

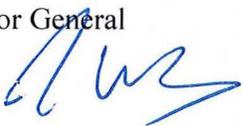


## BROWARD OFFICE OF THE INSPECTOR GENERAL

### MEMORANDUM

To: Honorable Philip Shailer, Chair,  
and Members, Inspector General Selection-Oversight Committee

From: John W. Scott, Inspector General

Date: November 2, 2017 

Subject: **Broward OIG Awarded Reaccreditation Status by CFA**

By way of this memorandum, I am pleased to inform you that on November 1, 2017, the Broward Office of the Inspector General (OIG) was awarded reaccreditation status by the Commission for Florida Law Enforcement Accreditation (CFA). Established in 1993 by Florida statute, the CFA reviews and accredits law enforcement agencies and OIGs that meet or exceed the principles and established standards for offices of inspectors general. To ensure consistent and continued compliance with these standards, the CFA reviews agencies every three years for reaccreditation. The CFA is nationally recognized for initiating the first state Inspectors General accreditation program in 2009. During our inaugural assessment the CFA assessment team appraised the OIG's performance as "flawless."

Achieving accredited status significantly enhances the quality of our investigations, as well as the credibility and professionalism of the agency. Obtaining and maintaining this status requires an ongoing commitment to adhering to comprehensive written directives that comply with more than 40 CFA standards for offices of Inspectors General. In August 2017, an assessment team from the CFA conducted an on-site assessment of all aspects of our policies and procedures, management, and operations.

On September 5, 2017, the CFA issued its final report of our reaccreditation assessment, which is attached as Appendix A. The report appraised the OIG's performance as "flawless and outstanding." In support of its findings, the assessment team stated that "The BOIG staff are the epitome of a professional and enthusiastic unit that recognizes the importance of accreditation, and how it plays an important role in their work. The BOIG's team is truly what has made it a successful organization." The assessment team highly recommended the Broward OIG be favorably reviewed for reaccreditation status by the CFA.

On November 1, 2017, the CFA Commission unanimously voted to grant the OIG reaccreditation status. The OIG will be reviewed every three years for reaccreditation status. We remain committed to maintaining compliance with the accreditation standards, so that we may better serve the residents of Broward County.

Attachment

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John W. Scott, *Inspector General*

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To: Commission for Florida Law Enforcement Accreditation

From: Regional Investigator / Accreditation Manager Flora Tran, Team Leader  
Florida Department of Children and Families, Office of Inspector General

Date: September 5, 2017

Re: Full Compliance Assessment Report  
Broward Office of the Inspector General  
Standards Manual Version: 1.0.09

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**A. Date of On-Site Assessment:** August 17, 2017

Key Agency Personnel

Inspector General:	John W. Scott
Deputy Inspector General:	Michael Mee
Assistant Inspector General and Accreditation Manager:	Dylan Hughes
General Counsel:	Jodie Breece
Office Manager and Assistant Accreditation Manager:	Monica Vidal

**B. Assessment Team**

Team Leader: Regional Investigator / Accreditation Manager Flora Tran (FT)  
Florida Department of Children and Families  
Office of Inspector General  
375 Commerce Parkway, Suite 101  
Rockledge, FL 32955  
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Team Member: Investigator / Accreditation Manager Anthony Jackson (AJ)  
Florida Department of Education  
Office of Inspector General  
325 West Gaines, Suite 1201  
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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
44	2	0	42	100%

**D. Agency Profile**

The Broward Office of the Inspector General (BOIG) is a criminal justice agency created and established by the Broward County Board of County Commissioners in response to a Charter Amendment placed on the ballot and affirmed by the voters in November 2010, which assures the independence of the BOIG.

The BOIG functions as an independent watchdog for over 1.8 million residents of Broward County and its authority encompasses county and municipal budgets totaling approximately \$8.9 billion, more than 25,000 employees, and over 450 separate divisions and departments of government. In addition, the BOIG has oversight responsibility for more than 170 elected officials, including county commissioners, mayors, vice mayors, city commissioners, and town council members, as well as more than 36,000 registered vendors who provide goods or services to the county and municipalities.

The BOIG has three dedicated investigative units to fulfill their broad and varied jurisdiction: Investigations, Audit and Contract/Procurement Oversight, and Ethics. The Investigations Unit (IU) is staffed with a highly qualified team of individuals who are responsible for the investigation of allegations of misconduct and gross mismanagement by county and municipal elected officials, employees, and providers. The BOIG has further enhanced its investigative function through participation in the Broward County Public Corruption Task Force, which is comprised of federal, state, and local investigators and prosecutors responsible for the identification, investigation, and prosecution of criminal public corruption cases.

The BOIG conducted 80 investigations during this accreditation cycle: 29 in 2014-2015, 31 in 2015-2016, and 20 in 2016-2017, and questioned, identified and/or recovered over \$12 million.

