec. 2-423. Functions, authority and powers.

The office of inspector general shall develop and adhere to written policies in accordance with the accreditation standards set forth by the Commission on Florida Law Enforcement Accreditation, Inc.

The OIG received Accreditation (February 2012) from the Commission on Florida Law Enforcement Accreditation, Inc. (CFLEA). The assessment was conducted in record time of 18 months, and noted that their review had discovered no flaws. The Final Assessment Report can be found at: http://www.pbcgov.com/oig/docs/reportsinternal/Palm_Beach_IG_Final_Report.pdf.

Direct from our Accreditation report:

“OVERALL CONCLUSIONS:

*File review was **exceptional and flawless**. The **detail and precision** in which the OIG’s Office directives were constructed were **exceptional**. The same was reflected in putting those directives into practices by the members of the Office.”*

*“The Office of Inspector General is a well trained and enthusiastic unit. This office has embraced their responsibilities to the citizens of Palm Beach County in a genuine fashion. **Everything they do, including seeking accreditation, is done to further the public’s trust in government.**”*

*“The effort and dedication put into the accreditation process is commendable and therefore the assessment team **highly recommends** the Office of Inspector General, Palm Beach County be favorably reviewed for accreditation status by the Commission for Florida Law Enforcement Accreditation at the next Commission meeting.” [Bold added]*

Complying 100% with Mandatory Standards

Total Number of Standards	Number of Standards Not Applicable (By Function)	Number of Standards Waived	Number of Applicable Standards in Compliance	Percent of Applicable Standards in Compliance
42	4	0	38	100%

****Commission on Florida Law Enforcement Accreditation, Inc. Re-Accreditation and Audit and Investigation Peer Review by the Association of Inspectors General occur every three years and are due to be conducted in FY2014-15.**

ARTICLE XII. INSPECTOR GENERAL

Sec. 2-423. Functions, authority and powers.

(6)The inspector general shall have the power to receive, review and investigate any complaints regarding any municipal or county-funded projects, programs, contracts or transactions. The inspector general shall establish a "hotline" to receive complaints, from either anonymous or identified persons.

- *A Hotline was established prior to my arrival. The County had not separated the Hotline number from the Office main line. We separated those numbers in 2012. In total, the Office has received over 5,074 calls since inception (June 28, 2010) thru September 30, 2013.*
- *All correspondences received are reviewed and evaluated. Matters outside the jurisdiction of the OIG, are referred to the appropriate agency with follow up to the complainant. Where complaints are within the jurisdiction of the OIG, work assigned is performed based on risk assessment/decision tree models within the office.*

Audit: <http://www.pbcgov.com/oig/audit.htm>

Investigations: <http://www.pbcgov.com/oig/investigations.htm>

Contract Oversight: <http://www.pbcgov.com/oig/contracts.htm>

LEADERSHIP

I established the OIG mission statement of "Enhancing Public Trust in Government" upon my arrival in June 2010. Although not specifically required under the Contract, I have gone to great lengths to make the activities of this office transparent; most of which can be found at our website at: <http://www.pbcgov.com/oig/index.htm>.

I was re-elected to the Executive Committee of the Board of Directors for the Association of Inspectors General. I am the Chair of the Membership Outreach, Ad Hoc Executive Director Contract and Peer Review (co-chair) committees.

I currently instruct classes on "Peer Reviews" and "Media- Creating a Win-Win" at the AIG Institutes for the Inspector General and Audit Certification classes. Class evaluations for the Certified Inspector General Auditors Institute (CIGA) was an overall 4.55 (out of 5). My overall evaluation for the Audit Peer Review class was a 4.77.

For the Certified Inspector General (CIG) my overall evaluation was a 4.82 for Peer Review and 4.83 for the Media class (jointly taught with a reporter and a State Public Information Officer.)

My rating comments, in part:

"Wonderful, engaging, make it longer; Invaluable knowledge!"

"Sheryl was very dynamic. Good job!"

"She (instructor) made the topic interesting"

"Sheryl is an excellent trainer!"

"Very good – good practical info and accurate"

"Effect: We will check on policies to see if there is guidance on encountering fraud."

