



Office of Inspector General

Medical Emergency Preparedness and Response Audit

Twelve-Month Follow-up Report

Project Number IG-0050-F12

September 2015

Service ★ Integrity ★ Respect ★ Quality



EXECUTIVE SUMMARY

The Office of Inspector General (OIG) conducted a follow up review to determine the status of the five open findings from the June 2014 audit of FDLE's Emergency Preparedness (Project No. IG-0050).

This 12-month follow-up concludes that, while management has taken steps to address these findings, all five findings remain open. The OIG staff acknowledges that extensive work has been completed regarding the restructuring and development of the FDLE safety program. The continued enhancements to the safety program aid in creating a more advance system. However, significant changes within the safety program are contingent upon final revisions and approval of FDLE Policy 3.15 and the FDLE Safety Manual. OIG staff could not evaluate the effectiveness of these changes until said documents have been approved and fully implemented. As a result, these findings will be administratively closed and a new audit will be conducted at a future date. Please see **Appendix A** for a copy of management's 12-month responses.

OBJECTIVES, SCOPE AND METHODOLOGY

The objective of this follow-up was to assess management implementation of OIG recommendations. Follow-up included correspondence with members responsible for implementation of recommendations.

BACKGROUND

An audit of FDLE's promotion of safety awareness through training, education, and recognition programs, as well as to ensure safety for all members, was scheduled as a part of the OIG annual audit plan for fiscal year 2013-2014.

A final report was issued in June 2014 and included five findings.

A 6-Month Status Report was issued in January 2015. At the time, all five findings remained open. Please see **Appendix B** for a copy of management's 6-month responses.



DISTRIBUTION, STATEMENT OF ACCORDANCE, AND PROJECT TEAM

Distribution

Rick Swearingen, Interim Commissioner
David Coffman, Forensic Services Director

Statement of Accordance

This audit was conducted pursuant to Section 20.055, Florida Statutes, and in accordance with Generally Accepted Government Auditing Standards as published by the United States Government Accountability Office.

Project Team

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A blue ink signature of Lourdes Howell-Thomas is written over a horizontal line.

Lourdes Howell-Thomas, Inspector General

9/14/15
Date



APPENDIX A

12 Month Management Response



Finding #1 - CPR/AED Certified Members

Recommendation

We recommend the CPR/AED Coordinator develop a list of current CPR/AED certified members that work at the HQ building. Members previously not identified in Pathlore LMS should have their certification information validated and entered into the system.

The OIG also recommends FDLE Policy 3.15 and the FDLE Safety Manual be revised to:

- Identify the position at HQ responsible for submitting the list of certified members to the CPR/AED Coordinator.
- Include a requirement for the Safety Officers to quarterly conduct an assessment of all members in their Division to identify any members who are certified, but were not previously included on the list of CPR/AED certified members; identify the certification expiration dates of members within their Division; and identify members who received their certification through an external agency to ensure such information is included in Pathlore LMS.
- Change the requirement for submitting the list of certified members to the CPR/AED Coordinator from annually to quarterly. This would allow for the CPR/AED Coordinator to maintain a more accurate list of certified members who work at the HQ building.
- Include a requirement for the CPR/AED Coordinator to on a quarterly basis submit a master list of certified members to the Department Safety Officer and Alternate Safety Officer.

12-Month Status – This finding remains open.

Management Twelve-Month Status:

1. The agency's CPR/AED Master Certification Listing has been created. To ensure all CPR/AED certified members are included, each Region/Division Safety Officer will be provided their respective area to review and update as necessary using the draft CPR/AED Certified Member Listing form (a component of the draft Safety and Facility Inspection Form). The Safety Officer will notate all newly certified CPR/AED members as well as those who will no longer maintain their CPR/AED certification, have transferred to another area, or left the agency. This follow-up review will be complete and the draft CPR/AED Master Certification Listing updated by August 15, 2015. In the draft revision of Policy 3.15 (See page 5) and the draft revision of the FDLE Safety Manual (See page 23), members that obtain CPR/AED training are directed to submit their CPR/AED Certification document(s) to their Region/Division training coordinator for retention in the Pathlore LMS system.

2. The draft revision of Policy 3.15 (See page 7) and the draft revision of the FDLE Safety Manual (See page 9) state that the Region/Division Safety Officer is responsible for submitting his/her CPR/AED certified members to the CPR/AED Coordinator using the draft CPR/AED Certified Member Listing each quarter. The draft Safety Officer Quarterly Safety Inspection Checklist was revised and renamed to the draft Safety and Facility Inspection Form with two separate versions – Division and Region.

3. The draft revision of Policy 3.15 (See page 5) and the draft revision of the FDLE Safety Manual (See page 9) include the directive for Region/Division Safety Officers to submit the names of all CPR/AED certified members on a quarterly basis using the draft CPR/AED Certified Member Listing the CPR/AED Coordinator. The form allows the Safety Officer to



identify and document each CPR/AED member's certification status and expiration date as well as the certifying entity.

4. The draft revision of Policy 3.15 (See page 9) and the draft revision of the FDLE Safety Manual (See page 10) includes the directive for Region/Division Safety Officers to submit the names of all CPR/AED certified members on a *quarterly* basis using the draft CPR/AED Certified Member Listing to the CPR/AED Coordinator. The information will be extrapolated by the CPR/AED Coordinator and recorded on the draft Master CPR/AED Certified Member Listing. When completed, the CPR/AED Coordinator will forward the updated draft Master CPR/AED Certified Member Listing to the Alternate Safety Coordinator for review and retention. Following the review to include any corrections, the draft Master CPR/AED Certified Member Listing will be sent to the Safety Coordinator.

5. The draft revision of Policy 3.15 (See page 9) states that the CPR/AED Coordinator will send the draft Master CPR/AED Certified Member Listing to the Safety Coordinator and the Alternate Safety Coordinator for review and retention.

NOTE: During the initial response to the audit items, many appeared independent but the magnitude and scope of this project became more encompassing as work progressed which includes revising previously submitted recommendations. Although this audit focused on the emergency response to medical emergencies at FDLE Headquarters, it affected the agency as a whole requiring additional research and review of agency policies, state of Florida Statutes, Florida Administrative Code as well as many other safety resources.

