

Mailing Addresses:

Dade City:
38053 Live Oak Avenue
Dade City, FL 33523-3894

New Port Richey:
P.O. Box 338
New Port Richey, FL 34656-0338

Office Locations:

Robert D. Sumner Judicial Center
38053 Live Oak Avenue, Suite 205
Dade City, FL 33523-3894

West Pasco Judicial Center
7530 Little Road, Suite 106
New Port Richey, FL 34654

East Pasco Government Center
14236 Sixth Street, Suite 201
Dade City, FL 33523

West Pasco Government Center
8731 Citizens Drive, Suite 220
New Port Richey, FL 34654

East Pasco Records Center
38319 McDonald Street
Dade City, FL 33525

West Pasco Records Center
Jack Albert Records Retention Center
8901 Government Drive
New Port Richey, FL 34654

Phone: (727) 847-8199

Fax: (727) 847-8121

www.pascoclerk.com

poneil@pascoclerk.com

Excellence...Always

Paula S. O'Neil, Ph.D.
Clerk & Comptroller
Pasco County, Florida

May 22, 2018

The Honorable Mike Wells, Chairman, and
Members of the Board of County Commissioners
Pasco County Board of County Commissioners
8731 Citizens Drive
New Port Richey, Florida 34654

Dear Chairman Wells and Members of the Board:

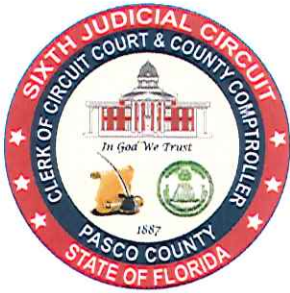
Enclosed is Inquiry Report No. 2018-01. The Department of Inspector General (IG) conducted an inquiry of reported document shredding that occurred at the Central Permitting locations in New Port Richey and Land O' Lakes on March 26, 2018.

The objective of the inquiry were to determine who shredded or disposed documents, what types of documents were shredded and/or disposed, and if documents were properly disposed in accordance with the County's Record Disposal Policy.

Based on the results of the inquiry, the following was noted:

- Documents retrieved from the recycling bins did not support the statements provided by County staff.
- The IG concluded 187 records found in the recycling bins were in violation of the County policies and procedures.
- There may have been a security violation that requires further action.
- The IG verified the statement about the shredding at Central Permitting in Land O' Lakes was taken out of context. There were no statements or documents provided to the IG that associated shredding in Land O' Lakes with shredding in New Port Richey.

We appreciate the cooperation and professional courtesy received from management during this inquiry. Please let us know if you wish to discuss any of the information provided in the report.



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Pasco County Board of County Commissioners
May 22, 2018
Page 2

We request the Board receive and file the report.

Sincerely,

Paula S. O'Neil, Ph.D.
Clerk & Comptroller

PSO/eh

*Office of Paula S. O'Neil
Clerk & Comptroller
Pasco County, Florida*

Improper Records Disposal

May 22, 2018



Department of Inspector General

Patrice Monaco-McBride, CIG, CIGA, CGFO
Inspector General

Auditor(s)
Erika Hendricks, CIA, CFE, CIGA
Auditor III

Inquiry Report No. INQ#2018-01

Department of Inspector General
P.O. Box 724
Dade City, FL 33523-3894
www.pascoclerk.com

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Executive Summary

Background Information

At the request of the County Administrator, the Clerk & Comptroller's Department of Inspector General (IG) conducted an inquiry of reported document shredding that occurred at the Central Permitting locations in New Port Richey and Land O' Lakes on March 26, 2018. An anonymous tip was reported to the Clerk & Comptroller and the County Attorney's Office which alleged management was behind closed doors shredding official documents at both locations. The basis of the allegation was that there was a large amount of documents shredded by the Central Permitting Manager, who had a personal relationship with an employee that resigned from County employment the business day prior.