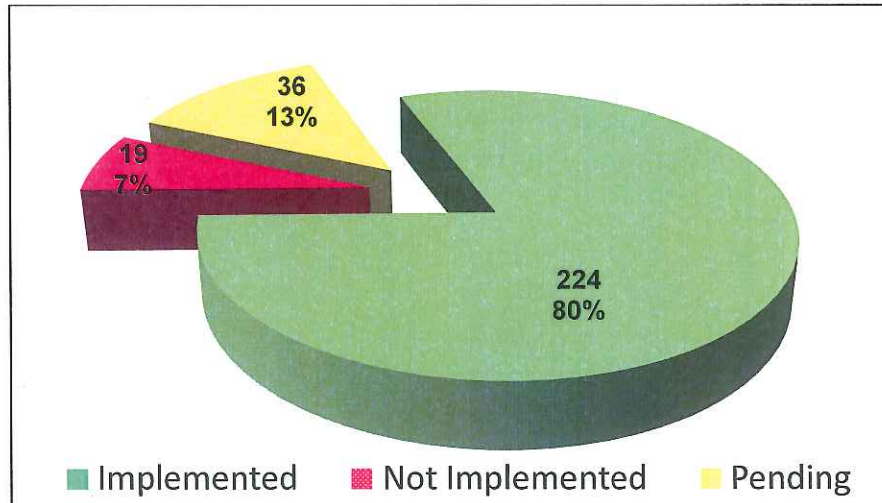
"The instructor provided useful information, lecture was excellent."

A snapshot of Intake comparables for 2011 and 2012 for similar IG offices:

<i>Office of Inspectors General</i>	<i>OIG Staff Size</i>	<i>Total Written Correspondence 2011</i>	<i>Total Written Correspondence 2012</i>	<i>Hotline and/or Main Line Calls</i>
<i>Miami-Dade</i>	36	286	213	<i>Hotline: 80 (2011);89 (2012) Does not track other calls</i>
<i>New Orleans</i>	33	55	63	<i>Calls are not actually logged. They average approx. 5 calls per week which equals approx. 260 calls per year</i>
<i>Palm Beach County</i>	23	307	433	<i>1,478 (6/28/10-9/30/11) 1,993 (10/1/11-9/30/12)</i>
<i>Broward County</i>	18	± 250	± 250 <i>(approx 500 total correspondences from inception August 2011 until now)</i>	<i>Not answered physically....go through computer</i>

Some additional examples of Leadership – Workload from June 28, 2010 - September 30, 2013:

- ***Issued the following reports (84):***
 - *10 Audits Reports since November 2012;*
 - *40 Investigative Reports: 15 Investigations, 11 Management Reviews; 4 Limited Reviews, 6 Investigation Notifications, 4 Corrective Action Memos; and*
 - *34 Contract Oversight Reports: 12 Observations, 21 Notifications and 1 Review.*
- ***Received 1,028 written correspondences. Each correspondence is entered into our data system within 2 business days (exceptions documented) and reviewed with disposition within 5 business days (exceptions documented). These timelines are self-imposed and are strictly adhered to.***
- ***Total Questioned¹ and/or Identified² Costs of \$10,684,452; \$354,337 was recovered. Where recommendations are implemented, a total of \$5,750,171 in Avoidable³ Costs (since Oct 2012) should be saved. All statistical data can be found at: <http://www.pbcgov.com/oig/index.htm>.***
- ***Issued 279 Corrective Actions &/or Recommendations to which 224 (80%) have been implemented and 36 (13%) in process.***



¹ Questioned Costs are a cost that is questioned because of a finding that the expenditure of funds for the intended purpose is unnecessary or unreasonable and/or lacks adequate documentation.

² Identified Costs are those dollars that have the potential of being returned to offset the taxpayers' burden.

³ Avoidable Costs is a value that represents the dollars an entity will not have to spend, and/or the increase in revenue, over the next three years if the OIG's recommendations are implemented. If the entity does not implement the OIG recommendations, the entity will continue to incur the costs.