Our goal must be to have a comprehensive safety program that reflects the needs of the agency. Throughout this process, many new forms and procedures as well as resource guides have been created or are in various stages of development to support this change in vision. Many of these items are being incorporated into the agency's Safety Manual as well as Policy #3.15 Safety and Work-Related Injury/Illness – Workers' Compensation that are currently in draft status. The revised Safety Manual and Safety Officer Guide will be provided to the agency's Safety Coordinator and Safety Committee for review on July 13, 2015 with all suggestions and corrections submitted to the Alternate Safety Coordinator by July 21, 2015. The documents will then be presented at the July 22, 2015, Safety Committee meeting for approval and forwarded on to the Inspector General's office for review on August 17, 2015.

Finding #2 - Automated External Defibrillator (AED)

Recommendation

We recommend the CPR/AED Coordinator immediately conduct an inventory of AEDs located in the HQ building to ensure all AEDs are identified for future inspections.

The OIG also recommends FDLE Policy 3.15 be revised to:

- Include a requirement for the CPR/AED Coordinator to, on a quarterly basis, submit the AED Log required by Policy 3.15 to the Department Safety Officer and Alternate Safety Officer for review.
- Include a requirement that the AED Use Report be submitted directly to the CPR/AED Coordinator.



- Update the references to all the responsible parties involved in submitting AED Use documentation.
- Update the outdated reference to the F.A.C. rule that identifies guidelines for AED use in state owned or leased facilities.

The OIG also recommends the FDLE Safety Manual be revised to identify the Safety Officer as the responsible party for the following safety rules: know the location of the nearest first aid kit/AED in each work area; assure that first aid kits are inspected at least annually and are properly stocked; and assure that the AED is inspected quarterly and the batteries and supplies are replaced as needed to ensure proper operation.

Note:

During the audit period, a new CPR/AED Coordinator was appointed and the Department is in the process of purchasing additional AEDs to serve as spare AEDs.

12-Month Status – This finding remains open.

Management Twelve-Month Status:

1. All agency AED units have been inventoried and a draft FDLE AED Master Listing created which includes each unit's property ID number, serial number and location. It will be reviewed each quarter using the Region's and Headquarters' draft AED Inspection Checklists.
2. The draft revision of Policy 3.15 (See page 5) includes the requirement for the CPR/AED Coordinator to submit the draft Quarterly AED Inspection Log to the Alternate Safety Coordinator for review and retention. The Alternate Safety Coordinator will notate any areas of concern and will forward the findings to the agency's Safety Coordinator for review. NOTE: The AED Log was revised and renamed as the draft Quarterly AED Inspection Log.
3. The draft revision of Policy 3.15 (See page 10) states that the AED Use Report and AED unit printout must be reviewed by each level of supervision through the chain-of-command and will be forwarded to the following individuals: CPR/AED Coordinator, Tallahassee Regional Operations Center Director, Safety Coordinator, Alternate Safety Coordinator and Division/Region Safety Officer within 24 hours of the incident. This will ensure that the documentation is provided to the Medical Director of the Florida Department of Health Bureau of Emergency Medical Services within the required 48 hour period.
4. The draft revision of Policy 3.15 (See page 10) explains the responsibilities of each member regarding the completion, review and submission of the draft AED Use Report including the AED Unit printout.
5. The draft revision of Policy 3.15 (See page 6) has been updated with the correct F.A.C. rule reference (Rule 64J-1.023) that identifies guidelines for AED usage in State Owned or Leased Facilities.
6. The draft revision of the FDLE Safety Manual (See page 9) states that the Region/Division Safety Officer is responsible for documenting the location of all first aid kits, Band-Aid boxes (if applicable) and Fire Safety Kits in his/her area of responsibility using the draft First Aid



Kit/Band-Aid Box/Fire Safety Kit Location form. This form will be completed on an annual basis or when the first aid needs of the area change. Each will be inspected quarterly using the draft Safety and Facility Inspection Checklist.

Finding #3 - First Aid Kits

Recommendation

We recommend the Department immediately purge and replace all expired medical supplies and medication contained in the first aid kits, including the first aid kits located in the Fire Safety Kits in each Division.

The OIG also recommends FDLE Policy 3.15 and the FDLE Safety Manual be revised to:

- Identify minimum requirements for the contents of first aid kits in a workplace as suggested in OSHA 3317-06N.
- Include a requirement for Safety Officers to conduct and document regular assessments of the first aid needs for the units within their Division and to identify the location of all first aid kits.
- Include a requirement for the Safety Officers to use a Department first aid checklist to ensure the kits are regularly stocked and contain the appropriate medical supplies and medication.
- Include a requirement for the Safety Officers to, on a quarterly basis; submit a completed first aid checklist to the Department Safety Officer and Alternate Safety Officer.
- Include a requirement that the first aid kits in each Division are centrally located and easily identifiable.

12-Month Status – This finding remains open.

Management Twelve-Month Response:

1. In the Management Six-Month Response, all previously identified HQ first aid kits were purged with most being eliminated. At Headquarters, comprehensive first aid kits were purchased that met the ANSI/ISEA Z308.1-2009 standard (OSHA recommended) and if possible, were placed with AED units in centralized locations through the building. The first aid kits contained within the Fire Safety Kits were also purged with new first aid kits purchased or expired items replaced.

2. The draft revision of the FDLE Safety Manual (See page 3) includes the minimum requirements for first aid kits as defined by OSHA standard 3317-06N and ANSI/ISEA Z308.1-2009 standard.

3. The draft revision of the FDLE Safety Manual (See page 10) provides direction for Region/Division Safety Officers to identify the location of each first aid kit, Band-Aid box and Fire Safety Kit. In addition, all Safety Officers will review and assess the first aid needs of their areas on an annual basis but no later than December 31.



4. The draft revision of the FDLE Safety Manual (See page 10) instructs each Region/Division Safety Officer to conduct a quarterly inspection of all first aid kits, Band-Aid boxes and Fire Safety Kits using the appropriate inspection form (draft General First Aid Kit Inspection Form and draft Fire Safety Kit Inspection Form) to ensure that all kits are regularly restocked and contain the appropriate medical supplies.

