



Inspector General Insights

(From the Clerk's August 2023 Newsletter)

Background: The Clerk's Office of Inspector General (OIG) conducts internal audits and fields complaints pertaining to the operations of the Clerk's Office. The OIG also investigates fraud, waste and abuse related to the operations of the Collier County Board of Commissioners, its staff, and/or vendors. It's important for complainants who come forward with allegations of wrongdoing or misconduct to trust the process and the professionals assigned to investigate the allegations.

A recent worldwide survey published by The Association of Certified Fraud Examiners (ACFE) and The Institute of Internal Auditors (IIA), [Building a Best-in-Class Whistleblower Hotline Program](#), produced results indicating that whistleblower hotline programs have a higher effectiveness if they include six identified factors.

Objective: To identify how the OIG Whistleblower Program meets the recommended ACFE and IIA criteria.

Scope: For the purpose of their publication, the ACFE and IIA defined a whistleblower hotline program as, "a program consisting of one or more mechanisms or initiatives designed to encourage and collect reports from parties with information about a potential wrongdoing or misconduct."

Observations: The OIG hotline meets the study recommendations as follows:

IIA/ACFE Surveyed Results for Highly Effective Whistleblower Hotlines	OIG Hotline Reporting Mechanisms					
	Phone - 2 Options		Online Form	Email - 2 Options		Mail or In-Person
	844-253-7544 (844-ClerkIG) (Third Party)	239-252-8412 Sr. Investigator (Local Office)	Reporting Fraud, Waste, & Abuse (Third Party)	OIG@CollierClerk.com (Local Office)	Reporting Fraud, Waste, & Abuse (Third Party)	3315 Tamiami Trail E Naples, FL 34112-5746 (Local Office)
1. Presence of a fraud department	The Clerk's Office of Inspector General (OIG) follows the standards of the Association of Inspectors General, and has personnel certified in fraud and other investigations. We can refer investigations to local, state and federal law enforcement for prosecution.					
2. Independent administration of the hotline program	The Constitution of Florida, Article VIII, Section 1. (d) and Article V, Section 16, states the independently-elected Clerk shall be the "ex-officio clerk of the Board of County Commissioners, auditor, recorder, and custodian of all county funds." To fulfill responsibilities related to the auditing, review and investigation functions, the Clerk transitioned its Internal Audit department into the Office of Inspector General (OIG) in 2020. Collier County is one of 15 counties in the State of Florida utilizing this model.					
3. Ability to receive anonymous reports (This addresses the receipt of complaints only, as investigators can't promise total confidentiality throughout the process)	The OIG's third party hotline promotes confidential complaints, which are entered into the OIG's complaint system directly by the third party. Complainants can be assigned a PIN to follow up solely through the third party via phone or website. Complainants should be aware that the OIG's final report may be subject to public records requests after the close of the case. The OIG supports Whistleblower protection practices, and the OIG would redact complainant identifying information to the extent allowed by law. If the complainant's email or phone number is displayed in corresponding directly with the local office , the OIG may be required to report a confidential complainant's identity as necessary to investigate the matter, or as otherwise required by law. Complainants should be aware that the OIG's final report may be subject to public records requests after the close of the case. The OIG supports Whistleblower protection practices, and the OIG would redact complainant identifying information to the extent allowed by law.					
4. Ability to receive reports 24 hours a day, 365 days a year	24/7, 365 English or Spanish	M-F, 9-5 English or Spanish	24/7, 365 English or Spanish	M-F, 9-5 English or Spanish	24/7, 365 English or Spanish	M-F, 9-5 English or Spanish
5. Number of reporting mechanisms	Complaints can be received via 2 phone options, an online option, 2 email options, by mail, or by drop-box within the courthouse. The OIG will also take complaints through an in-person interviews, either at the Clerk's office, on County property, or off-site. This yields a total of 10 potential reporting mechanisms.					
6. Protection against retaliation	Retaliation is specifically covered in the Board of County Commissioner's policy, CMA # 5311, Section C - Prohibition Against Retaliation. The Clerk specifically discusses retaliation in the employee attestation and in the policies within her employee manual. Additional protections for all employees and whistleblowers are contained in the Florida Statute 448.102 and the Florida's Whistle-blower's Act.					

Recommendations & Actions: For more information about the statutory protections for employees and whistle-blowers, see [Florida Statute 448.102](#) or [Florida's Whistle-blower's Act](#).

For more information on ways to report incidents of fraud, waste, abuse, mismanagement, or misconduct visit the [Inspector General's Report Fraud, Waste & Abuse page](#) at www.CollierClerk.com.

Total # Transactions	Amounts Audited or Reviewed	Questioned Costs	Taxpayer Savings	# Observations / Recommendations
N/A	N/A	N/A	N/A	N/A