



# Department of Environmental Protection Office of Inspector General

December 15, 2025

Report A-2425DEP-021

## *Audit of Department Perquisites*

### **INTRODUCTION**

The Florida Department of Environmental Protection (Department) Office of Inspector General (OIG) conducted an audit of Department perquisites. This audit was initiated as a result of the OIG Annual Audit Plan for Fiscal Year (FY) 2024-2025.

### **AUDIT SCOPE, OBJECTIVES, AND METHODOLOGY**

The scope of this audit included a review of Department perquisite approvals, payments, activities, and all associated documentation during the period of July 1, 2023, to the present. The objectives of the audit were to:

1. Determine whether Department perquisites are being approved, purchased, and reported in accordance with applicable State laws, rules, policies, orders, and directives.
2. Evaluate administration, internal controls, and oversight of Department perquisites.

To achieve our audit objectives, our methodology included:

- Reviewing applicable statutes, rules, guidance, and Department policies.
- Reviewing Departmental transactions during the audit period and selecting a sample of transactions which included the purchase of perquisites for detailed review.
- Obtaining supporting documentation and conducting an analysis for the approval and purchase of perquisites.
- Interviewing Department management and employees.

### **BACKGROUND**

According to the Department's Administrative Policy for the Payment of Perquisites (ADM 485), the Department provides perquisites when it is in the best interest of the State due to the exceptional or unique requirements of the position. Perquisites are defined within Florida Statute (F.S.), Florida Administrative Code (F.A.C.), and State guidance documents as *Those things or the use thereof or services of a kind which confer on the officers or employees receiving same, some benefit that is in the nature of additional compensation or which reduces to some extent the normal personal expenses of the employee receiving the same and may include, but not be limited to, such things as moving expenses, quarters, subsistence, utilities, clothing, laundry service, medical service, use of state-owned vehicles for other than state purposes and similar things.* The Department is required to report all perquisites approved the preceding fiscal year,

**Department of Environmental Protection  
Office of Inspector General  
Audit of Department Perquisites**

including the dollar value, to the Department of Management Services (DMS) by August 1<sup>st</sup> of each year. According to the reporting document provided to DMS, the Department approved \$3,549,030 in perquisites for FY 2023-2024, as shown in the table below. For FY 2024-2025, the Department reported a total of \$3,640,141 in approved perquisites.

<b>Approved Perquisites Amounts as Reported for FY 2023-2024</b>	
<b>Perquisite Description</b>	<b>Total Cost</b>
Clothing – Identification	\$294,405
Clothing – Protective Outerwear	\$103,960
Equipment – Diving Gear	\$75,800
Equipment – Safety Equipment	\$958,885
Housing – Utilities Provided	\$1,027,812
Housing – No Utilities Provided	\$172,080
Mobile Home Space – Utilities Provided	\$342,708
Mobile Home Space – No Utilities Provided	\$3,600
H-1B Nonimmigrant Worker Employer Filing Fee	\$2,320
Uniform - With Allowance or Laundry Service	\$567,460
<b>Department Total:</b>	<b>\$3,549,030</b>

Within the Financial Information Network (FIN<sup>1</sup>), there was a total of \$515,194.89 in transactions which were identified with an object code for the payment of a perquisite for FY 2023-2024. It should be noted this amount did not include perquisites approved as housing or moving expenses paid.

## **RESULTS OF AUDIT**

During the audit, we reviewed a sample of Department transactions for the payment of perquisites from My Florida Market Place (MFMP), Works<sup>2</sup>, and payroll allocations along with supporting approval documentation in accordance with State and Department requirements. The sample transactions spanned FY 2023-2024 and 2024-2025. We also reviewed the Department’s DMS reporting documents with supporting tracking spreadsheets to determine if the Department is accurately reporting approved perquisites to DMS. Based on our review we found the following:

### **Perquisite Approval and Purchases**

Based on our review of the 115 sample perquisite transactions, there was a total of \$101,992.97 expended on perquisites, with \$69,928.37 spent on perquisites during FY 2023-2024, and \$32,064.60 for FY 2024-2025. The object code description for the transactions is summarized below.

<b>Object Code Description</b>	<b>Number of Transactions in Sample</b>
Perquisites - Clothing Uniform	57
Perquisites - Equipment/Accessories	15
Perquisites - General	35
Perquisites - Parking	8
<b>Total:</b>	<b>115</b>

<sup>1</sup> The FIN is the Division of Administrative Services suite of applications to manage the Department’s financial and reporting data.

<sup>2</sup> The Works application is a Web-based, electronic card payment management service that automates, streamlines, and integrates existing payment authorization and reconciliation processes while providing management reporting and spending controls for the Purchasing Card (PCard) program.