5. The draft revision of the FDLE Safety Manual (See page 10) instructs each Region/Division Safety Officer to send the draft First Aid Kit Inspection Form and the draft Fire Safety Kit Inspection Form to the Alternate Safety Coordinator each quarter. The Alternate Safety Coordinator will compile each Region/Division forms into a comprehensive agency report which will be forwarded to the Department's Safety Coordinator.

6. The draft revision of the FDLE Safety Manual (See page 23) states that all first aid kits must be easily assessable, clearly identified and centrally located. If a first aid kit is stored within a drawer or cabinet, the Safety Officer will place a sign that states "First Aid Kit inside".

NOTE: Medical emergency signing was created but is being revised. Upon approval, it will be printed and installed. The installation of telephones near the centrally located first aid kits and AED units is still being reviewed to determine feasibility.

Finding #4 - Medical Reporting

Recommendation

We recommends FDLE Policy 3.15 be revised to clearly define members' expectations for all medical emergencies. The policy should also include reference to Section 284.50, Florida Statutes.

The OIG also recommends FDLE Policy 3.15 and the FDLE Safety Manual be revised to:

- Clearly define the use of the Supervisor's Report of Personal Injury/Illness Form (OHR-064) for any incident involving or that could have resulted in personal injury/illness.
- Require a quarterly evaluation of all medical incidents/accidents that require the response of EMS to an FDLE building, to assess the effectiveness in preparedness and response to a medical emergency.

12-Month Status – This finding remains open.

Management Twelve-Month Response:

1. The draft revision of Policy 3.15 (See page 2) defines the term "medical emergency" and the reference to Section 284.50, Florida Statutes has been added (See page 1).

2. The draft revision of Policy 3.15 (See page 3) and the draft revision of the FDLE Safety Manual (See page 13) direct members to regard ALL medical emergencies as work-related. Supervisors must complete all Workers' Compensation forms (First Report of Injury/Illness Worksheet, Workers' Compensation Injury/Illness Checklist and the Supervisor's Report of Personal Injury/Illness Form) as well as report the incident to AmeriSys. This will ensure that if the medical emergency is determined to be work-related and compensable by the Division of



Risk Management, the member will be covered under Workers' Compensation. Note: As with any work-related injury/illness that is reported to AmeriSys and the Division of Risk Management, the act of reporting does not determine whether the incident will be covered under Workers' Compensation.

3. The draft revision of Policy 3.15 (See page 3) and the draft revision of the FDLE Safety Manual (See page 13) address the review of each EMS response to an FDLE building including the completion of the Medical Emergency Incident Review Form and the subsequent review of the form by the Safety Committee. The Safety Officer will present his/her findings at the Safety Committee Meeting following the incident. The Safety Committee members will evaluate the emergency incident by assessing the effectiveness in preparedness and response to the incident. Their findings will be reported to the agency's Safety Coordinator for review.

Finding #5 - Training and Procedures

Recommendation

We recommend the Department:

- Implement basic safety awareness training for all members. The Department could provide members with training in an on-line or classroom format. As a reminder of the training, the Department could develop a slide to add to the existing standard FDLE screen saver which includes key points members should follow in response to a medical emergency.
- Provide a link to the Safety Manual via the Member Dashboard. This would ensure members could readily determine the location of the Safety Manual and acknowledge review of revisions once they are made.
- Provide a link on the main intra-net FDLE homepage for Safety Committee contact information.

The OIG also recommends FDLE Policy 3.15 and the FDLE Safety Manual be revised to:

- Include a requirement for the CPR/AED Coordinator to quarterly coordinate CPR and AED training and certification of agency members.
- Include a requirement for training documentation to be submitted to the Department Safety Officer and Alternate Safety Officer as a review process to ensure CPR and AED trainings are consistently offered for all members.
- Include written procedures regarding EMS arrival at the HQ building to ensure efficient arrival without delays. The procedures should clearly define: member responsibilities; the coordination of the arrival location of EMS; response for medical emergencies that occur after hours; and the roles and responsibilities of the units involved during a medical emergency (e.g. the Watch Desk, Building Security, etc.).

12-Month Status – This finding remains open.



Management Twelve-Month Response:

1. Several basic on-line training options were explored and while they provided the comprehensive basic safety awareness that is needed for our members, they were too costly. However, the Division of Risk Management has provided several PowerPoint presentations on basic safety awareness topics such as Slip, Trip, and Fall; How to Use a Fire Extinguisher; and General First Aid. The Safety Committee has formed a sub-committee to develop the presentations into interactive safety training for our members with the assistance of the Bureau of Professional Development. Once the training is developed and approved, it will be placed on the FDLE Safety intra-net web page.
2. The Alternate Safety Coordinator is working with ITS to place the Safety Manual on the FDLE Member Dashboard. ITS is researching the possibility of building an application which would allow members to acknowledge having read the Safety Manual and all subsequent updates similar to the process for acknowledging FDLE Policies and Procedures.
3. The Safety Committee members are listed on the FDLE Safety intra-net web page with contact information available through the FDLE Directory.
4. The draft revision of Policy 3.15 (See page 9) and the draft revision to the FDLE Safety Manual (See page 10) state that the CPR/AED Coordinator will conduct quarterly CPR/AED training classes at Headquarters with the emphasis on non-sworn members. Regional Safety Officers are responsible for conducting CPR/AED training classes for their respective non-sworn members.
5. The draft revision of Policy 3.15 (See page 9) and the draft revision of the FDLE Safety Manual (See page 10) direct the agency's CPR/AED Coordinator to submit a copy of the training documentation for each quarterly CPR/AED training class to the agency Safety Coordinator and the Alternate Safety Coordinator for review and retention.
6. The Tallahassee Regional Operations Center and Building Security are currently reviewing and developing written procedures regarding EMS arrival at the HQ building. The procedures when completed will be included in the agency's draft revision of Policy 3.15 and the draft revision of the FDLE Safety Manual.



APPENDIX B FINDINGS AND RECOMMENDATIONS

6 Month Management Response

**Finding #1 - CPR/AED Certified Members**

The CPR/AED Coordinator does not maintain an accurate list of current CPR/AED certified members who work at the HQ building.