When the inquiry was initiated, the Clerk & Comptroller recommended the County Administrator place the Central Permitting Manager (Manager) on paid administrative leave and restrict access to the buildings and computer systems until the inquiry was completed. The County Administrator informed the Clerk & Comptroller that he intended to temporarily assign the manager to report to a different building to work on a separate project. When the IG team later entered the building to interview the Manager, they saw that the Manager's Administrative Secretary II and the Program Administrator were in an office with the Manager upon their arrival. The IG could not determine if the presence of the Manager interfered with interviews that were conducted during the inquiry process.

The Pasco County Sheriff's Office was also contacted to assist with the inquiry, to determine if there was potential criminal activity. Based on the interviews conducted by the Sheriff's Economic Crimes Office, the Detective concluded that he could not determine any obvious criminal activity.

Documentation was retrieved between March 26, 2018 and March 28, 2018 from the recycling bins located in a public area near the Central Permitting Office in New Port Richey. The IG reviewed and documented the contents inside the recycling bins. The majority of the documents retrieved were employment applications which contained Personally Identifiable Information (PII). The PII included: name, address, driver license number, and/or social security number.

The IG conducted interviews and follow-up interviews with management and staff. According to staff in New Port Richey, the first page of the employment applications were removed and shredded. However, a total of 462 employment applications were not disposed as described in the interviews. The first page of each application contained sensitive and/or protected PII and was not shredded.

Objective

The objectives of the inquiry were as follows:

- Determine who shredded or disposed documents at the Central Permitting locations in New Port Richey and Land O'Lakes on March 26, 2018.
- Determine what types of documents were shredded and/or disposed at the Central Permitting locations in New Port Richey and Land O'Lakes.

- Determine if documents were properly disposed in accordance with the County's Record Disposal Policy.

Scope and Methodology

The inquiry period was March 26, 2018 through March 28, 2018. The interviews were conducted between April 2, 2018 and April 5, 2018. The nature and scope of the inquiry was intended to determine what documents were disposed, and if the documents were properly disposed.

Although the audit team exercised due professional care in the performance of this inquiry, this did not mean that unreported noncompliance or irregularities did not exist. The deterrence of fraud, and/or employee abuse was the responsibility of management. An inquiry alone, even when carried out with due professional care, did not guarantee that fraud or abuse was detected. The inquiry was neither designed nor intended, to be a detailed study of every relevant system, procedure, or transaction.

To achieve our objectives, the procedures performed included, but were not limited to, the following:

- Contacted the Pasco County Sheriff to assist with the inquiry.
- Reviewed Florida Statutes and the County's internal policies and procedures related to record disposal.
- Obtained and reviewed the Records Retention Training Sign-in Sheet.
- Retrieved documentation from the recycling bins located on the 2nd floor of the West Pasco Government Center.
- Reviewed and documented the contents disposed in the recycling bins.
- Contacted Pasco County Human Resources and obtained supporting documentation.
- Obtained copies and reviewed written statements by seven Development Services staff members.
- Conducted and documented interviews and follow-up interviews with management and staff.

Statutory Authority and County Guidelines

To conduct this inquiry, the Department of Inspector General relied on the following authoritative guidelines to serve as criteria:

- 2017 Florida Statute, Chapter 119- Public Records
- State of Florida's General Records Schedule GS1-SL for State and Local Government Agencies, August 2017

- Pasco County Administrative Policy #100-11, *Proper Disposal of Official Records*, 7/22/2015
- Pasco County Administrative Policy #600-07, *Information Security Personally Identifiable Information*, 05/03/2017
- Pasco County Career Service Manual, section B2.05 Employment of Relatives, rev. 04/08/1994

Results

Pasco County Sheriff's Office Investigation

Based on the interviews conducted by the Pasco County Sheriff's Economic Crimes Office, the Detective concluded that he could not determine any obvious criminal activity.

