

Department of Agriculture and Consumer Services



Status Report
Auditor General Report No. 2015-182

October 14, 2015

Office of Inspector General
Ron Russo, Inspector General

Florida Department of Agriculture and Consumer Services
Adam H. Putnam, Commissioner



Department of Agriculture and Consumer Services Office of Inspector General

External Audit Status Report

October 2015

Report No. AG 2015-182

Operational Audit of Selected Inspection Programs

AT A GLANCE

The Inspector General is required by s. 20.055(5)(h), Florida Statutes, to report to the Commissioner of Agriculture on the status of corrective actions taken on reports published by the Auditor General or the Office of Program Policy Analysis and Government Accountability. The Auditor General's report No. 2015-182 on Selected Inspection Programs contained seven findings and recommendations that required corrective action by the Florida Department of Agriculture and Consumer Services (department). The status of corrective actions, as reported by management for the divisions of Aquaculture, Consumer Services and Fruit and Vegetables, are summarized in this report.

FINDINGS DETAIL

INSPECTION POLICIES AND PROCEDURES

Finding: The Auditor General's audit procedures disclosed that the policies and procedures for inspections conducted by the Division of Aquaculture and the Division of Consumer Services could be enhanced as described below.

Division of Aquaculture. The division had not developed adequate policies and procedures addressing the conduct of and required documentation for aquaculture certification inspections. For example, the desk procedures and checklists did not address when to create and issue compliance and noncompliance notices, the process for

re-inspecting noncompliant certificate holders, the detail information to be input into the database of aquaculture certification inspections, instructions for completing the BMP checklists, or the retention period for inspection documentation.

Division of Consumer Services. The division's weighing and measuring policies and procedures did not specify a retention period for the inspection forms.

Recommendation: The Auditor General recommends that department management enhance aquaculture certification inspection policies and procedures by specifying the manner in which the inspections are to be conducted and documented. Additionally, the Auditor General recommends that department management enhance weighing and measuring device inspection policies and procedures to ensure inspection forms are appropriately retained.

Status: Partially Corrected

Division of Aquaculture

The Standard Operating Procedures (SOPs) are in draft form and are currently being reviewed by Division staff. It is anticipated that the SOPs will be finalized and implemented by December 1, 2015.

Division of Consumer Services

The division follows the retention guidelines outlined in the department's Administrative Policies and Procedures 4-18, Records Management, and the Records Management Desk Manual. For inspection reports, the division follows GS-1 Schedule Number

176, Item Number 0001A, which requires that inspection reports be maintained for three years. The division completes a records inventory annually, as required by department policy.

INSPECTION DOCUMENTATION

Finding: The Auditor General's audit procedures disclosed that inspections were not always properly conducted or adequately documented in accordance with applicable rules and department guidelines. Specifically:

Division of Fruit and Vegetables: Processed Citrus Inspections. For six of nine regrading inspections examined, the division was unable to provide evidence that the regrading inspector had signed the required Regrade Clearance Form (From). Additionally, for four of these six inspections, the initial inspector did not identify the regrade location on the Form. In response to the Auditor General's audit inquiry, division management indicated that procedures to track the completion and return of all Forms to the division had not been established. Department management also indicated that, at the time the initial Form was completed, the inspector may not have known what the owner's intent was for the fruits that failed inspection. Therefore, on the Form, the initial inspector may have written "unknown" for the designated regrade location or left the location blank.

Division of Aquaculture: Aquaculture Certification and Shellfish Processing Plant Inspections. A review of the division's records for 23 applicable aquaculture inspections disclosed that the data entered in the Aquaculture Certification database for 15 inspections did not contain sufficient detail to document the BMP compliance requirements reviewed by the inspector. For another 2 inspections, the inspection results had not been entered into the database. While the division had established BMP checklists to guide inspectors through the inspection process, such checklists were not available for these

17 inspections. Additionally, for 3 other inspections, compliance letters were not issued by the inspector. In response to the Auditor General's audit inquiry, division management indicated that inspectors may choose whether or not to use the BMP checklists and were not required to enter in the Aquaculture Certification database the results for all applicable sections of the BMP Manual subject to inspection or the results for those sections the inspector determined the facility to be compliant.

In addition, for 5 of the 24 shellfish processing plant inspections with noted deficiencies, division inspectors did not specify on the Form DACS-15012 the time frame in which the deficiencies were to be corrected.

