



# Follow-up Review of the Audit of the Public Records Requests Program

## Office of the County Auditor

### Follow-up Review

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**County Auditor**

**Review Conducted by:**

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**Report No. 25-23**  
**September 17, 2025**



**OFFICE OF THE COUNTY AUDITOR**

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September 17, 2025

Honorable Mayor and Board of County Commissioners

We conducted a Follow-up Review of our Audit of the Public Records Request Program (Report No. 23-16) dated June 21, 2023. The objective of our review was to determine the implementation status of our previous recommendations.

We conclude that of the seven recommendations in the original report, seven recommendations were implemented. We commend management for implementing our recommendations. The status of each of our recommendations is presented in this follow-up report.

Please be advised that the information presented herein is not considered an audit in accordance with Generally Accepted Governmental Auditing Standards. Had we conducted an audit, we may have identified additional findings and concerns.

We appreciate the cooperation and assistance provided by the Office of Public Communications throughout our audit process.

Respectfully submitted,

A handwritten signature in blue ink that reads "Bob Melton".

Bob Melton  
County Auditor

cc: Monica Cepero, County Administrator  
Andrew Meyers, County Attorney  
Kevin Kelleher, Deputy County Administrator  
Sandy Michael-McDonald, Assistant County Administrator  
Margaret Stapleton, Director of Public Communications

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# IMPLEMENTATION STATUS SUMMARY

## Implementation Status of Previous Recommendations from the Audit of the Public Records Request Program

Rec. No.	PREVIOUS RECOMMENDATION	IMPLEMENTED	PARTIALLY IMPLEMENTED	NOT IMPLEMENTED	NOT APPLICABLE
1.A.	We recommend management update the User Guide to specifically require the completion of key fields in the PRR tracking system (Cherwell) such as the date the request was acknowledged, resolution details, legal involvement, and whether redaction is required.	✓			
1.B.	We recommend management update the User Guide and Training Manual to ensure they clearly state that the statutory basis for non-disclosure of confidential or exempt records must be provided to the requestor in writing.	✓			
1.C.	We recommend management update the User Guide to comply with the County's Administrative Policies and	✓			

Rec. No.	PREVIOUS RECOMMENDATION	IMPLEMENTED	PARTIALLY IMPLEMENTED	NOT IMPLEMENTED	NOT APPLICABLE
	Procedures, Volume 12, Chapter 4 related to document retention.				
1.D.	We recommend management work with the County Attorney to amend the language in the User Guide to ensure all records, including those that exist and are outside of retention requirements, are accessible per Florida Statute and County Policy.	✓			
2.A.	We recommend management enhance monitoring and oversight controls to encourage and enforce compliance with the public records requests program requirements.	✓			
2.B.	We recommend management evaluate the operations of the Medical Examiner's Office related to handling public records requests and amend policies and procedures as needed to account for operational needs.	✓			
3.	We recommend management enhance monitoring and oversight procedures to ensure compliance with key aspects of the program, including those elements that pose the highest risk to the County such as fees charged, exempt and confidential information, and record retention requirements for requests provided.	✓			

# INTRODUCTION

## **Scope and Methodology**

The Office of the County Auditor conducts audits of Broward County's entities, programs, activities, and contractors to provide the Board of County Commissioners, Broward County's residents, County management, and other stakeholders, with unbiased, timely, and relevant information for use in promoting government accountability and stewardship and improving government operations.

We conducted a Follow-up Review of our Audit of Public Records Requests Program overseen by the Office of Public Communications (Report No. 23-16) dated June 21, 2023. The objective of our review was to determine the implementation status of our previous recommendations.

Please be advised that the information presented herein is not considered an audit in accordance with Generally Accepted Governmental Auditing Standards. Had we conducted an audit, we may have identified additional findings and concerns.

Our follow-up review included such tests of records and other auditing procedures, as we considered necessary in the circumstances. The review period was January 1, 2025 through August 26, 2025. However, transactions, processes, and situations reviewed were not limited by the review period.