According to ADM 485, *A separate [DMS] Form DP-A-4 must be prepared for each type of perquisite being requested and include a justification.* According to the Department's PCard Policy, the purchase of perquisites should include supporting documentation within Works. We reviewed each transaction to determine if the required DP-A-4 (Approval Form) had been completed and included with each transaction. Based on our review, there were 13 samples which did not have the Approval Form attached within Works as required. Of those 13 samples, it was determined there were 12 that were not perquisites and had utilized an incorrect object code and 1 did not receive perquisite approval prior to the purchase. Though Approval Forms were attached to most of the sampled transactions, there were 30 transactions which had attached Approval Forms that were incomplete and did not include all information the form required. For example, some documents were missing classification information, cost information, or signatures.

### Unapproved Purchases

During the review, we found some sampled transactions included the purchase of items that did not meet the definition of the approved perquisite, exceeded the amount approved, or more items were purchased than approved.

- Category D40-Clothing Identification: This category is defined as the *Issue of identifying clothing or items (e.g. shirts, identification badges, caps, etc.) when required by the position for the representation of the agency.* Based on review, there were 14 transactions totaling \$17,165.93 that were stated to be a perquisite for clothing identification, but supporting documentation did not demonstrate the clothing included the Department's logo or other identifying branding. Moreover, there was one transaction that included a purchase of 35 items for clothing identification, but the items purchased were pants, jeans, joggers, and a pair of leggings totaling \$1,845.90.
- Category of E40-Equipment: This category is defined as the *Issue of specific equipment (glasses, footwear, gloves, belts, back braces, hardhats, etc.) when required by the position for the protection of the employee.* We determined the same district that purchased the jeans, joggers, and leggings also purchased 32 items such as jackets, sweatshirts, and a pair of overalls in the amount of \$2,596.70 which included an Approval Form for the category of E40-Equipment. The Approval Form only listed the approval of field boots, snake boots, prescription eye wear, sun protection, and hydration equipment. The following FY, the same district purchased 47 jackets between two separate purchases as perquisites totaling \$4,003.40 under the perquisite category of D40-Clothing Identification and E40-Equipment.
- Exceeded Approval: We found some purchases where the number of items purchased, or the costs of the items, exceeded what the Approval Form authorized. For example, one transaction included the purchase of 2 pairs of boots which were approved not to exceed \$150 each. However, one pair was \$153, and the other pair was \$175. Another transaction included an approval for the purchase of 3 shirts per employee but there were instances where some employees received 4 or more shirts. Additionally, the purchase of uniforms for the Division of

Recreation and Parks (DRP) were approved not to exceed \$700 but there were 4 transactions that exceeded the authorized amount.

#### Purchases Outside of State Term Contract (STC) and Incorrect Object Codes

In accordance with Section 287.056, F.S., State agencies are required to purchase commodities and contractual services from STCs procured by DMS. DMS maintains a STC for clothing purchases which includes 9 available vendors to purchase tops, bottoms, outerwear, shoes, and accessories. Our sample included 62 transactions for the purchases of all types of clothing available in the STC. Of those 62 sampled transactions, 13 transactions totaling \$6,344.61 were made with vendors that were not included on the STC for clothing. In addition to the sampled transactions, we found 86 transactions within Works and MFMP totaling \$15,041.67 for the purchase of boots outside of an STC. Of these transactions, there were 15 purchases for boots as perquisites that did not include a perquisite object code. Instead, most of the purchases of these items included object codes for the purchase of supplies. Our review determined there were purchases made within the Department for perquisites offered under a STC but were purchased outside of an established STC. We also found some transactions did not include a perquisite object code identifying the purchase was for perquisites.

#### Uniforms with Allowance

Some perquisite categories defined by DMS include monetary allowances provided to employees. During FY 2024-2025, the Department paid a total of \$95,650 through payroll allocations for allowances to Department employees. Our sample included 19 transactions for payroll allocations to employees for allowances. Within the 19 transactions, there was a total of 278 allowance payments. Of the 278 payments, 235 were for DRP employees receiving an annual payment of \$100 for a shoe allowance. The remaining 43 payments were made to the Division of Law Enforcement (DLE) employees receiving \$250 payments bi-annually, totaling \$500 annually. To support the payment of these perquisites, we were provided Approval Forms for DRP and the DLE for category of U32 Uniform - With Allowance or Laundry Service which is defined as *Issue of uniform including required accessories (e.g. belts, holsters, protective vests, caps, hats, ties, name plates, etc.) when the position requires specific identification or a uniform appearance of the employee. Monetary allowance or laundry service is also provided to maintain uniform.* Based on our review, the Approval Forms were incomplete as discussed further, below.