Department of Inspector General Inquiry

Based on the results of the inquiry related to the shredding that occurred on March 26, 2018, the following was noted:

1. The majority of the documents retrieved from the recycling bins between March 26, 2018 and March 28, 2018 were employment applications. There were also meeting agendas, building/construction plans, working draft copies, emails, handwritten notes, and other miscellaneous items.
 - Included in the handwritten notes found in the recycling bins, was the cell phone number of a County Commissioner.
 - There were two emails that reflected information protected under the Health Insurance Portability and Accountability Act (HIPAA). One of those emails included specific detailed data of the insured (DOB, Group #, Policy #).
2. There were 474 employment applications from approximately 421 different applicants retrieved from the recycling bins. Of the 474 employment applications, 462 had the first page attached or present that included PPI. The IG verified with Human Resources that the job numbers reflected on the applications were related to Central Permitting.

Position	Number of Applications w/1st Page
Development Review Technician	21
Administrative Secretary	76
Customer Service Specialist II	165
Customer Service Specialist III	122
Permit Technician	78
Total	462

3. A total of 187 documents with protected PII were retrieved from the recycling bins, which included copies of social security cards, copies of driver licenses, printed social security numbers, and printed driver license numbers. The table below represents the application type and the number of applications with sensitive and confidential information:
 - a. 114 of 462 applications with the first page present reflected driver license number, that when combined with the other information on the page and the application, qualified as protected PII, and were exempted from public disclosure. (Exhibits 1 and 2)
 - b. There were 73 documents that reflected either: a copy of the applicants Driver License, Social Security Card, a signed release with the Driver License number written on it, or a signed release with both the Social Security number and Driver License number written on it. One application also included a copy of a DD Form 214, and another included a copy of a diploma.(Exhibits 3,4, and 5)

Position	Driver License Number on 1st Page	# Docs with SS Card/DL/DD Form 214/Signed Releases	Total
Development Review Technician	19	2	21
Administrative Secretary	0	31	31
Customer Service Specialist II	0	19	19
Customer Service Specialist III	95	0	95
Permit Technician	0	21	21
Total	114	73	187

Interviews

The IG conducted 16 interviews with 14 different employees on 04/02/2018, 04/03/2018, and 04/05/2018. Based on the interviews, the following was noted:

1. The allegation regarding the shredding at the Central Permitting location in Land O' Lakes was taken out of context, and was not associated with the shredding reported in New Port Richey. The Central Permitting Supervisor at the Land O' Lakes Office stated she was shredding copies of scanned documentation after the originals were sent to Financial Services. The employee who made the comment about shredding in Land O' Lakes informed the IG that her comment was taken out of context by other County employees.
2. According to the Central Permitting Manager (Manager) the shredding took place in New Port Richey because the department was getting different office furniture, and the County Trustees were scheduled to move the furniture later in the week. The office had to be cleaned out prior to the move. The Director of Building Construction Services (Director) stated that because of the noise, she instructed staff to close the door while the office was being vacuumed.
3. The Manager and the Administrative Secretary II (Secretary) stated they were the only two who shredded documents at the Central Permitting location in New Port Richey. The shredding continued throughout the day, as time permitted.
 - c. The Manager and the Secretary stated hundreds of old employment applications were disposed.
 - d. According to the Secretary, agendas from past meetings and other out dated materials were also placed in the recycling bins.
4. The Manager and the Secretary explained applications were saved and stored for six months for record retention purposes and future employment openings.. They stated they destroyed old applications to reduce the amount of documents stored in the furniture scheduled to be moved later in the week. They described the process of disposing the applications in the following two steps:
 - a. The first page of the application was removed and shredded because it reflected sensitive information.
 - b. The rest of the application was placed in stacks, and the stacks were then put into recycling bins.
 - o The Secretary stated that she carefully examined all applications with paperclips because those applications had copies of the applicant's driver license, social security card, and signed releases with social security numbers written on them. She reiterated her understanding of the importance of making certain no sensitive information was put in the recycling bins.
5. The Secretary stated the Manager instructed her to place some employment applications in the recycling bin, but she did not verify if the first page of each application was removed.
 - o However, the Manager stated she did not instruct anyone to put employment applications that she processed in the recycling bins.

