

To: Commission for Florida Law Enforcement Accreditation  
From: José L. Monteagudo, Team Leader  
Deputy Chief of Police  
Village of Key Biscayne Police Department  
Date: January 12, 2012  
Re: Full Compliance On-Site Assessment Report  
Office of Inspector General, Palm Beach County  
Standards Manual Version: 1.0

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**A. Date of On-Site Assessment:** November 3, 2011

Key Agency Personnel:

Inspector General: Ms. Sheryl G. Steckler  
Accreditation Manager: Ms Flora Butler

**B. Assessment Team:**

Team Leader: José L. Monteagudo **(JLM)**  
Deputy Chief of Police  
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Team Member: Captain Amy Schmidt **(AS)**  
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Office of Inspector General  
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**C. Standards Summary Tally:**

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%

#### **D. Agency Profile:**

The Office of Inspector General (OIG), Palm Beach County, Florida was authorized pursuant to County Ordinance (2009-049) in December 2009. The OIG was created to restore public trust in government. The OIG provides an independent oversight authority to ensure accountability, transparency and efficiencies in local government. To ensure the independence of the OIG, policy requires that the Inspector General be selected by the Inspector General (IG) Committee (Commission on Ethics, State Attorney, and Public Defender) and report to the citizens of Palm Beach County.

The Inspector General, Sheryl G. Steckler, was selected by the IG Committee in May of 2010 and the doors to the OIG opened on June 28, 2010. In the November 2010 general election, voters elected to put all 38 municipalities under the OIG jurisdiction. Also in 2010, the Solid Waste Authority voluntarily came under OIG jurisdiction. Effective January 1, 2012, the Health Care District and the Children's Services Council came under the OIG's jurisdiction.

The OIG plays a significant role in the furtherance of ethics reform in Palm Beach County. Enabling legislation outlines the OIG's purpose to promote economy, efficiency and effectiveness and as its priority to prevent and detect fraud and abuse in programs and operations administered or financed by the public entities within OIG jurisdiction. The Inspector General has established an infrastructure with the capacity, diversity and flexibility to address each complaint in a timely manner. The dynamics of having over 40 separate, and at times competing, entities within its jurisdiction require the OIG to be sensitive to the varying capacity levels among the entities. The diversity of OIG staff education, training and certifications reflects the OIG's ability to succeed at it accomplishing its mission of "*Enhancing Public Trust in Government*". Also, the professional ethics and personal behavior of the OIG staff are of great significance. Every employee must maintain unassailably high ethical standards, faithful obedience to the law, a strict avoidance of even the appearance of unethical behavior, and an unrelenting self-discipline for independent and objective thoughts and work habits.

The OIG currently has an annual budget of \$3.6 million and 40 positions (23 currently on board) centrally located within Palm Beach County, the third most populous county in Florida. The combined FY 2012 budgets of the public entities within OIG jurisdiction total \$10 billion and encompass more than 15,000 employees. There are three separate units within the OIG: Audit, Investigations, and Contract Oversight.

The Investigations Unit consists of an intake section that is responsible for receiving complaints involving fraud, waste, misconduct, mismanagement and other abuses. Each complaint is considered for its qualification under Florida Statutes 112.3187 – 112.31895, also known as the Whistle-Blower's Act. The Investigations Unit coordinates inquiries and referrals and conducts investigations and management reviews involving elected and appointed officials, employees, agencies, instrumentalities, contractors, their sub-contractors and lower tier sub-contractors and

other parties doing business with and or receiving funds from any of the over forty public entities within the OIG jurisdiction. Once completed, investigations and reviews are submitted to the head of the affected public entity, the IG Committee and posted to the OIG website.

Some highlights of the OIG's Investigation's Unit's accomplishments include: put in place a paperless, web-based case management system that incorporates accreditation standards; formally issued the Accreditation Manual within the first 12 months; and completed the accreditation assessment within the first 16 months of operations.

#### **E. On-Site Assessment Summary:**

Prior to the assessment of the Office of Inspector General, the assessment team was provided with an information packet that contained a welcoming letter from the Inspector General, an assessment itinerary, a copy of the OIG Organizational Chart, and a self-assessment status report. The team was also provided a copy of the Written Directive System which describes the process for developing written directives and procedures.

Assessors met on Tuesday, November 2, 2011 reviewed the assessor assignments, and discussed the itinerary and the Commission's philosophy. Some of the discussion focused on the specific duties of an IG office, the distinction between an audit and an investigation and the fact that it would be the first Office of Inspector General that would undergo an electronic accreditation process. Assessor Schmidt is employed by an Inspector General and was very instrumental in describing the intricacies and uniqueness of that Office.