#### DRP Uniforms with Allowances

According to the DRP Operations Manual, *Uniformed* [Full Time Employees] are authorized to receive an annual shoe allowance. *The shoe allowance is paid once a year through a supplemental payroll in June. For those employees hired after the supplemental payroll date, they will receive a shoe allowance during next June's supplemental payroll distribution. Near the end of each fiscal year, DRP Human Resources will notify supervisors of the procedure for submitting shoe allowance requests. Shoe allowance is a perquisite and is available based on funding availability.* Based on the results of our sample transactions, we reviewed all DRP shoe allowances for FY 2023-2024, and there were 877 DRP employees issued a \$100 shoe allowance. According to Section 216.262(1)(f), F.S., the delegated authority must approve the kind and monetary value of a perquisite before they can be furnished. Our review of the Approval Forms provided during the audit noted there was no approval for the monetary value for the allowances

**Department of Environmental Protection  
Office of Inspector General  
Audit of Department Perquisites**

---

being paid to Department employees though the types and amounts for uniforms with accessories was included. Additionally, the DRP Approval Form did not include all positions that received the \$100 shoe allowance nor did it include the total number of positions approved to receive the perquisite nor the total cost to the State. Finally, our review found the Department does not include any allowances paid to DRP employees within the DMS reporting forms.

In addition to the Department not including the total amount of allowances paid within the Approval Forms or DMS reporting forms, the Department is not accurately reporting to DMS the amounts for uniforms as approved. According to the Approval Forms, the purchase of a uniform for an employee is approved to be up to \$700 during FY 23-24 and was increased to \$800 for FY 24-25. However, the Department reported the approval for uniforms to DRP in the amount of \$530 per position each FY. Overall, our review found the amounts reported to DMS for the approval of U32 - Uniforms with Allowance did not include the total amount approved for uniforms nor the amount of allowances paid to DRP employees.

#### DLE Allowances

For FY 2023-2024, DLE issued \$500 to up to 16 employees. According to the Bureau of Human Resource Management (HR), allowances paid to the DLE were made in accordance with the Collective Bargaining Agreement (CBA) between the State of Florida and the Florida Police Benevolent Association Law Enforcement Bargaining Unit. The CBA states the *state will provide employees who are furnished and required by the state to wear a uniform, or those employees assigned to full-time plain clothes positions, a maintenance, clothing and shoe allowance in the amount of \$500.00 annually, unless laundry and dry-cleaning facilities are available and the service is furnished by the agency without cost to the employees.* Based on our review, most positions within the DLE have received \$500 annually as required. However, not all positions receiving this allowance are included in the CBA. The positions the Department has paid the \$500 allowance which are not included in the CBA include the Law Enforcement Captain, Law Enforcement Lieutenant, and Director of Law Enforcement. According to DMS Definitions of Perquisite Categories, the category of D55 Uniform/Clothing/Footwear Maintenance Allowance is the *monetary allowance provided to employees pursuant to [CBAs] for maintaining and cleaning uniforms and plain clothes and repair/replacement of footwear.* Though HR advised that allowances provided to DLE positions are made in accordance with the CBA, the current Approval Form does not include DMS category D55 nor the allowance amounts being disbursed. Moreover, the Department does not report any allowances paid to DLE under any category to DMS.

#### Housing Perquisites

According to DMS, housing perquisites are defined as *Accommodations for an employee whose position requires residency at a state facility or on state property such as a park, campground, etc. or Space for an employee owned mobile home when the position requires the employee to live on the grounds of a state facility.* During the audit we determined DRP and the Office of Resilience and Coastal Protection (ORCP) provide housing perquisites. A summary of our review is below.

### Housing Provided by the DRP

According to ADM 485, *Approval of Florida State Parks housing perquisite changes and residential agreement is delegated to the respective district bureau chief. Each perquisite change must be forwarded to the Bureau of Operational Services for processing. For additional Florida State Parks Housing Perquisites procedures see the Florida State Parks Operational Manual (OM). The OM states that Approval of housing perquisite changes and residential agreement is delegated to the respective district bureau chief. Each perquisite change must be forwarded to the Bureau of Operational Services [BOS] for processing.* Within DEP Directive 100, the Secretary has delegated the Authority to *designate essential and non-essential housing. Approve request for housing perquisite change and residency* to the DRP Director who is allowed to further delegate and has further delegated this authority to one Assistant Director within the DRP. We found no delegations to District Bureau Chiefs for the approval of any housing documents; however, we found the housing perquisite change and residency agreements are generally signed by a District Bureau Chief.

According to the BOS, a DMS Approval Form for a housing perquisite is completed when a housing site is initially established. However, the Approval Form is not updated as housing perquisite changes occur nor is the annual re-authorization of the perquisite to the residing position completed by the delegated authority. We reviewed Approval Forms, some park Request for Housing Perquisite Change and Residency Agreements, and documentation from HR. Our review found DRP was reporting housing perquisites to HR as being provided to employees of other State agencies and local municipalities. Therefore, we requested documentation to support all residents being provided State-owned housing. DRP was unable to provide accurate documentation to support who was approved and actively residing at State-owned housing. Our review also found that when perquisite changes and housing agreements were approved by District Bureau Chiefs, the DMS Approval Form and HR tracking spreadsheet used for reporting perquisites to DMS was not accurately updated to reflect these changes.