6. The Assistant to the County Administrator stated that on 03/26/2018, she instructed the Development Services Program Administrator (Program Administrator) and Assistant County Administrator to stop shredding.
 - However, the Manager stated no one instructed staff to stop shredding.
7. The Assistant to the County Administrator stated the Program Administrator told her the Manager and Building Construction Services Director (Director) were shredding.
 - However, no one else interviewed saw the Director shredding.
8. Without request from the Sheriff's Office or the IG, seven written statements were prepared by staff, submitted to the County HR director, and forwarded to the IG. The HR Director informed the IG that she requested written statements from staff explaining what they observed on 03/26/2018.
 - However, the Development Review Technician (DRT) interviewed stated that the Manager asked for a written statement.
 - The Secretary stated the Program Administrator requested the written statement.
 - The Program Administrator stated that no one asked her for a written statement; she just thought a statement should be written.
9. The Secretary and Senior DRT wrote a statement that included the Manager was shredding employment applications.
 - However, both stated they saw the Manager shredding, but did not witness what types of documents were shredded.
 - The Senior DRT was told by another employee that old applications were shredded, and she said that was why she wrote it in her statement.
10. The employees interviewed were not aware of the Record Disposal Policy or that sensitive information was required to be burned in accordance with County policy.
 - According to the Records Retention Training Sign-in Sheet, 37 employees attended the record disposal training on August 3, 2017 and August 4, 2017.
 - The IG verified that the 14 employees interviewed did not attend the training.

The interviews also revealed other concerns within the County and the Central Permitting Department. These concerns were outside the scope of this inquiry, but were important enough to bring to the attention of Management

1. The interviews revealed the furniture was moved around because the new accountant needed a desk.

- The Senior DRT confirmed that the new accountant was her son.
 - This was a violation of the Career Service Rules and Regulations, section B2.05.
- 2. During the interviews, several employees mentioned there was a “mean girl” group that caused problems. Employees stated this group had an alleged “hit list” with pictures of management, which were marked with an X when they left County employment.
 - However, the employees interviewed did not see this list.

Conclusions

The documents retrieved from the recycling bins did not support the statements provided by County Staff. The IG concluded 187 records found in the recycling bins were in violation of the County’s Proper Disposal of Official Records Policy and/or the County Information Security Personally Identifiable Information Policy. According to the County’s Disposal of Official Public Records Policy, all documents containing confidential materials, including medical information and social security numbers, should have been burned.

The PII disposed in the recycling bins in an area with public access could have been easily viewed, stolen, or used by an unauthorized person. As a result, there may have been a security violation that requires further action. Pursuant to the Information Security Personally Identifiable Information Policy, the IG reported this incident to the County Information Technology Security Officer.

The IG verified the statement about the shredding at Central Permitting in Land O’ Lakes was taken out of context. There were no statements or documents provided to the IG that associated shredding in Land O’ Lakes with shredding in New Port Richey. As a result, the IG could not determine what documents were shredded in Land O’Lakes.

Recommendations

The Inspector General recommends:


- Management follow up with the County’s Security Officer regarding the breach of PII, and determine if further action is required.
- Management take disciplinary action for the violations listed above pursuant to the Pasco County Information Security Personally Identifiable Information Policy.
- Management provide record disposal training to all staff to ensure documents were secured, retained, and disposed of in accordance with County policies and applicable laws.

- Management review and update the Career Service Manual, Employment of Relatives policy to include more restrictions for employment of relatives. The IG recommends restrictions on relatives working in the same department, the same building, and for the same Assistant County Administrator. Furthermore, related individuals should not audit or review in any manner a relative's work. This may help reduce the appearance of or allegations of favoritism, and conflicts of interest.
- Management should consider utilizing independent coaching or counseling services to work towards unifying the department to reduce the tension and divisiveness that appears to exist in the Building Construction Department.