Information extracted from Pathlore LMS by the CPR/AED Coordinator is used to compile a list of current CPR/AED certified members in the Department. The audit identified discrepancies between the information extracted from Pathlore LMS for the period of 1/1/11 through 3/10/14, and the information provided by the Safety Officers. The comparison revealed that there were ten (10) names provided by the Safety Officers that were not included in the Pathlore LMS report. It was also noted, the Pathlore LMS report included information for members who are no longer employed with the Department or whose certification has expired. Additionally, the Pathlore LMS report did not include information for some members who received their certification through an external agency. (Note: The Division Training Coordinator may not have been aware of some members receiving CPR/AED certification, therefore the information was not included in Pathlore LMS, which could account for the discrepancies.)

Policy 3.15 requires that the CPR/AED Coordinator maintain a record in the electronic training management system of all members trained and certified in CPR/AED use. In addition, each Division and/or Region must have at least two CPR/AED certified members. The name of each such person is to be provided to the CPR/AED Coordinator annually by December 31; however, policy does not identify who is responsible for submitting such information.

Without an accurate list of members trained in CPR and AED use, the Department runs the risk of not knowing which members to contact in a medical emergency. Also, a member certified in CPR and AED use may not be identified on the CPR/AED certified list posted under the AEDs; a member that is currently identified may have an expired certification; or may include members who are no longer employed with the agency. The risks identified above may hinder the delivery of aid in a medical crisis.

Recommendation

We recommend the CPR/AED Coordinator develop a list of current CPR/AED certified members that work at the HQ building. Members previously not identified in Pathlore LMS should have their certification information validated and entered into the system.

The OIG also recommends FDLE Policy 3.15 and the FDLE Safety Manual be revised to:

- Identify the position at HQ responsible for submitting the list of certified members to the CPR/AED Coordinator.
- Include a requirement for the Safety Officers to quarterly conduct an assessment of all members in their Division to identify any members who are certified, but were not previously included on the list of CPR/AED certified members; identify the certification expiration dates of members within their Division; and identify members who received their certification through an external agency to ensure such information is included in Pathlore LMS.
- Change the requirement for submitting the list of certified members to the CPR/AED Coordinator from annually to quarterly. This would allow for the CPR/AED Coordinator to maintain a more accurate list of certified members who work at the HQ building.
- Include a requirement for the CPR/AED Coordinator to on a quarterly basis submit a master list of certified members to the Department Safety Officer and Alternate Safety Officer.

**Management Response:**

1. Agree. To create a master listing of all current HQ CPR/AED certified members, the CPR/AED Coordinator in conjunction with the Alternate Safety Coordinator will conduct an audit using the Pathlore LMS system. In addition, each Division Safety Officer will be contacted to request that he/she review his/her current listing of CPR/AED certified members and provide the additions/deletions to the CPR/AED Coordinator for inclusion to the master listing. Verification of all CPR/AED certified members will be included as part of the draft Safety Officer Quarterly Safety Inspection Checklist. This component will include confirming that the member has submitted his/her CPR/AED certification document(s) to his/her Division training coordinator for retention in the Pathlore LMS system.
2. Agree. The agency will draft a revision to Policy 3.15 and the FDLE Safety Manual that will, once adopted, address this policy/procedural concern regarding the submission of CPR/AED certified members' names to the CPR/AED Coordinator by each Division Safety Officer.
3. Agree. The agency is currently drafting a Safety Officer Quarterly Safety Inspection Checklist that will include an assessment of all members within each division that are CPR/AED certified, as well as their training certification status, and the submission of any external CPR/AED trained member's certification documentation to the Pathlore LMS system. This form will be submitted to the agency's Alternate Safety Coordinator who will extrapolate this information and provide it to the CPR/AED Coordinator to use in maintaining the agency's master HQ CPR/AED Member Certification Listing. The Safety Officer Quarterly Safety Inspection Checklist will be included in the draft revision of the FDLE Safety Manual and newly developed draft Safety Officer Guide. The requirement for the CPR/AED certified member quarterly assessment will be included in the draft revision of Policy 3.15.
4. Agree. The agency will draft a revision to Policy 3.15 and the FDLE Safety Manual that will, once adopted, direct the Division Safety Officers to submit a list of CPR/AED certified members on a quarterly rather than annual basis as currently directed in Policy 3.15. In addition, with the adoption of the Safety Officer Quarterly Safety Inspection Checklist, the Division Safety Officers will be prompted to review their CPR/AED Certified Member Listings and send the updates, via the form, to the Alternate Safety Coordinator. This information will be provided to the CPR/AED Coordinator to provide a quarterly update to the agency's master listing of all HQ CPR/AED certified members.
5. Agree. The agency will draft a revision of Policy 3.15 and the FDLE Safety Manual that will, once adopted, include in the CPR/AED Coordinator's responsibilities the submission of a quarterly CPR/AED Master Listing to the Department's Safety Coordinator and Alternate Safety Coordinator.

Management Six-Month Status:

FDLE Security Agent Morrison Hearn has been designated as the CPR/AED Coordinator for the entire agency. The agency's HQ CPR/AED Member Certification Listing status is pending. As part of each Safety Officer's responsibilities, he/she will submit on a quarterly basis a listing of all CPR/AED trained members using the newly approved Safety Officer Quarterly Safety Inspection Checklist. All CPR/AED Coordinator and Safety Officer responsibilities and duties will be incorporated into the applicable policy and agency Safety Manual pending revisions and approval.

**Finding #2 - Automated External Defibrillator (AED)**

Documentation of AED inspections is not maintained in accordance with Policy 3.15 and notification of the use of an AED is not consistently practiced. In addition, Policy 3.15 does not identify who is responsible for submitting the AED Use Report to the CPR/AED Coordinator; inaccurately identifies the involvement of the Professionalism Program Director; and includes an inaccurate F.A.C. rule reference.

AED Inspections

The CPR/AED Coordinator provided a list of ten AEDs located throughout the HQ building. The list, not an AED Log, was dated 6/11/13 and had been used to document the last quarterly inspection. Information for prior quarterly inspections was not provided.

Policy 3.15 requires that the CPR/AED Coordinator and/or designee inspect AEDs for placement and access at least once annually, and not less than quarterly, conduct an inspection of all AED units to ensure each unit is in proper working order, and record the results of the inspection on the AED log.