According to Section 262.216(f) F.S., the kind and monetary value of perquisites must be approved before they may be furnished. During our review, we found that the DRP has established an annual fair market value for the housing provided when the perquisite Approval Form is initially completed but the Approval Forms are not re-approved annually as required. For FY 2024-2025, there were six Approval Forms for housing perquisites which listed the annual fair market values shown below:

- \$1,200 for a mobile home space with utilities provided (4 spaces);
- \$6,000 for housing with no utilities provided; and
- \$4,800 for housing with utilities provided.

However, the Department reported \$1,559,496 in housing perquisites for FY 2024-2025. During the review, we asked HR and DRP how the value of the housing reported to DMS each year is determined. We were told they may have been determined based on a housing study completed several years ago. According to the OM, the Housing Committee, which is composed of all District Bureau Chiefs, is to perform an annual FPS (Florida Park Service) Housing Study Assessment and make appropriate recommendations. However, we were unable to obtain any housing study.

Overall, we found that housing perquisites are not being approved annually for the positions actively residing in Department housing, the determination of the value cannot be supported, nor are the perquisites accurately tracked and reported to DMS each fiscal year.

#### Housing Provided by the ORCP

Unlike the housing perquisite change and agreement documentation for DRP, there was no additional direction found within the ADM 485 for housing perquisite changes or agreements specific to the ORCP. Within the DEP 100, the Secretary has also delegated the approval of housing to the Director of the ORCP. During the audit, we found that the ORCP has provided housing perquisites for one Department employee and is providing housing to an employee of another State agency. We were provided an Agreement of Occupancy for State-owned Residences for both individuals. However, the ORCP had not executed the Approval Form nor was the housing perquisite reported to HR for the annual reporting to DMS. During the review, the ORCP stated they were beginning the process to complete the required DMS Approval Form and provide it to HR.

#### Moving Expense Perquisites

According to ADM 485, *The payment of moving expenses for any Department employee is a perquisite and requires the approval of the Secretary or the Delegated Authority and may only be paid when in the best interest of the state due to the exceptional or unique requirements of the position.* According to DEP 100 Delegations, perquisites may only be approved and further delegated by a Deputy Secretary or Assistant Deputy Secretary and may only be approved but not delegated by a Division or District Director. We reviewed all approval documents for a delegated authority included with the payment for moving expenses. For FY 2023-2024, there were 20 approvals for moving expenses completed by a Bureau Chief or Assistant Bureau Chief, which did not have delegated authority to approve such perquisites.

The Department paid a total of \$25,520 in moving expenses for Department employees for FY 2023-2024. Based on our review, the Department generally reported most of the moving expenses for each approved employee. However, some expenses were not reported accurately while others were not included within the report at all. The total difference in reporting was \$3,583.67 more than what was reported to DMS for FY 2023-2024. During the audit, we were provided the moving expenses reported for FY 2024-2025, which included most of the missing expenses from the previous year. Our review found that though the approval and reporting of moving expenses could be improved, the Department ultimately reports moving expenses with general accuracy.

#### Delegation of Authority

Our review found that there were some positions that approved perquisites but were not delegated authority. ADM 485 states each *fiscal year, Secretary or designee are responsible for re-authorizing perquisites previously approved by the DMS in accordance with the provisions of Rule 60L-32, F.A.C.* The Secretary of the Department has delegated authority for the approval of perquisites through DEP 100 to certain positions within each Division. According to the DEP 100, positions that may perform this duty and delegate further through a written memo include the Chief of Staff, Deputies and Assistant Deputies. The positions which may authorize and approve perquisites but cannot delegate further are the General Counsel, Inspector General, Chief Information Officer,

Division Directors, and District Directors. In addition to the 20 approvals for moving expenses, which were also not completed by a delegated authority, there were 16 of the sampled transactions which included signed perquisite Approval Forms where the approver did not have delegated authority.

### **Approval of Own Perquisites**

Within our sample, we noted 13 perquisite Approval Forms included the approval, and determination of value, for a perquisite for which the approver may receive. Overall, there were 5 transactions where the perquisites approved resulted in a purchase for the individual approving the perquisite. The Department has implemented some measures to prevent employees from incurring, approving, or accounting for their own purchases. For example, the PCard Policy does not allow accountholders or approvers to approve their own charges. The PCard Policy also requires that all PCard transactions be preapproved in writing by the purchaser's supervisor or higher-level manager. However, it does not appear that the approval of perquisites has similar internal controls implemented. According to Administrative Directive DEP 202, *Employees must safeguard their ability to make objective, fair and impartial decisions. Accordingly, employees are prohibited from engaging in any activity or accepting benefits that a reasonable person could perceive as potentially influencing or rewarding their decisions. Employees should avoid any conduct (whether in the context of business, financial or social relationships) that might undermine the public trust, whether that conduct is unethical or may give the appearance of ethical impropriety.*

### **Physicals and Immunizations**

According to the DMS Definitions of Perquisite Categories, *Periodic medical examinations and/or immunizations for employees whose positions include exposure or potential exposure to contagions, research experiments, diseases, etc. is provided as a definition for perquisite category P10 Physicals and Immunizations.* During the audit, we found transactions made during FY 2024-2025 within Works and MFMP for the payment of physical evaluations and immunizations for Department employees. These transactions were processed using object codes for medical services or fees for services and did not include the object code for physicals and immunizations as a perquisite. Our review found there was a total of \$45,616.29 in Works transactions which included purchases for physical examinations and immunizations and \$9,204 spent in MFMP. Overall, we found there was a total of \$54,820.29 spent in Works and MFMP for the payment of a medical exam, physical, or immunization for Department employees.

