

**To: Commission for Florida Law Enforcement Accreditation, Inc.**  
**From: Rob Pace, Team Leader**  
**Date: December 6, 2021**  
**Re: Florida Department of Transportation, Office of Inspector General**  
**Full Compliance Assessment Report**  
**November 17, 2021**

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**A. Agency/Assessment Information:**

Chief Executive Officer: Inspector General Kristofer Sullivan

Accreditation Manager: Deputy Director of Investigations Anthony Jackson

Standards Manual Version: IG 2.09

Previous Accreditation Dates: October 2009, February 2013, February 2016, and February 2019

Assessment Team Recommendation: Reaccreditation

**Assessment Team**

Team Leader: Investigator Rob Pace  
City of Tallahassee, Office of the Inspector General  
[william.pace@talgov.com](mailto:william.pace@talgov.com)

Deputy Chief Inspector General Dawn Case  
Office of the Chief Inspector General  
[Dawn.E.Case@eog.myflorida.com](mailto:Dawn.E.Case@eog.myflorida.com)

**B. Compliance Tally:**

<b>Status</b>	<b>Mandatory Standards</b>	<b>Other-than-mandatory Standards</b>	<b>Total Standards</b>
In compliance	39	0	39
Not in compliance	0	0	0
Not applicable	7	0	7
Elected exemptions	0	0	0
Not Set	0	0	0
In progress	0	0	0
Waiver	0	0	0
<b>Total:</b>	46	0	46

Total Applicable Other-than-mandatory Standards	0
Maximum allowable number of Elected Exemptions	0

**C. Agency Profile:**

Section 20.055, Florida Statutes (F.S.), established the Office of Inspector General (OIG) within each state agency to provide a central point for coordination of and responsibility for activities that promote accountability, integrity, and efficiency in government. The OIG conducts independent and objective audits, investigations, and reviews of agency issues and programs in order to assist the Florida Department of Transportation (FDOT) in accomplishing its mission.

The mission of the OIG is to promote integrity, accountability, and process improvement in the FDOT by providing objective fact-based assessments to the FDOT team. The OIG vision is, “To be championed by our customers, benchmarked by our counterparts, and dedicated to quality in our products and services.”

The OIG has three primary functions in support of their mission: Audit, Investigations, and Quality Assurance and Operations Support.

The OIG’s Investigations Section is led by Director of Investigations Kim Likens and consists of two deputy directors, six investigators, and an investigative analyst. The section’s mission is to deter, detect, and investigate crimes or misconduct impacting the FDOT. The focus of the section is to aggressively pursue any attempt by FDOT employees, contractors, or vendors to gain benefits to which they are not entitled. Investigations, referrals to management, and fraud awareness briefings are the primary methods used to accomplish this objective. The section prides itself on objectivity; the goal is to prove or disprove the allegations they receive based purely on the facts. In accordance with Section 20.055, F.S., the section follows the Principles and Standards for Offices of Inspector General established by the Association of Inspectors General.

In fiscal year 2019-2020, the OIG Investigations Section received 161 complaints, initiated 22 investigations, and closed 27 cases.

**D. Assessment Summary:**

On Monday, November 1, 2021, Accreditation Manager Anthony Jackson provided the formal assessment pre-read packet to the assessment team members. The materials provided the team with a clear background of the agency including applicable reports and information pertinent to the assessment.

Team Leader (TL) Rob Pace and Assessor Dawn Case met in advance of the assessment telephonically for a pre-assessment team meeting. The meeting purpose was to review and discuss the FDOT-OIG assessor packet, itinerary, and issues or concerns related to the upcoming assessment. Chapter review preference, CFA philosophy, and assessment protocol were discussed during the pre-assessment meeting. The assessor packet contained a welcoming letter from Inspector General Sullivan, the 2020/2021 Annual Report, an assessment itinerary, a copy of the FDOT-OIG organizational chart, and all other required materials.

On Wednesday, November 17, 2021, TL Pace and Assessor Case met in the lobby of the FDOT-OIG office in Tallahassee, Florida. Front office personnel verified the identification of both assessors and issued visitor badges for access to the FDOT-OIG area. The facility is securely maintained with significant protocols for restricted access including main door access locks only accessible to visitors through an intercom and camera observation system. Assessors were welcomed by FDOT-OIG Deputy Director of Investigations and Accreditation Manager (DDI/AM) Anthony Jackson who escorted the team to their work area. DDI/AM Jackson provided an overview of the resources located in the room and confirmed computer access.

