



DEPARTMENT OF INSPECTOR GENERAL
OKALOOSA COUNTY, FLORIDA
JD PEACOCK II, CLERK OF CIRCUIT COURT AND COMPTROLLER



April 29, 2022

John Hofstad, County Administrator
Okaloosa County Administration Building
1250 N Eglin Pkwy, Suite 102
Shalimar, FL 32579

Mr. Hofstad,

Please find attached the report on our audit of the Emergency Medical Services Division.

Our work served as a review of the department's internal controls, policies, and procedures specifically related to inventory and supply.

I want to thank Chief Welborn, Director Maddox, and their staff for the cooperation and accommodation they afforded us. Should you have any questions in the interim please do not hesitate to call me at (850) 689-5000 Ext. 3424.

Respectfully,

Brad E. Embry, Inspector General

CC: Patrick Maddox, Public Safety Director
Darrell Welborn, EMS Division Chief
JD Peacock, Okaloosa Clerk of Courts

OKALOOSA COUNTY CLERK OF CIRCUIT COURT



DEPARTMENT OF INSPECTOR GENERAL



REPORT ON THE AUDIT OF EMERGENCY MEDICAL SERVICES INVENTORY AND SUPPLY

REPORT NO. BCC 22-01

REPORT ISSUED APRIL 29, 2022

ISSUED BY: BRAD E. EMBRY, INSPECTOR GENERAL

Introduction

The Clerk-wide risk assessment released by the Department of Inspector General (IG) in October 2020 identified the Department of Public Safety as an area of risk. Our Office's audit work plan for 2022 included an audit of the Department's Emergency Medical Services (EMS).

Objective

The objective of our audit was to examine the department's internal controls, policies and procedures, and security of medication. Our goal was to provide an assessment of the department's system of internal control and to evaluate the appropriateness of, and compliance with departmental policies and procedures and industry best practices. The overall objective of the audit was to provide meaningful feedback and/or guidance.

Scope & Methodology

The scope of our audit included all processes in place during our work and all policies and procedures as of the date of this report. Audit methodology included interviews with leadership and staff, process walkthroughs, a site visit, policy examination, and documenting controls.

Management is responsible for ensuring compliance and adequate safeguarding of public resources from fraud, waste, or abuse. This includes the design, implementation, and maintenance of internal controls relevant to these objectives. This review was conducted in compliance with The International Professional Practices Framework issued by the Institute of Internal Auditors and Principles & Standards for Offices of Inspector General issued by the Association of Inspectors General.

Department Overview

Background

Okaloosa County Emergency Medical Services (OCEMS) is part of The Department of Public Safety under the authority and supervision of the Board of County Commissioners. Most employees of OCEMS are Paramedics and Emergency Medical Technicians, requiring professional licensure by the Florida Department of Health.

OCEMS is 1 of 20 EMS agencies in the State of Florida to be accredited by the *Commission on Accreditation of Ambulance Services (CAAS)*. CAAS defines their intent as to define the "gold standard" for the medical transportation industry. CAAS evaluates over 100 grading points including how EMS tracks and secures supplies, including advanced life support (ALS) supplies security, how patient care is monitored, response times, mutual aid agreements, disaster coordination, and community education. In 2021, OCEMS received CAAS reaccreditation with a perfect score. OCEMS has formalized policies and standard operating procedures publicly available on their website. Policies are based on state and federal laws as well as CAAS standards.

Security and Controls

Much of the security and controls implemented by OCEMS are based on DEA, State, and/or CAAS standards. For instance, OCEMS policy for Medical Supplies: Inventory, Storage, Security procedures for Medications and Fluids are derived from Sections 499 and 893 of Florida State Statute and Chapter 64J-1 of Florida Administrative Code. OCEMS stores supplies in facilities with a minimum of

one lock accessible only by current employees of Okaloosa EMS. To further protect inventory, select supply depots have a supply “vending machine” which provide a controlled supply dispensing solution, accountability through audit logs, and real-time inventory tracking. While there is presently a shared access code to enter buildings, OCEMS leadership have supplemented security through the addition of security camera(s) and engaging with County Information Technology about the installation of keycard access to their facilities. Keycard access is a method currently used by other County departments including by Public Safety personnel at the Emergency Operations Center. *Note: supply room cameras have been temporarily removed due to collective bargaining negotiations. EMS expects them to be returned within the next 6 months.*

Logistics

OCEMS welcomed a new Supply Coordinator with over a decade of experience in Logistics/Supply in the United States Military. Medical supplies are obtained via a contract with a national distributor of prehospital emergency medical supplies, equipment, and pharmaceuticals for EMS providers. Uniforms and associated items are obtained through various vendors due to supply chain issues and availability of items. OCEMS Command Staff advised they wanted to explore finding a vendor contract so that furnishment of uniform and associated items would be more reliable and consistent.