A similar finding was reported in a previous OIG audit report<sup>3</sup> regarding payments made for medical examinations that did not contain itemized receipts and did not have required perquisite approval documentation. Since the finding was issued, the Department has reported the approval for category P10 Physicals and Immunizations in the amount of \$1,700 for FY 2024-2025.

### **Assignment of State-owned Vehicles**

According to the DMS Definitions of Perquisite Categories, *Special assignment of a state-owned or leased motor vehicle to an employee who is required to perform duties of the position after normal duty hours and whose incidental personal use of the vehicle has*

---

<sup>3</sup> Audit of Department Issued Purchasing Cards issued on October 22, 2024, (A-2324DEP-017)

**Department of Environmental Protection  
Office of Inspector General  
Audit of Department Perquisites**

been determined to be in the best interests of the state and approved by the Division of Motor Pool pursuant to Rules 60B-1.005 and 1.008, F.A.C. is defined for perquisite category for G10 Transportation. During the review, there were a total of 70 vehicles reportedly assigned to Department employees as seen below. Our review found that no vehicle assignments have been reported as perquisites.

Assignment Type	Number Assigned	Use Provisions per Chapter 60B-1, F.A.C., and DMS Fleet Vehicle Assigned Use Codes
B1-Passenger Carrying Limited Use Assignment Vehicle	3	<i>Employee has requirements for a full-time use of a vehicle during regular working hours, but vehicle remains parked at office overnight and when not in use.</i>
C2-Special Assignment: Law Enforcement Vehicle	17	<i>Employee is subject to special emergency calls from his residence for law enforcement.</i>
C3-Special Assignment: Emergency Service	17	<i>Employee is subject to emergency calls from his residence for the protection of life or property.</i>
C4-Special Assignment: Employee's Home is Office	32	<i>Employee's home is his official base of operation and vehicle is parked at home when not in use.</i>
E1-Mission Support	1	<i>Vehicle is used to support agency's mission, but is not available for general use, is not assigned to an employee, and is not used for law enforcement or emergency services.</i>
<b>Total Vehicles</b>	70	<b>Note:</b> This total is for vehicles reported as assigned to Department employees as of July 21, 2025.

**Taxable Non-cash Fringe Benefits**

The DFS Payroll Preparation Manual includes requirements for perquisites which are considered taxable non-cash fringe benefits. During the review, we were unable to determine whether any perquisites had been established or reported as taxable non-cash fringe benefits within the Department. We were also unable to locate any Department policies or procedures for the determination, reporting, or processing of perquisites provided as taxable non-cash fringe benefits.

**Other Personal Services (OPS)**

According to Section 216.011(e), F.S., an *Authorized Position* means a position included in an approved budget. In counting the number of Authorized Positions, part-time positions shall be converted to full-time equivalents. In addition to Authorized Positions, Section 216.011(jj), F.S., defines OPS as the appropriation category used to fund the compensation for services rendered by a person who is not filling an established position.

The authorization for the furnishing of perquisites to State employees (officers or employees) is found within Section 216.262 F.S., which is titled *Authorized Positions*. Under Chapter 60L-32 F.A.C, perquisites are considered part of an employee's total compensation, and OPS employees are entitled only to the compensation expressly designated as available to them. According to Chapter 60L-33.005(1), F.A.C., OPS positions may be eligible for state group insurance, recognition and rewards or telework programs, deferred compensation, and the Employee Assistance Program. However, they are *not eligible for any paid leave, holiday or personal holiday, retirement or any other employee benefit program unless provided by law*. Therefore, it does not appear OPS are eligible to receive perquisites as a form of benefit or as part of their total compensation.

According to DMS, OPS are not eligible for perquisites as they do not fill an Authorized Position. Based on our sample, we determined that many OPS positions were approved to be furnished perquisites which include uniforms, shoes, clothing, diving gear, and fire gear for up to 85 OPS positions. We also found some housing perquisites, approved or reported during the audit scope, were designated for OPS positions. Overall, we found the Department reports to DMS the approval of a variety of perquisites for 260 OPS positions.