The BOIG received its initial accreditation in October 2014 from the Commission for Florida Law Enforcement Accreditation and this will be its first reaccreditation assessment.

**E. Assessment Summary**

Prior to the assessment team's arrival, the BOIG provided the team with an assessor packet for review, which included a detailed itinerary and all necessary supporting documentation relative to the scheduled assessment. Team Leader Tran and Assessor Jackson met prior to the assessment to conduct a pre-assessment team meeting where chapter assignments, commission philosophy, and protocol were discussed.

On August 17, 2017, the team was greeted outside of the BOIG office in Plantation, FL and then escorted into the lobby by Assistant Inspector General (AIG)/Accreditation Manager (AM) Dylan Hughes. The team was then joined by Office Manager (OM)/Assistant Accreditation Manager (AAM) Monica Vidal who assisted the team through required building security protocols (swipe card access, sign-in/sign-out) and then escorted the team inside the BOIG office suite. A tour of the office was provided by both AIG/AM Hughes and OM/AAM Vidal, where the team observed the BOIG office suite to be clean, organized, and professional in appearance. The BOIG office suite was inside a secure area with both individual offices and open work spaces. During the tour, the team was introduced to BOIG staff and provided with details of how the other two units work directly with the IU. The team was provided with a private conference room to conduct their assessment and all necessary resource materials, computer, and software access.

An entrance interview was conducted following the office tour and was attended by IG Scott, DIG Mee, AIG/AM Hughes, General Counsel Breece, and OM/AAM Vidal. The IG expressed his commitment to the accreditation process and understood the important role that it plays in continuing the BOIG's mission. During the tour, assessors made multiple standards-related observations, asked questions relating to standards, and met key people to possibly be interviewed at a later time.

After the tour of their main office, assessors returned to the work area and began the assessment which consisted of interviews and a review of electronic files and standards-related policies. The Investigations Unit currently consists of nine staff members, to include DIG Mee, Supervisory Special Agent Stuart Robinson, and seven Special Agents.

All of the individuals that either met with or were interviewed by the assessment team expressed genuine enthusiasm and support for the accreditation process, regardless of their individual unit responsibilities. The IU members were found to be extremely knowledgeable and truly understood the importance of accreditation.

Key employee interviews:

Assistant Inspector General  
And Accreditation Manager:  
General Counsel:

Dylan Hughes  
Jodie Breece

## **Conclusion**

The BOIG assessment was concluded in a single day. The exit interview was conducted on the afternoon of August 17, 2017 with Team Leader Tran, Assessor Jackson, IG Scott, DIG Wee, AIG/AM Hughes, GC Breece, and OM/AAM Vidal. As further evidence of the entire BOIG's staff support, the exit interview was attended by all staff members.

During the exit interview, assessors discussed their assigned chapters and any comments or issues related to those particular topics and standards. The discussion centered on the positive impact that accreditation has made to the Inspector General community and how it supports their ongoing mission. IG Scott expressed his commitment to continue the BOIG's hard work and dedication to the accreditation process.

Team Leader Tran, with the concurrence of Assessor Jackson, communicated to the entire staff that the assessment team would recommend to the Commission the Broward Office of the Inspector General be reaccredited at the next meeting to be held in October 2017. On behalf of the Commission, Team Leader Tran and Assessor Jackson thanked all those in attendance for their cooperation and enthusiasm.

- F. Standards Non-compliance Discussion:** None.
- G. Corrective Action Discussion:** None.
- H. Standards Verified by the Team as "Non Applicable" to the Agency**
  - 3.04 (FT)                      3.05 (FT)
- I. Standards, the Status of Which, Were Changed by Assessors:** None.
- J. Public Information Activities:** None.
- K. Exemplary Policies/Projects/Procedures:** None submitted.
- L. Quality of Service:**

**CHAPTER 1: ORGANIZATION AND GOVERNING PRINCIPLES (Assigned Assessor: FT)**

Pursuant to § 12.01 of the Charter of Broward County, the BOIG was created to investigate misconduct and gross mismanagement. The BOIG's mission statement is prominently displayed in their office suite, as well as in their lobby. All members of the office are required to annually sign by and abide by an OIG Code of Ethics and Statement of Independence. There are appropriate procedures in place and employees are knowledgeable of procedures when a potential conflict is identified.

The Investigations Unit's policies and procedures are well-written and organized in a manner that made it easy for the assessment team to follow. All policies and procedures met current standards and all proofs provided met the applicable standards.

Public records requests are maintained in a consistent manner and a process was developed to safeguard and protect confidential information.

All annual reports were submitted in a timely manner.