On the morning of Wednesday, November 3, 2011, the assessment team travelled to the Office of Inspector General, Palm Beach County and was met by Administrative Secretary Cynthia Montero, who escorted the team to the Office's location on the fourth floor of the building. Upon reaching the fourth floor, assessors were met by Investigations Supervisor and Accreditation Manager Flora Butler and Director of Investigations, Donald Balberchak. They led assessors to the office that was to be utilized as assessor's work area.

The team was provided a briefing regarding the accreditation files, various resources and other matters. After this was concluded, the team was escorted by Ms. Butler and Mr. Balberchak to Inspector General Sheryl G. Steckler's office. Inspector General Steckler conducted a brief introduction with the assessors. Subsequently, the team was escorted to the conference room where the entrance interview was conducted. Attending the entrance interview was Inspector General Steckler, Ms. Butler and Mr. Balberchak.

During the entrance interview, the team leader introduced Team Member Schmidt and described the assessment procedure. Inspector General Steckler provided an overview into the challenges faced during the establishment of the Office, as well as the vision and strategy. I.G. Steckler provided a brief introduction of the Office's personnel and

emphasized her long standing commitment to professionalism and belief in the accreditation process. She strongly believed that a governmental agency that strives to instill trust in the public it serves and holds transparency as a fundamental tenet should subject itself to open scrutiny and review the accreditation process provides.

The entrance interview concluded at approximately 10:00am, and assessors were given a brief tour of the facility by Ms. Butler and Mr. Balberchak. During the tour assessors made multiple standards related observations and briefly met key people to be interviewed at a later time. Prior to returning to the work area, Assessor Schmidt asked several questions relating to file security and whistle blower regulations to satisfy the standards.

At approximately 10:05am, assessors returned to the work area and commenced the assessment that consisted mostly of file reviews and interviews as necessary.

During the assessment, the team reviewed all files, interviewed several agency members and found no areas of concern or non compliance issues. All individuals interviewed were knowledgeable in the accreditation process and with the policy and procedures of the agency.

The exit interview was conducted in the afternoon with the Inspector General Sheryl Steckler, Investigations Supervisor and Accreditation Manager Flora Butler, and Director of Investigations, Don Balberchack. During the interview, each assessor discussed their assigned chapters and any comments or issues related to those particular topics and standards. The team leader summarized the results of the assessment, and thanked all those in attendance for the responsiveness and commended the accreditation manager and the entire staff for its hard work and professionalism.

Because of the exceptional preparedness of this agency for its assessment, there were absolutely no issues to address during the exit interview. The assessors were very complimentary of the contact with staff as well as the organization and completeness of the accreditation files. Inspector General Steckler was very supportive of the process in their remarks and thanked the team for its hard work and dedication.

The assessment was concluded in a single day. There were no team/agency conflicts. The team worked extremely well together and with the agency's accreditation team. It was a very professional and smooth assessment for all concerned.

**F. Standards Noncompliance Discussion:** None.

**G. Corrective Action Discussion:** None.

**H. Standards Verified by the Team as "Non Applicable" to the Agency:**

**3.04M**

**4.11M**

**4.12M**

**4.13M**

**I. Standards, the Status of Which, Were Changed by Assessors: None.**

**J. Public Information Activities:**

**J-1. Correspondence and Media Interest: None.**

**J-2. Follow up by Assessment Team: None.**

**K. Exemplary/Projects/Procedures: None.**

**L. Quality of Service:**

## **CHAPTER 1: ORGANIZATION AND GOVERNING PRINCIPLES (JLM)**

The Office of Inspector General (OIG), Palm Beach County, Florida was authorized pursuant to County ordinance (2009-049) in December 2009. The OIG was created to restore public trust in government. The OIG provides an independent oversight authority to ensure accountability, transparency and efficiencies in local government. To ensure the independence of the OIG, policy requires that the Inspector General be selected by the Inspector General (IG) Committee (Commission on Ethics, State Attorney, and Public Defender) and report to the citizens of Palm Beach County.

The OIG currently has an annual budget of \$3.6 million and 40 positions (23 currently on board) centrally located within Palm Beach County, the third most populous county in Florida. The combined FY 2012 budgets of the public entities within OIG jurisdiction total \$10 billion and encompass more than 15,000 employees. There are three separate units within the OIG: Audit, Investigations, and Contract Oversight.

The mission statement of the Office of Inspector General, Palm Beach County, is "Enhancing Public Trust in Government" which is conspicuously posted in all the offices. In order to meet that mission, each staff member signs an acknowledgement of receipt attesting to receiving the Mission Statement/Core Values. Also, each staff member completes an annual attestation of independence from impairments. OIG investigative staff members will be free from personal, organizational, and external impairments to independence in the performance of their duties and responsibilities. Additionally, the office's organization charts were present on all bulletin boards.