---

## **CONCLUSION**

---

During the audit, we reviewed a sample of Department transactions for the payment of perquisites from MFMP, Works, and payroll allocations along with supporting approval documentation in accordance with State and Department requirements. The sample transactions spanned FY 2023-2024 and 2024-2025. We also reviewed the Department's DMS reporting documents with supporting tracking spreadsheets to determine if the Department is accurately reporting approved perquisites to DMS. Based on our review, we found areas regarding the administration, purchase, and use of perquisites where internal controls should be strengthened. Our findings and recommendations are listed below.

---

## **FINDINGS AND RECOMMENDATIONS**

---

**Finding 1: Purchase of Perquisites – Some purchases of perquisites included items that were not approved, exceeded the amount or cost approved, were not purchased under an STC, or did not use a perquisite object code.**

During the review, we determined some sampled perquisite transactions included the purchase of items that did not meet the definition of the approved perquisite, exceeded the amount approved, or exceeded the cost of items approved. Additionally, we determined there were purchases made for perquisites offered under an STC but were purchased outside of an established STC. We also found some transactions did not include a perquisite object code identifying the purchase was for perquisites.

- **Category D40-Clothing Identification:** This category is defined as the *Issue of identifying clothing or items (e.g. shirts, identification badges, caps, etc.) when required by the position for the representation of the agency.* Based on review, there were 14 transactions totaling \$17,165.93 that were stated to be a perquisite for clothing identification, but supporting documentation did not demonstrate the clothing included the Department's logo or other identifying branding. Moreover, there was one transaction that included a purchase of 35 items for clothing identification, but the items purchased were pants, jeans, joggers, and a pair of leggings totaling \$1,845.90.
- **Category of E40-Equipment:** This category is defined as the *Issue of specific equipment (glasses, footwear, gloves, belts, back braces, hardhats, etc.) when required by the position for the protection of the employee.* We determined the same district that purchased the jeans, joggers, and leggings also purchased 32 items such as jackets, sweatshirts, and a pair of overalls in the amount of

**Department of Environmental Protection  
Office of Inspector General  
Audit of Department Perquisites**

---

\$2,596.70 under an Approval Form for the category of E40-Equipment. The Approval Form only listed the approval of field boots, snake boots, prescription eye wear, sun protection, and hydration equipment. The following FY, the same district purchased 47 jackets between two separate purchases as perquisites totaling \$4,003.40 under the perquisite category of D40-Clothing Identification and E40-Equipment.

- **Exceeded Approval:** We found some purchases where the number of items purchased, or the costs of the items, exceeded what the Approval Form authorized. For example, one transaction included the purchase of 2 pairs of boots which were approved not to exceed \$150 each. However, one pair was \$153, and the other pair was \$175. Another transaction included approval for the purchase of 3 shirts per employee but there were instances where some employees received 4 or more shirts. Additionally, the purchase of uniforms for DRP were approved not to exceed \$700 but there were 4 transactions that exceeded the authorized amount.
- **Purchases Outside of State Term Contract (STC) and Incorrect Object Codes:** In accordance with Section 287.056, F.S., State agencies are required to purchase commodities and contractual services from STCs procured by DMS. Of 62 sampled transactions for the purchase of clothing available on a STC, 13 transactions totaling \$6,344.61 were made with vendors that were not included on the STC for clothing. In addition to the sampled transactions, we found 86 transactions within Works and MFMP totaling \$15,041.67 for the purchase of boots from vendors outside of an STC. Of these transactions, there were 15 purchases for boots as perquisites that had not used a perquisite object code. Instead, most of the purchases of these items included object codes for the purchase of supplies.

**Recommendations:**

We recommend the Department implement internal controls to ensure that purchases of perquisites fall under the category approved, do not exceed the amount or cost approved; are purchased under an STC, when applicable; and are coded the correct object code.

**Management Response:**

The Department agrees with the recommendation and will work to complete the corrective actions mentioned.

**Finding 2: Uniforms with Allowance – Approval forms for Uniforms with Allowance perquisites were not always complete, did not include a determination of value, and were not accurately reported to DMS.**

According to ADM 485, *A separate [DMS] Form DP-A-4 must be prepared for each type of perquisite being requested and include a justification.* The Department is required to report all perquisites approved the preceding fiscal year, including the dollar value, to DMS by August 1<sup>st</sup> of each year. Additionally, according to Section 216.262(1)(f), F.S., the delegated authority must approve the kind and monetary value of a perquisite before they can be furnished. Our sample included some transactions which had Approval Forms that were incomplete and did not include all information the form required. For example, some documents were missing classification information, cost information, or signatures.

Many of the incomplete forms were for the category of U32 Uniform - With Allowance or Laundry Service.

To support the payment of allowances as perquisites, we were provided Approval Forms for DRP and DLE for category of U32 Uniform - With Allowance or Laundry Service. Based on our review, the Approval Forms did not include all elements required for approval. We also found the amounts approved or paid for uniforms with allowance were not always accurately reported to DMS as seen below.