At 9 a.m., the team conducted an entrance interview including Inspector General (IG) Kristofer Sullivan, Director of Investigations (DI) Kim Likens, Deputy Director of Investigations (DDI) Larry Burns, and DDI/AM Jackson. IG Sullivan thanked the team for their participation in the assessment and offered any assistance necessary for its completion. He expressed his agency's commitment to the accreditation process. TL Pace and Assessor Case discussed the CFA philosophy and assessment protocols with the group. They thanked the FDOT-OIG team for their hospitality and dedication to the assessment process.

DDI/AM Jackson provided a brief tour of the OIG suite. The tour was comprehensive showing observables to include:

- Secure Access to OIG Offices
- OIG Mission Statement
- Secure File Room

During the tour of the FDOT-OIG suite assessors asked questions relating to standards and met key staff members to interview later, if necessary. It was noted that each office door of the FDOT-OIG staff was equipped with an electronic entry lock providing additional security of each individual working space.

The assessment team completed file review in the area designated by the OIG. DDI/AM Jackson assisted the team with computer access to accreditation files through PowerDMS and was available to arrange any required interviews or observations requested by team members.

The assessment was completed on the same day. DDI/AM Jackson was complimented by the assessment team for the construction of the assessment files. The files contained all the necessary proofs and policies, and were well organized.

There were no noncompliance issues and no corrective actions.

The assessment team held an exit meeting with IG Sullivan, DI Likens, DDI Burns, DDI/AM Jackson, and the remaining FDOT-OIG staff at 2:30 p.m. The team gave an overview of the assessment including the file review, interviews, and observations. The team thanked IG Sullivan and DDI/AM Jackson for their assistance during the assessment. The team unanimously recommended the FDOT-OIG be favorably reviewed for reaccreditation.

**E. Standards Noncompliance Discussion: None**

**F. Corrective Action Discussion: None**

**G. Standards Verified by the Team as COVID-19 Waiver Applicable: None**

**H. Standards Verified by the Team as Not Applicable to the Agency:**

3.03M	3.04M	5.02M
5.04M	7.02M	7.04M
7.06M		

**I. Standards with a Status Changed by Assessors: None**

**J. Public Information Activities: None**

**K. Exemplary Policies/Projects/Procedures:**

#### **The Office of Inspector General (OIG) Mentoring Program**

The OIG Mentoring Program supports one of the key components of the Florida Department of Transportation Secretary's "Vital Few," specifically, to foster talent through the development and implementation of plans and initiatives that will enable the

department to Attract, Retain, and Train (ART) the best and brightest employees in the nation.

The OIG mentoring program facilitates the partnering of new hires, as well as tenured employees, with experienced and enthusiastic mentors who can guide them on their professional journeys. The mentorship program goals are to:

- Enhance professional and personal growth opportunities.
- Foster an open environment where information is shared, and knowledge is transferred.
- Develop a future pool of leaders who have the skills to move to great responsibility, improve morale and quality of work life.
- Aid in retaining employees.

The mentoring program is a learning partnership that focuses on the interests and personal development of staff through a shared experience between mentor and mentee.

## **L. Chapter Summaries:**

### **CHAPTER 1: Organization and Governing Principles (Assigned Assessor: RP)**

The FDOT-OIG conducts its investigations in accordance with state statute to promote accountability, integrity, and efficiency in government. The OIG's mission statement and organizational chart are displayed on the agency SharePoint system for access. All members are required to annually receive and abide by the OIG Code of Ethics. There are appropriate procedures in place when a potential conflict is identified. Employees are knowledgeable of agency policy and procedures. The OIG's written directives were organized in a manner that made it easy for the assessment team to follow. Interviews were conducted with DI Likens, DDI Burns, and Investigator (Inv.) Christine LeClere to confirm compliance.

### **CHAPTER 2: Personnel Practices (Assigned Assessor: DC)**

The FDOT-OIG has well-written procedures to ensure that staff are qualified for the positions they hold, and that staff collectively possess the necessary skills to complete assigned investigations. Proofs demonstrated that investigative staff members receive and acknowledge position descriptions and are evaluated annually based on the expectations for their assigned positions. Assessors spoke with DI Likens who explained the process for ensuring staff assigned to investigations have proper expertise in the subject matter reviewed. Assessors also confirmed with DDI Larry Burns and DDI/AM Jackson as well as Inv. LeClere that supervisors meet with employees to review their performance on multiple occasions throughout the year.