Division of Consumer Services: Weighing and Measuring Device Inspections). For 9 of 10 inspections recorded in the WinWam System, the inspector's detailed testing data and results had not been included in the WinWam System and the inspection forms had not been maintained.

Recommendation: Ensure that inspections are conducted and documented in accordance with established rules and procedures.

Status: Partially Corrected

Division of Fruit and Vegetables: Processed Citrus Inspections

A written policy and procedure regarding the completion of Regrade Clearance Forms has been developed. The procedures will be implemented during the 2015-2016 citrus season.

Division of Aquaculture: Aquaculture Certification and Shellfish Processing Plant Inspections

The SOPs for aquaculture inspections are in draft form and are currently being reviewed by division staff. It is anticipated that the SOPs will be finalized and implemented by December 1, 2015.

In regards to shellfish processing plant inspections, the OIG obtained a list of inspections that were performed during May through August 2014 where deficiencies were noted by the inspector. The OIG randomly selected 10 inspections and determined that Form DACS-15012 contained the time frame in which the deficiencies were to be corrected.

Division of Consumer Services: *Weighing and Measuring Device Inspections.*

The division's conversion from the former WinWam program to the current DOCS program is now complete and the deficiencies cited in this audit were addressed prior to the audit through this conversion to DOCS. The previous WinWam program did not have the capability to capture and retain inspection worksheets and the program did not require certain information to be recorded. Since the implementation of the new DOCS program for weighing and measuring device inspections, all inspection data is captured directly into the database and requires complete data input. Further, DOCS has the capability to retain scanned images of documents, which include worksheets created by inspectors at the time of an inspection. The documents can be recalled anytime thereafter. It is the policy of the division for inspectors to scan and upload into DOCS all worksheets created.

INSPECTION TIMELINESS

Finding: The Division of Consumer Services did not always timely perform re-inspections to ensure corrective actions were appropriately taken. Specifically:

- For 2 fuel pump device inspections, the division did not complete re-inspections although completed and signed correction notices for fuel pump device deficiencies had not been returned to the division. Similarly, the division did not complete re-inspections for 2 small scale device inspections, although correction notices had been issued for the devices.

- For 2 other small scale device inspections, the division did not complete re-inspections within 30 business days. For these 2 devices, re-inspections were completed 215 business days and 130 business days, respectively, after the division issued the correction notices.

Recommendation: Ensure re-inspections are performed in accordance with established procedures. Additionally, to ensure commercial measuring device re-inspections are timely performed, develop a process to track delinquent correction notices and to remind inspectors to perform re-inspections.

Status: Corrected

The division recognized that the former database (WinWam) was insufficient to track outstanding responses to correction notices and implemented a new database before the audit commenced.

The current DOCS program has reporting capabilities that allow for both inspectors and supervisors to generate a list of outstanding correction notices beyond 60 days. Current procedures require inspectors to generate a report of outstanding correction notices weekly and follow up with the business. Supervisors are required to generate a report biweekly to ensure inspectors are tracking outstanding correction notices. This procedure is currently in place and has been since shortly after the inspectors started using the new database. The division's policy has been revised to reflect these procedures.

*SHELLFISH PROCESSING PLANT
STANDARDIZATION INSPECTORS*

Finding: For two of five inspectors in the Division of Aquaculture, the division was unable to provide documentation demonstrating that the inspectors were qualified as state standardized inspectors.

Another two inspectors were not standardized at the time inspections were

completed. These two inspectors qualified as standardized inspectors 397 days and 98 days, respectively, subsequent to employment as shellfish processing plant inspectors.

Recommendation: To better demonstrate that shellfish processing plant inspections are properly conducted, maintain documentation evidencing that all shellfish processing plant inspections are performed by qualified state standardized inspectors.

Status: Corrected

Subsequent to the audit, the division has re-standardized one of the two Sanitation and Safety Specialists (October 2014), and the other Sanitation and Safety Specialist inspector has retired. On an annual basis, the Shellfish Processing Plant program administrator will confirm active standardization certification for all Sanitation and Safety Specialists inspectors. Sanitation and Safety Specialists will not perform unsupervised inspections without written current standardization documentation from the State Shellfish Standardization Officer.

The most recent inspector certification confirmation process was initiated on July 1, 2015.