During an interview, it was noted that the CPR/AED Coordinator is not kept informed of AED use.

Based on the inspection of the ten (10) AEDs identified as located in the HQ building, the following was observed:

- The AED located on the first floor between quads B and C was missing from the AED wall bracket for eight (8) days due to the unavailability of a replacement AED.
- One of the ten (10%) AEDs had a serial number that did not match the serial number on the list of AEDs.
- Ten of 10 (100%) AEDs passed the functionality test.
- Ten of 10 (100%) AED pads will not expire until 2018.

Without proper notification to the CPR/AED Coordinator that an AED was removed from the AED wall bracket during a medical emergency, regardless if it was used, the Department runs the risk that the unit is not inspected by the CPR/AED Coordinator to ensure that it is in properly working order prior to the AED being returned to the AED wall bracket. In addition, if an AED is not replaced in a timely manner, the Department may not be able to ensure proper preparedness for a medical emergency in the HQ building.

Policy and Safety Manual

Policy 3.15 does not identify who is responsible for submitting the AED Use Report to the CPR/AED Coordinator. In addition, Policy 3.15 has not been revised to amend reference to the responsible Division for receipt of the AED Use documentation. Currently, the policy references submission of documentation to the Professionalism Program Director. However, the current Department Safety Officer is the Forensic Services Director within the Investigations and Forensic Sciences Division.

Policy 3.15 further requires that the Professionalism Program Director or the CPR/AED Coordinator forward the internally recorded information from the AED device within 48 hours of the AED event to the Medical Director of the Florida Department of Health, Bureau of Emergency Medical Services. Without accurate identification of the responsible party for receipt



of the AED Use documentation, the responsibilities identified above may not be fulfilled and the Department may not be in compliance with the Florida Department of Health, Bureau of Emergency Medical Services.

Furthermore, the Policy has not been updated with the correct F.A.C. rule reference that identifies guidelines for AED usage in State Owned or Leased Facilities. Policy currently references Rule 64E-2.039, F.A.C.;¹ however, the correct reference is Rule 64J-1.023, F.A.C.

In addition, the Safety Manual does not clearly identify who is to know the location of the nearest first aid kit/AED in each work area, ensure that the AED is inspected quarterly and ensure the batteries and supplies are replaced as needed for proper operation. Currently, all members are required to read the Safety Manual and may assume the above identified responsibilities.

With the issues identified above, the Department is limited in the ability to ensure all the AEDs located in the HQ building are being inspected, proper documentation is maintained, and proper notification is being made. Members may also not know where to find an AED in an emergency if the location of the machine is not easily identifiable.

Recommendation

We recommend the CPR/AED Coordinator immediately conduct an inventory of AEDs located in the HQ building to ensure all AEDs are identified for future inspections.

The OIG also recommends FDLE Policy 3.15 be revised to:

- Include a requirement for the CPR/AED Coordinator to, on a quarterly basis, submit the AED Log required by Policy 3.15 to the Department Safety Officer and Alternate Safety Officer for review.
- Include a requirement that the AED Use Report be submitted directly to the CPR/AED Coordinator.
- Update the references to all the responsible parties involved in submitting AED Use documentation.
- Update the outdated reference to the F.A.C. rule that identifies guidelines for AED use in state owned or leased facilities.

The OIG also recommends the FDLE Safety Manual be revised to identify the Safety Officer as the responsible party for the following safety rules: know the location of the nearest first aid kit/AED in each work area; assure that first aid kits are inspected at least annually and are properly stocked; and assure that the AED is inspected quarterly and the batteries and supplies are replaced as needed to ensure proper operation.

Note:

During the audit period, a new CPR/AED Coordinator was appointed and the Department is in the process of purchasing additional AEDs to serve as spare AEDs.

¹ Rule Title: Guidelines for Automated External Defibrillators (AED) in State Owned or Leased Facilities (Transferred to 64J-1.023).



Management Response:

1. Agree. An inventory of all HQ AEDs has been conducted by the agency's CPR/AED Coordinator, including verification of each unit's property ID number, serial number and location. In addition, each unit was inspected to ensure that it is in working order including containing all appropriate supplies. This information will be recorded on the recently revised AED Log which will be maintained by the CPR/AED Coordinator. The agency will include in the draft revision to Policy 3.15 that will, once adopted, address this policy concern regarding the revised AED Log.
2. Agree. The agency will draft a revision to Policy 3.15 that will, once adopted, address this policy concern regarding the quarterly submission of the AED Log to the Department Safety Coordinator and Alternate Safety Coordinator.
3. Agree. The agency has drafted a revision to Policy 3.15 that will, once adopted, address this policy/procedural concern regarding the requirement that the recently revised AED Use Report be submitted directly to the CPR/AED Coordinator.
4. Agree. The agency will draft a revision to Policy 3.15 that will, once adopted, address this policy/procedural concern by clarifying the sequence of each responsible party when submitting the AED Use Report documentation.
5. Agree. The agency's draft revision to Policy 3.15 will, once adopted, address this policy concern of removing the outdated reference to the F.A.C. rule identifying guidelines for AED use in state owned or leased facilities.
6. Agree. The agency will draft a revision to the FDLE Safety Manual that will, once adopted, clarify each Division Safety Officer as the responsible party for the following: documenting the location of each safety first aid kit within his/her division so that it may be inspected on a quarterly basis to ensure that it is properly stocked. A quarterly inspection of the first aid kits will allow a more timely response to replenish any missing and/or nearly depleted items. The quarterly safety first aid kit inspection will also be included on the draft version of the Safety Officer Quarterly Safety Inspection Checklist within the revised FDLE Safety Manual draft and the newly developed draft Safety Officer Guide.

NOTE: The CPR/AED Coordinator responsibilities contained within Policy 3.15 have been revised at the request of Director of Forensic Services and Safety Coordinator David Coffman with the consensus of Tallahassee Regional Operations Center Director Mark Perez as of April 28, 2014. The revised responsibilities of the CPR/AED Coordinator will be included in the draft revision of Policy 3.15 that will, once adopted, address this policy concern.