## **Overall Conclusion**

We conclude that of the seven recommendations in the original report, seven recommendations were implemented. We commend management for implementing our recommendations. The status of each of our recommendations is presented in this follow-up report.

# OPPORTUNITIES FOR IMPROVEMENT

This section reports actions taken by management on the Opportunities for Improvement in our previous review. The issues and recommendations herein are those of the original review, followed by the status of the recommendations.

## **1. Internal Policies and Procedures Needed to be Strengthened to Ensure Consistency, and Compliance With County Policy, Florida Statutes and Best Practices.**

The Office of Public Communications' (OPC) User Guide (User Guide) and the Public Records Requests Coordinator (PRRC) Training Manual (Training Manual) required enhancement to resolve inconsistencies with County policies, Florida Statutes, and best practices. Specifically, we noted:

- A. During our review of Cherwell, the software previously used to track public record requests, we noted a significant amount of incomplete information, which created difficulty in identifying key activities and requirements related to public records requests that reduced management's ability to provide oversight.
- B. The User Guide and Training Manual did not include the requirement for PRRCs to disclose the statutory basis for exempt or confidential records in accordance with Section 119.07,
- C. The User Guide's requirement for document retention was inconsistent with the County Administrative Policies and Procedures (CAPP).
- D. The User Guide was unclear as it related to providing existing documents in fulfillment of requests that are outside of the County's record retention requirements.

### **We recommended management:**

- A. Update the User Guide to specifically require the completion of key fields in the PRR tracking system (Cherwell) such as the date the request was acknowledged, resolution details, legal involvement, and whether redaction is required.
- B. Update the User Guide and Training Manual to ensure they clearly state that the statutory basis for non-disclosure of confidential or exempt records must be provided to the requestor in writing.

- C. Update the User Guide to comply with the County's Administrative Policies and Procedures, Volume 12, Chapter 4 related to document retention.
- D. Work with the County Attorney to amend the language in the User Guide to ensure all records, including those that exist and are outside of retention requirements, are accessible per Florida Statute and County Policy.

**Implementation Status:**

- A. **Implemented.**
- B. **Implemented.**
- C. **Implemented**
- D. **Implemented**

**2. Compliance with the County's Public Records Request Program Required Enhancement.**

- A. During our testing of public records requests, we identified several areas where compliance needed to be improved. Specifically, during our testing of public records requests for compliance with State and County requirements, we noted the following:
  - 38 of 101 (38%) requests were not entered into Cherwell within one business day of receipt and 25 of 93 (27%) PRRs were not acknowledged within one business day.
  - 7 of 91 (8%) requests were not filled timely and were open for periods ranging from 65 to 325 days.
  - For 2 of 59 (3%) requests, the PRRC did not retain the supporting documentation as required by County Policy. Therefore, we were unable to determine whether the requests were fulfilled correctly or whether confidential or exempt information was properly excluded, in compliance with County Policy.
- B. Practices for the handling of public records requests at the Office of Medical Examiner & Trauma Services (ME) were significantly noncompliant with the public records requests policies and procedures published in the User Guide and Training Manual.



**We recommended** management:

- A. Enhance monitoring and oversight controls to encourage and enforce compliance with the public records requests program requirements.
- B. Evaluate the operations of the Medical Examiner's Office related to handling public records requests and amend policies and procedures as needed to account for operational needs.

**Implementation Status:**

- A. **Implemented.**
- B. **Implemented.**

**3. Monitoring and Oversight of the Public Records Request Program Needed to be Enhanced.**

While the OPC did provide for some oversight and monitoring of the public records requests program, such as generating aging reports and reports showing multiple requestors, the OPC did not have a formal, documented process for the monitoring of the following key elements of the program:

- i. Appropriateness of fees charged.
- ii. Exclusion of exempt and confidential information.
- iii. Record retention for requests provided.

**We recommended** management enhance monitoring and oversight procedures to ensure compliance with key aspects of the program, including those elements that pose the highest risk to the County such as fees charged, exempt and confidential information, and record retention requirements for requests provided.

**Implementation Status: Implemented.**