OCEMS is in the process of implementing a new inventory management system. The new system uses Radio Frequency Identification (RFID) for all items in inventory, including consumables, for an enhanced ability to manage, issue, and track inventory. The new inventory management system enables OCEMS to forecast the need for more supplies, and the identification of what supplies are the most consumed, during different seasons such as Spring Break or Holiday events based on historic trends.

Testing

During our audit, we conducted interviews with Command Staff, the Supply Coordinator, and EMS personnel. We examined policies, documented processes, and verified controls. We also conducted a walk-through of the main supply depot, a medic station, and an ambulance. We found no instances of noncompliance with Department policy, statutory requirements, or best practices.

Conclusion

In our opinion, Okaloosa County Emergency Medical Services is well managed, well controlled, and effective at meeting its objectives. OCEMS is subject to periodic, scheduled, and/or unannounced inspections and audits to ensure compliance from various entities such as Florida Department of Health and the Drug Enforcement Agency. As such, OCEMS Management has been proactive in identifying and mitigating risks, and proactive in working towards improving efficiency. Many of the risks assessed had already been identified by OCEMS and they were already engaged in finding resolutions or mitigation.

Finding: The absence of formal written procedure in supply presents the opportunity for inefficiency

Risk Factors: Currently, EMS has formalized policies pertaining to supply and the security of supplies; however, there is no formal written procedure to ensure continuity of the process in the event of employee attrition or absence. The current process relies on the knowledge and expertise of

Command Staff and/or the Supply Coordinator. Word of mouth procedures create an increased risk of inventory loss, waste, or a potential for improper documentation of supply usage.

Recommendation: Public Safety and EMS leadership should develop formal written procedures for the ordering, replacement, and issuance of inventory and supplies. An operating instruction would allow a new hire or a staff member on temporary duty to seamlessly continue the logistics process if a member of Command Staff or the Supply Coordinator is unavailable.

Observation: While sufficient security and controls exist, in compliance with state and DEA guidelines, there is the opportunity for improvement of security and controls

Risk Factors: The Ambulances are locked when unattended and narcotics are securely stored inside. Only Paramedics (Advanced Life Support) are authorized to access and disseminate controlled substances. A key is issued to an on-duty Paramedic to access the secured area within the ambulance. If the key is misplaced, stolen, or damaged, a locksmith must be summoned to rekey the lock(s) presenting the risk of an additional expense and an out-of-service ambulance pending the response of a locksmith and the replacement of the lock(s).

Narcotics are maintained on ambulances even if the healthcare providers are Emergency Medical Technicians providing Basic Life Support “BLS” and there is no Paramedic on board. While BLS providers are not authorized to access the narcotics, they have physical control of the key and theoretically could access controlled substances.

Mitigation: OCEMS mitigates unauthorized access by utilizing tamper-evident seals on narcotic storage. Additionally, they maintain logs which must be signed by two employees as well as checks conducted by the oncoming Paramedic/EMT and the outgoing Paramedic/EMT at shift changes. If there is a breakage, or a controlled substance must be wasted, a witness, typically an independent medical provider such as a Registered Nurse at an Emergency Department, must also sign the log.

We recognize the practicality of maintaining narcotics on BLS ambulances due to the dynamic nature of EMS coupled with the force multiplying capability of a Paramedic to board the ambulance and assume the higher level of care.

The EMS Chief and Command Staff described their desire for a product they believe could alleviate and further mitigate the aforementioned risk factors. EMS Command Staff described the need for a safe complemented by an Inventory Control System utilizing RFID tags with complete chain of custody information and audit trails identifying the user, date, time, and narcotic accessed from within as well as any access attempts. In addition to increased control with audit logs, the audit logs could alleviate civil liability as audit logs can demonstrate whether or not a controlled substance was accessed during a patient’s transport as well as show how much medication was withdrawn from the safe during a patient’s transport.

Recommendation: Public Safety and EMS leadership should explore options that enhance the mitigation and deterrence of unauthorized access to narcotics as well as to prevent a single point of failure presented by a single key.

Management Response

The Okaloosa County Department of Public Safety, Division of Emergency Medical Services is committed to constant evolution. We appreciate the insight and acumen of the Office of the Inspector General and welcome all opportunities for improvement.

Received via email, 4/29/2022, from Patrick Maddox, Okaloosa County Director of Public Safety