In addition, to further assist the CPR/AED Coordinator with the position's responsibilities, the agency's Alternate Safety Coordinator in conjunction with the CPR/AED Coordinator began creating a CPR/AED Coordinator Procedural Manual in March 2014.

Management Six-Month Status:

The Alternate Safety Coordinator in conjunction with the agency's CPR/AED Coordinator inventoried the agency's AED units including HQ, Capitol Police and Regional Operations Centers. The agency has purchased two spare AED units for HQ.



All CPR/AED Coordinator responsibilities and duties including the newly drafted AED documentation (AED Checklist, AED Log and AED Use Report), and all applicable state of Florida statute and Florida Administrative Code rule references will be incorporated into the applicable policy and agency Safety Manual pending revisions and approval.

Finding #3 - First Aid Kits

The auditor observed that not all first aid kits located at the HQ building were readily accessible; some contained expired medical supplies and/or medication; and there is no uniformity in the brand or the contents of first aid kits purchased throughout the Divisions.

Through a survey and interviews of the nine Safety Officers, along with an inspection of the first aid kits, the following was identified:

- Some Safety Officers were not aware of all the first aid kits located within their respective Division. As a result, not all first aid kits were annually inspected and/or properly stocked as required per the FDLE Safety Manual. Two of the nine (0.22%) Safety Officers indicated they have not checked the first aid kits in their respective Divisions within the last six, twelve, and/or twenty-four months.
- 35 first aid kits were discovered during the inspection; these are in addition to the 47 first aid kits identified by the Safety Officers.
- 64 of the 82 (0.78%) first aid kits were not located in plain sight, as defined as easily accessible. It was also noted, twelve of the 64 (0.19%) first aid kits were located behind a locked door (e.g. locked closet and/or a locked room).
- Some Safety Officers did not identify the first aid kits located in the Fire Safety Kit as a part of their Division inventory. Fourteen of the 82 (0.17%) first aid kits were located in Fire Safety Kits located throughout the units within Divisions.
- Several first aid kits contained expired medical supplies and/or medication. (Due to the large number of first aid kits inspected, the total quantity of expired supplies and medication were not individually identified.)

OSHA 3317-06N Best Practices Guide suggests the use of American National Standards Institute (ANSI) Z308.1-2003, Minimum Requirements for Workplace First Aid Kits, when determining adequate first aid supplies for an agency. However, it was noted the Department has not identified minimum requirements for workplace first aid kits for all Divisions. The auditor also observed several different first aid kit brands were purchased throughout the Department. Additionally, some first aid kits were not identified as OSHA/ANSI compliant.

The Safety Manual requires that the location of the nearest first aid kit/AED be known in each work area. The manual also requires that first aid kits be inspected at least annually and are properly stocked.

Without ensuring that first aid kits are inspected and properly stocked; contain unexpired medical supplies and medication; and are readily accessible, the Department runs the risk that during a medical emergency, assistance may be delayed. The Department also runs risk that



Safety Officers may purchase first aid kits for their Division that may not be OSHA/ANSI compliant. Without the use of minimal contents requirements in a first aid kit, the Department may not be consistent in supplying each Division with basic first aid supplies.

Recommendation

We recommend the Department immediately purge and replace all expired medical supplies and medication contained in the first aid kits, including the first aid kits located in the Fire Safety Kits in each Division.

The OIG also recommends FDLE Policy 3.15 and the FDLE Safety Manual be revised to:

- Identify minimum requirements for the contents of first aid kits in a workplace as suggested in OSHA 3317-06N.
- Include a requirement for Safety Officers to conduct and document regular assessments of the first aid needs for the units within their Division and to identify the location of all first aid kits.
- Include a requirement for the Safety Officers to use a Department first aid checklist to ensure the kits are regularly stocked and contain the appropriate medical supplies and medication.
- Include a requirement for the Safety Officers to, on a quarterly basis; submit a completed first aid checklist to the Department Safety Officer and Alternate Safety Officer.
- Include a requirement that the first aid kits in each Division are centrally located and easily identifiable.

Management Response:

1. Agree. Each Division Safety Officer along with the agency's Alternate Safety Coordinator will review all first aid kits to purge and replace all expired medical supplies and medication. The Division Safety Officer will notate any missing items contained in his/her area's first aid kits including the Fire Safety Kits for immediate replenishment. In addition, each Divisional Safety Officer will document the location of each first aid kit to prepare for the newly required Safety Officer Quarterly Safety Inspection component. Follow-up will be conducted by the agency's Alternate Safety Coordinator to ensure compliance.

NOTE: For items 2-6, the projected inclusion of the FDLE Safety Manual as a component of the agency's Policies and Procedures, accessible on the FDLE intra-net, will alleviate the need to also address these items in Policy 3.15.

2. Agree. The agency's Safety Committee will review the OSHA minimum requirements for first aid kits in a workplace to determine the most appropriate for each Division. After a consensus is reached, the recommendations will be included in the agency's draft revision of the FDLE Safety Manual and the draft version of the Safety Officer Guide that will, once adopted, address this procedural concern.

3. Agree. The agency's draft revision of the FDLE Safety Manual and the draft version of the Safety Officer Guide will, once adopted, address this procedural concern of ensuring that as part of the Safety Officer's responsibilities, he/she will document the location of each first aid kit



within his/her Division. Each quarter, the Safety Officer will review each first aid kit for completeness and will replenish any necessary items. This action will be documented on the newly developed Safety Officer Quarterly Safety Inspection Checklist and follow-up will be conducted by the agency's Alternate Safety Coordinator to ensure compliance.

4. Agree. The agency's draft revision of the FDLE Safety Manual and the draft version of the Safety Officer Guide and the newly developed Safety Officer Quarterly Safety Inspection Checklist, will, once adopted, address this procedural concern of ensuring that all divisional safety first aid kits are verified on a quarterly basis for the appropriate medical supplies and medication.

5. Agree. The agency's draft revision of the FDLE Safety Manual will, once adopted, address this procedural concern regarding the establishment of a requirement for Division Safety Officers to submit on a quarterly basis to the agency's Safety Coordinator and Alternate Safety Coordinator, a completed Safety Officer Quarterly Safety Inspection Checklist which includes a component for first aid kit inspections.