INFORMATION TECHNOLOGY CHANGE MANAGEMENT CONTROLS

Finding: The department did not always follow information technology (IT) change management policies and procedures. Specifically:

- For the **Division of Fruit and Vegetables**, division staff did not complete Change Log forms for any of the 18 BAU System program changes. Additionally, division staff did not document that independent testing had been performed for the Citranet program change. Division management stated that the only change control process in place for the BAU System was a log file kept on the server and program code

comments. However, audit tests disclosed that the log file and program code comments did not identify all the aspects of the program changes required by the Change Log form. Division management also indicated that independent testing for the Citranet program change had been performed; however, it was not documented.

- For the **Division of Aquaculture**, four programming changes were made to the Aquaculture Certification database and one change to the Shellfish Shippers database. One division employee was responsible for making all four Aquaculture Certification database program changes and the Shellfish Shippers database program change, testing the changes, and moving the changes into production. Additionally, although all five program changes were documented on the division's internal Computer Request Form (Form) and the requestor signed the Form, the Form did not specifically identify the person who programmed the change, tested the change, moved the change into production, or accepted the change. Division management indicated that due to limited resources, the division's IT Administrator had made, tested, and moved all program changes into production.

Recommendation: Ensure that responsibilities for all IT resource program changes are appropriately separated and that the program changes are documented in accordance with established department policies and procedures.

Status: Partially Corrected

Division of Fruit and Vegetables

Subsequent to the program changes noted during the audit, a change log was initiated to update contact information and to fix broken links in the Citranet System. Testing of the program changes consisted of reviewing the website after the changes were

made; however, the change log does not contain a place to document testing was completed.

Division of Aquaculture

There were seven program changes made to the Aquaculture Certification database subsequent to the audit. The same individual programmed, tested and moved the change into production. The division's ability to appropriately separate responsibilities is still limited due to an insufficient number of available, qualified FTEs. The division will continue to separate and document change requests, programming, testing, and implementation subject to available division staff expertise.

INFORMATION TECHNOLOGY SECURITY CONTROLS

Finding: IT security controls for the Brix Acid Unit System, Citranet, and Shellfish Shippers database need improvement. Specific details of the issues were not disclosed in the report to avoid the possibility of compromising department data and IT resources. However, appropriate department management was notified of the specific issues.

Recommendation: Strengthen security controls related to the BAU System, Citranet, and Shellfish Shippers database to ensure the confidentiality, integrity, and availability of department data and IT resources.

Status: Partially Corrected

Division of Fruit and Vegetables

The IT security controls have been strengthened for the BAU System to correct the noted deficiencies. The security controls for the Citranet database have not been implemented due to the fact that the database is industry-driven and the Division would need to seek the industry's input concerning any changes to the system. It is not anticipated that changes to the Citranet

database would occur prior to the start of the 2015-2016 citrus season.

Division of Aquaculture

The IT security controls for the Shellfish Shippers database have not been revised. The Division is planning to move the database to Healthspace, a hosted inspection solution. This solution will address some, but not all, of the security control deficiencies identified during the audit.

APPROPRIATENESS OF ACCESS PRIVILEGES

Finding: An examination of the Division of Fruit and Vegetables' records for 62 BAU System user accounts active as of May 8, 2014, disclosed that 8 BAU System users had inappropriate or unnecessary update access privileges with respect to their division duties and positions. Specifically, all 8 users had technician and database administrator access privileges. Combined, these access privileges granted these 8 users the ability to create or delete user accounts and passwords, perform BAU System application modifications, and perform the same functions that processed citrus inspectors performed within the BAU System.

Recommendation: Appropriately limit BAU System user access privileges to promote the proper separation of duties and to restrict user access to only those functions necessary for their assigned job duties.

Status: Corrected

The BAU System improvements have been made. Currently there are three access levels where each employee is granted a specific level of access that is needed to perform their job duties. The three levels are: BAU Operator, Technician, and Administrator.

End of Report

Report Completed on Previous Page.

This follow-up was conducted in conformance with the applicable standards for the General Principles and Standards for Offices of Inspector General, the International Standards for the Professional Practice of Internal Auditing, and Information Systems Auditing Standards as published by the Association of Inspectors General, the Institute of Internal Auditors and the Information Systems Audit and Control Association, respectively.

Nedra Harrington, CIA, CISA, CPA - Director of Auditing
2005 Apalachee Parkway, Suite E, Tallahassee, Florida 32399-6500
(850) 245-1360 <http://www.FreshFromFlorida.com/oig/> oig@FreshFromFlorida.com