### **CHAPTER 3: Training (Assigned Assessor: DC)**

The FDOT-OIG has clear and concise written procedures that address the training requirements for new investigative staff members and the continuing education hours for investigative staff members. Proofs demonstrated the training received by new investigative staff members and the training hours earned by OIG staff. DDI/AM Jackson created a training table as a proof that clearly depicts the number of training hours received as well as the number of training hours received in subjects directly related to staff members' responsibilities. Assessors spoke with DI Likens about the on-boarding process for new investigative staff members and spoke with DDI Burns who highlighted for assessors the FDOT-OIG Mentoring Program. Assessors confirmed that standards 3.03M and 3.04M were not applicable as the FDOT-OIG does not have sworn personnel.

### **CHAPTER 4: Investigation Process (Assigned Assessor: RP)**

FDOT-OIG has procedures in place which clearly outline the process for handling complaints, conducting investigations, conducting interviews, and securing investigative records. The case planning process used by the OIG is effective and includes updates through the course of each applicable investigation. The OIG practices are reflective of their policies for the investigative process. Case reviews are conducted to ensure legal sufficiency and access to legal counsel is available, if needed. OIG management and staff were very knowledgeable of the established policies and procedures as evidenced during the interviews. Key interviews were conducted with DI Likens, DDI/AM Jackson, and Inv. LeClere to confirm compliance.

### **CHAPTER 5: Case Supporting Materials and Evidence (Assigned Assessor: DC)**

The FDOT-OIG's procedures were comprehensive and thorough, ensuring the privacy and safeguarding of case supporting materials. The OIG has only a minimal amount of paper files, but they are secured in a locked room in a locked cabinet inside a secure suite. Most of the OIG's records are maintained in an electronic case management system with proper credentialing steps in place to prevent improper access. Assessors determined that the FDOT-OIG does not collect, handle, or maintain evidence; therefore, standards 5.02M and 5.04M were verified as not applicable.

### **CHAPTER 6: Whistle-Blower's Act (Assigned Assessor: DC)**

The FDOT-OIG has well-written procedures in place to ensure staff in the Investigations Section follows the provisions outlined in statute for compliance with confidentiality requirements, timeframes, notification, and report dissemination. The OIG provided available, applicable proofs demonstrating they follow procedures as written. During interviews, staff demonstrated their knowledge and familiarity with all processes and requirements of the Whistle-blower's Act.

## **CHAPTER 7: Notification Process (Assigned Assessor: DC)**

The FDOT-OIG's written procedures were very concise and address requirements that ensure that entities contracting with the state or individuals substantially affected as defined are provided with the investigative findings, notified of the opportunity to submit a written response, and notified that their written response will be included in the final report of investigation. Proofs demonstrating compliance were uploaded as appropriate in PowerDMS. During the assessment period, the OIG did not receive any complaints or allegations of misconduct related to the OIG or its staff members. Assessors verified during the assessment that standards 7.02M, 7.04M, and 7.06M were not applicable to the FDOT-OIG as they are a state agency.

## **CHAPTER 8: Case Management (Assigned Assessor: RP)**

FDOT-OIG utilizes a restricted access complaint tracking system for intake, processing, and disposition of complaints. Policies and procedures clearly address the process of tracking cases and proper retention of records. Assessors conducted a review of the tracking system which confirmed a quality assurance system for investigative files with consistent organization and confirmation that all required documentation is completed. Assessors also confirmed the procedures for storage, archival, and destruction of case file materials. Interviews were conducted with DDI/AM Jackson and Inv. Heather Parramore to confirm compliance.

## **CHAPTER 9: Final Reporting Processes (Assigned Assessor: RP and DC)**

The FDOT-OIG's procedure was clearly written. The process outlined steps for investigative conclusions, distribution of final reports, post investigative responses, and timely notification to law enforcement when the inspector general has reasonable grounds to believe a criminal violation has occurred. In addition to reviewing files, interviews were conducted with DI Likens, DDI Burns, and DDI/AM Jackson to confirm compliance.

### **M. Summary and Recommendation:**

The Florida Department of Transportation, Office of Inspector General, is a well-organized, professionally led agency. All members interviewed were enthusiastic and demonstrated commitment to the accreditation process. Everyone contacted exhibited great pride in their organization and mission.

It is evident through this assessment that FDOT-OIG consistently demonstrates a commitment to their mission statement, "The mission of the Office of Inspector General is to provide independent and objective investigative and audit services that promote accountability, integrity, and efficiency within the Florida Department of Transportation and its partners."

The assessment team unanimously recommends that the Florida Department of Transportation, Office of Inspector General, be favorably reviewed for reaccreditation at the next scheduled commission meeting.

Submitted by Investigator Rob Pace  
Team Leader