## **CHAPTER 2: PERSONNEL PRACTICES (Assigned Assessor: FT)**

During the review period, two investigative employees were hired and two investigative support staff were hired. TL Tran found all proofs in compliance for all of the employees hired during the review period and all Performance Evaluations were completed for staff members.

## **CHAPTER 3: TRAINING (Assigned Assessor: FT)**

All training standards were met and all records are maintained by OM/AAM Vidal. All IU staff received more than the required amount of training during the review period. Additional random samples were reviewed and those records were also found to be more than adequate.

Standards 3.04 and 3.05 were found to be non-applicable as BOIG Investigators are non-sworn.

## **Chapter 4: INVESTIGATION PROCESS (Assigned Assessor: FT/AJ)**

Special Agent Gil Suarez and AIG/AM Hughes were interviewed by TL Tran and both were found to be extremely knowledgeable about the BOIG's processes. Special Agent Suarez was able to provide detailed explanations as to his responsibilities.

The BOIG investigative files were secure and locked in file cabinets. The BOIG's evidence facility was orderly and clean and well-maintained through various security protocols. AIG/AM Hughes, who serves as the evidence custodian, was very knowledgeable regarding the evidence process and maintains strict control of all evidence stored in the evidence room. Inspections and inventories of evidence were completed within required timeframes and found to be in good order.

## **CHAPTER 5: WHISTLE-BLOWERS ACT (Assigned Assessor: AJ)**

The assessment team interviewed GC Breece and AIG/AM Hughes while reviewing the BOIG's Whistle-blower policies and procedures. The BOIG has thorough policies and procedures to ensure proper investigations that comply with Florida Statute regarding allegations that may fall under the Whistle-blower's Act. The Whistle-blower's Act provides for specific investigative actions and timeframes for state agencies and/or local

government agencies that have designated themselves as the appropriate reporting authority for reporting allegations under the Whistle-blower's Act. As the BOIG is not a state agency, nor is it a designated authority, it is exempt from this provision. Regardless of its exemption from some provisions of the Whistle-blower's Act, Broward OIG policies clearly define actions to be taken for all complaints that may potentially fall under the Whistle-blower's Act, to include determination of status, referral to the appropriate agency, security of the records it receives, as well as maintaining the confidentiality of such information.

#### **Chapter 6: NOTIFICATION PROCESS (Assigned Assessor: AJ)**

Section 20.055, Florida Statutes, requires state agencies to conduct specific actions for investigations involving entities contracting with the state and individuals substantially affected. These statutory provisions allow for specific entities to receive and provide rebuttal to investigative findings. As the BOIG is a county entity, it is exempt from these provisions; however, the BOIG has developed comprehensive procedures similar to the requirements of Florida Statutes. Section 12.01 of the Broward County Charter establishes a notification and reporting procedure that is represented in their directives. As outlined in their Charter, the BOIG reports to an OIG Selection-Oversight Committee, which is solely empowered to remove the Inspector General for cause. Appropriate proofs for each standard were provided and accreditation standards were met within this Chapter.

#### **CHAPTER 7: CASE MANAGEMENT (Assigned Assessor: AJ)**

The BOIG exercises tight controls over case management and confidentiality of files. All documents and data are protected and stored within the Investigative Management System, which is supported by the Broward OIG staff. OM/AAM Vidal confirmed tight controls are utilized to maintain the confidentiality of all information it receives. All requirements for standards 7.01 and 7.02 were observed within the Investigative Management System. A random review of their investigative files showed they were organized and clearly labeled.

Although no files had been destroyed or exceeded their retention period, the BOIG has clear procedures for destruction within the upcoming year. OM/AAM Vidal showcased BOIG's electronic tracking method, which was found to be well-organized and in accordance with the standard.

#### **CHAPTER 8: FINAL REPORTING PROCESSES (Assigned Assessor: AJ)**

The BOIG policies and procedures clearly address investigative conclusions, distribution of final reports, post investigative responses, and notification of criminal allegations. Additionally, the BOIG made required notifications to appropriate law enforcement officials during the review period. A sufficient quantity of review and response documentation was provided for review.

## **M. Summary and Recommendations**

### OVERALL CONCLUSIONS:

With IG Scott's support, the BOIG staff are the epitome of a professional and enthusiastic unit that recognizes the importance of accreditation, and how it plays an important role in their work. The BOIG's team is truly what has made it a successful organization.

As an independent organization, the BOIG must always hold itself accountable to its stakeholders, the citizens of Broward County. Through accreditation, the BOIG is able to ensure its stakeholders that they too are also accountable. The BOIG's assessment was flawless and outstanding.

The assessment team highly recommends the Broward Office of the Inspector General be favorably reviewed for reaccreditation status by the Commission for Florida Law Enforcement Accreditation at the next Commission meeting.

NON-COMPLIANCE SUMMARY: None.

Submitted by Flora Tran  
Team Leader