The Office of the Inspector General's policies and procedures clearly define the authority and responsibilities of the Inspector General. The written directive system is exceptional. The directives are clear and succinct allowing employees to quickly and easily find appropriate guidance.

They contain a procedure for numbering, indexing or searching. There is a format for each type of directive and a system for keeping the directives current. The directive system has procedures to carry out activities, for staff review and approval, and for dissemination. Only the Inspector General has the authority to approve policy.

## **CHAPTER 2: PERSONNEL PRACTICES (JLM)**

The OIG has a directive that clearly defines what type of qualifications an investigator on an investigative team must possess. The office also requires each employee to sign a position description detailing all aspects of the investigative staff members' position. The office performance evaluation process is fair, impartial, and designed for improving staff members' performance through constructive criticism. Staff members and their supervisor review, discuss, and acknowledge the evaluation.

Director of Investigations Don Balberchak advised that before an investigation begins, he carefully selects the investigative team members to ensure all staff has the skills and qualifications needed to conduct that specific investigation. He indicated that he would have the members assembled to complete and sign an attestation form as well as completing a form describing their field of expertise.

## **CHAPTER 3: TRAINING (JLM)**

Newly appointed staff members receive the orientation listed on the New Member Training and Orientation Checklist. This training is completed within six months of the hire date.

Investigators are required to complete a minimum of 40 hours continuing education every two years with at least 12 of those hours being subjects directly related to their primary responsibilities. Ms. Flora Butler demonstrated the highly integrated software, Investigations and Complaint Management System (ICMS) that is utilized in all phases of the Office of Inspector General. This system, in addition to storing a myriad of data, allows for each staff member to enter the training they attend. The member's supervisor is able to log on to the member's profile to review, verify and ensure that all mandated training is being received.

## **CHAPTER 4: INVESTIGATION PROCESS (AS)**

The Office of Inspector General, Palm Beach County, has a thorough process for the review of complaints and investigations. They use an Investigations and Complaint Management System (ICMS), to track all complaints and investigations. The system allows members to upload all elements of their investigations, is very user friendly, and provides safeguards for the required steps of the investigative process.

Investigator Leo Allen described that upon assignment of a case, he has to complete the attestation of independence before the system will allow him to continue into the case file. As the case is worked, the system automatically prompts and requires certain information and review processes. Additionally, Investigator Allen advised he was able to upload his digital interviews and other case related materials into ICMS.

Sufficient documentation was provided for review for the standards in this chapter. A secure location within the office has been identified for storage of case files and case

supporting materials. Additionally, Investigations Supervisor Flora Butler advised the ICMS system is housed on a secure county server that also has an audit feature that tracks all access to the system and notifies the OIG if an unauthorized user attempts to access the system.

The Office of Inspector General, Palm Beach County, has a dedicated General Counsel, Mr. Rob Beitler. Mr. Beitler advised he is consulted by the investigations staff on every case for legal sufficiency and serves as an integral member of the OIG team.

#### **CHAPTER 5: WHISTLE-BLOWER'S ACT (AS)**

The Office of Inspector General, Palm Beach County, has thorough policies and procedures to ensure proper investigations of Whistle-Blower's Act allegations. There were no completed whistle-blower investigations during the assessment period. The Inspector General makes the whistle-blower determinations.

The purpose of the whistle-blower act is to provide safeguards for reporting allegations of gross misconduct, gross mismanagement and gross waste of public funds.

#### **CHAPTER 6: NOTIFICATION PROCESS (AS)**

The Office of Inspector General, Palm Beach County, has policies and procedures that clearly address the process of notifications. Sufficient quantities of notifications were provided for review.

#### **CHAPTER 7: CASE MANAGEMENT (JLM)**

Assessor Monteagudo observed the highly integrated software system (ICMS) that is utilized for all phases of the IG's Office and is password protected. The system was designed at the request of and with the direction of the Inspector General.

Investigations Supervisor and Accreditation Manager Flora Butler was interviewed regarding the archival of investigative case files. Ms. Butler demonstrated the system that revealed the investigative files contained all of the documents specified by the standards. They were precise and maintained several fail-safe systems that not only prevented unauthorized personnel from editing the files, but even in cases where permitted, notification systems exist to alert of the access to and edit of the files.

#### **CHAPTER 8: FINAL REPORTING PROCESSES (JLM)**

The Office of Inspector General, Palm Beach County, policies and procedures clearly address investigative conclusions, distribution of final reports, post investigative activities, and notification of criminal allegations. A sufficient quantity of review and response documentation was provided for review.

**M. Summary and Recommendations:**

**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.

**NON-COMPLIANCE SUMMARY:** None.

**Signed:**

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**José L. Monteagudo, Team Leader**  
**Deputy Chief of Police**