In order to promote transparency, educate on the role of the Office of Inspector General, build relationships with those entities under our jurisdiction, and enhance our operations and effectiveness, to date we have conducted 311 outreach efforts. These efforts include on-going meetings and/or communication with Business Community Stakeholders, Ethics Reform Stakeholders, Municipal City Manager Stakeholders, and Citizen Stakeholders thru our Citizens Initiative Training, as well as countless public events, speeches, media contacts and training. Our outreach efforts have reached over 5,300 people since the OIG doors opened in June 2010. I conducted 97% of all speeches and was involved in 96% of the media news print contacts, 100% of radio and school media contacts, 49% of the television interviews, and 62% of all presentations and training.

I was also instrumental in drafting the 2011 Legislative changes to the Public Records law to ensure that information on open activities within a local inspector general's office does not prematurely get out in the public domain. This was an important step to safeguard and protect information that could, if prematurely released, unfairly damage someone's reputation or impede an ongoing investigation.

Our investigations unit is located in a secure area, as required by accreditation standards, and all staff is HIPPA trained.

During my interview for this position, I mentioned my ability to bring automation to this office. Although not specifically required in my contract, with the assistance from the County Information Systems Services (ISS) Department, we established web based systems for Investigations, Audit, Contract Oversight and Payroll. Although the County ISS Department sets out the timelines for each project, Investigations, Contract Oversight and Payroll are now fully implemented and Audit is in testing mode with an expectation to be completed by December 2014.

PROFESSIONALISM

I require both an Annual Attestation of Independence for all staff, as well as the additional self imposed requirement of attestations for all staff who are involved in any investigation.

ARTICLE XII. INSPECTOR GENERAL

Sec. 2-427. Procedure for finalization of reports and recommendations which make findings as to the person or entity being reviewed or inspected.

...Notwithstanding any other provision of this article, whenever the inspector general determines that it is appropriate to publish and deliver a report or recommendation which contains findings as to the person or entity being reported on or who is the subject of the recommendation, the inspector general shall provide the affected person or entity a copy of the findings. Such person or entity, who is the subject of a finding or recommendation resulting from an investigation or review, shall have ten (10) calendar days to submit a written explanation or rebuttal of the findings before the report or recommendation is finalized. In the case of an audit, such person or entity shall have twenty (20) calendar days to submit a written explanation or rebuttal of the audit findings or before the report or recommendation is finalized. The inspector general shall grant reasonable extensions of time for providing a written explanation or rebuttal upon written request. Such timely submitted written explanation or rebuttal shall be attached to the finalized report or recommendation. The requirements of this subsection shall not apply in matters subject to the State of Florida's Whistle-blower's Act, or when

the inspector general, in conjunction with the state attorney or U.S. Attorney, determines that supplying the affected person or entity with such report will jeopardize a pending criminal investigation.

Our office has implemented quality assurance checks throughout the audit, investigative and contract oversight process to ensure due professional care in our duties. In addition, those individuals subject to our investigative and audit findings are provided an opportunity to respond before we issue any Final Report. The only exceptions as outlined in the ordinance: whistle-blower or referral for criminal investigation. Extensions of at least one week, when requested, are granted. All subject/entity responses are attached to the final report when issued to appropriate parities as well as placed on the OIG website.

Current Fiscal Year: <http://www.pbcgov.com/oig/reports.htm>

Prior Fiscal Years: <http://www.pbcgov.com/oig/archreports.htm>

Although not specifically required by my contract, in addition to the County Code of Ethics, I have established OIG Core Values. They can be found at: <http://www.pbcgov.com/oig/aboutus.htm>.

ACCOUNTABILITY

ARTICLE XII. INSPECTOR GENERAL

Sec. 2-423. Functions, authority and powers.

Such audits shall be conducted in accordance with the current International Standards for the Professional Practice of Internal Auditing as published by the Institute of Internal Auditors, Inc., or where appropriate, in accordance with generally accepted governmental auditing standards. Such investigations will comply with the General Principles and Standards for Offices of Inspector General as published and revised by the Association of Inspectors General. The office of inspector general shall develop and adhere to written policies in accordance with the accreditation standards set forth by the Commission on Florida Law Enforcement Accreditation, Inc.

Our Audits and Investigations comply with the above standards. We have developed and adhere to written policies in accordance with the specified accreditation standards.

ARTICLE XII. INSPECTOR GENERAL

Sec. 2-423. Functions, authority and powers.

(13)The inspector general shall establish policies and procedures and monitor the costs of investigations undertaken. The inspector general shall cooperate with other governmental agencies to recover such costs from other entities involved in willful misconduct in regard to county or municipal funds.