Appendix

Exhibit 1

NEOGOV Insight
Page 813 of 896

EMPLOYMENT APPLICATION		
 <p>PASCO COUNTY FLORIDA Open Spaces. Pleasant Places.</p>	<p style="text-align: center;">PASCO COUNTY 8731 Citizens Drive Suite 330 New Port Richey, Florida 34654 (727) 847-8030 http://www.pascocountyfl.net</p>	<p>Received: 3/10/17 8:08 AM For Official Use Only: QUAL: _____ DNQ: _____ <input type="checkbox"/> Experience <input type="checkbox"/> Training <input type="checkbox"/> Other:</p>
PERSONAL INFORMATION		
POSITION TITLE: CUSTOMER SERVICE SPECIALIST III		EXAM ID#: 1617-221
NAME: (Last, First, Middle) _____		SOCIAL SECURITY NUMBER: N/A
ADDRESS: (Street, City, State, Zip Code) _____		
HOME PHONE: _____	ALTERNATE PHONE: _____	EMAIL ADDRESS: _____
DRIVER'S LICENSE: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	DRIVER'S LICENSE: State: FL Number: _____	LEGAL RIGHT TO WORK IN THE UNITED STATES? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
PREFERENCES		
PREFERRED SALARY: \$11.00 per hour; \$22,000.00 per year		ARE YOU WILLING TO RELOCATE? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Maybe
WHAT TYPE OF JOB ARE YOU LOOKING FOR? Regular		
TYPES OF WORK YOU WILL ACCEPT: Full Time		
SHIFTS YOU WILL ACCEPT: Day		
OBJECTIVE: To Provide excellent administrative and customer service!		
EDUCATION		
DATES: From: To: _____	SCHOOL NAME: _____	
LOCATION: (City, State) _____	DID YOU GRADUATE? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	DEGREE RECEIVED: Associate's
MAJOR: Liberal Arts	UNITS COMPLETED: _____	
WORK EXPERIENCE		
DATES: From: 2/2016 To: 4/2016	EMPLOYER: _____	POSITION TITLE: Cashier
ADDRESS: (Street, City, State, Zip Code) _____ New Port Richey, Florida 34654		COMPANY URL: _____
PHONE NUMBER: _____	SUPERVISOR: _____ Head Cashier	MAY WE CONTACT THIS EMPLOYER? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
HOURS PER WEEK: 25	SALARY: \$1,100.00/month	# OF EMPLOYEES SUPERVISED: 0
DUTIES: Customer Service, Cashiering.		
REASON FOR LEAVING: Still There		
DATES: From: 1/2013 To: 12/2015	EMPLOYER: _____	POSITION TITLE: Administrative Assistant
ADDRESS: (Street, City, State, Zip Code) _____ Drive, Holiday, Florida 34690		COMPANY URL: _____
PHONE NUMBER: _____	SUPERVISOR: _____	MAY WE CONTACT THIS EMPLOYER? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
HOURS PER WEEK: 20	SALARY: _____	# OF EMPLOYEES SUPERVISED: 0
DUTIES: Type letters, process accounts payable, answer phones. Greet walk ins.		

<https://secure.neogov.com/OHC/reports/apprintview.cfm>
5/3/2017

Exhibit 2

NEOGOV Insight - Application Detail Page 1 of 7

1617-391 - DEVELOPMENT REVIEW TECHNICIAN

Contact Information -- Person ID: [REDACTED]

Name: [REDACTED] Address: [REDACTED]
 N/A
 Palm Harbor, Florida 34683
 US

Home Phone: [REDACTED] Alternate Phone:
 Email: [REDACTED] Notification Email
 Preference:
 Former Last Name: Month and Day of Birth: 04/20

Personal Information

Driver's License: Yes, Florida [REDACTED], Class E
 Can you, after employment, submit proof of your legal right to work in the United States? Yes
 What is your highest level of education? Bachelor's Degree

Preferences

Preferred Salary: \$15.00 per hour; \$30,000.00 per year
 Are you willing to relocate? Maybe

Types of positions you will accept: Regular
 Types of work you will accept: Full Time
 Types of shifts you will accept: Day, Evening

Objective

To obtain a job in the Environmental science field.