6. Agree. The agency's draft revision of the FDLE Safety Manual and newly developed Safety Officer Guide will, once adopted, address this procedural concern regarding the establishment of a requirement that all divisional first aid kits are easily assessable and clearly identified. Placement guidelines will be provided for first aid kit locations. In addition, if approved, the standardization of first aid kits (applicable to the work area) will provide consistency.

Management Six-Month Response:

The Alternate Safety Coordinator and Division Safety Officers inspected and purged all identified HQ first aid kits. Many of these kits were eliminated due to the selection of a comprehensive first aid kit that meets the ANSI/ISEA Z308.1-2009 standard (OSHA recommended). The OSHA recommended first aid kits and AED units have been placed in centralized locations throughout HQ. Medical emergency signage has been approved and will be installed upon receipt. The installation of telephones near the centrally located first aid kits and AED units is currently being reviewed to determine feasibility.

The agency's Safety Officers will document, inspect, and replenish each first aid kit within their respective area using the Safety Officer Quarterly Safety Inspection Checklist.

The recommendations, pending approval will be incorporated into the applicable policy and agency Safety Manual.

Finding #4 - Medical Reporting

A review of Policy 3.15 and the Safety Manual noted that it is not clear whether the FDLE Supervisor's Report of Personal Injury/Illness Form (OHR-064) is to be submitted for all incidents involving or that could have resulted in personal injury/illness. Even though both Policy 3.15 and Safety Manual make reference to using Form OHR-064, it may not be clear to supervisors that the form is to be used for all incidents/accidents, as the form is mainly referenced in conjunction with workers compensation incidents. In addition, though Policy 3.15 and the Safety Manual reference member expectations for work-related injury/illnesses, neither distinguishes member expectations for all medical emergencies deemed not work-related.



It was further noted, the Safety Committee currently has a process for reporting medical incidents/accidents via the "Lost Time Report" presented at committee meetings. Policy 3.15 could be enhanced by adding an evaluation component similar to what is identified in the work-related injury/illness investigation and reporting procedures section within the Safety Manual. This would allow the Safety Committee to determine FDLE's effectiveness in the preparedness and response to the emergency after a medical incident/accident has occurred. Section 284.50(1) (c), F.S. requires each safety coordinator, at the direction of his or her department head, to investigate job-related employee accidents of his or her department. Currently, policy does not include reference to this section of the statute.

The Department runs the risk that without clear instructions regarding medical reporting for any incident/accident that occurred at the HQ building involving or that could have resulted in personal injury/illness, the Safety Committee is limited in their ability to evaluate FDLE's preparedness and response to a medical incident/accident that occurs at the HQ building. Also, a member who has an injury/illness that is later determined to be work-related may be denied workers' compensation benefits because the Department failed to submit the information in a timely manner as required.

Recommendation

We recommends FDLE Policy 3.15 be revised to clearly define members' expectations for all medical emergencies. The policy should also include reference to Section 284.50, Florida Statutes.

The OIG also recommends FDLE Policy 3.15 and the FDLE Safety Manual be revised to:

- Clearly define the use of the Supervisor's Report of Personal Injury/Illness Form (OHR-064) for any incident involving or that could have resulted in personal injury/illness.
- Require a quarterly evaluation of all medical incidents/accidents that require the response of EMS to an FDLE building, to assess the effectiveness in preparedness and response to a medical emergency.

Management Response:

1. Agree. The agency's draft revision of FDLE Policy 3.15 will, once adopted, address this policy concern regarding clarification of members' expectations for all medical emergencies to include defining the term *medical emergency*. In addition, the reference to Section 284.50, Florida Statutes will be added.

2. Agree. The agency's draft revision to Policy 3.15 and the FDLE Safety Manual will, once adopted, address this policy/procedural concern regarding the clarification of the use of the Supervisor's Report of Personal Injury/Illness Form (OHR-064) to include documenting work-related injury/illness incidents and providing documentation for any incident involving, or that could have resulted in, personal injury/illness due to a medical emergency.

3. Agree. The agency's draft revision to Policy 3.15 and the FDLE Safety Manual will, once adopted, address this policy/procedural concern regarding a quarterly evaluation of all medical incidents that require the response of EMS to an FDLE building, to assess the effectiveness in preparedness and response to a medical emergency. A form will be developed to record this information allowing the Safety Officer to present his/her findings at the Safety Committee



meeting following the incident. The Safety Committee members will evaluate the emergency incident and revise/create new parameters, as necessary, to improve the agency's response to a medical emergency.

Management Six-Month Response:

Within the agency's draft revision to Policy 3.15 and the Safety Manual, members will be directed to consider all medical emergencies to be work related and therefore documented using the agency's current Workers' Compensation forms to include reporting the incident to the state of Florida's managed care provider, AmeriSys.

As part of the ongoing analysis of the agency's response to medical emergencies, the Medical Emergency Incident Review Form will be incorporated into the applicable policy and Safety Manual pending revisions and approval.

Finding #5 - Training and Procedures

The Department's safety awareness training could be enhanced.

Safety Awareness Training

During the audit, the following was identified regarding FDLE's safety awareness training:

- The Department has not developed basic safety awareness training for all members. Section 284.50(1) (d), F.S., requires each safety coordinator, at the direction of his or her department head, establish a program to promote increased safety awareness among employees. Without training, members may lack basic safety awareness necessary to respond to a medical emergency.
- The Safety Manual requires that all members participate in on-going safety training and instructs each Region and Division to administer first aid training programs that include the training of selected members in first aid, CPR, AED, emergency care procedures, injury/illness reporting, and maintenance of first aid supplies. However, the Safety Manual does not identify the frequency of the trainings nor does it provide guidance on how to ensure training is administered in a consistent, effective manner. Without a training frequency requirement (e.g. quarterly, bi-annually, annually) the Department runs the risk that on-going training in the Region/Division is not provided.
- Policy 3.15 identifies the CPR/AED Coordinator as responsible for coordinating CPR and AED training and certification of agency members. However, Policy 3.15 does not identify the frequency in which said training should be coordinated. During the period of 2007 through 2013, the Department offered 59 classes in CPR/AED/First-Aid training at the HQ building. Forty (40) classes were designated for sworn members only; nineteen (19) of the 59 classes had sworn and non-sworn members in attendance. Without sufficient availability of sworn/non-sworn classes, the Department may not have CPR/AED trained personnel available to respond to a medical emergency in each Division.