We have established such policies and procedures and when our administrative investigations lead to possible criminal violations, we request from the State Attorney's Office investigative costs for cases referred by our office that are prosecuted. In addition, our office provides all necessary information to any entity that has any recoveries due based on our administrative findings. See Questioned and/or Identified Costs since Inception at: <http://www.pbcgov.com/oig/dashboard-main.htm#bqicsi>.

COMMUNICATION

Although not specifically required in my contract:

- *Our Intake Unit for correspondences/inquiries has very strict self-imposed time standards. We must abide by the time standards we set in order to obtain accreditation and reaccreditation.*
- *We provide factual and relevant information and strive to write reports in a clear, concise, and easy to read style.*
- *Our website is world class when it comes to transparency and information flow.*
- *Customer service is critical to us and we take it very seriously. Our website and form letters have a survey where the complainant can indicate whether we were professional, knowledgeable and able to assist him/her. Further, on our home page we also provide a direct email link for Feedback to the Inspector General. See: <http://www.pbcgov.com/oig/index.htm>.*

REPORTING PROCEDURES/NOTIFICATION COMPLIANCE

ARTICLE XII. INSPECTOR GENERAL

Sec. 2-423. Functions, authority and powers.

(3)...In the case of a refusal by an official, employee or other person to obey a request by the inspector general for documents or for an interview, the inspector general shall have the power to subpoena witnesses, administer oaths, and require the production of documents. Seventy-two (72) hours prior to serving a subpoena, the inspector general shall provide written notice to the state attorney and the U.S. Attorney for the Southern District of Florida. The inspector general shall not interfere with any ongoing criminal investigation or prosecution of the state attorney or the U.S. Attorney for the Southern District of Florida. When the state attorney or the U.S. Attorney for the Southern District of Florida has explicitly notified the inspector general in writing that the inspector general's investigation is interfering with an ongoing criminal investigation or prosecution, the inspector general shall suspend service of subpoena, examination of witnesses, or other investigative activities as set forth in the notice. In the case of a refusal to obey a subpoena served to any person, the inspector general may make application to any circuit court of this state which shall have jurisdiction to order the witness to appear before the inspector general and to produce evidence if so ordered, or to give testimony relevant to the matter in question.

I have implemented a standard protocol for notifying the SAO and United States Attorney of our intent to issue subpoenas, with which we have achieved 100% compliance.

ARTICLE XII. INSPECTOR GENERAL

Sec. 2-427. Procedure for finalization of reports and recommendations which make findings as to the person or entity being reviewed or inspected.

The inspector general shall publish and deliver finalized reports and recommendations to the board or the appropriate municipality, and to the county commission on ethics.

I have a documented process in place for release of reports to appropriate individuals.

ARTICLE XII. INSPECTOR GENERAL

Sec. 2-423. Functions, authority and powers.

(1) The inspector general shall have the authority to: (a) make investigations of county or municipal matters and publish the results of such investigations; (b) review and audit past, present and proposed county or municipal programs, accounts, records, contracts, change orders and transactions; and (c) prepare reports and recommendations to the board, or the subject municipality, or participating entities subject to section 2-421 (2) based on such audits or investigations.

Our reports contain recommendations where appropriate. To date, we have issued 279 Corrective Actions and/or Recommendations of which 224 (80%) have been implemented and 36 (13%) in process.

ARTICLE XII. INSPECTOR GENERAL

Sec. 2-427. Procedure for finalization of reports and recommendations which make findings as to the person or entity being reviewed or inspected.

...Notwithstanding any other provision of this article, whenever the inspector general determines that it is appropriate to publish and deliver a report or recommendation which contains findings as to the person or entity being reported on or who is the subject of the recommendation, the inspector general shall provide the affected person or entity a copy of the findings. Such person or entity, who is the subject of a finding or recommendation resulting from an investigation or review, shall have ten (10) calendar days to submit a written explanation or rebuttal of the findings before the report or recommendation is finalized. In the case of an audit, such person or entity shall have twenty (20) calendar days to submit a written explanation or rebuttal of the audit findings or before the report or recommendation is finalized. The inspector general shall grant reasonable extensions of time for providing a written explanation or rebuttal upon written request. Such timely submitted written explanation or rebuttal shall be attached to the finalized report or recommendation. The requirements of this subsection shall not apply in matters subject to the State of Florida's Whistle-blower's Act, or when the inspector general, in conjunction with the state attorney or U.S. Attorney, determines that supplying the affected person or entity with such report will jeopardize a pending criminal investigation.