DRP Uniforms with allowances

- There was no approval for the monetary value for the allowances being paid to Department employees.
- The Approval Form did not include all positions that received the \$100 shoe allowance nor did it include the total number of positions approved to receive the perquisite and the total cost to the State.
- Reporting forms to DMS for the approval of uniforms with allowance did not include the allowance amounts nor the total amount approved for uniforms for FY 2023-2024 and 2024-2025.

DLE Allowances

- Though HR advised that allowances provided to DLE positions are made in accordance with the CBA, the current Approval Form does not include DMS category D55 which is defined as the *monetary allowance provided to employees pursuant to [CBAs] for maintaining and cleaning uniforms and plain clothes and repair/replacement of footwear*. Moreover, the Department does not report any allowances paid to DLE under any category to DMS.
- Employees within the DLE received \$500 annually, as required by the CBA according to HR. However, not all positions receiving this allowance are included in the CBA. The positions the Department has paid the \$500 allowance which are not included in the CBA include the Law Enforcement Captain, Law Enforcement Lieutenant, and Director of Law Enforcement.

**Recommendations:**

We recommend the Department ensure that perquisite Approval Forms are complete and contain all required information. We also recommend the Department ensure the approval of Uniforms with Allowance are accurately reported to DMS each fiscal year.

**Management Response:**

The Department agrees with the recommendation and will ensure that perquisite approval forms are complete and accurately reported to DMS each fiscal year.

**Finding 3: Delegations of Authority – Perquisites were not always approved by the employee with delegated authority.**

Based on our review of sample transactions, we determined some perquisite Approval Forms were not signed by the delegated authority. In addition, we determined some perquisites for moving expenses were also not signed by the delegated authority.

**Department of Environmental Protection  
Office of Inspector General  
Audit of Department Perquisites**

---

ADM 485 states each *fiscal year*, *Secretary or designee are responsible for re-authorizing perquisites previously approved by the DMS in accordance with the provisions of Rule 60L-32, F.A.C.* The Secretary of the Department has delegated authority for the approval of perquisites through DEP 100 to certain positions within each Division. According to the DEP 100, positions that may perform this duty and delegate further through a written memo include the Chief of Staff, Deputies and Assistant Deputies. The positions which may authorize and approve perquisites but cannot delegate further are the General Counsel, Inspector General, Chief Information Officer, Division Directors, and District Directors. Our review found there were 16 of the sampled transactions which included signed perquisite forms where the approver did not have delegated authority. Overall, our review found that there were some positions that approved perquisites but were not delegated authority.

According to ADM 485, *The payment of moving expenses for any Department employee is a perquisite and requires the approval of the Secretary or the Delegated Authority and may only be paid when in the best interest of the state due to the exceptional or unique requirements of the position.* According to DEP 100 Delegations, perquisites may only be approved and further delegated by a Deputy Secretary or Assistant Deputy Secretary and may only be approved but not delegated by a Division or District Director. We reviewed all approval documents for a delegated authority included with the payment for moving expenses. For FY 2023-2024, there were 20 approvals for moving expenses completed by a Bureau Chief or Assistant Bureau Chief, which did not have delegated authority to approve such perquisites.

**Recommendations:**

We recommend the Department implement internal controls to ensure perquisite Approval Forms are approved by the appropriate delegated authority.

**Management Response:**

The Department agrees with the recommendation and will work to implement internal controls.

**Finding 4: Internal Controls – Internal controls could be improved regarding the approval of one’s own perquisite and determining taxable non-cash benefits for some approved perquisites.**

Our review determined that the Department’s internal controls need to be strengthened regarding the approval of one’s own perquisites and the determination of taxable non-cash benefits for some approved perquisites.

**Approval of Own Perquisites**

Within our sample, we noted 13 perquisite Approval Forms included the approval, and determination of value, for a perquisite for which the approver may receive. Overall, there were 5 transactions where the perquisites approved resulted in a purchase for the individual approving the perquisite. The Department has implemented some measures to prevent employees from incurring, approving, or accounting for their own purchases. For example, the PCard Policy does not allow accountholders or approvers to approve their own charges. The PCard Policy also requires that all PCard transactions be preapproved in writing by the purchaser’s supervisor or higher-level manager. However, it does not

appear that the approval of perquisites has similar internal controls implemented. According to Administrative Directive DEP 202, *Employees must safeguard their ability to make objective, fair and impartial decisions. Accordingly, employees are prohibited from engaging in any activity or accepting benefits that a reasonable person could perceive as potentially influencing or rewarding their decisions. Employees should avoid any conduct (whether in the context of business, financial or social relationships) that might undermine the public trust, whether that conduct is unethical or may give the appearance of ethical impropriety.*

**Taxable Non-cash Fringe Benefits**

The DFS Payroll Preparation Manual includes requirements for perquisites which are considered taxable non-cash fringe benefits. During the review, we were unable to determine whether any perquisites had been established as taxable non-cash fringe benefits within the Department. We were also unable to locate any Department policies or procedures for the determination, reporting, or processing of perquisites provided as taxable non-cash fringe benefits.