Education

College
 University of South Florida
 www.usf.edu
 8/2012 - 5/2017
 Tampa, Florida

Did you graduate: Yes
 College Major/Minor: Environmental Science and Policy
 Units Completed: 8 Semester
 Degree Received: Bachelor's

Work Experience

Laboratory Monitor
 [REDACTED]
 [REDACTED]
 Tampa, Florida 33620

Hours worked per week: 18
 Monthly Salary: \$0.00
 Name of Supervisor: [REDACTED]
 May we contact this employer? Yes

Duties

- Working knowledge of Makerbot Replicator 3D printers and their materials
- Supervise and interact with students and faculty
- Ensure equipment and laboratory are safe and clean
- Computer software and operating system updates

Reason for Leaving

I graduated from college.

https://secure.neogov.com/OHC/view_resume.cfm?Print=Y&JobID=1775365&ResumeID... 7/11/2017

Exhibit 3



Exhibit 4

Applicant Release Form
Pasco County Board of County Commissioners

Date: NOV 7, 2017

Full Name: [REDACTED]

Address: [REDACTED]

City: [REDACTED] State: FL Zip Code: 34669

Home Phone #: [REDACTED] Alternate Phone #: [REDACTED]

Social Security Number: [REDACTED] Date of Birth: [REDACTED]

Driver's License#/Class/Expiration Date: [REDACTED]

Applicant Release Agreement

In connection with any application made by me, I understand that you may be requesting information from various Federal, State, and other agencies which maintain records concerning past activities relating to my credit, criminal, driving, civil, and other records and experiences, including claims involving me in the files of insurance companies, if any. These reports may also include information on education, experience, work habits, and performance, along with reasons for termination of employment from previous employers, if any. I also agree, that should I become an employee, my employer has the right to perform the above searches at any time during my employment.

Without reservation, I authorize any agency or third party contacted to furnish the above-mentioned information and release all parties involved, holding all parties harmless, from any liability and/or responsibility for doing so. I hereby consent to any potential employer obtaining such information from Argus Search, Inc. and/or any of their agents. This authorization and consent shall be submitted in an original, fax, or copy form.

I have the right to make a request to Argus Search, Inc., upon proper identification and payment of any authorized fees, the information in its files on me at the time of my request. Argus Search, Inc. does hereby agree to provide the requested information in accordance with the Fair Credit Reporting Act and submit a written report via U.S. mail or fax.

Signature: X [REDACTED]

Argus Search, Inc. ♦ 18303 E. Corbin Place ♦ Spokane Valley WA 99016
Phone: 509-893-9330 ♦ Fax: 509-893-8926


[Print Form](#)
2012HTBToolkit


Exhibit 5


PASCO COUNTY
PERSONNEL DEPARTMENT
APPLICANT CERTIFICATION

I hereby certify that each of my answers or comments placed on Pasco County's Application for Employment and all other information otherwise furnished, is true and correct to the best of my knowledge. I further certify that all such answers and information constitute full and complete disclosure with respect to the questions or subject matter. I understand that any incorrect, incomplete, or false statements or information furnished by me may subject me to disqualification or discharge at any time, if employed by Pasco County.

I further understand that Pasco County will do an extensive background investigation upon my acceptance of employment and my employment will be subject to that investigation. Any information received which is not in conformance with my application will subject me to immediate rejection of my employment.


Name (Please Print)


Signature


Social Security Number:

11/7/17
Date

04/15/03 app/cert.doc