Those persons or entities subject to our investigative and audit findings are provided an opportunity to respond, as specified in the Ordinance. (Exceptions as outlined in the ordinance: whistle-blower or referral for criminal investigation). When requested, extensions of at least one week were granted. All subject/entity responses are attached to the final report when issued and placed on the OIG website.

Current Fiscal Year: <http://www.pbcgov.com/oig/reports.htm>

Prior Fiscal Years: <http://www.pbcgov.com/oig/archreports.htm>

ARTICLE XII. INSPECTOR GENERAL

Sec. 2-428. Reporting.

(1) Not later than December 31 of each year, the Inspector General shall prepare and publish a written annual report summarizing the activities of the office during the immediately preceding fiscal year ended September 30. The report shall be furnished to the inspector general committee, the county administrator and the Palm Beach County League of Cities, Inc., and posted on the inspector general's website. The report shall include, but need not be limited to: a description of significant abuses and deficiencies relating to the administration of programs and operations disclosed by investigations, audits, reviews, or other activities during the reporting period; a description of the recommendations for corrective action made by the inspector general during the reporting period with respect to significant

problems, abuses, or deficiencies identified; identification of each significant recommendation described in previous annual reports on which corrective action has not been completed; and a summary of each audit and investigation completed during the reporting period.

We have fully complied with requirements for OIG Annual reports:

- *Published December 7, 2011*
http://www.pbcgov.com/OIG/docs/reportsinternal/Annual_Report_2011-FINAL%2012-7-2011.pdf; and
- *Published December 14, 2012*
http://www.pbcgov.com/OIG/docs/reportsinternal/Annual_Report_12_14_12.pdf

Although not specifically required in my contract:

- *Our Office has established methods for receiving and processing correspondences/ complaints. See our Intake Process Flow Model located under the Investigations tab at:*
<http://www.pbcgov.com/oig/investigations.htm>
- *Employees, contractors and the public can report waste, fraud or abuse via the website at:*
<http://www.pbcgov.com/oig/rwfa.htm>. (Form is also available in Spanish)
- *Employees, contractors and the public can request whistle-blower protection via the website at:*
<http://www.pbcgov.com/oig/rwfa.htm>. (Form is also available in Spanish)
- *We issued a Strategic Plan (2012) and an Updated Strategic Plan in 2013:*
(http://www.pbcgov.com/OIG/docs/reportsinternal/OIG_Strategic_Plan_Final_1-18-12TOC.pdf)

(<http://www.pbcgov.com/OIG/docs/reportsinternal/FINAL%20Strategic%20Plan%20Update%2004-9-2013.pdf>)

OUTREACH

ARTICLE XII. INSPECTOR GENERAL

Sec. 2-423.1. Outreach.

The inspector general will coordinate with the county administrator and municipal manager or administrator to develop public awareness strategies to inform government officials and employees, as well as the general public, of the authority and responsibilities of the office of the inspector general. Such strategies shall include but not be limited to inclusion in the government's web page with a link to the office of inspector general website, publication of notices in the government's newsletters, and posting information about the office of inspector general in government employee break rooms and other common meeting areas. The inspector general shall provide on its website examples that illustrate fraud, waste, mismanagement, misconduct and abuse.

My extensive outreach efforts are set out in detail above. Supplementing those efforts are the following sections which can be found on our web site:

- *Report Waste, Fraud or Abuse:*
<http://www.pbcgov.com/oig/rwfa.htm>
- *Whistle-blower Poster:*
http://www.pbcgov.com/oig/docs/Outreach/IG_Poster_5_25_12.pdf
- *Website dashboard*
<http://www.pbcgov.com/oig/dashboard-main.htm>
- *Website has Illustrations and Common Issues Found*
<http://www.pbcgov.com/oig/rwfa.htm>
<http://www.pbcgov.com/oig/comissues.htm>
- *Corrective Action Recommendations:*
<http://www.pbcgov.com/oig/caps.htm>
- *What To Expect When Contacted by OIG Staff:*
<http://www.pbcgov.com/oig/faqs.htm#bexpect>
- *Presentations:*
<http://www.pbcgov.com/oig/outreach.htm>
- *Citizens Initiative:*
<http://www.pbcgov.com/oig/citinit.htm>
- *Speakers Request:*
http://www.pbcgov.com/OIG/docs/Outreach/Speaker_Request_IG.pdf
- *Customer Feedback Survey*
<http://www.pbcgov.com/oig/CustFeedback.htm>

ARTICLE XII. INSPECTOR GENERAL

Sec. 2-423. Functions, authority and powers.

(4) ...The county administrator and each municipal manager, or administrator, or mayor where the mayor serves as chief executive officer, shall promptly notify the inspector general of possible mismanagement of a contract (misuse or loss exceeding \$5,000 in public funds), fraud, theft, bribery, or other violation of law which appears to fall within the jurisdiction of the inspector general, and may notify the inspector general of any other conduct which may fall within the inspector general's jurisdiction.

The county administrator and each municipal manager, or administrator, or mayor where the mayor serves as chief executive officer, shall coordinate with the inspector general to develop reporting procedures for notification to the inspector general.

*Reporting Procedures by entities under OIG jurisdiction are located at:
<http://www.pbcgov.com/oig/policy.htm>.*

Sec. 2-423. Functions, authority and powers.

(4) Where the inspector general suspects a possible violation of any state, federal, or local law, he or she shall notify the appropriate law enforcement agencies.

We have fully complied with the requirement to report any suspected violation of law to the appropriate law enforcement agency. In addition, we are continually in contact with the State Attorney's Public Corruption Unit.

INSPECTOR GENERAL CONTRACT RENEWAL EVALUATION 2013

IG Committee Member: _____

PERFORMANCE DIMENSION

IG Ordinance 2011-009 Directives & AIG Standards

	RATING		
	Meets Expectation	Needs Improvement	Not Observed or N/A
1 Employs properly experienced staff and ensures their continued professional development where appropriate	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2 Establishes OIG internal personnel procedures, and takes personnel-related actions (e.g., hires, trains, disciplines, and reviews staff)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3 Publishes OIG annual report no later than December 31st of each year	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4 Maintains a fiscal year that coincides with that of PBC BCC	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5 On May 1st each year, submits to the BCC a budget request (including capital & operating expenses, anticipated revenues from external sources, funds received but not expended in current fiscal year)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6 By April 1st each year, delivers preliminary budget request to the Palm Beach League of Cities, Inc.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7 Develops and adheres to written policies that correspond to accreditation standards of the Commission on Law Enforcement Accreditation, Inc.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8 Conducts audits in accordance with current International Standards for the Professional Practice of Internal Auditing or where appropriate, in accordance with the accepted government auditing standards	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9 Conducts investigations that comply with General Principals & Standards for Offices of Inspectors General as published by the AIG	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10 Establishes a "hotline" to receive complaints from both anonymous and identified sources <small>(References: Pbc IG Ordinance, Employment Contract, AIG Standards)</small>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

INSPECTOR GENERAL CONTRACT RENEWAL EVALUATION 2013

IG Committee Member: _____

Narrative:

INSPECTOR GENERAL CONTRACT RENEWAL EVALUATION 2013

IG Committee Member: _____

PERFORMANCE DIMENSION

RATING

Meets Expectation Needs Improvement Not Observed or N/A

Leadership

Behavioral Examples:

- 11 OIG activities contribute in a positive way to the mission of "Enhancing Public Trust in Government"

Narrative:

- 12 Initiates/supervises/coordinates investigations, audits, and contract oversight of parties under the OIG's jurisdiction

Narrative:

- 13 Promotes transparency by providing user-friendly access to OIG information and work products

Narrative:

- 14 Safeguards and protects confidential, privileged, or classified information in compliance with applicable laws, regulations, and standards

Narrative:

- 15 Leverages technology for effectiveness and efficiency

Narrative:

(References: PBC OIG Values, AIG Standards, IG Ordinance Sec. 2-422 and 2-429 (3), Employment Contract Paragraph 5 [A, B, E, J])