**Recommendations:**

We recommend the Department ensure strengthened internal controls and guidance is in place regarding the approval of one's own perquisite and determining taxable non-cash benefits for some approved perquisites and provide guidance.

**Management Response:**

The Department agrees with the recommendation and will work to complete the corrective actions mentioned.

**Finding 5: Housing Perquisites – The Department is not approving, reporting, or tracking housing perquisites in accordance with State or Department requirements.**

According to Section 216.262(f) F.S., *Perquisites may not be furnished by a state agency or by the judicial branch unless approved by the Department of Management Services, or otherwise delegated to the agency head, or by the Chief Justice, respectively, during each fiscal year.* Additionally, according to Section 262.216(f) F.S., the kind and monetary value of perquisites must be approved before they may be furnished. During the audit we determined DRP and ORCP provide housing perquisites; however, the forms were not always completed in compliance with State or Department requirements.

**Housing Provided by the DRP**

- Within DEP Directive 100, the Secretary has delegated the Authority to *designate essential and non-essential housing. Approve request for housing perquisite change and residency* to the DRP Director who is allowed to further delegate and has further delegated this authority to one Assistant Director within the DRP. We found no additional delegations to District Bureau Chiefs for the approval of any housing documents; however, we found the housing perquisite change and residency agreements are generally signed by a District Bureau Chief.
- The Approval Form for housing perquisites is not updated as housing perquisite changes occur nor is the annual re-authorization of the perquisite to the residing position completed by the delegated authority.

**Department of Environmental Protection  
Office of Inspector General  
Audit of Department Perquisites**

---

- When perquisite changes and housing agreements were approved by District Bureau Chiefs, the DMS Approval Form and HR tracking spreadsheet used for reporting perquisites to DMS was not accurately updated to reflect these changes. Additionally, DRP was unable to provide accurate documentation to support who was approved and actively residing at State-owned housing.
- The annual fair market value for housing is listed on the Approval Form when the form is initially completed. However, there was no documentation to support the methodology used to determine the value approved or reported for State-owned housing.

Housing Provided by the ORCP

- ORCP has provided housing perquisites for one Department employee and is providing housing to an employee of another State agency. However, ORCP had not executed the Approval Form nor was the housing perquisite reported to HR for the annual reporting to DMS.

**Recommendations:**

We recommend the Department ensure State-owned housing provided to Department employees are tracked to ensure accountability of residents in State-owned housing, and housing perquisite Approval Forms are completed annually, as required. We also recommend the Department ensure housing perquisite change and residency forms are completed and signed by the appropriate delegated authority as housing changes occur. We also recommend the Department establish and document the methodology used to determine fair market value of State-owned housing and ensure housing perquisites are accurately reported to DMS.

**Management Response:**

The Department agrees with the recommendation and will work to complete the corrective actions mentioned.

**Finding 6: OPS Perquisites – OPS are not eligible to receive perquisites; however, the Department provides various perquisites to OPS staff.**

According to DMS, and based on Section 216.262 F.S., Chapter 60L-32 F.A.C., and Chapter 60L-33.005(1), F.A.C., OPS are not eligible to receive perquisites as they do not fill an Authorized Position. However, we noted that some OPS provide services that are also provided by Authorized Positions. Section 216.262(f), F.S., states that perquisites may be furnished only when in the best interest of the State due to the exceptional or unique requirements of the position. Based on our sample, we determined that many OPS positions were approved to be furnished perquisites which include uniforms, shoes, clothing, diving gear, and fire gear for up to 85 OPS positions. We also found some housing perquisites, approved or reported during the audit scope, were designated for OPS positions. Overall, we found the Department reports to DMS the approval of a variety of perquisites for 260 OPS positions.

**Recommendations:**

We recommend the Department review perquisites approved and purchased for OPS positions to ensure compliance with statutory law.

**Management Response:**

The Department agrees with the recommendation. DMS advised that OPS may be eligible for perquisites if it is in the best interest of the State. We will research perquisites provided to OPS and determine their appropriateness, whether they are in the best interest of the State, and whether there are alternative purchasing options.

---

**STATEMENT OF ACCORDANCE**

---

**Statement of Accordance**

The Mission of the OIG is to promote accountability, integrity, and efficiency by providing quality audits, investigations, management reviews, and technical assistance.

This work product was prepared pursuant to Section 20.055, F.S., and in accordance with the *Principles and Standards for Offices of Inspectors General*, as published by the Association of Inspectors General. The audit was conducted by Tessa Jordan and supervised by Susan Cureton.

We conducted this performance audit in accordance with Generally Accepted Government Auditing Standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives.

We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

This report and other reports prepared by the OIG can be obtained through the Department's website at <https://floridadep.gov/oig> or by contacting:

Office of Ombudsman and Public Services  
public.services@floridadep.gov  
(850) 245-2118

Candie M. Fuller,  
Inspector General