The Safety Manual requires that members sign a Safety Acknowledgment Form once they have received and read the Safety Manual. However, the Department does not require a member to review and acknowledge revisions to the Safety Manual. Without a requirement to read and



acknowledge revisions to the Safety Manual, the Department runs the risk that not all members are aware of changes to the Safety Manual.

Emergency Medical Services (EMS) Procedures and Training

The Department does not have written procedures for all members regarding the arrival location of Emergency Medical Services (EMS) at the HQ building; nor does the Department provide all members EMS response training. FDLE members expressed concerns regarding the coordination of EMS arriving at the main entrance versus the security gates and/or loading dock. During interviews it was noted that if EMS arrived at the guard gates, the security guards are not allowed to let EMS enter without proper authorization, due to security concerns as there is no way to confirm the legitimacy of their arrival. In addition, the members of the Watch Desk temporarily lost the ability to raise and lower the guard gates/barriers from the Watch Desk due to a software programming issue. (Note: Prior to the conclusion of the audit, members of the Watch Desk regained the ability to raise and lower the gates/barriers).

Best business practices dictate that there should be a written plan for member response to a medical emergency. Without comprehensive EMS procedures and member training for all members, the arrival of EMS through the main entrance may not be consistently practiced, which may hinder the delivery of medical treatment to a member.

Recommendation

We recommend the Department:

- Implement basic safety awareness training for all members. The Department could provide members with training in an on-line or classroom format. As a reminder of the training, the Department could develop a slide to add to the existing standard FDLE screen saver which includes key points members should follow in response to a medical emergency.
- Provide a link to the Safety Manual via the Member Dashboard. This would ensure members could readily determine the location of the Safety Manual and acknowledge review of revisions once they are made.
- Provide a link on the main intra-net FDLE homepage for Safety Committee contact information.

The OIG also recommends FDLE Policy 3.15 and the FDLE Safety Manual be revised to:

- Include a requirement for the CPR/AED Coordinator to quarterly coordinate CPR and AED training and certification of agency members.
- Include a requirement for training documentation to be submitted to the Department Safety Officer and Alternate Safety Officer as a review process to ensure CPR and AED trainings are consistently offered for all members.
- Include written procedures regarding EMS arrival at the HQ building to ensure efficient arrival without delays. The procedures should clearly define: member responsibilities; the coordination of the arrival location of EMS; response for medical emergencies that



occur after hours; and the roles and responsibilities of the units involved during a medical emergency (e.g. the Watch Desk, Building Security, etc.).

Management Response:

1. Agree. Through the creation of a comprehensive Safety Officer Training Guide, each Safety Officer will be able to provide basic safety awareness training for all members. In addition, during New Member Orientation, each member will be provided a safety pamphlet which will provide basic safety tips as well as safety information applicable to his/her work area, such as the location of first aid kits, evacuation route(s), rally point, etc. Basic on-line safety training options will be researched to determine their feasibility and, if approved, will be adopted by the agency. To reinforce the key points to follow in a medical emergency, the agency's Safety Committee in conjunction with the agency's Alternate Safety Coordinator will research the feasibility of developing a slide to add to the existing standard FDLE screen saver.

In an effort to provide a quality safety program and to maintain consistency, it would be very beneficial for the agency to have a full-time Safety Coordinator and re-institute the Safety Officer salary incentive. Currently, the members assigned safety duties change at such a high frequency, it is difficult to achieve the necessary continuity and stability.

2. Agree. The FDLE Safety Manual needs to be easily accessible for all members and a link could be provided on the main intra-net FDLE homepage and the Member Dashboard. In an effort to provide documentation and consistency with members' review of the FDLE Safety Manual and any subsequent revisions, the agency's Safety Coordinator will request, in consultation with the Director of External Affairs, that each member will be notified and will acknowledge his/her initial review of the FDLE Safety Manual and any updates/revisions via the Policies and Procedures section of the FDLE intra-net page. The agency will include this change in its draft revision of the FDLE Safety Manual that will, once adopted, address this procedural concern.

3. Agree. The Alternate Safety Coordinator will research and confirm with ITS and the Director of External Affairs regarding the placement of a link on the main intra-net FDLE homepage for Safety Committee contact information.

4. Agree. The agency's draft revision of Policy 3.15 and the FDLE Safety Manual will, once adopted, address this policy/procedural concern to include the requirement for the CPR/AED Coordinator to quarterly coordinate CPR and AED training allowing agency members to become certified. Currently, CPR/AED training classes are being conducted on a quarterly basis with emphasis on the agency's non-sworn members.

5. Agree. The agency's draft revision of Policy 3.15, the draft revision of the FDLE Safety Manual, and the newly developed CPR/AED Coordinator Procedural Manual will, once adopted, address this policy/procedural concern to include the requirement for the CPR/AED Coordinator to submit a copy of the training documentation of each quarterly CPR/AED training class to the agency Safety Coordinator and the Alternate Safety Coordinator to ensure consistency and compliance.

6. Agree. An analysis will be conducted to create written procedures regarding EMS arrival at the HQ building to include member responsibilities; the coordination of the arrival location of EMS; response for medical emergencies that occur after hours; and the roles and responsibilities of the units involved during a medical emergency (e.g. the Watch Desk, Building



Security, etc.) and will be included in the agency's draft revision of Policy 3.15 and the FDLE Safety Manual.

Management Six-Month Response:

The agency's safety pamphlet and basic safety awareness training are in development with emphasis placed not only on basic safety but incorporating specialized training as needed. A sub-committee of the agency's Safety Committee has been established to review all safety training components for content, consistency and appropriate training schedules.

A link to the agency's Safety Manual via the Member Dashboard is currently pending approval.

The current list of Safety Committee members has been posted on the FDLE Safety intra-net web page with contact information available through the FDLE Directory.

The CPR/AED Coordinator responsibilities regarding quarterly training to include Safety Coordinator review of training documentation and the EMS Response Procedures will be incorporated into the applicable policy and agency Safety Manual pending revisions and approval.