INSPECTOR GENERAL CONTRACT RENEWAL EVALUATION 2013

IG Committee Member: _____

PERFORMANCE DIMENSION

RATING

Meets Expectation Needs Improvement Not Observed or N/A

Professionalism

Behavioral Examples:

16	Maintains independence	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Narrative:				
17	Impartial in fact and appearance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Narrative:				
18	Exercises due professional care in performance of duties (e.g., thoroughness, compliance with legal requirements, appropriate techniques for circumstances involved, fairness in evidence gathering)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Narrative:				
19	Conducts meetings efficiently	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Narrative:				
20	Follows Code of Ethics and established standards	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Narrative:				
21	Properly follows-up on problems and issues brought to the IG's attention	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Narrative:				
22	Performs duties with integrity	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Narrative:				

(References: PBC OIG Values, AIG Standards)

INSPECTOR GENERAL CONTRACT RENEWAL EVALUATION 2013

IG Committee Member: _____

PERFORMANCE DIMENSION

RATING

Meets Expectation Needs Improvement Not Observed or N/A

Accountability

Behavioral Examples:

23 Complies with applicable professional standards, laws, rules, policies, and past practices in conducting audits and investigations

Narrative:

24 Consistently strives in daily activities to fulfill the OIG mission

Narrative:

25 Considers relative costs and benefits in planning and conducting activities

Narrative:

26 Monitors the costs of investigations undertaken and cooperates to recover costs from entities

Narrative:

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

(References: PBC OIG Values, AIG Standards, IG Ordinance Sec. 2-423 (1, 2, 13), Employment Contract Paragraph 5 (M))

INSPECTOR GENERAL CONTRACT RENEWAL EVALUATION 2013

IG Committee Member: _____

PERFORMANCE DIMENSION

RATING

Meets Expectation	Needs Improvement	Not Observed or N/A
-------------------	-------------------	---------------------

Communication

Behavioral Examples:

27	Responds to inquiries in a timely manner	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Narrative:				
28	Provides relevant and fact-based communications to those who require it in the format and timeframe needed to take action	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Narrative:				
29	Conveys findings clearly and concisely	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Narrative:				
30	Communicates respectfully via phone, email, written reports, and in person	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Narrative:				
31	Provides the public with adequate information concerning OIG activities and programs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Narrative:				
32	Participates in public/community/civic meetings	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Narrative:				

(References: PBC OIG Values, IG Ordinance Sec. 2-423 (3, 9), Employment Contract Paragraph 5 (I))

INSPECTOR GENERAL CONTRACT RENEWAL EVALUATION 2013

IG Committee Member: _____

PERFORMANCE DIMENSION

RATING			
Meets Expectation	Needs Improvement	Not Observed or	N/A

Reporting Procedures/Notifications Compliance

Behavioral Examples:

33 Provides required notice to the State Attorney and U.S. Attorney	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Narrative: Provides finalized reports and recommendations to board or appropriate municipality, and to the county Commission on Ethics	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
35 Prepares reports and recommendations for involved entities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Narrative: Performs duties with respect toward affected parties	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
37 Produces comprehensive written annual reports that include: Audit and investigation summaries, descriptions of recommendations for corrective actions, significant abuses and deficiencies disclosed, reports of corrective actions not completed, etc.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Narrative: Establishes methods to receive and process complaints	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Narrative: (References: PBC OIG Values, AIG Standards, IG Ordinance Sec. 2-423 (3, 6), 2-427, and 2-428, Employment Contract Paragraph 5 [A, N, O])	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

INSPECTOR GENERAL CONTRACT RENEWAL EVALUATION 2013

IG Committee Member: _____

PERFORMANCE DIMENSION

RATING

Meets Expectation Needs Improvement Not Observed or N/A

Outreach

Behavioral Examples:

39 Develops, in coordination with County/Municipal administrators, public awareness strategies for varied audiences

Narrative:

40 Provides relevant statistics to the public regarding OIG activities

Narrative:

41 Provides examples on the OIG website that illustrate fraud, waste and abuse

Narrative:

42 Recommends corrective actions

Narrative:

(References: AIG Standards, IG Ordinance Sec. 2-423 (12) & 2-423.1, Employment Contract Paragraph 5 [L])